

Birmingham Local Plan Focused Preferred Options – Preferred Options (Summer 2024) Consultation Responses

Consultee Name	Consultee Organisation	Responded Consultation Points	Summary	Officer Response
	Walsall Council	1.1 Paragraph	Comments have been divided up and allocated to relevant consultation point.	Comments have been divided up and allocated to relevant consultation point.
	Withy Hill Consortium	1.1 Paragraph	It is recommended that the Local Plan going forward should reflect the forthcoming new NPPF and local housing need calculation. This will require a review of the Green Belt and collaborative working with nearby local authorities to ensure that all of the wider housing needs can be met.	The Local Plan will be prepared in conformity with the most up-to-date National Planning Policies and Legislation. The Preferred Option document was prepared in advance of the NPPF revision that was released in July 2024. Birmingham CC will proactively seek opportunities to work with surrounding Local Planning Authorities to consider and discuss how housing needs can best be met.
POD Consultation Event - Handsworth		1.1 Paragraph	Respondent mentions issues to do with safety and surveillance in the area by City Hospital. Infrastructure such as schools should be built with new housing.	Redevelopment of the City Hospital site will consider aspects such as safety and surveillance. Demand for new infrastructure such as schools will be considered.

POD Consultation Event - Central Birmingham Library		1.1 Paragraph	Respondent emphasises the importance of food banks.	This falls outside the direct remit of planning but policies such as affordable housing, employment land and retail all impact on resident's ability to afford the basic necessities.
	Lendlease	1.1 Paragraph	A draft NPPF was published after the Preferred Option Document was consulted on and Lendlease understands that the Council will now consider implications for the new Plan. This approach is supported but should not lead to delays in the Plan timetable.	The Local Plan will be prepared in conformity with the most current legislation and guidance - NPPF and PPG. The Preferred Option Document was prepared in advance of the NPPF consultation in July 2024. The intention is to progress the Local Plan in accordance with the updated Local Development Scheme.

	Birmingham Airport	1.1 Paragraph	Request that emerging Local Plan takes account of the Aerodrome Safeguarding process including Aviation Safeguarding as a policy consideration. These include the following considerations: 1. Obstacle Limitation Surfaces (OLS) surfaces define height limits above which objects around an aerodrome should not infringe 2. Instrument Flight Procedures (IFP) standardised flight paths and manoeuvring areas area essential for safe navigation 3. Wildlife and Landscape Management, risk bird strikes and other wildlife hazards must be mitigated through land use planning. Airport's wildlife monitoring area extends to a radius of 13 kilometres. 4. Electromagnetic Interference: New developments, such as buildings and 5G masts have the potential to interfere with Communication, Navigation and Surveillance (CNS) equipment 5. Lighting and Visual Aids: it is vital to ensure that surrounding developments do not create flare or confusion with aerodrome lighting 6. Drones and Vertiports: with rise of Urban Air Mobility (UAM) there is increasing need for enhanced safeguarding measures.	Request for new Local Plan to take account of Safeguarding process is noted. All new development proposals that come forward in locations surrounding Birmingham Airport are carefully assessed by Development Management Planning Officers, together in consultation with the Environmental Protection Unit, who provide expert advice where needed.

	Property Link	1.1 Paragraph	Supportive that proposed policies are in line with government proposed NPPF changes to increase commercial development	General support for the new Local Plan is welcomed and that policies to update approach to Industrial and Commercial areas, to respond to current and future demands are particularly supported.
	Interested Parties of Digbeth High Street Major Development Site	1.1 Paragraph	Support especially of role in delivering vision set out in Our Future City Framework. Scale and ambition in aims to be global leader in inclusivity, innovation and sustainability among other aspiration supported.	General support for new Local Plan is welcomed and specific support to deliver the Central Birmingham Framework Vision, for the city to become a global leader in inclusivity, innovation and sustainability is noted.
	Zero Carbon House	1.1 Paragraph	The major shift in direction is welcome in terms of climate and environment (CE) policies.	Support for new Local Plan is welcomed. The inclusion of Climate Change and wider Environmental Policies are particularly supported.
	Handsworth Wood Residents Association	1.1 Paragraph	Filter through and discount planning applications which are contrary to policy before they progress further, possibly through AI. Concerns over schemes that are contrary to Nationally Described Standards.	The Development Management process is continually kept under review, to identify efficiencies and ensure National Performance targets for the determination of planning applications are achieved. The use of new technologies (including AI) is currently being explored across all Council Departments.
	Oval Real Estate	1.1 Paragraph	Supportive especially of supporting brownfield regeneration and setting policies to deliver ambitions set out in Our Future City Framework.	Support for new Local Plan is welcomed and the specific support for the regeneration of Brownfield sites and the delivery of the Central Birmingham Framework Vision is noted.

	Solihull Metropolitan Borough Council	1.1 Paragraph	Identifies that the Government published a revised NPPF for consultation part way through the Preferred Options consultation. Suggests that any changes to the emerging Local Plan are addressed through DTC discussions.	The Preferred Option document was prepared in advance of the NPPF consultation that was launched in July 2024. The offer to discuss changes that may result from the NPPF revisions, through discussions with Solihull MBC is welcomed.
	Birmingham City Council Conservative Group	1.1 Paragraph	We are concerned that some of the changes are retrograde step that risks undermining local character. This includes the removal of references to the importance of beauty in design and the threats to green belt land. If the changes required to the local plan as a result of national changes are significant, then it should be subject to further full public consultation.	The Local Plan will be in conformity with the most current National Planning legislation and guidance. The Preferred Option document was prepared in advance of the NPPF revision that was launched in July 2024. The revised NPPF removed the majority of references to beauty and also requires those Local Planning Authorities, that are unable to meet their housing need figure to undertake a Green Belt review. A second Preferred Option will be consulted upon during Autumn 2025, meaning that any revisions to the Local Plan will be subject to public scrutiny and enable new representations to be submitted.
	St Modwen	1.1 Paragraph	To summarise it is recommended that BCC proceed with the BLP under the current Planning and Compulsory Purchase Act 2004 plan making system and the emerging NPPF.	The new Local Plan will be prepared in conformity with the NPPF that was updated in December 2024. An amended Local Development Scheme was published in January 2025, setting out a revised timetable, with the new Birmingham Local Plan to be submitted in advance of the December 2026 deadline.

	Lichfield District Council	1.1 Paragraph	Updates on the fact that Lichfield District Council are working towards an Issues and Options consultation later in 2024. LDCs view is that both authorities will need to have regard to the changes set out in the NPPF consultation once they are published in their final form.	Update from Lichfield DC is noted and Birmingham CC welcomes all opportunities to discuss both emerging Local Plans during 2025.
	Hammerson	1.1 Paragraph	The glossary should include a definition of both PBSA and Co-Living.	Agreed, the Glossary will be reviewed and amended to include a definition of PBSA and Co-Living development.
	Rainer and Wigley	1.1 Paragraph	Welcome a new Local Plan to ensure consistency with National Planning Policy and enable Council to plan for future housing and employment needs.	Support for new Local Plan is welcomed. The Plan will be prepared in conformity with the most current National Planning Policy and Legislation.

		1.1 Paragraph	The Plan should make explicit reference to the issues of efficient use of land and density. Increased density will not only make more efficient use of land to deliver the growth needs of the city, but it is also vital to the viability of public transport networks and other local services.	Policy HN4 proposes the introduction of higher density levels to make more efficient use of land within Birmingham and particularly in City Centre locations. The minimum density rates proposed are 400 dwellings per HA in and within 400m from the City Centre, 70 dwellings per HA in and within 400m of Town, District and Local Centres and 40 dwellings per HA elsewhere. The Policy recognises that this approach would also deliver associated benefits related to increased public transport patronage, reduced Carbon emissions and increasing use of local amenities.
		1.1 Paragraph	The respondent believes the plan does not highlight the importance of incorporating commercial spaces within high density residential buildings. They suggest that this would encourage residents to remain local and reduce the need to travel.	The importance of meeting the daily living needs of residents across the city is recognised, particularly within the locality of where they live. The mix of uses in a development are considered as development proposals come forward, as part of the planning application process or within masterplanning documents that set a vision for a more comprehensive scale of change within a specific area.
	Acocks Green Focus Group	1.1 Paragraph	Generally supportive of the document, particularly in regard to whole life cycle and retaining buildings rather than demolishing and rebuilding. Further clarity required on how facilities can be made more accessible by walking and cycling, rather than the trend for larger and more centralised services that people have to travel further to access.	Support for new Local Plan is welcomed, and inclusion of Whole Life Cycle and Embodied Carbon Policies are noted as being specifically supported. The new Plan seeks to deliver enhanced walking and cycling routes across the city, with the need for Mobility Hubs, segregated cycle routes and improvements to the Canal Network all being outlined.

	Health and Safety Executive	1.1 Paragraph	HSE has issued standard guidance on sites with potentially higher risk.	Standard guidance from HSE for higher risk sites is noted. None of the areas or sites covered by the new Local Plan are near to a nuclear installation.
	Nuneaton And Bedworth Borough Council	1.1 Paragraph	No comments	NBBC confirmed that it had no comment on this consultation point.
		1.2 Paragraph	Suggests Levelling Up is outdated due to change in Government.	The new Local Plan will be prepared in conformity with the most current National Planning Policy and Guidance. The Preferred Option document was prepared prior to the NPPF consultation being launched in July 2024.
The Tyler Parkes Partnership Ltd	West Midlands Police	1.20 Paragraph	In principle, the PCCWM has no issue with this. However, references to safe and secure internal and external living environment are referenced far less frequently yet and the PCCWM considers these are equally important matters and it should be clear in the plan that this is the case. This is a matter to which these representations will return.	Comment noted, regarding the importance of providing greater prominence in the Plan towards the creation of safe and secure environments for both the city and its residents. Representations submitted to the consultation will inform the drafting of a second Preferred Option, which will be consulted upon during Autumn 2025.

	Natural England	1.22 Paragraph	We accept the commitment to undertake an HRA, Natural England considers that the HRA process is an iterative one and should inform the development of the plan. The outcome of the assessment could require changes to the plan or highlight where additional evidence is required. This may be specifically relevant to this plan due to the scale of growth proposed and the housing shortfall identified in the plan requiring your authority to work with others to overcome the shortfall. It is likely that air quality, water quality and quantity and recreational impacts will be the main issues for the HRA which will also need to be considered as part of your Duty to Co-Operate. There is the potential for designated sites at significant distance from your authority's boundaries to be affected depending upon the outcomes of your work to find the additional capacity for housing and employment which cannot yet be accommodated within your authority's boundaries. Natural England would welcome the opportunity to work with your authority on the production of your HRA.	The Birmingham Local Plan is committed to ensuring a robust HRA process is adhered Due to the release of new National Planning Policy and Guidance, a second Preferred Option document is to be drafted, based upon additional and/or refreshed evidence, further cross-boundary working with LPAs surrounding Birmingham and another round of public consultation. BCC welcomes the offer of expert support by Natural England on the HRA process.

	South Worcestershire Councils	1.22 Paragraph	Identifies the following areas of concern - i) housing supply, ii) housing density, iii) affordable housing, iv) the Green Belt, and v) employment land. Suggests that the NPPF consultation will have implications for the Birmingham Local Plan. The SWDPR area falls outside of the GBHMA. The reduction in the housing shortfall between the Issues and Options and Preferred Options is welcomed by the SWCs. Acknowledges the ongoing positive engagement with SWCs as part of the DTC and commits to further discussions as both plan progress.	Acknowledgment of the reduction in the housing shortfall in housing need between the Issues and Options stage and the Preferred Options stage of the plan making process is welcomed. A commitment, to continue positive discussions between Birmingham CC and South Worcestershire Councils on the progress of all Local Plans is also welcomed. South Worcestershire Councils concerns in relation to housing supply, housing density, affordable housing, the Green Belt and Employment land are all noted and BCC can confirm that due to the revised NPPF, a Green Belt review will now be undertaken and a second Preferred Option is to be prepared, with public consultation during Autumn 2025. All Policies within the existing Preferred Option will be reviewed and re-assessed in relation to any new evidence and newly emergent issues.
	Gladman Developments Ltd	1.22 Paragraph	Consider it important that the Council maintain a continual review of the end date of the plan period to ensure that looks ahead over a sufficient time period (i.e., at least 15 years) on adoption.	The new Local Plan will cover the period up to 2042. If the Plan is adopted in 2027, it will meet the 15-year minimum requirement. Once adopted, the Birmingham Local Plan will be monitored and formally reviewed, as per the National Policy requirements in place at that time.

	Withy Hill Consortium	1.23 Paragraph	The Duty to Cooperate will continue to apply if the plan is prepared under the current system. No information is current presented on discussions that have taken place and any agreements that have been reached to accommodate housing needs, including any draft Statements of Common Ground that might exist. Too much reliance is placed on the December 2021 update to the GBBCHMA housing supply and need position statement which is now out of date and requires updating. Significant work on this is required as a matter of urgency given the short plan preparation timetable currently being worked towards.	BCC has worked with local authorities within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA), since the Birmingham Development Plan was adopted in 2017 which confirmed a housing shortfall of 37,900 homes up to 2031. This work may also require further studies across the wider West Midlands area as well as Statements of Common Ground with, and between, relevant local authorities as a roadmap for meeting shortfalls through potential local plan allocations elsewhere.

	IM Properties	1.23 Paragraph	Agree with the statement made in this paragraph about working with other authorities under the duty to cooperate to meet the shortfall in Birmingham's development needs. This should be supported through the ongoing preparation of Statements of Common Ground which define the shortfalls and how theses will be apportioned and addressed. Leicester and Leicestershire are good examples of this, and BCC should prepare a similar 'Employment Distribution Paper' as has been done in that area.	Welcome support for Para 1.23, which sets out Birmingham City Council's commitment to joint working, to facilitate positive plan-making with surrounding authorities in relation to any Employment Land shortfall. Examples of approaches by other Local Authorities such as Leicestershire may be used to inform future work on the next stage of Plan production.

	WMRTAB	1.23 Paragraph	Pleased to note that the document generally acknowledges the Duty to Co-operate requirements. WMRTAB has prepared a SOCG that acknowledges that waste is a strategic issue on the basis that waste arising in one area is often managed in another. It is not clear whether the partnership relates to WMRTAB. The document and evidence base does not indicate which WPAs in particular that Birmingham has a strategic relationship with and therefore it isn't clear whether the Plan has been prepared in accordance with the DtC. Recommend that the approaches set out in the Duty to Co-operate on Waste - Practice Guide for Waste Planning Authorities in England" be referred to. BCC has yet to sign the WMRTAB SCG and recommended that it does so as soon as possible.	BCC is a member of the West Midlands Resource Technical Advisory Body (WMRTAB) which supports co-operation between Waste Planning Authorities in the West Midlands and has a long history of cooperation in line with DtC requirements with all of the other WPAs which have a strategic relationship with Birmingham. This work will continue as the BLP moves towards adoption including Statements of Common Ground with, and between, relevant WPAs.

	St Modwen	1.23 Paragraph	Cross boundary collaboration in terms of strategic matters impacting the Plan should be a priority.	The re-introduction of Strategic planning has been confirmed by the Government and Birmingham City Council will respond fully to any requirements. Birmingham City Council is currently contributing to the Economy and Place Strategy, which is being led by the West Midlands Combined Authority (WMCA) and will identify priorities for future funding and overarching issues for the WMCA areas, all of which will inform Strategic planning activities.
	Home Builders Federation	1.23 Paragraph	The Council will need to ensure that they engage effectively with neighbouring areas with regard to housing needs. In particular the council will need to engage with its partners in the Greater Birmingham and Black Country Housing Market Area (GBBCHMA), including the authorities of Sandwell, Walsall, Wolverhampton, Dudley, Solihull, Tamworth, Lichfield, Cannock Chase, South Staffs, Bromsgrove, Redditch, Stratford-upon-Avon and North Warwickshire.	Birmingham City Council is committed to working proactively with neighbouring local authorities, to support positive plan-making and address any housing shortfall issues, in particular. The GBBCHMA housing supply evidence is to be refreshed in 2025, to ensure the new local Plan evidence base is robust and the Council will continue to use the GBBCHMA Working Group to discuss, and share findings and implications posed by the updated evidence.
	Satnam Planning Services Ltd	1.25 Paragraph	The timeline must now be reviewed to meet the requirements of the revised standard methodology and NPPF.	The Preferred Option document was prepared prior to the publication of the updated NPPF in December 2024. As a result, a second Preferred Option document will be consulted upon during Autumn 2025. A refresh of parts of the evidence base will also be completed.

		1.3 Paragraph	Respondent suggests using UK Green Building Council research that all new developments should be operationally net zero carbon by 2030, including 40% reduction carbon emissions associated with material choices and construction processes.	Viability, as well as national policies will guide as to whether these requirements would be feasible.
		1.3 Paragraph	Duplication of wording identified in para 1.3.	Agree - duplication of wording noted and will be amended.
		1.4 Paragraph	Respondent queries what specifically green means in this instance, i.e. is it Passivhaus, Net Zero Carbon etc.	Within Para 1.4, the term 'green' has been used as a generic term to confirm intentions for new homes to include a range of green measures. For example, the use of sustainable building materials, renewable energy generation, the incorporation of green infrastructure to provide thermal comfort and reduce vulnerability to heat island affects, orientation of buildings to make most use of daylight and more efficient water management systems. Green policy requirements are discussed in in Policies CE1 to CE8.
		1.4 Paragraph	Policy needs to consider those living with mobility impairments when planning and building new homes in line with government regulations for inclusivity and accessibility e.g. approved document M.	Agree that Birmingham needs to deliver homes that meet the needs of all residents, which includes those with mobility impairments. Policy HN5: Housing for Older People and Others with Support Needs and Care sets out a requirement that all new build housing should be designed to be accessible and adaptable, complying with Building Regulations Part M4(2) Accessible and adaptable dwellings. The Policy also requires that at least 10% of housing on major development sites should designed to be wheelchair adaptable, complying with Building Regulations Part M4(3a) Wheelchair adaptable dwellings.

		1.4 Paragraph	Suggested amendment to Homes, neighbourhoods and places.	Disagree with suggested amendment, as the full sentence already refers to places - 'In a dense urban area, innovative ways need to be found to deliver high quality new homes and neighbourhoods, ensuring affordability and creating healthy, inclusive and attractive places to live'.
	Walter Smith Farms Ltd, L N Mitchell Ltd and Emmanuel College, University of Cambridge	2.1 Paragraph	While the plan rightly takes a pro-active stance, it proposes a scale of housing growth founded on some assumptions that the respondent believes are over-optimistic and possibly, unbalanced. Belief that the plan over estimates the likely housing capacities and deliverability and gets the balance between housing and employment development wrong. The reduction of employment land supply by approximately one third and loss of 120 hectares of Core Employment Areas to housing, while accelerating the rates of housing development seem counter intuitive. A more balanced approach should be taken including the need to review and potentially locate some of the new development on land currently designated as Green Belt. Without appropriate investment opportunities in the city, it is highly likely that markets will be attracted into adjoining areas where complementary levels of new build for housing and employment growth will increase significantly.	The contribution employment land within Core Employment Areas makes to providing jobs to accompany housing development is appreciated. Core Employment Areas are only taken out where it has been shown that there is not a market for this anymore and other uses such as residential are more prevalent now and in the future. It is important to consider new ways in which people work and the areas in which they work. Since the consultation took place before the new Government took office, the housing need was therefore done under different assumptions, such as the 35 % urban areas uplift. Therefore, a Green Belt review is underway in preparation for the Preferred Options stage in order to align to December 2024 changes to the NPPF and subsequent revisions of the PPG.

	St. Philips Land	2.1 Paragraph	Consider that the Council should not utilise the BDP housing requirement for the first 2-years within the housing need and the BDP housing requirement was artificially lowered to account for the Council not being able to fully meet its housing needs and therefore constrains delivery further into another plan period. Crucially, to ensure a sound approach, which aligns with the guidance in the PPG, the Councils LHN should be applied to the whole emerging plan period (2020-2042). St Philips strongly contend that the Councils proposed approach of deferring meeting these needs to the wider GBBCHMA authorities is not sustainable, robust, and is likely to result in years of uncertainty as to whether these needs will actually be planned for across the GBBCHMA. There is, therefore, a legitimate and cogent need to consider the release of Green Belt land within Birmingham to seek to reduce the level of unmet housing needs arising from the city.	Housing need is being adjusted as a result of changes to the Standard Method introduced in December 2024 as part of changes to the National Planning Policy Framework.
	Canal and Rivers Trust (Planning Manager)	2.1 Paragraph	Comment stresses importance of canal network in delivery of sustainable development in planning decisions.	The role that the canal network plays in sustainable development is recognised and opportunities to maximise this in subsequent stages of the Local Plan will be capitalised upon.

	Friends of Birmingham Wheels Park including motorsport related clubs, community groups, organisations and businesses formerly operating at the site	2.1 Paragraph	Request modification to the following bullet points as indicated: A city of layers rich in heritage assets, the arts, and culture and sport, which make Birmingham like no other place, and a city that we can be proud of, own and celebrate. A city known for its people-centred design, enduring places and high-quality environments. The reason for this is that the subsequent bullet point covers day-to-day sport and recreation facilities but does not cover major sport and recreation facilities such as Villa Park, St Andrews, Edgbaston Cricket Ground and Birmingham Wheels Park. Those assets are important and integral to Birmingham's offer for local people as well as visitors. A beautiful and distinctive city on p19. Request amendment to the 3rd bullet of this objective on the following lines: To protect and enhance the city's character, rich heritage, and cultural sport and recreation assets, and to integrate new development with respect to them. Complements Comment 01 and requires that much loved and treasured sport and recreations assets such as Birmingham Wheels Park receive the recognition and support, they deserve. The vision and objectives are supported. However, what is less clear is how the subsequent provisions of the plan will deliver those objectives. Provides a number	Suggestions of rewording in relation to the Local Plan representing Birmingham as a unique place with its own stories is noted, as is the need to recognise the wider role than sporting facilities have in benefitting local communities. In terms of balancing employment and housing land, whilst the Council puts forward plans to use formerly employment land for housing, this will only be allowed in areas where it has been shown that there is not a need any longer for such employment land and it links to sustainable connections to other residential areas. The Preferred Options Document sets out a sufficient reservoir of employment land and many of the Core Employment Areas will be retained for this use. Any future development of the Wheels Site will consider nature at the very heart of its proposals in alignment with City of Nature aspirations.

			of specific comments on the objectives to be addressed in further policy development.	
The Tyler Parkes Partnership Ltd	West Midlands Police	2.1 Paragraph	In the description of Birmingham today there is no mention of the level and concerns over crime and safety as part of the context. The PCCWM suggest this should be added because it does add important context to policy, generally and is one of the most important challenges faced by the city.	Importance of reducing rates of crime in the city is recognised. Reworking of wording will be considered, as with other policy areas where the issue of crime is dealt with.

		2.1 Paragraph	Generally supportive of Vision for the Plan but recommend several additions - 1) explicit reference to making best use of available land resources and ensuring sufficient land is made available and 2) intention to regenerate areas of the City Centre in need of investment. Nine objectives should also include regeneration and renewal of areas of the city, with increase densities. Objective 4 should be expanded and include specific wording, 'to promote the regeneration and renewal of areas of the city that would enable investment in communities and support sustainable patterns of development'. Also, should commit to, 'meeting the needs of both current and future citizens of Birmingham'.	The Council is supportive of facilitating development and therefore investment in areas which are in need of regeneration. The Local Plan builds on many of the aspirations within Central Birmingham Framework which aims to spread new development to inner-city areas where there has not traditionally been as much investment.
		2.1 Paragraph	wording change to "which are home to 1.15 million people".	Wording change will be implemented.
	BCC Lead Local Flood authority	2.17 Paragraph	Birmingham LLFA support the comments made in this paragraph regarding climate change.	Support is welcomed from the LLFA regarding the urgency of the Climate Crisis and the responsibility that the LP has in reducing emissions and improving resilience.

	BCC Lead Local Flood authority	2.18 Paragraph	Include the following text to reflect that green and blue infrastructure creation and enhancements will be critical for the city to adapt to a changing climate; "Extreme weather events have the potential to cause flooding to homes, businesses and essential infrastructure and the creation and expansion of green and blue infrastructure in new developments will mitigate against these events and will be supported".	Consideration will be given to including this wording to ensure that the policy is as robust as possible, and to consider more fully the increased likelihood of extreme weather events in Birmingham.
		2.18 Paragraph	Does 'shifts in private vehicle use' mean 'a reduction in'? Need to redesign our streets for pedestrian safety and the pleasure of walking and cycling rather than for driver speed which should be tackled by extensive redesigning of the public realm.	Wording change will be considered to ensure that it is clear car reduction is intended.
		2.19 Paragraph	Respondent raises the importance of mass retrofit in reducing carbon emission and cutting costs for residents.	Mass retrofit is incredibly important and will play a key role in reducing carbon emissions. More information is set out in the net zero policies.
		2.19 Paragraph	Gun Quarter is mostly low quality and low value buildings that could be entirely flattened for 15,000 new homes close to the city centre. No mention of the need to densify suburbs, local centres or the area around transport interchanges.	How housing is accommodated within the city boundary will be re-considered as a result of changes to the NPPF and resultant housing need. Gun Quarter Growth Zone will be refined as a result of representations that have been received, as well as overall approach to Growth Zones. Suggested densities in local transport nodes and in suburbs have been identified in light of delivery rates and other evidence base.

		2.2 Paragraph	Consider those with mobility impairments when planning changes to public transport to ensure they are living independently and engaging with community.	The need to make new developments accessible for people with mobility impairments including making adjustments to public realm is supported by the council.
		2.2 Paragraph	Lack of plural makes it read as if there is only one metro extension planned.	Will be clarified, should be extensions.
		2.20 Paragraph	To ensure this includes individuals with disabilities e.g., learning disabilities, mobility impairments.	Suggestion for wording to include individuals with disabilities e.g. learning disabilities, mobility impairments will be considered at the next plan making stage.
		2.25 Paragraph	Need to dismantle or discourage the use of motorways through the city by traffic not entering or leaving the city.	Point is noted regarding dismantling of motorways to reduce the need to travel by private car through the city. Reconfiguring in collaboration with national highways and other stakeholders will be crucial to deliver such schemes to divert traffic effectively and manage impacts to the rest of the network.
	Birmingham city council	2.26 Paragraph	More of an emphasis should be placed on the role art, culture, sport and green blue space play in relation to placemaking.	This is an important point with regard to the role community arts plays in place making. This will be considered in light of refreshments to Cultural Strategies.
	Birmingham city council	2.28 Paragraph	Ensure that cultural and natural heritage outlined in the Sustainable Development Goals are embedded in opportunities.	As outlined in the Document, BCC is required in the NPPF to consider all the Sustainable Development Goals to shape the Local Plan.
	Withy Hill Consortium	2.30 Paragraph	The plan needs to provide for its development needs in order to meet the proposed vision. The vision and objectives do not address the need for adequate provision of family housing. Insufficient information has been provided to demonstrate how the council is meeting the Duty to Cooperate.	Point is noted regarding the adequate provision of family housing. Robust evidence base showing the need for family housing will be crucial in addressing this. The Council is in regular contact with neighbouring authorities to accommodate housing needs.

	Lendlease	2.30 Paragraph	Support the overarching vision and objectives	Support for the proposed development strategy is welcomed.
	Stoford	2.30 Paragraph	Supportive of the plan for sustainable and inclusive, but Typhoo Wharf should be included as a site allocation to help address the housing shortfall.	We will review the housing need in light of changes to the NPPF and adjust proposed site-specific housing numbers accordingly in light of representations received and the evidence base.
	Aegon UK Property Fund	2.30 Paragraph	Support the overarching vision and objectives.	Support for overarching vision and objectives is welcomed.
	Calthorpe Estates	2.30 Paragraph	Support for the Vision and Objectives. Consideration should be given to the benefit of the overall offer, not just the constituent parts in implementing the policies of the BLP to achieve the Plan's Objectives.	Whilst decisions need to be made in accordance with the Local Plan, it is anticipated that planning judgement will be used for individual planning applications to come to a well-rounded decision, taking into account the benefit of the overall offer. Support for this approach in the case of the decisions to demolish or retain buildings is welcomed.
	Icknield Port Loop LLP	2.30 Paragraph	Support the vision, particularly in regard to brownfield land. Efficient use of land in the city is required to meet the high housing needs, even under the government's proposed new lower calculation. Support the identification of Icknield Port Loop as a proposed site allocation but amendments are suggested as set out separately in response to proposed policy SA1.	Support for vision of sustainable and inclusive growth, particularly on brownfield land, is welcomed. It is noted that use of sites will need to be efficient in order to meet level of housing need. The need for all potential development opportunities to be reflected in the Greater Icknield Growth Zone is noted and will be developed further in light of analysis of representations.
	BCC Lead Local Flood authority	2.30 Paragraph	Birmingham LLFA strongly supports the wording of objectives 3 (a resilient city), 8 (a healthy city) and 9 (a city of nature).	Support from the LLFA in relation to the Objectives 3 (a resilient city), 8 (a healthy city) and 9 (a city of nature) is welcomed.

	Natural England	2.30 Paragraph	The Plan should include the natural environment in its long-term vision and objectives for the plan area. We are pleased that the plan puts protecting and enhancing the natural environment, combating and adapting to climate change and commitments to growth in the most sustainable locations. Strong green and blue infrastructure within and linking these locations should provide multiple benefits.	It will be reviewed how the natural environment is covered in the vision and objectives. Currently nature is well covered in Objective 3 and Objective 9 and as an overarching theme in tackling climate change and building in resilience to extreme weather events, as well as improving mental and physical wellbeing. It is noted the importance of both green and blue infrastructure in achieving this.
	MEPC Limited	2.30 Paragraph	Support the overarching vision and objectives.	Support for overarching vision and objectives is welcomed.
	Birmingham Friends of the Earth	2.30 Paragraph	Respondent expresses support for green economy overarching theme, although some objectives may be in conflict with each other.	Support for green economy is noted. The objectives are designed as much as possible to be mutually supportive.
	St Modwen	2.30 Paragraph	Evidence is required against Objective 4 to demonstrate of the ongoing engagement with neighbouring authorities and actions taken to address the housing shortfall. The vision and objectives do not specifically highlight the needs of households with children. The vision and objectives (notably Objective 6) should be modified so that it properly reflects the available evidence relating to family households and housing issues.	We will continue to engage with neighbouring authorities to ensure that housing shortfalls in the region are being accommodated. Evidence of this work will be documented at the submission stage of the Local Plan. It is noted the point about the need to provide more suitable family housing to ease overcrowding and offer comfortable living spaces. In light of analysis of representations and evidence base, we will ensure that it is properly referenced and considered both at strategic and more specific policy levels.

	Hammerson	2.30 Paragraph	Generally supportive, but there needs to be a balance between objectives for sustainability and encouraging viable development. References to existing and future non-statutory plans should be clear on their status in the policy hierarchy.	Point about balancing sustainability objectives, encouraging development and ensuring scheme viability is noted. There will be further viability studies to ensure that these are balanced correctly. The Central Birmingham Framework 2045 will flow from the Local Plan and will help to capitalise on investment opportunities in the city.
	Birmingham city council	2.30 Paragraph	Respondent proposes adding in creativity to point on knowledge and innovation. In Objective 7, specific reference should be made to arts in culture as it can be used interchangeably. In Objective 8, arts and culture should be recognised for having benefits for mental and physical health by preventing more serious illnesses down the line.	The impact of arts and culture is recognised, and it will be further considered how the benefits of this can be best expressed through the lens of other objectives.
		2.30 Paragraph	The vision is supported by Birmingham and Solihull Integrated Care Board (BSol ICB). In terms of the objectives, special interest is in the delivery of Objective 8: A healthy city to ensure that new development improves the health and wellbeing of residents and reduces health inequalities across the city. The Board's Infrastructure Strategy is in alignment with the Health and Care Strategy, and projected levels of growth is factored into the approach shown in the development of a model which takes into account these levels of growth. The Board asks for early engagement on all significant schemes (20+ dwellings).	Support for the way in which health is dealt in the vision in Preferred Options Document is welcomed. The work that Birmingham and Solihull NHS ICB are doing to ensure that development has positive impacts on residents' health and wellbeing is welcomed and the council will continue to collaborate with the ICB to embed health matters into new developments. Planning teams maintain a dialogue with health providers which will continue to be vital in progressing the plan and embedding health in policy.

	Birmingham and Solihull NHS ICB	2.30 Paragraph	Birmingham and Solihull Integrated Care Board supports the vision in the Preferred Option Document specifically the Objective 8: A Healthy City. This is consistent with the ICB's Strategy Health and Care 2023 - 2033 A Bolder, Healthier Future for the People of Birmingham and Solihull. The development of a model to identify health care and community facilities need for new developments is being progressed. The ICB also requests to be involved in early engagement for all significant development (above 20 dwellings).	Work with ICB and other healthcare co-ordinators is vital in delivering better health outcomes for residents. Work will continue to ensure health needs are being addressed both in times of health and social care provision and creating healthy environments.
	Sport England	2.30 Paragraph	Sport England supports those objectives that relate well to tackling inequalities in opportunities to be physically active particularly Objective 8 as these relate well to Sport England's Active Design guidance.	Support is welcomed for tackling inequalities in opportunities to be physically active.
	Birmingham and Solihull NHS ICB	2.31 Paragraph	see note above re Objective 8	Noted.
		2.31 Paragraph	This should read "For example, meeting the housing needs of families and the housing needs of students or younger people; people who *need to* drive and people walking and cycling"	Rewording will be considered at the next plan making stage.

		2.32 Paragraph	Respondent underlines the importance of reaching net zero to give citizens a city in the future which is conducive to healthy and comfortable living.	This is incredibly important; the timescale and strength of net zero policies is subject to viability and national policies.
	CPRE West Midlands	3.1 Paragraph	The consideration to allocate some redundant employment land for housing is welcomed. However, the respondent considers the housing numbers to be exaggerated due to the new standard methodology.	The new standard methodology will be considered when the new NPPF is adopted and will inform the next stage of consultation on the Local Plan Review.
	NHS Property Services	3.1 Paragraph	New development should contribute to funding healthcare needs due to constraints on NHS as health provision is an integral component of sustainable development. Planning policies should be harnessed to improve estate transformation.	The comments relating to funding healthcare needs and health provision are noted and will be fully considered through the Plan Review.

	Transport for West Midlands	3.1 Paragraph	Overall supportive of the approach set out in the Draft Local Plan. Aligns with many of the issues outlined in the emerging draft statutory Local Transport Plan. The alignment of the Local Plan, West Midlands LTP and Area Strategy and the Birmingham Transport Plan present an opportunity for us to ensure that land use planning and transport are successfully integrated. The Birmingham Transport Plan and supporting Delivery Plan identify the specific interventions required in Birmingham and sets out a plan for their delivery. It is noted this document supports and complements the approach set out in these documents plus the Bus Service Improvement Plan and the Enhanced Partnership.	Support for the Development Strategy is welcomed. The Plan will help to deliver the interventions identified in the Birmingham Transport Plan.

	Church Commissioners	3.1 Paragraph	This section reviews evidence on migration flows from the previous chapter, plus 2021 Census commuting data, to provide a view on how any need should be distributed across the HMA, based on the functional relationship between each authority and Birmingham. Our analysis suggests that the authorities with the closest functional relationship to Birmingham are Solihull, Sandwell, Walsall, Dudley and Bromsgrove. It follows that the unmet housing need would most appropriately be delivered within these authority areas on a proportionate basis. The biggest moves in both directions relate to Birmingham's large, immediate neighbours Sandwell, Solihull, and Walsall. These three authorities accounted for roughly 16,000 of 29,000 movements out to other HMA authorities. The extent to which Birmingham will generate unmet housing need following the imposition of the new Standard Method is uncertain. However, we believe a substantial shortfall will remain, irrespective of whether the current or consultation version of the Standard Method is used. The percentages in Table 13 represent a robust starting point for distributing the unmet housing need arising from within Birmingham. This must be thoroughly explored through the duty-to-cooperate and	The comments relating to unmet housing need are noted. As suggested, this continues to be discussed with the other West Midlands authorities. This will be further considered through the Duty to Co-operate process taking account of any changes the Government makes to strategic planning.

			an agreement reached between all of the HMA authorities in terms of accommodating this need. (Refer back to PDF version to see Tables)	
	Commercial Estates Group (CEG)	3.1 Paragraph	CEG is supportive of the broad principles set out within the BLP and its continued strategy for supporting regeneration including the various positive references to the importance of maximising the regeneration of brownfield land. CEG welcomes, and is supportive of, a number of the key aspects of the vision set out by the emerging Local Plan, such as the clear acknowledgment that Birmingham will be a City of Growth These are strong aspirations that align well with the approach to investment that CEG takes nationally and has sought to take in their proposals for SBQ in particular.	Support for the Plan's development strategy and vision is welcomed.
	Bruntwood Sci Tech	3.1 Paragraph	Fully supports the broad strategic thrust of the Preferred Options Document. The document sets out some ambitious goals for the city over the plan period and Bruntwood Sci Tech would be keen to play a full part as an active partner in achieving these. We would however caution that a careful balance needs to be struck between setting out a detailed set of ambitious requirements that developers have to meet on the one hand and the impacts these can have on the viability of schemes and on the timescales in bringing them forward on the other.	Support for the strategy is welcomed. The comments relating to viability and deliverability are noted and agreed.

		3.1 Paragraph	Agree with vision and objectives. NPPF proposed changes will affect the Plan. Are ambitions for tackling climate change possible in light of decisions to demolish buildings rather than retrofit.	Support for the Vision and Objectives is welcomed.
	St. Philips Land	3.1 Paragraph	Has concerns that the Councils proposed policies would not actually deliver on some of these objectives; in particular, Objectives 4 and 6. Significant concerns regarding the Councils proposed strategy for meeting its housing needs and namely focussing housing growth in the 25 Growth Zones and on urban regeneration and not releasing land from the Green Belt. The Councils proposed approach to meeting its needs is highly likely to fail to address key areas of Objectives 4 and 6, with respect to affordable housing and the delivery of family homes.	The comments are noted. The concerns about the Growth Zones and deliverability are noted. Further work on the evidence base relating to deliverability will continue to inform the next stage of the Plan Review. This will also be informed by a Green Belt Review.
	Satnam Planning Services Ltd	3.1 Paragraph	Growth should be distributed across the City, to include both Brownfield and Greenfield land, to ensure sufficient homes are delivered.	Comments are noted. Following the revisions to the NPPF, the Local Plan Review will be informed by a Green Belt Review which will also seek to identify Grey Belt sites for potential inclusion in the Plan Review.
	Canal and Rivers Trust (Planning Manager)	3.1 Paragraph	Canal network vital in realising Local Plan's Vision and Objectives.	Comments are noted and agreed.

The Tyler Parkes Partnership Ltd	West Midlands Police	3.1 Paragraph	While the PCCWM continues to support the proposed vision, it is regrettable there is no mention of the need to reduce levels of crime and fears of crime, and this should be weaved into the list of bullet points making up the vision on p17.	The PCCWM's request to include the reduction in the fear of crime across the city within the Local Plan's vision is noted and agreed. This will be included in the next stage of the Plan Review which is due for consultation in autumn 2025.
		3.1 Paragraph	Supportive of proposal to increase housing density and undertake comprehensive housing regeneration to address housing shortfall. Comprehensive regeneration will be key and suggest addition of wording - 'the existing low density of land use within areas of the city and opportunities that increased density would bring to both housing supply and delivering local infrastructure'. A reference to working with the Private sector should also be added, as partnership working will be key to achieving growth. Plan must recognise that existing housing areas are home to established communities and regeneration should benefit existing residents in terms of new jobs and infrastructure.	The request to include reference to 'the existing low density of land use within areas of the city and opportunities that increased density would bring to both housing supply and delivering local infrastructure' is noted and agreed in addition to partnership working with the private sector. These will be included within the next stage of consultation on the Local Plan Review.
	Worcestershire County Council	3.1 Paragraph	Supports the vision and objectives.	Support for the vision and objectives is welcomed.
	Handsworth Wood Residents Association	3.10 Paragraph	Consider another tier of density requirements for "Mature Suburbs", outlined in an older policy, for areas such as Handsworth.	Proposed density requirements are based on evidence on completions. The City's Design Guide as mentioned will be key in shaping new development in this area.

		3.10 Paragraph	Doesn't reflect the urban grain or the opportunities of the city. For example, you may not get 400dph in parts of Digbeth and the Jewellery Quarter because the conservation areas preserve low rise characters. Also, many local centres can accommodate and should accommodate more than 70dph, particularly where public transport accessibility is high. We need to densify our local centres urgently.	The comments relating to urban densification are noted and agreed.
		3.12 Paragraph	Shouldn't be selling small plots in the Gun Quarter which are better suited being marketed together.	These comments are noted and will be shared with the Property Services Team.
	Acocks Green Focus Group	3.14 Paragraph	Existing residents should be at the heart of estate redevelopments, with 90% having a rehoming option before redevelopment takes place. Need to avoid past bad practices and learn from previous good practice such as Stockfield and rebuilding grants.	The concerns relating to existing residents in relation to estate redevelopment are noted and it is agreed that we should learn from previous good practice.

	Sport England	3.16 Paragraph	Supports the reference to protecting existing public open space, including playing fields. Sport England does not support the reference to redeveloping open spaces, even where they are identified to be of poor quality, where no evidence is presented that the issues in respect of their quality cannot be addressed through appropriate investment. Sport England reserves the right to object as a Statutory Consultee in respect of any proposals within the proposed plan that relate to the loss of playing field.	Sport England's comments are noted, particularly their concerns relating to the redevelopment of open spaces and the requirement for evidence in relation to quality.
		3.16 Paragraph	Development on public open space should be high density to make the best use of the land.	Comments are noted. Densities will need to be in line with the density policy set out within the Plan.
	Property Link	3.22 Paragraph	Underutilised industrial land can make a significant contribution to meeting unmet housing need without impacting on obligations to have supply of employment.	These comments are noted and underused employment land is monitored and considered through the HELAA process as part of the evidence base work to inform the Local Plan Review to identify future housing land supply.

	Walsall Council	3.22 Paragraph	The reference in paragraph 3.22 to 53 hectares of land available in South Staffordshire does not appear to correspond with Stantec SRFI apportionment study indicating that 67ha of the land at WMI could be apportioned to the Birmingham FEMA, but only 37ha of this could be apportioned to the city itself	Your references to 67 and 37 hectares of land being apportioned to the Birmingham FEMA and the city itself are taken from earlier sections of the Stantec West Midlands SFRI Employment Issues Response Paper (February 2021). When these different elements of the study are brought together in the report summary the amount recommended to be apportioned to Birmingham City Council is 53 hectares (Table 5 of the paper).
		3.23 Paragraph	More employment land could be designated for other uses if BCC advocated for and encouraged intensification of existing employment sites - stacked logistics facilities rather than single storey big sheds.	These comments will be further considered through the Plan Review Process and Employment Land/Growth Zone policies.
	Satnam Planning Services Ltd	3.24 Paragraph	Documents attached that relate to Land at Worcester Lane, Roughley in Sutton Coldfield.	Noted.
	Satnam Planning Services Ltd	3.26 Paragraph	The new Local Plan must reference the new NPPF.	Noted and agreed.

	Solihull Metropolitan Borough Council	3.27 Paragraph	Suggests that further Green Belt release should not be ruled out because of expected changes to the NPPF, sites being discounted in the 2017 Local Plan because they could not accommodate an urban extension and this may not be the correct strategy going forward and the fact that the evidence base around market conditions might be out of date.	Comments are noted. The next stage of the Plan Review will be informed by a Green Belt Review and will also potentially identify Grey Belt sites in line with the latest NPPF revisions.
	Lichfield District Council	3.27 Paragraph	Notes the decision not to review the Green Belt boundary in this Local Plan. However, LDC feels that BCC should review its Green Belt given the significant scale of unmet need within Birmingham and the wider HMA. There are limited areas beyond the Green belt and as such all authorities should consider their Green Belt to ensure homes are delivered as close as possible to where the need arises. BCC will need to fully evidence that there are no exceptional circumstances including taking into account the impact of unmet need on neighbouring authorities and the significant scale of need across the HMA.	The concerns relating to Green Belt Review are noted. As part of the Local Plan Evidence Base a Green Belt Review will be undertaken to include the potential identification of suitable Grey Belt sites for inclusion in the Local Plan Review. This will inform the next stage of consultation which will take place in autumn 2025.
	Satnam Planning Services Ltd	3.27 Paragraph	Object to the decision to not undertake a Green belt review, all sources of land supply should be investigated and considered.	Noted. As part of the evidence base to inform the next stage of the Local Plan Review and in accordance with the changes to the NPPF, BCC will undertake a Green Belt Review to include the potential identification of suitable grey belt sites for inclusion in the Local Plan.

	South Staffordshire District Council	3.27 Paragraph	Highlights the key changes proposed in the NPF consultation including Green Belt release, Grey Belt and a new standard methodology. Identifies that the BCC housing requirement will be smaller under the new standard methodology and suggests this might eliminate the shortfall and potentially provide a surplus based on current capacity. However, the plan would still be required to build in flexibility for potential non delivery of brownfield land and therefore a review of the Green Belt would be necessary to meet the requirements of the proposed NPPF.	Comments related to flexibility and deliverability are noted. Following the changes to the NPPF the Council will undertake a Green Belt Review which will also potentially identify Grey Belt sites for potential inclusion within the Local Plan Review. This will inform the next stage of Plan consultation which will take place in autumn 2025.
		3.27 Paragraph	Agreement that no more green belt should be released for redevelopment.	Acknowledgement of priority of building on brownfield sites and sites which have already been released from Green Belt in previous Birmingham Development Plan in favour of releasing any more greenbelt.
	Satnam Planning Services ltd	3.3 Paragraph	The Plan must use the revised methodology for housing need, which has led to a 30% total increase for housing across the West Midlands Region and Birmingham should contribute to this.	The comments relating to the revised housing need methodology are noted and will continue to be discussed with other West Midlands Authorities through the Duty to Co-operate process.

The Tyler Parkes Partnership Ltd	West Midlands Police	3.3 Paragraph	Objective 1 (on page 18), PCCWM requests that a 4th bullet point should be added on the following lines: To reduce crime and the fear of crime through provision of associated infrastructure alongside the promotion of thoughtful high-quality design both internal and external in the built environment. Objective 4, 4th bullet refers to: To provide essential infrastructure to support development in a co-ordinated and timely manner. Whilst welcome, this should embrace infrastructure related to all aspects of policing, because as written this is not entirely clear. Should there be a definition of infrastructure and what it includes? Given the lapse in time since CIL was prepared, it is also requested the Local Plan should commit to an early review of CIL in the city (i.e. more than the regular updating of payment rates) and updating of the Infrastructure Delivery Plan.	The PCCWM's comments and requests in relation to Objectives 1 and 4 are noted and agreed. The Objectives will be amended for inclusion in the next stage of the Local Plan Review which it is anticipated will be out to consultation in autumn 2025.
	Birmingham city council	3.31 Paragraph	Respondent makes valid point about supporting community led housing schemes such as Stirchley housing coop.	Enshrining community led housing into policy has been considered and will need more demand and a more robust evidence base to include this in the mix of housing delivery.
	Handsworth Wood Residents Association	3.35 Paragraph	Respondent supports bringing empty properties back into use and acknowledges the wider community benefit of this.	The Council will continue to strive to bring back as many empty properties back into residential use as possible.

	Satnam Planning Services ltd	3.37 Paragraph	Object to the decision to not undertake a Green belt review, particularly as surrounding areas will have increased housing numbers and without Green belt land Birmingham will be unable to maximise its housing delivery.	Noted. As part of the evidence base to inform the next stage of the Local Plan Review and in accordance with the changes to the NPPF, BCC will undertake a Green Belt Review to include the potential identification of suitable grey belt sites for inclusion in the Local Plan.

	Withy Hill Consortium	3.40 Paragraph	Agree that the standard method should be used to calculate the city's housing requirement, but the requirement from the BDP should not be used in the first two years as this is constrained and is based on a different methodology. Instead, the LHN calculations for those points in time should be used, which results in an annual housing need figure of 6,354 for 2020-21 and 6,370 for 2021-22. When added to the 2022-42 figure this results in an overall need for the plan period of 157,828 dwellings. If the proposed new standard method is applied over the 22 year plan period, then the need figure is 109,428 dwellings and the identified shortfall will increase to at least 53,177 dwellings. There would also be a shortfall of around 84,000 dwellings across the wider housing market area. There is also concern about the deliverability of the 'other opportunity' sites. If these are discounted, then the shortfall would increase by a further 11,481 dwellings. Further upward adjustments should be made to deliver economic growth and to address unmet needs for affordable housing. In particular the proposed new standard method calculation is lower than the overall affordable housing needs identified by the HEDNA. A review of the Green Belt is required to address these significant unmet needs.	The concerns related to updated housing needs are noted and in particular the need to make further upward adjustments and the requirement to undertake a Green Belt review. As part of the evidence base process the Council will be updating the HEDNA and housing needs assessment in line with the latest NPPF requirements. We will also be undertaking a Green Belt Review and potentially identifying Grey Belt sites through this process to inform the next stage of the Local Plan Review. This is due out for consultation in autumn 2025.

	St Modwen	3.40 Paragraph	Council has sought to apply a mix and match approach to determining an up-to-date housing need for the plan period that is based on the current, but now out of date, housing requirement figures taken from the adopted development (which itself is constrained). Council should only apply figures from standard method. Revised dwellings per annum should be 7,100 dpa. No evidence of consideration of factors such as economic growth aspirations or affordable housing need. More should be done to cater for those who cannot afford a house of their own. Reliability of 'other opportunity sites' is questioned which would make shortfall higher. Emerging NPPF is considered which would still present a shortfall especially with an affordable housing uplift.	The concerns relating to the standard method, growth aspirations and affordable housing need are noted. To inform the next stages of the Local Plan Review, further evidence base will be undertaken including an updated HEDNA which will take into account the requirements from the revised NPPF. A Green Belt Review will also be undertaken which will assess Grey Belt sites that could potentially be allocated through the Plan process.
	South Staffordshire District Council	3.40 Paragraph	Welcomes the approach taken by the City Council to improve the capacity of the Local Plan and reduce the shortfall but would like to see the measures that will be considered if non delivery of brownfield land and regeneration opportunities results in a housing shortfall.	The concerns relating to non-delivery are noted. Following the changes to the NPPF the Council will undertake a Green Belt Review which will also potentially identify Grey Belt sites for potential inclusion within the Local Plan Review. This will inform the next stage of Plan consultation which will take place in autumn 2025.

	Acocks Green Focus Group	3.40 Paragraph	Lower government housing targets mean that Birmingham's shortfall is mostly removed. Higher densities will conflict with the aim to deliver more family housing, particularly in more central areas of the city, as well as retaining graduates.	The delivery of family housing will be an important part of the housing mix within the City Centre. Well-designed higher densities can contribute to family housing and overall mix.
	South Staffordshire District Council	3.41 Paragraph	It is unclear how the housing shortfall from Birmingham and the Black Country will be accommodated within the HMA. South Staffordshire DC are offering a 640 dwelling contribution to the shortfall in their Regulation 19 Local Plan which is based on the current standard methodology.	The HMA housing shortfall continues to be discussed and addressed through the Duty to Co-operate and Statements of Common Ground process.
		3.42 Paragraph	Undermines the ambitions of Birmingham's local plan to encourage homes to be built in unsustainable locations in other LAs.	The new Standard method for calculating housing need will result in a significant reduction in Birmingham's housing requirement and shortfall. Birmingham will continue to work with its neighbouring local authorities to meet any shortfalls across its housing market area in the most strategic and sustainable way as set out in the NPPF when it cannot be met within Birmingham's own boundary.
	Satnam Planning Services Ltd	3.43 Paragraph	It is unclear if surrounding Authorities will be able to support Birmingham growth needs in future years up to 2042.	Noted. Discussions relating to growth across the Greater Birmingham Housing Market Area are ongoing through the Duty to Co-operate process.
	St Modwen	3.46 Paragraph	POD is devoid of any strategy to address shortfall outside city boundary. Green belt review should look at releasing sites for development.	Comments are noted. As part of the Local Plan Review, the Council has commissioned a Green Belt Assessment to inform the Development Strategy and to assess all Green Belt parcels against the five purposes and also identify any potential sites as Grey Belt. This evidence will inform the development of the Regulation 19 Publication Plan following the publication of the Revised NPPF in late 2024.

	Cannock Chase Council	3.47 Paragraph	Reduction in the housing shortfall from the previous stage of consultation is a positive step. Important that all options are considered and explored, including green belt release, due to the implication on other authorities in the Housing Market Area (HMA) including CCDC which may be asked to contribute to meeting the shortfall. Please communicate with authorities in the HMA about any changes going forward that could alter the strategy and the level of unmet need as a result of the proposed NPPF and Housing projection methodology changes.	The concerns relating to the housing shortfall across the HMA are noted and BCC will continue to work with the HMA authorities through the Duty to Co-operate process.

	Nurton Developments	3.48 Paragraph	NDL challenges para 3.49's claim that the city has sufficient land to meet HEDNA-identified needs. They argue the HEDNA underestimates industrial and warehousing land requirements due to an assumed plot ratio of 50%, which exceeds industry norms. The HELAA potentially overestimates deliverable land and question if gross or deliverable site areas are used to calculate the supply and also omits a lapse rate. NDL emphasises the need to confirm a sites availability before including them in the supply. The absence of a qualitative assessment, in particular to meet the need of the sectors referenced by paragraph 84(b) of the new NPPF, is an omission.	The concerns relating to the delivery of employment land are noted. Further work will be undertaken on a HEDNA update and also relating to the deliverability and availability of employment land opportunities to inform the site allocations, growth zones and Core Industrial Areas policies.
		3.48 Paragraph	Para 3.48 - The Council should review its employment land provisions, to have a good mix of sites in sustainable locations. Sites within the Core Industrial Areas should continue to be recognised for their value, for example, 17 Langley Drive.	The comments relating to the Core Industrial Areas are noted and agreed. Employment Land will continue to be reviewed through the HELAA process.
		3.48 Paragraph	It is important that the Council has a mix of employment sites in sustainable locations. Core Industrial sites such as land to the west and east of Bromford Vent should continue to be recognised for their importance in employment generating uses.	The comments relating to a mix of employment sites are noted and agreed.
	Dudley Metropolitan Borough Council	3.49 Paragraph	Supportive of the approach taken to identifying additional employment land supply within Birmingham	Support is welcomed.

	Property Link	3.5 Paragraph	Shortfall after proposed standard methodology changes would be 7,753 dwellings. Gun Quarter Growth Zone has ability to accommodate 1,870 dwellings and with other areas and site-specific allocation represents a crucial contribution towards meeting this ongoing housing need.	The comments relating to the Gun Quarter Growth Zone are welcomed and will be further considered through viability and deliverability work on the Growth Zones and site allocations.
	Lichfield District Council	3.5 Paragraph	Lichfield District Council are supportive of the overall approach taken to increase the level of housing provided. The Plan must consider the implications of the standard methodology changes set out in the NPPF consultation. However, the potential shortfall is still significant, particularly when combined with the other shortfalls across the HMA. Therefore, it is important that all opportunities for growth are explored including Green Belt	Support for the overall approach is welcomed. As part of the Local Plan Evidence Base a Green Belt Review will be undertaken to include the potential identification of suitable Grey Belt sites for inclusion in the Local Plan Review. This will inform the next stage of consultation which will take place in autumn 2025.
	Hammerson	3.5 Paragraph	The Council is likely to have to look to surrounding authorities for more assistance in meeting its housing shortfall, even though the new methodology has reduced the total numbers. The Council should also work closely with landowners and investors, such as Hammerson to identify an potential assets that could contribute to the shortfall. Hammerson supports Policy HN4 to increase residential densities.	The concerns relating to the housing shortfall are noted. The Council will continue to work with landowners and investors to ensure deliverability.

	Walsall Council	3.51 Paragraph	Note in paragraph 3.51 is unclear how land that is used for the former class B1 (now E(g)(i)/(ii)/(III)) is to be treated in the plan, including proposals for new developments that fall within this sub-class that may not be main town centre uses.	Paragraph 3.51 is not a proposed policy. It provides the context for the proposed policy approaches to be followed later in the document. Proposed policy EC2 states that E(g)(ii) and E(g)(iii) uses will be considered as acceptable in the Core Industrial Areas, where a condition can be applied to ensure that they do not change to another E class use in the future. E(g)(i) is office development, which the NPPF identifies as a main town centre use. Therefore, it will continue to be appropriate for office developments to be directed towards the city's centres.
	Rail Freight Group	3.52 Paragraph	Supportive of safeguarding land for industrial and logistics use, particularly the need to safeguard land for rail freight use.	Support for the safeguarding land for industrial/logistics use is welcomed.
		3.52 Paragraph	Intensify industrial use. Stacked warehouses. Multiple occupancy employment units.	These comments will be further considered through the Plan Review Process and Employment Land/Growth Zone policies.

	IM Properties	3.53 Paragraph	Between 2014 and 2023 the demand for employment land has exceeded supply. Rents have also increased at rates higher than inflation. There is also relatively small industrial and logistics floorspace per working age resident when compared to the wider FEMA and West Midlands. There is a lack of larger strategic employment sites over 25 hectares. Older and lower quality employment land and premises are being redeveloped for housing and are not being replaced by new supply. The supply is also likely to be lower due to the Former Wheels Site being promoted for other uses by the new landowner, a greater mix of land uses at the Longbridge West Works site and uncertainty about the total deliverable land at Washwood Heath. The potential land supply of 123 hectares within the Core Industrial Areas is not deliverable or developable as landowner availability has not been confirmed. It is not clear whether the 53 hectares apportioned to Birmingham at the West Midlands Interchange site is to meet local or strategic needs. This should be confirmed through Statements of Common Ground as well as in the Birmingham Local Plan.	The concerns relating to the provision of and deliverability of employment land provision are noted. Further work will be undertaken in relation to viability and deliverability within the Core Industrial Areas to inform the next stage of the Local Plan review. The position relating to the West Midlands Interchange Site will be confirmed in the next consultation stage and this will be undertaken in line with Duty to Co-operate requirements and ongoing co-operation with the West Midlands authorities.

	IM Properties	3.54 Paragraph	The assessment supporting this representation identifies a need for 396 hectares of employment land, rather than the 295.6 hectares identified in the Preferred Options Document. Further employment land opportunities are therefore required in Birmingham and across the FEMA. In meeting this shortfall, the recommendations of the WMSESS Stage 2 report should be taken forward with a focus on a broad location east of Birmingham. The strong demand in the take up of land at supports this. The Thrive site in North Warwickshire is promoted as a development opportunity within this broad location. In terms of site/location characteristics, this should be in suitably accessible locations as specified by the NPPF. The Coventry and Warwickshire HEDNA includes criteria that would assist with this. Cooperation with duty to cooperate partners on transport and connectivity as well as distributing the employment land shortfall should be actioned through Statements of Common Ground and shared evidence gathering.	The concerns relating to the provision of and deliverability of employment land provision are noted, particularly within accessible locations. This will be undertaken in line with Duty to Co-operate requirements and ongoing co-operation with the West Midlands authorities through consideration of the WMSESS Stage 2 report.

	Lichfield District Council	3.54 Paragraph	Lichfield District Council are supportive of the approach taken to employment land and notes that BCC is able to meet its own needs. Lichfield District Council only has sufficient employment land to meet its own needs. Lichfield District Council welcomes continuing positive dialogue through the DTC.	Support for the approach to employment land is welcomed. BCC will continue to discuss this through the Duty to Co-operate process.
		3.56 Paragraph	Supportive of the identification of new Core Industrial Areas but suggests proposals should be more ambitious, to provide an available portfolio of employment sites.	The comments relating to a more ambitious approach to the employment sites portfolio are noted and employment land will continue to be reviewed through the site allocation and HELAA update process.
		3.56 Paragraph	Supportive of intention to identify new Core Industrial Areas to meet demand for industrial development over Plan period. Council should be more ambitious in its economic growth plans.	Support is welcomed.
		3.57 Paragraph	Para 3.57 - supportive of intention for Council to work proactively with landowners to deliver new industrial development and provide job opportunities for the city and wider regional economy.	Support is welcomed.

		3.57 Paragraph	Supportive of intention for Council to work proactively with landowners to deliver new industrial developments. These new sites will support economic growth and new job opportunities for the city and wider regional economy.	Support is welcomed.
	South Staffordshire District Council	3.57 Paragraph	Acknowledges that the Strategic Rail Freight Interchange in South Staffordshire serves a wider market area. It recognises that the 53ha which the Stantec report (2021) identifies as being attributable to Birmingham is being claimed by Birmingham through the emerging Local Plan and is being used to meet B8 need.	The comments relating to the Strategic Rail Freight Interchange in South Staffordshire are noted and welcomed.
	Handsworth Wood Residents Association	3.58 Paragraph	Handsworth Wood Residents Association responses have been recorded in their relevant consultation points.	Comment noted.

	Nurton Development s	3.58 Paragraph	The respondent concludes that there is a shortfall in employment land and suggests addressing it through new allocations, potentially including Green Belt releases, or via the Duty to Co-operate. They question whether the 257.73 ha supply figure reflects gross or developable areas. Applying a 12% lapse rate, as used for housing supply, would reduce employment land by 6.83 ha. Additionally, the 123.13 ha identified through an urban capacity study cannot be relied upon due to unconfirmed availability, with many sites still occupied, creating further demand for land to relocate existing businesses.	The concerns relating to the shortfall in employment land are noted. This will continue to be addressed through updates to the evidence base - HELAA and the Duty to Co-operate process. Following the NPPF updates, BCC will undertake a Green Belt Review to include the potential identification of Grey Belt sites for allocation through the Local Plan. This will inform the next stage of consultation.
	South Staffordshire District Council	3.58 Paragraph	South Staffordshire note and welcomes the approach to meeting the future employment land need within Birmingham's administrative boundary. South Staffordshire welcomes the work to identify additional capacity post the Issues and Options consultation however, it notes that much of this is still subject to landowner agreement and would welcome reassurance on the steps being taken to secure these sites and ensure that they will contribute to employment land during the plan period.	The concerns relating to the deliverability of employment land are noted. Work will continue to be undertaken on the HELAA and landowner liaison to establish deliverability of these sites and through the growth zones approach.
	Solihull Metropolitan Borough Council	3.6 Paragraph	All measures to maximise the urban area to accommodate the city's needs should be pursued.	These comments are noted and agreed.

	Dudley Metropolitan Borough Council	3.6 Paragraph	Support the Councils approach in respect of maximising the urban capacity as far as possible, particularly in respect of Option 1 Increase housing densities where the BLP now takes forward higher density standards in Policy HN4.	Support for maximising urban capacity is welcomed.
		3.7 Paragraph	Doesn't reflect the urban grain or the opportunities of the city. You may not get 100dph in parts of Digbeth and the Jewellery Quarter because the conservation areas preserve low rise characters. Also, many local centres can accommodate and should accommodate more than 50dph, particularly where public transport accessibility is high. We need to densify our local centres urgently and this plan fails to do that.	The comments relating to density and local centres are noted and will be further considered during the formulation of the Regulation 19 stage, alongside the liveable neighbourhoods concept for local centres and uses.

	North Warwickshire Borough Council	Policy PG1 Overall Levels of Growth	Considers that the approach to addressing the unmet housing need is unacceptable, particularly around the issue of not revisiting a Green Belt Review since the last one in 2013 and the proposed planning system changes in the new NPPF consultation indicate the need for a Green Belt review as part of wider measures to reduce pressures on adjoining local authorities including North Warwickshire to further accommodate any future shortfalls.	North Warwickshire BC's comments around the housing shortfall and Duty to Co-operate issues are noted, particularly the view that BCC's approach to addressing the unmet housing need is unacceptable and that the issue of revisiting a Green Belt Review needs to be reconsidered through the Plan review process. Following the publication of the new NPPF and the guidance on undertaking Green Belt Reviews and identifying Grey Belt sites, BCC has revised its Local Development Scheme to include a further Preferred Options/Regulation 18 consultation scheduled for Autumn 2025. This will be informed by a Green belt Boundary review to be undertaken in accordance with Government guidance.
	Birmingham City Council (Investment and Valuation)	Policy PG1 Overall Levels of Growth	Cross boundary opportunities must be considered a key component of the Birmingham local plan growth strategy. Council must explore potential growth options in co-operation with Bromsgrove District Council. The two authorities must have meaningful and open engagement to maximise the benefits of well-planned growth at the border for each authority.	The comments relating to co-operation with Bromsgrove District Council to identify growth options to meet future housing needs on a cross-boundary basis are noted. This process is being considered and discussed through the Duty to Co-operate process and Statements of Common Ground. It is noted that a number of cross boundary sites have been submitted for consideration through the Plan Review process.

	Withy Hill Consortium	Policy PG1 Overall Levels of Growth	Broadly support the strategy to promote the delivery of growth in the urban area, but this will not deliver sufficient growth to meet the identified needs. Many of the proposed allocations and Other Opportunity sites are shown as having 'unknown' developer interest and so cannot be considered as available or developable. Many of these sites also have existing uses that will require removal/relocation, but no explanation is provided as to how this will be facilitated. These factors will further reduce the capacity to deliver against the proposed plan strategy. Further Green Belt release will therefore be required as an exceptional circumstance to address the increased shortfall of housing. The HELAA site schedules do not provide sufficient information to determine which Other Opportunity sites have also been identified as proposed allocations.	Support for the Plan's overall growth strategy is welcomed. The comments and observations in relation to undertaking a Green Belt Review to inform the Plan Review are noted. Following the publication of the new NPPF and the guidance on undertaking Green Belt Reviews and identifying Grey Belt sites, BCC has revised its Local Development Scheme to include a further Preferred Options/Regulation 18 consultation scheduled for Autumn 2025. This will be informed by a Green belt Boundary review to be undertaken in accordance with Government guidance. The comments in relation to the HELAA site schedules are also noted and more detailed information and evidence will be included to support site allocations and growth zones at the next stage of the regulation consultation as the Plan evolves.
	IM Properties	Policy PG1 Overall Levels of Growth	Policy PG1 should include a commitment to deliver an uplifted employment land requirement of 396 hectares over the whole plan period, rather than referring to an ongoing minimum 5-year reservoir of employment land.	The comments are noted, and further consideration will be given to this in the Preferred Options Consultation during autumn 2025 and will be informed by information in the HEDNA.

	Developers Consortium - Barratt Homes, Bloor Homes, Bromford, Catesby Estates, Heyford Developments & IM Land	Policy PG1 Overall Levels of Growth	Concern over focussing development within the existing urban area and the optimisation of development densities. Evidence to support the sustainable longevity of this Option is scant and ignores the findings of the SA. The Council should re-consider the extent to which other growth options can contribute towards the delivery of houses. Option 2 - no examples are provided as to recent public sector land assembly schemes, and no data is provided as to how many homes can be delivered through this Option and how much it will contribute towards identified supply. It is inappropriate for the Council to rely on this method as part of its overall development strategy. Option 3 - The Council needs to provide evidence of anticipated delivery in respect of these sites Option 5 - Clear from the evidence that these sites cannot be relied upon as part of the Council's supply of employment land and therefore incorrect for the Council to suggest that there is a sufficient supply of industrial land to meet the employment development needs. The Council should immediately look to allocate additional land for employment uses. Option 6 - Stantec disputes this conclusion as it demonstrates a clear negativity bias, weighting has been applied in order to justify the Council's pre-determined preferred option. Ignores the SA findings	The comments against the growth options are noted. In particular, in accordance with the publication of the new NPPF a Green Belt Review will be undertaken in 2025 to inform the revised Preferred Options Consultation scheduled for autumn 2025. This will inform and refine the Plan's future growth strategy. Housing Need will continue to be assessed in accordance with the NPPF and national guidance.

			that Green Belt release would also result in increased positive effects. Council appears to have applied greater weighting to the negative effects associated with Green Belt release are considered to outweigh the increased positive effects. Notable that the Green Belt Review did not include an assessment against the five purposes as set out in the NPPF, instead immediately proceeded to a constraint based analysis. It is therefore not appropriate to continue to rely on this outdated Assessment. Consider that the percentages set out in the submitted Table 13 represent a robust starting point for distributing the unmet housing need. This must be thoroughly explored through the duty to co-operate and an agreement reached between all of the HMA authorities in terms of accommodating this need.	

	Lendlease	Policy PG1 Overall Levels of Growth	Supportive of proposal to identify 26 Growth Zones, which focus on urban regeneration and revitalisation of existing areas. The Smithfield Quarter has potential to deliver over 3,000 new homes on Brownfield land, meaning the Smithfield site should be included within an existing Growth Zone and shown as a major development site. Or the inclusion of a new Smithfield Growth Zone, which would reflect the aspirations set out in the CBF for Smithfield to create a new City Heart quarter. It is clear that Smithfield given its scale would be aligned to the objective of the Growth Zones.	Support for the growth zone approach is welcomed. The comments relating to The Smithfield Quarter to be included as a Growth Zone are noted and will be further considered in the next stage of the Plan's consultation on a preferred option in autumn 2025.
	National Grid Electricity (South West) Limited	Policy PG1 Overall Levels of Growth	Local planning authorities have a duty to safeguard the operation of National Grids infrastructure to enable NGED to supply electricity in the most efficient and cost-effective manner. In the majority of cases this will involve retention of the existing infrastructure in situ, including overhead power lines and pylons.	The comments relating to infrastructure are noted and agreed.

	MODA	Policy PG1 Overall Levels of Growth	Recommend that the level of additional homes be identified as a minimum level of provision. There is a continuing need for local authorities to be subject to a duty to co-operate. Likely to be a need to increase housing supply over the Plan period beyond the levels provided through Policy PG.1. Helpful to include a general policy on the growth zones capturing the overarching principles and to summarise what development is acceptable in the Growth Zones. The content is not consistent with Policy SA.1.	The comments are noted; the Council will continue to work with other west midlands authorities through the Duty to Co-operate process and this will include the new requirements for strategic planning. Consistency with the site allocations policies is noted and will be further clarified through the next stage of plan review.
	Stoford	Policy PG1 Overall Levels of Growth	As Birmingham has significant housing shortfall it should be recognised that large strategic sites such as Typhoo Wharf could contribute to meeting the unmet need over the Plan period. Site Allocations should be identified for Typhoo Wharf, with capacity testing currently being undertaken.	Further consideration will be given through the site allocations policy to the Typhoo Wharf area and will inform the next stage of the Plan Review consultation.
	Aegon UK Property Fund	Policy PG1 Overall Levels of Growth	Supportive of identification of Growth Zones as it will focus new development on urban regeneration and densification in existing areas.	Support for the Growth Zone approach is noted.

	Folkes Holdings Limited	Policy PG1 Overall Levels of Growth	Despite the latest housing methodology proposal being appreciably lower for Birmingham than before, the proposed new figure combined with the Black Country is still more than the previous combined figure. FH consider that due to the Councils reliance on increasing densities, particularly for high density City Centre apartments and the focus on the reuse of employment sites, the contribution of these two sources of supply will not deliver as many houses as the Council is suggesting. Furthermore, issues around site assembly, regeneration of public sector land and development on public open space will prove problematic and again will not deliver the levels of housing that is envisaged. By focusing on high density development, the housing needs of those seeking larger family housing in Birmingham will not be fulfilled, leaving those seeking a home the decision of whether they wish to remain in Birmingham or not. Our overall conclusion is that the supply of homes identified is not deliverable and that there will be a significant need for additional land to be provided by adjoining HMA authorities to address the even greater conurbation housing shortfall. To date it has not been demonstrated that any agreement has been made on how and where this shortfall will be met.	The concerns relating to focus on high density development are noted. Also, the additional land requirements by adjoining HMA authorities which continues to be discussed through Duty to Co-operate. This will continue to be considered through any new government requirements/clarification on the Strategic Planning approach.

	Housebuilder Consortium (incl. Gladman and Vistry)	Policy PG1 Overall Levels of Growth	Consider that a furthermore robust review of the potential supply of 93,309 dwellings between 2022 and 2042 should be undertaken. A reliance on a further 11,8411 dwellings to be delivered from other opportunity sites appears to be ambitious. Affordable homes can often only be delivered as part of wider schemes and not by placing unrealistic and unviable affordable housing requirements on proposals. Any strategy must be agreed between the wider GBBCHMA authorities. The certainty provided by a strategy agreed early on by all authorities will ensure that plan making can continue without delay across the GBBCHMA. There should be a fresh Growth Study to inform the SOCG evidence base that considers a model for distributing the unmet needs that goes beyond identifying growth areas. Consideration of factors such as commuting patterns and functional relationships is also critical. In order to determine the extent of any shortfall within the BLP a Green Belt Review will need to be undertaken to understand whether there is any additional supply arising from sites that are grey belt land. It will be important to then consider land within the Green Belt. Preparation of a Green belt review should be commenced immediately; this work will then feed into discussions with the wider GBBCHMA	The comments relating to strategic planning/growth studies and consideration of commuting patterns and functional relationships are noted. These issues continue to be discussed under the Duty to Co-operate approach and will be informed by emerging Government policy/requirements in relation to strategic planning. The Council intends to undertake a Green Belt Review in 2025 to inform the next stage of the Plan Review consultation to be undertaken in autumn 2025.

			authorities to determine whether the City is in the position to take some of the unmet needs arising from its neighbouring authorities and vice versa.	

	Walter Smith Farms Ltd, L N Mitchell Ltd and Emmanuel College, University of Cambridge	Policy PG1 Overall Levels of Growth	Questionable if development with Permission in Principle (PiP) or Permitted Development (PD) should be included, as there is insufficient evidence to ensure these developments will be delivered. These two categories should be omitted or if retained they should be included within the Windfall category. An initial, high-level review of the site allocations within and outside of Growth Zones, based on available data (i.e. planning application research) and available development status information, found that, of the 54,759, ca 15,837 dwellings are not considered to be deliverable within the plan period, further reducing the number of deliverable allocated sites to 38,922 dwellings. The housing land supply would be reduced to 87,190 dwellings, which would lead to an increase in the housing shortfall (plan period 2020-2042) up to 61,988 dwellings and, based on the 2024 Standard Method, a shortfall of 22,591 dwellings. A buffer of 5% would increase the shortfall to 69,447 (current Standard Method) or 28,080 (2024 Standard Method) dwellings respectively. Considered essential that the council seeks to provide additional homes to meet the objectively assessed housing needs, which should include a green belt review and allocate sites in sustainable locations, including on grey belt and green belt land.	The assertions in relation to the deliverability of site allocations are noted and the Appendix has been thoroughly examined. Much of this information appears to be based on assumptions around deliverability and will need to be further tested through the evidence base that informs the next stage of the Plan Review and Growth Zones development.

	Henley Investment Management Ltd	Policy PG1 Overall Levels of Growth	The housing target in the policy should be expressed as a minimum in order to comply with national policy. The policy should include a clear target for the Plan to deliver at least the total OAN of 149,180 dwellings.	The comments in relation to the housing target for the Plan are noted. This will be calculated in accordance with the NPPF, and evidence base as set out in the HEDNA.
	Handsworth Wood Residents Association	Policy PG1 Overall Levels of Growth	Residents group in Handsworth feel they are spending too much time fending off planning applications. Agree that Handsworth should not be a Growth Zone but should reinstate allocation of Handsworth as a Mature Suburb as per previous documents.	The comments in relation to Handsworth are noted and the desire for it to be reinstated as a Mature Suburb are noted.
	Church Commissioners	Policy PG1 Overall Levels of Growth	The Site is therefore ideally positioned to the south of the conurbation to deliver housing closest to where the need arises. In our view, meeting Birmingham's unmet need would constitute an exceptional circumstance that would justify an alteration to the Green Belt boundary in this location.	Comments in relation to the site to Birmingham's southern boundary with Bromsgrove are noted. The Council has commissioned a Green Belt Assessment which will look at Green Belt parcels to the south of the city and assess against the five purposes and also identify potential Grey Belt sites for allocation through the BLP Review.

	Commercial Estates Group (CEG)	Policy PG1 Overall Levels of Growth	CEG is supportive of draft policy PG1 which seeks to enable continued growth (to reflect Birmingham's status as a City of Growth) and the bringing forward of viable plans for significant new development to meet the needs Birmingham's growing population. The recent SBQ planning permission (ref: 2022/08496/PA) for at least 1,700 homes alongside a mix of commercial and community uses represents a key strategic brownfield regeneration opportunity that contributes to Birmingham's housing supply during the identified plan period. The importance of ensuring that the development can come forward, together with its wider associated regeneration benefits, is therefore particularly heightened.	Support for Policy PG1 is welcomed.
	CPRE Warwickshire	Policy PG1 Overall Levels of Growth	The Reg.18 Plan refers to a shortfall of housing supply but does not make clear this is a calculation still using the old and out-of-date ONS 2014-based SNHP. The housing requirement will need to be re-estimated as soon as the ONS 2022-based SNHP projections are published, and no move to a Reg.19 Plan should be made until the post-2021 Census projections are available. Housing supply is still underestimated in terms of projected windfalls and the use of a high lapse rate (12%) as opposed to an average of 8% which should be used. No justification for export of 2000 houses to Solihull as based on out-of-date evidence.	The comments in relation to the calculation of the housing shortfall are noted. The HEDNA will be updated in 2025 to inform the next stage of the Plan Review and will take account of the latest ONS data at the time it is produced.

	Hanehouse Ltd	Policy PG1 Overall Levels of Growth	It is likely that other surrounding Local Authorities have already explored ways to meet housing shortfall in Housing Market Area so may not be able to assist Birmingham in meeting its housing shortfall. To increase housing supply, it is important for continual and robust monitoring on an annual basis to be undertaken. To allow additional growth, a positive approach must be adopted such as more allocation sites and explicit support for residential and other forms of development in Growth Zones in current B2 and B8 uses. Many older buildings on the edge of the City Centre are no longer fit-for-purpose and have limited attraction for investors and new occupiers. We recommend that the level of additional new homes by 2042 is identified as minimum provision. Due to the revised Standard Methodology for housing need, many surrounding Local Authorities are likely to see higher housing numbers and Birmingham may need to accommodate some of their unmet need. This could necessitate Strategic planning and could create delays for the new Local Plan, but it is likely that housing supply will need to be increased beyond the levels proposed in Policy PG1 by the positive measures outlined in previous paragraph.	The comments relating to increased housing supply are noted and will be considered through further work to be undertaken on the HEDNA update and through joint working with the other West Midlands Local Authorities through the Duty to Co-operate process which will also be informed by the latest developments in national planning policy.

	MEPC Limited	Policy PG1 Overall Levels of Growth	Supportive of Policy PG1 and proposal for 26 Growth Zones to focus urban regeneration and revitalise existing areas. Welcome the Policy reference that the Council will continue to use its CPO powers to support land assembly, with example of Paradise. This collaboration between the Council and the Private sector has proved to be successful (i.e. Paradise) and allows holistic development to deliver quality buildings, high quality public realm and improved connectivity for communities.	Support for Policy PG.1 and the growth zones to focus urban regeneration is welcomed.
	Walsall Council	Policy PG1 Overall Levels of Growth	The revised standard method would considerably reduce the annual housing need for Birmingham, to the extent that the supply would be sufficient to meet the city's needs over the period to 2042 with some surplus. We would ask if consideration can be given, under duty to co-operate, to that surplus being used to contribute to the needs of neighbouring local authorities, particularly those in the Black Country.	The comments relating to the housing supply and future consideration under the duty to co-operate in terms of contributing to the Black Country's needs are noted and will continue to be discussed under the Duty to Co-operate and Statements of Common Ground procedures.

		Policy PG1 Overall Levels of Growth	City Council should work towards accommodating nearly all of its housing needs within the City's boundaries rather than requiring neighbouring areas to take up the shortfall. Some site allocations appear to have low densities, such as Growth Zone 18 Tower Mount and Molliet Park. Albert Road/Station Road, Stetchford could have a much higher density to take advantage of its location near to Stetchford Station. Any shortfall taken up elsewhere in the Greater Birmingham and Black Country HMA should be accessible to Birmingham by public transport.	The comments relating to accommodating all housing needs within the City's boundaries are noted and are being furthered through the growth zones development strategy. Densities within the growth zones are currently indicative and further work will be done on delivery and implementation in these areas prior to the next stage of consultation on the Local Plan Review.
	St Modwen	Policy PG1 Overall Levels of Growth	Site assessment sheets do not explain which of the opportunity sites have been proposed as site allocations raising significant concerns as to transparency and credibility of process. It should be shown that to show exceptional circumstances exist to justify changes to Green Belt boundaries, it needs to be shown that all other reasonable options have been examined.	The comments relating to the transparency and credibility of the process are noted and further work is being done on site allocations, deliverability and implementation to inform the next stage of Preferred Options consultation.

	Bloor Homes	Policy PG1 Overall Levels of Growth	Despite the latest housing methodology proposal being appreciably lower for Birmingham than before, the proposed new figure combined with the Black Country is still more than the previous combined figure. Consider that due to the Councils reliance on increasing densities, particularly for high density City Centre apartments and the focus on the reuse of employment sites, the contribution of these two sources of supply will not deliver as many houses as the Council is suggesting. Furthermore, issues around site assembly, regeneration of public sector land and development on public open space will prove problematic and again will not deliver the levels of housing that is envisaged. By focusing on high density development, the housing needs of those seeking larger family housing in Birmingham will not be fulfilled, leaving those seeking a home the decision of whether they wish to remain in Birmingham or not. Our overall conclusion is that the supply of homes identified is not deliverable and that there will be a significant need for additional land to be provided by adjoining HMA authorities to address the even greater conurbation housing shortfall. To date it has not been demonstrated that any agreement has been made on how and where this shortfall will be met.	The concerns relating to high density and deliverability are noted. The need for more family housing is agreed with. The Development Strategy and growth zones approach will continue to be developed in line with deliverability and viability issues identified through the evidence base work, which will include a green belt review to identify any potential grey belt sites that could be brought forward through the Local Plan Review process.

	West Midlands Housing Association Planning Consortium (WMHAPC)	Policy PG1 Overall Levels of Growth	It is strongly recommended that this figure should be presented as a minimum requirement to allow for additional delivery over the Plan period where necessary and for opportunities to increase affordable housing as a percentage of overall delivery. The WMHAPC recommends that the emerging draft of Policy PG1 includes a specific requirement for affordable housing throughout the Plan period. This is particularly important because brownfield developments may face challenges in meeting affordable housing targets, making it essential to clearly define the need for affordable housing in order to maximise the provision in Birmingham.	The housing need figure will be expressed as a minimum in the Local Plan. Policy HN.2 sets out the affordable housing requirements for the plan period; however, it is agreed that this could also be usefully cross referenced within PG.1.
	G.C. No 26 Ltd	Policy PG1 Overall Levels of Growth	Supportive of Policy PG1 - as new development will maximise use of underperforming Brownfield land in highly sustainable locations.	Support for PG.1 is welcomed.
	Walmley Golf Club Ltd	Policy PG1 Overall Levels of Growth	Housing shortfall set out in the PO document should be a justification to review the green belt. Green belt sites promoted in Call for sites would make a significant contribution towards addressing housing shortfall and alleviate any potential under-delivery of hard-to-develop sites making the plan more positively prepared and flexible.	The comments relating to the Green Belt are noted. As part of the Local Plan Review process, a Green Belt Review will be undertaken which will include the assessment of Grey Belt sites. This will inform the next stage of the Regulation 18 consultation process.

	Glenbrook Property Limited	Policy PG1 Overall Levels of Growth	The respondent supports this policy and notes that although the overall requirement for homes in Birmingham may reduce due to draft changes to calculating local housing needs, there will still be significant pressure to deliver new dwellings.	Support for Policy PG.1 is welcomed, and it is agreed that there will be significant pressure to deliver new housing.
	Sandwell Metropolitan Borough Council	Policy PG1 Overall Levels of Growth	Sandwell MBC supports the steps that Birmingham has taken to reduce its housing shortfall. Sandwell is facing a housing shortfall of its own so is unable to accommodate any of Birmingham's unmet housing need. However, Sandwell MBC will continue to work with other authorities in the Birmingham and Black Country Housing Market Area to seek to address the shortfalls arising within the region.	Sandwell MBC's comments are noted, and BCC will continue to work with the authorities across the Housing Market Area to help address the housing shortfalls across the region.
	Picton Jones (Asset Management) Ltd	Policy PG1 Overall Levels of Growth	Policy PG1 identifies a shortfall of 45,300 homes that cannot be met over lifetime of Plan, which is a concern, as the new NPPF clearly sets out expectations for growth. The Council should be more ambitious in planning for growth, such as favourably considering Brownfield sites in sustainable locations that might come forward but are not identified as housing allocations and could deliver new residential development.	The comments relating to ambitions for planning growth are noted. As part of the Local Plan Review process the Council will undertake a Green Belt review which will include the assessment of potential Grey Belt sites for inclusion in the Plan going forward.
	Hammerson	Policy PG1 Overall Levels of Growth	Supportive of Policy PG1 Overall Levels of Growth, as it provides sufficient flexibility to respond to changing market condition.	Support for Policy PG.1 is welcomed.

	Home Builders Federation	Policy PG1 Overall Levels of Growth	The HBF considers that the Council should be seeking to ensure that its entire housing need is addressed, as a first priority with as much delivered within its own authority area as is possible, and then through an agreement with other authorities within the GBBCHMA. In addition, the HBF considers that this policy is likely to need to be amended to reflect the latest government guidance in relation to the Written Ministerial Statement, and the proposed standard methodology and emerging NPPF.	The HBF's comments in relation to Duty to Co-operate and also the revisions to the NPPF are noted and agreed.
	Satnam Planning Services ltd	Policy PG1 Overall Levels of Growth	The level of growth for the city could be higher if Green belt land is reviewed.	Following the publication of the Revised NPPF, a Green Belt Review will be undertaken as part of the Local Plan Review process and will inform the next stage of the Regulation 18 process.

	Bloor Homes	Policy PG1 Overall Levels of Growth	The reliance on increasing densities, particularly for high density City Centre apartments and the focus on the reuse of employment sites will not deliver as many houses as expected. Issues around site assembly, regeneration of public sector land and development on public open space will prove problematic and again will not deliver the levels of housing that is envisaged especially for those seeking larger family housing. The supply of homes identified is not deliverable and the size of the shortfall is considerably larger than the suggested 45,300 dwellings and therefore a further significant need for additional land to be provided by adjoining HMA authorities which has not been successful in the past through the Duty to Cooperate. This will mean that less affordable homes will be built, and affordability issues will increase.	The concerns relating to the deliverability of future housing supply within the growth zones are noted. Further work will be undertaken relating to deliverability, viability and implementation and to clarify site thresholds going forward. In addition, the Plan Review will be informed by a Green Belt Review and potential identification of grey belt sites.

	Barratt David Wilson	Policy PG1 Overall Levels of Growth	Despite the latest housing methodology proposal being appreciably lower for Birmingham than before, the proposed new figure combined with the Black Country is still more than the previous combined figure. Consider that due to the Councils reliance on increasing densities, particularly for high density City Centre apartments and the focus on the reuse of employment sites, the contribution of these two sources of supply will not deliver as many houses as the Council is suggesting. Furthermore, issues around site assembly, regeneration of public sector land and development on public open space will prove problematic and again will not deliver the levels of housing that is envisaged. By focusing on high density development, the housing needs of those seeking larger family housing in Birmingham will not be fulfilled, leaving those seeking a home the decision of whether they wish to remain in Birmingham or not. Our overall conclusion is that the supply of homes identified is not deliverable and that there will be a significant need for additional land to be provided by adjoining HMA authorities to address the even greater conurbation housing shortfall. To date it has not been demonstrated that any agreement has been made on how and where this shortfall will be met.	The concerns relating to the deliverability of future housing supply within the growth zones are noted. Further work will be undertaken relating to deliverability, viability and implementation and to clarify site thresholds going forward. In addition, the Plan Review will be informed by a Green Belt Review and potential identification of grey belt sites. Housing Need across the HMA will continue to be discussed through the Duty to Co-operate process with adjoining authorities.

	Birmingham city council	Policy PG1 Overall Levels of Growth	inclusion of arts, cultural and sports facilities	Noted. Arts, cultural and sports facilities are central to place making and are addressed through specific thematic policies within the Local Plan.
	Wolverhampton City Council	Policy PG1 Overall Levels of Growth	Support the steps that Birmingham has taken to reduce its housing shortfall. Wolverhampton is facing a housing shortfall of its own within its emerging Local Plan and unable to accommodate any of Birmingham's unmet housing need. Commitment to continue to work with other authorities in the Birmingham and Black Country Housing Market Area to seek to address the shortfall of housing land arising within the region.	Wolverhampton's comments are noted, and the City Council will continue to work with WCC to address the housing shortfalls through the Duty to Co-operate process.

	Birmingham City Council Housing Department	Policy PG1 Overall Levels of Growth	The Druids Heath estate has been identified in the adopted and emerging plan and a housing regeneration and renewal area. The plans for this estate have increased and it is now envisaged that up to 3,500 dwellings could be created. This includes the replacement of approximately 1,800 existing dwellings along with new build dwellings. Concern is raised at the level of the shortfall of 45,300 homes that cannot be met within the administrative area of Birmingham. In light of the recently produced NPPF consultation and change in government administration it is clear that there is an urgent need to facilitate the growth agenda. It is suggested that Birmingham City Council should be more ambitious in its plans for growth. This will require a flexible approach to consideration of housing proposals. Sites that can deliver a higher level of growth should be supported as they will assist in meeting the growth agenda.	The concerns relating to the facilitation of the growth agenda are noted. As part of the evidence base, work will continue on deliverability of sites as part of the growth agenda. The Plan Review will also be informed by a Green Belt Review which will identify potential grey belt sites for inclusion in the Local Plan.
	Rainer and Wigley	Policy PG1 Overall Levels of Growth	Policy PG1 - outlines the City's significant housing shortfall and to contribute towards this housing need, ask the Rainer and Wigley site on Pritchett Street be added as an additional site allocation.	The request to include the site on Pritchett Street as an additional site allocation is noted and will be considered to inform the next stage of the Local Plan Review and through consideration of evidence base and deliverability.

		Policy PG1 Overall Levels of Growth	Supportive of Policy PG1 but this will need to be amended one revised NPPF is introduced.	Support is welcomed and it is agreed that PG.1 will need to be amended in light of the changes to the NPPF.
		Policy PG1 Overall Levels of Growth	The Council should plan for ambitious levels of growth, and the Core Industrial Areas will be an important focus for employment development. 17 Langley Drive offers opportunities for redevelopment over the Plan period.	The comments in relation to the Core Industrial Areas and 17 Langley Drive are noted and agreed.
		Policy PG1 Overall Levels of Growth	Core Industrial Areas will be an important focus for additional employment development and land to the west and east of Bromford Vent offers redevelopment opportunities for industrial and storage use over the Plan period.	The comments in relation to the Core Industrial Areas and land to the west and east of Bromford Vent are noted and agreed.
	National Highways	Policy PG1 Overall Levels of Growth	National Highways agree in principle to the vision and objectives. Identified some discrepancies in the growth quantities set out across the different chapters for specific Growth Zones. For example, Growth Zone 12 sets out the proposed number of dwellings as 7007 in Chapter 6, 9743 in Chapter 7 and 8973 in Appendix 1 which contains the site allocation details. As well as GZ12, there are also inconsistencies which need explaining between figures in these sections for Growth Zones 2,3,10,11,13,16,18 and 26. Similarly, Growth Zones 13,24 and 27 have inconsistent figures for employment land.	Support for the vision and objectives is welcomed. The discrepancies are noted, and these will be addressed and corrected within the next stage of the Plan Review.

	Dudley Metropolitan Borough Council	Policy PG1 Overall Levels of Growth	Welcomes Birmingham Council continuing to apply a comprehensive approach to identifying additional urban capacity as part of its annual HELAA updates and factor in any additional supply arising to seek to reduce the housing supply shortfall further.	Support for the approach set out in PG1 is welcomed.
POD Consultation Event - Handsworth		Policy PG2 Place making	More bins, flower beds and paths to walk across.	Support for public realm improvements such as more bins, flowers and suitable paths is welcomed.
	Lendlease	Policy PG2 Place making	Suggest that it is critical for all development, both strategic and smaller sites within Growth Zones correctly balance the need to deliver new development and also quality design. The Smithfield hybrid application is underpinned by a site wide Design Code which will ensure that high quality design comes forward during each phase of development. Growth Zones pose the potential to better control development in terms of effective placemaking to maximise public benefits. They will also ensure that individual schemes are assessed in relation to the wider placemaking policies for that Growth Zone and avoid ad-hoc development that undermines high quality and sustainable design.	Comments noted.

	MODA	Policy PG2 Place making	Recommend that a "comply or justify" approach is embodied in Policy PG.2 in terms of its application to various criteria. This could be achieved in PG.2 with the addition of policy wording to confirm that development proposals that deviate from one or more of the criteria outlined in the policy will be considered acceptable where it can be shown that the criterion is not wholly appropriate to the particular development and/or that proposals deliver other benefits that outweigh non-adherence to a particular criterion. Criterion 8 - recommend that criterion 8 is amended or additional explanatory text added after the policy to acknowledge the challenges around making the best use of all existing buildings and that redevelopment may be a preferable option where there are overriding constraints in terms of condition, adaptability, overall sustainability, efficiency of land use etc. The Local Plan should express support for outline planning applications to establish the main parameters and design principles of development as a means of facilitating the delivery of major and complex development opportunities which will be important to realising the scale of renewal and change proposed for many parts of the city.	The strong focus on design is welcomed in terms of embedding this in firmly in planning decisions. It is also acknowledged that building re-use cannot always be achieved.

	Aegon UK Property Fund	Policy PG2 Place making	Generally supportive of Policy PG2 but the requirement that 'new development must make the best use of existing buildings and efficient use of land' is too inflexible and fails to recognise that in the planning balance, demolition may sometimes deliver other benefits. The Policy should ask for developers to consider if a building can be viably reused or not.	Support for Policy PG.2 is welcomed. The comments relating to inflexibility around the best use of existing buildings and land are noted and will be fully considered.
	Calthorpe Estates	Policy PG2 Place making	There are aspects of this policy that will only apply to development of a major scale. This is not clear within the policy or supporting text as currently drafted. Provide clarification to make it clear that all of the identified areas to be applied in a way that is proportionate to the scale of development proposed. Significant viability implication for the delivery of all aspects of this policy - helpful to add text to the wording to confirm that this will be a consideration in the determination of applications.	The concerns relating to viability are noted and that further clarification is required within Policy PG.2 with regard to proportionality and the scale of development proposed.
	Walter Smith Farms Ltd, L N Mitchell Ltd and Emmanuel College, University of Cambridge	Policy PG2 Place making	The policy should avoid a requirement to meet specific other policies within the plan, as it is considered that this may lead to unnecessary confusion when determining planning applications.	The comments are noted.

	Warwickshire County Cricket Club Limited	Policy PG2 Place making	WCCC welcome the continued consideration to placemaking align with the visions of the ongoing realisation of the redevelopment of the Stadium. It is, however, imperative that appropriate flexibility is applied so that this does not prejudice the day-to-day operations of a major sporting venue.	Comments noted.
	Henley Investment Management Ltd	Policy PG2 Place making	It is important that guidance documents which are material considerations are not given the status of development plan policy by the back door. Such elevation would be inappropriate as those supplementary policies have not been subject to public examination. Sub-part 8 regarding making the best use of existing buildings, is ambiguous. It would assist if the policy was made clear in terms of what it requires.	The comments relating to Policy PG.2 are noted, relating to guidance documents and sub part 8 being ambiguous. These will be addressed prior to the next consultation stage on the Local Plan Review in autumn 2025.
	Homes England	Policy PG2 Place making	Support for Policy PG.2	Support for Policy PG.2 is welcomed.
	Knighthead Capital Management	Policy PG2 Place making	Fully supportive of this policy in securing sustainable, high-quality development which contributes to a sense of character and place and for the creation of well-connected environments by promoting necessary infrastructure such as public transport and active travel which would be critical to the long-term success of the Sports Quarter.	Support for Policy PG.2 is welcomed.

	Handsworth Wood Residents Association	Policy PG2 Place making	More should be done at an earlier stage to ensure design quality of applications are up to standard.	These comments are noted.
	Soho Road Business Improvement District	Policy PG2 Place making	Public Realm Improvements to Soho Road area. Implement a comprehensive streetscaping program, including new paving, street furniture, and greenery. Install public art installations to enhance the area's cultural appeal. Safety and Security. Expand CCTV coverage throughout the BID area. Improve street lighting to LED for better visibility and energy efficiency. Make walkways safer and better lit to the Metro stops, ensuring a secure environment for commuters.	The comments in relation to the Soho Road area are noted, particularly in relation to the cultural environment.

	Hanehouse Ltd	Policy PG2 Place making	General support for Policy PG2 but some policy requirements need to be reviewed, as there are potentially conflicts or tensions between some of the criteria, for example, all heritage buildings may not be able to adopt more sustainable materials and Urban Greening Factor may conflict with Policy HN4 for higher densities. To resolve these conflicts, a 'Comply or Justify' approach is recommended for PG2 and a similar approach is used in the Birmingham Design Guide SPD of 'Align or Explain'. PG2 Policy should reflect this approach, to manage instances where development proposals deviate from the criteria but may still be found acceptable. Criterion 8 - it should be recognised that the re-use of buildings may not always be the most sustainable solution particularly for high-density schemes and where the existing scale of development fails to make effective use of the land. Additionally, a building may not lend itself to adaptation and re-use may fit less with policies for climate resilient development compared to new build. This Criterion should be amended to reflect these challenges. The role of obtaining Outline planning permission in progressing major transformation schemes should be recognised, as the level of flexibility provided is important for major and complex schemes that are usually delivered	The points relating to a "Comply or Justify" approach and amendments to Criterion 8 for PG.2 to manage instances where development proposals deviate but may still be found acceptable are noted and will be considered for inclusion in Policy PG.2 at the next stage of the Plan Review consultation in autumn 2025.

			in phases. The Plan should express support for this type of planning approach.	
	Bruntwood Sci Tech	Policy PG2 Place making	We would like to see a clearer framework for improving existing spaces such as Old Square and Smallbrook Queensway and suggest that improving existing spaces, often relatively small in scale, should be afforded higher priority than the creation of significant new areas of open space. We would have welcomed a key diagram or other device to show the growth zones on a city footprint close to the beginning of the document. While we found the glossary at the end helpful, we did feel that the reader may be somewhat confused by the number of descriptions/terminologies for the central areas of the city e.g. Heartlands, City Centre, City Heart, Park Birmingham and the adjoining Growth Zones. Again, a map, or diagram, explaining how these different areas interact would be helpful.	The comments are noted and the points relating to clarity are agreed and will be addressed through the revised/ preferred options consultation which will be undertaken in autumn 2025.
	MEPC Limited	Policy PG2 Place making	Supportive of Policy PG2 - it is essential that all new development on strategic and prominent sites is fully committed to a high-quality standard of design and attract major occupiers that can offer diverse employment opportunities (i.e. as achieved by Paradise development).	Support for Policy PG2 is welcomed. Support the need for high quality design.

	Woodbourne Group	Policy PG2 Place making	Recommendation of a 'comply or justify approach' to providing density alongside other requirements such as urban greening. Building re-use may not always lead to most sustainable solution, especially where a delivery of higher-density scheme would bring more residents or employment opportunities into the area.	'Comply or justify' approach is acknowledged and will be explored as an approach to planning decisions. It is also noted that building re-use may not always be the most sustainable solutions in terms of densification and making best use of land.
		Policy PG2 Place making	Preferred Options could have included the City Councils approach to Tall Building including the spatial strategy for Tall Buildings, rather than leave Tall Buildings policy to SPD.	The comments relating to the Tall Buildings Policy are noted and will be considered to inform the next stage of the Plan Review.

	Birmingham City Council Conservative Group	Policy PG2 Place making	Should include a requirement for local-level design guides, developed in conjunction with local communities and ward councillors, that recognise and protect the individual character and aspirations of local neighbourhoods. Separate, design guides should exist for district centres, which include specifications on use class, and license requirements for high streets. This should be led by local councillors and, where in place, Business Improvement Districts. It should cover both the type of establishments that should be given preference (preventing the growth of unwanted stores such as late-night takeaways or betting shops) as well as aspects such as shop frontages and street furniture to create and maintain and attractive aesthetic that is in keeping with the heritage of that area and meet the needs of local communities.	The comments relating to PG.2 are noted, particularly in relation to local level design guides which will need to be considered by the City Design Team and through the Design Coding process.
	Bloor Homes	Policy PG2 Place making	In seeking to achieve the policy objectives as well as achieving the requisite densities will prove challenging particularly if the character of the local area diverges from the intended density that needs to be achieved. In seeking to achieve the required density in itself may not result in good placemaking nor achieve the objectives set out within the policy. Policy needs to be flexible for different sites and different locations in the City.	The comments in relation to densities and the need for flexibility for different sites and locations are noted and agreed.

	Glenbrook Property Limited	Policy PG2 Place making	The respondent objects to criteria 8 of policy PG2 and are concerned the current wording will result in all buildings having to be retained, they suggest rewording as below. "As a starting point make best and efficient use of land and consider whether the re-use of existing buildings would be possible and the most appropriate response to development of the site.	Comments noted.
	Picton Jones (Asset Management) Ltd	Policy PG2 Place making	Supportive of Policy PG2, as it is an important tool to achieve high quality and sustainable design which is a key requirement of National Policy.	Support noted.
	Hammerson	Policy PG2 Place making	Supportive of Policy PG2.	Support for Policy PG2 is welcomed.
	Home Builders Federation	Policy PG2 Place making	The HBF considers that it is not appropriate for the Council to require adherence to another policy in the Plan, the Plan will be read as a whole, and applications will be determined in line with the plan-led system, taking into account any material considerations. The HBF also considers that it is inappropriate to require development to reflect the requirements of an SPD, it is not appropriate to give increased weight to an SPD through the Development Plan.	The comments relating to SPDs are noted and will be considered when producing the next iteration of the Local Plan Review which will be the Revised Preferred Options in autumn 2025.
	Canal and Rivers Trust (Planning Manager)	Policy PG2 Place making	Canal network integral for placemaking.	Comments are noted and agreed.

	Avison Young on behalf of National Grid	Policy PG2 Place making	Increasing pressure for development is leading to more development sites being brought forward on land that is crossed by NGET (National Grid Electricity Transmission). Request inclusion of a policy strand such as x. take a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites.	Comment noted.
	Friends of Birmingham Wheels Park including motorsport related clubs, community groups, organisations and businesses formerly operating at the site	Policy PG2 Place making	Request an amendment to the following bullet point in this policy:12. Promote health and wellbeing and the creation of sustainable, healthy neighbourhoods (HN12) and communities, good levels of amenity, sport and recreation provision and social and cultural inclusion. Central East, p48 We object to this reference as it is inconsistent with the approach in the BDP and AAP in respect of Birmingham Wheels Park. As a minimum it should be amended as shown.	The objections and request to amend Policy PG.2 are noted and will be further considered to inform the next consultation on the Revised Preferred Options in autumn 2025.
	Birmingham city council	Policy PG2 Place making	Site context to include and be sensitive to social contexts and inclusion. Welcome reference to public art.	Comments are noted.

The Tyler Parkes Partnership Ltd	West Midlands Police	Policy PG2 Place making	Supports this policy but would request the following small, highlighted amendments: All development will achieve high quality, safe and secure sustainable design informed by the sites character and surrounding context. Proposals will be expected to contribute to a sense of place, deliver landscape and green infrastructure gains, create good architecture that will endure, meet the needs of users and contribute to people's well-being. New development must: 3. Create safe and secure environments (both external and internal) that design out crime and fear of crime encouraging encourages social interaction and natural surveillance through for example activating frontages and overlooking public spaces and streets. 5. Provide inclusive, attractive, and functional, safe and secure streets and public realm which prioritise people over vehicles, use good quality materials, soft landscape, street furniture, lighting and signage and incorporate public art. PCCWM also requests the addition of text to the supporting text on the following lines: Prospective developers should maximise the extent, safety and security of the built environment and public realm through the integration of Secured by Design and Park Mark principles including liaison with West Midlands Polices Design Out Crime Officers and, where appropriate anti-terrorism	The suggested amendments to Policy PG2 are noted and will be fully considered for incorporation to inform the Preferred Options consultation scheduled for autumn 2025.

			officers. Some developments such as pay day loan shops, pawnbrokers, and other gambling uses will need to take full account of any issues concerning community safety, crime, and disorder and will, where necessary, seek advice from the Police and other safety organisations.	
	Birmingham City Council Housing Department	Policy PG2 Place making	This policy is an important tool in assisting new development to achieve high quality and sustainable design that is a key requirement in national policy. Support is given to the need for developments to enhance local identity, create safe environments that design out crime and that promote active travel. It is considered that part 8 of the policy should be amended to be more flexibly worded to make the best use of existing buildings, where possible. The plans for Druids Heath include demolition of properties that are not currently up to current standards, and it is not possible to re-use them, there are circumstances where re-use is not appropriate or viable, and this should be recognised in this policy. Support is given to part 10 of this policy. The regeneration plans for Druids Heath will meet this policy requirement and ensure that an inclusive, adaptable environment is created to promote social cohesion.	Support and comments noted.

		Policy PG2 Place making	Policy PG2 should acknowledge and include the following reference, 'that in order to enable the growth required across the city the existing character and context of some areas may require significant change'. This is important in the regeneration of Estates, where poor quality urban design should not inform future development. The following wording should be included, 'In areas of regeneration and renewal, it is appropriate for significant changes to local character where it is demonstrated that this would contribute to the achievement of high-quality buildings and places and regeneration objectives'.	The comments relating to estate regeneration references within Policy PG2 are noted and the following text will be considered for inclusion: 'In areas of regeneration and renewal, it is appropriate for significant changes to local character where it is demonstrated that this would contribute to the achievement of high-quality buildings and places and regeneration objectives'.
	Acocks Green Focus Group	Policy PG2 Place making	Support this policy.	Support is welcomed.
	Sport England	Policy PG2 Place making	Sport England supports the reference in the first bullet to any relevant national and local design guidance and advocate that reference be added to Sport England's Active Design Guidance in the reasoned justification and as part of the key evidence identified to support the plan. Would encourage an appropriate cross-reference in this policy to policies CE13 and CE14 when considering how creating well designed places and spaces can play a key role in people being physically active in their everyday lives.	Support is welcomed. Appropriate cross references to policies CE13 and CE14 will be incorporated here.

		Policy PG2 Place making	Integral to successful placemaking is a sense of variety and diversity in architecture - too much red brick in many proposals and not enough variety.	Variety and diversity in architecture is essential to place making across the city.
	Lendlease	Policy PG3 Central Birmingham	Supportive of Policy PG3 in general and it's underpinning by the CBF. The Smithfield Quarter is located in the City Heart and is on periphery of the Rea Valley Growth Zone and Digbeth and Garrison Park Growth Zone and a small proportion of Smithfield is currently identified on the Rea Valley Growth Zone map to illustrate connections between the Smithfield Neighbourhood Park and the River Rea corridor. This is an inaccurate reflection of the wider strategic site allocation for the Smithfield Quarter as it will make a significant contribution to the success of the area through the provision of a variety of uses, including a new public space and key routes. So greater recognition is required in the Policy as to the how a co-ordinated offer of individual sites will contribute to the overall success of placemaking in the City Heart and that the Smithfield Quarter will have much wider influence beyond its site allocation boundaries.	Support for Policy PG.3 is welcomed. Further work will be undertaken on the Policy to look at how the co-ordinated offer of sites such as the Smithfield Quarter will contribute to the overall development strategy.

	MODA	Policy PG3 Central Birmingham	It would be helpful if the City Council could make it clearer in this section that this is the area referred to and replaces the previous city centre definition. It may be more appropriate for the BLP to refer to the CBF for further detail and subsequently condense this section. This policy should also recognise that a mix of Living Sectors should be encouraged in this area given its central location and accessibility to sustainable modes of travel, services, employment and educational establishments. Central South - Support the mixed-use aspirations of this unique part of the city. We encourage the City Council to incorporate a mix of Living Sectors here and not just residential. Central East - The Digbeth area mentions very little regarding growth and other uses such as residential and the nighttime economy.	The comments in relation to PG.3 are noted and will be reviewed for inclusion in the Policy within the next stage of the plan review.

	Stoford	Policy PG3 Central Birmingham	Supportive of Policy PG3 which incorporates the CBF into the Plan. Typhoo Wharf is located within the Central East Zone and the focus on regeneration within Digbeth is welcomed. The Policy should recognise that the character of areas such as Digbeth will continue to evolve over time, as such the requirement to 'strengthen the areas character' is idealistic and is not aligned to the growth agenda. Also, the requirement to 'protect heritage assets through renovation' is too prescriptive and should be amended. The Policy wording for Central East refers to ambitions to fund Green infrastructure such as Digbeth Branch Canal, Garrison Park and Duddeston Sky Park but contributions should only be sought for what is necessary for development and not hinder scheme viability, as outlined in NPPF Para 47. The Policy should state that contributions will be sought that directly relate to the site or that proposals will be negotiated on a case-by-case basis. Strongly support the Policy wording on the creation of new affordable workspaces in Digbeth.	Support for Policy PG3 is welcomed. Officers are currently reviewing evidence in relation to the Growth Zones and are focussing on streamlining the Digbeth Grown Zone and ensuring that it will be deliverable.

	Aegon UK Property Fund	Policy PG3 Central Birmingham	Supportive of Policy PG3 as it recognises the importance of Central Birmingham to the UK economy. Also support the reference to CBF and need to have regards to its content and support the identification of Growth Zones within the City Centre, one of which is the Gun Quarter.	Support for PG.3 is welcomed.
	Calthorpe Estates	Policy PG3 Central Birmingham	Strongly support the aspirations set out on page 47 of the consultation document. The supporting text to the policy in respect of Central South provides a strong indication of the opportunities within the area. Welcome its inclusion within the BLP.	Support for Policy PG.3 and its reasoned justification is welcomed.
	Icknield Port Loop LLP	Policy PG3 Central Birmingham	Support PG3, particularly the importance of Central Birmingham as a thriving centre with significant levels of development and with an improved environment.	Support for Policy PG.3 is welcomed.
	Volume Property	Policy PG3 Central Birmingham	Policy PG3 Central Birmingham - the City Centre is defined in different ways throughout the document (e.g., the Middleway and Central Birmingham boundaries) and there needs to be a consistent definition adopted. Section 4 (p.24) densities are proposed but unclear what the boundary is and in CBF, is the City Heart the same as the City Centre or is there a wider Central Birmingham area? On page 50 should City North be identified as Central North, to align with all other sub areas?	The comments relating to consistency of the definition of the City Centre are noted and will be addressed through the Regulation 18 consultation document which will be out to consultation in autumn 2025.

	Warwickshire County Cricket Club Limited	Policy PG3 Central Birmingham	Welcome the reference to Central Birmingham following on from the Central Birmingham Framework including aspirations relating to Edgbaston Stadium around active travel, social infrastructure and public transport including the metro extension proposals along Pershore Road in helping to maintain and enhance Edgbaston's status as an internationally renowned sporting venue.	Support for Policy PG.3 and the aspirations around Edgbaston Station is welcomed.
	Interested Parties of Digbeth High Street Major Development Site	Policy PG3 Central Birmingham	Generally, support aspiration for Central East and Eastside metro extension through to St Andrews Stadium, Bordesley Park and Birmingham Airport. BLP must be explicit in identifying that the extension through and beyond Digbeth is a critical priority as should be the proposed extensions connecting and through the Smithfield masterplan.	The comments in relation to the prioritisation of the extension through and beyond Digbeth and the connections through the Smithfield masterplan are noted.
	Henley Investment Management Ltd	Policy PG3 Central Birmingham	It is noted and agreed that it is regard only which is to be had to the Central Birmingham Framework and supplementary masterplans and briefs. The policy should state more clearly that such documents are guidance only.	Noted and agree that Policy PG3 should clearly state that documents are guidance only.
	Homes England	Policy PG3 Central Birmingham	Support for Policy PG3	Support for Policy PG3 is welcomed.

	Commercial Estates Group (CEG)	Policy PG3 Central Birmingham	Supportive of draft Policy PG3 Central Birmingham. To ensure a positive balance between the aims and objectives of different draft policies, this paragraph should be updated to more specifically identify the night-time economy aspirations for the City Heart and how these relate to the Plans requirement to meet other needs such as for new high quality housing within the city centre. further detail should be provided as to the City Hearts intended character when considered in the context of the City Councils wider aspirations for creating a sustainable and mixed economy, given that it is identified as an area of focus. Greenway linear parks will provide new green lungs in the city, and higher density mixed-use development will bring a major new residential offer alongside flexible commercial space that meets modern needs, whilst supporting higher frequency public transport options and providing critical mass for location of mobility hubs and car clubs, and provision of other local services. CEG is supportive of this aspiration in principle, and it should be included within the policy wording.	Support for Policy PG3 is welcomed. We note and agree the comments in relation to the night-time economy aspirations for the City Heart and the wider aspirations.
	Oval Real Estate	Policy PG3 Central Birmingham	Local Plan giving statutory policy to Our Future City Framework aims is supported.	Support for Policy PG.3 is welcomed.

	Hanehouse Ltd	Policy PG3 Central Birmingham	Asks if the new Plan seeks to redefine the City Centre from how it has been traditionally known (i.e. land within the Ring Road)? A number of later Policies refer to 'Central Birmingham' so is this the new City Centre definition or not? If the definition is to be changed it should be amended in other key policy documents such as the Design Guide. PG3 summaries key elements of the CBF but suggest that as the Growth Zone Policies provide specific guidance, the CBF could be condensed? But if CBF section is fully retained, please note that on Central West Quarter - should acknowledge the Jewellery Quarter Neighbourhood Plan, which is silent on housing matters and has own aspirations for area which do not always align with adopted Plan. Current policies appear to contradict each other and make it a challenge to bring forward new development in this area so will there be an expectation that the Neighbourhood Plan be updated following the adoption of the new Local Plan?	It is agreed that there needs to be clarity over the terminology relating to the city centre within the PG policies. The comments relating to the Central West Quarter and the Jewellery Quarter Neighbourhood Plan are noted and further clarification will be provided within Policy PG.3 at the next stage of consultation on the Preferred Options due in autumn 2025.
	MEPC Limited	Policy PG3 Central Birmingham	Supportive of Policy PG3 and strongly supports recognition of Central Birmingham. Paradise is located within the City Heart and makes a significant contribution to its success. It is important that the City Centre continues to provide a co-ordinated offer, where all individual sites contribute to its overall success.	Support for Policy PG3 is welcomed.

	Woodbourne Group	Policy PG3 Central Birmingham	Helpful if it could be made clearer that Central Birmingham replaces city centre definition.	The comments relating to a clear definition for the city centre are noted and agreed.
	Ardstone Capital	Policy PG3 Central Birmingham	Victoria Square House falls within Policy PG3 and Ardstone support the vision set out in the policy.	Support for Policy PG.3 is welcomed.
	Schroders Capital	Policy PG3 Central Birmingham	Support the Vision for Policy PG3 and the recognition of the benefits of improving the areas vitality and ambition to provide a high-quality environment and visitor experience in the context of the CCH building.	Support for Policy PG.3 is welcomed.
	Glenbrook Property Limited	Policy PG3 Central Birmingham	The respondent supports this policy.	Support for Policy PG.3 is welcomed.
	Picton Jones (Asset Management) Ltd	Policy PG3 Central Birmingham	Supportive of the Central East part of Policy PG3, as Digbeth is an important part of the city and the focus on its regeneration will ensure that new development contributes to strengthening the areas character and give protection to its heritage assets.	Support for Policy PG3 is welcomed and agree with the comments relating to the protection of the heritage assets.
	Hammerson	Policy PG3 Central Birmingham	Supportive of Policy PG3 Central Birmingham, as it reflects the 'Town Centre First' approach advocated by National Policy.	Support for Policy PG.3 is welcomed.

	HUB Residential	Policy PG3 Central Birmingham	In HUBs opinion, both Snowhill and Digbeth present exciting opportunities to support the future development of BtR, PBSA, and co-living schemes within Birmingham city centre, with the delivery of housing and accommodation schemes across these locations being crucial to BCC addressing the city's housing needs, foster economic growth, and revitalise key areas.	Support is welcomed. It is agreed that Snowhill and Digbeth will support future development of housing and accommodation schemes within the city.
	Canal and Rivers Trust (Planning Manager)	Policy PG3 Central Birmingham	Central Birmingham Framework 2045 boundaries should be shown in the policies map rather than just a reference to the Framework.	The comments relating to the policies map are noted and agreed.
	Birmingham city council	Policy PG3 Central Birmingham	Leisure and Culture.	Comments are noted.
The Tyler Parkes Partnership Ltd	West Midlands Police	Policy PG3 Central Birmingham	A clear objective of the Central Area Framework concerns reducing the barrier presented by the Ring Road, but the proposals as set out do relatively little to address the perceived threat to personal safety from the barriers set by the Ring Road and railway lines. Improvements to railway stations in the area, as stated, would be welcome yet it is far from clear how such improvements in themselves would address those barrier and public safety issues when those same railway stations already exist.	The comments relating to personal safety are noted and will be fully considered to inform the Preferred Options consultation in autumn 2025.

		Policy PG3 Central Birmingham	Supportive of Policy PG3 and identification of importance of Central Birmingham. The reference to the Ladywood Estate is important in relation to growth but the current Policy fails to reflect the scale of change that can be delivered. The wording on p.49 should be expanded to, 'that it is one of the city's most significant housing regeneration and redevelopment opportunities'. The intention for the re-opening of a railway station in Ladywood is not supported by evidence or funding and the wording on p.49 should be amended to, 'that BCC will work with partners to explore options to improve public transport accessibility to and within the area'. The justification section needs significant strengthening, to expand on reasons for Ladywood growth and on p.52 the following should be added, 'the regeneration of the Ladywood Estate will address both social and environmental issues and the housing estate's outdated network of cul-de-sacs, dead ends an alleyways with rows of efficient two and three storey houses, maisonette and concrete towers, interspersed with underutilised green space, poor natural surveillance and limited transport connectivity'.	General support for Policy PG3 is welcomed. The specific points relating to regeneration and redevelopment are noted and the following proposed amendments will be considered for inclusion: The wording on p.49 should be expanded to, 'that it is one of the city's most significant housing regeneration and redevelopment opportunities'. Wording on p.49 should be amended to, 'that BCC will work with partners to explore options to improve public transport accessibility to and within the area'. On p.52 the following should be added, 'the regeneration of the Ladywood Estate will address both social and environmental issues and the housing estate's outdated network of cul-de-sacs, dead ends an alleyways with rows of efficient two and three storey houses, maisonette and concrete towers, interspersed with underutilised green space, poor natural surveillance and limited transport connectivity'.

		Policy PG3 Central Birmingham	NT are working in partnership with Moseley Baths CIO, BCC and others to deliver the restoration of the grade II* Moseley Road Baths, which are an important community and cultural heritage asset in the Central South area. We consider that Moseley Road Baths alongside other cultural heritage institutions in Balsall Heath have an exceptional opportunity to catalyse wider regeneration throughout the area and contribute towards the area as a destination for wider Birmingham. We are supportive of the focus that the policy places on the opportunities that are presented here. Whilst there are some references to green infrastructure throughout this policy, they are few and far between. We would be keen to see greater acknowledgment that currently the city centre underdelivers for green space provision and that this plan should place green infrastructure and urban greening at its core, in order to ensure that this is well integrated in the interests of climate resilience and improving access to green space. With regards to proposals in Central East, we are supportive of green infrastructure initiatives being delivered as part of new residential communities, including the development of Duddeston Viaduct Sky Park.	The comments are noted and the need for overarching reference to the need for green infrastructure and urban greening within Policy PG3 is agreed.

	Aston University	Policy PG3 Central Birmingham	Between Policy PG3 and Policy GZ4, the terms Birmingham Innovation Quarter (BIQ) and Birmingham Knowledge Quarter (BKQ) appear to be used interchangeably. Both should be referred to but distinguished. The current policy text refers to clusters of universities and colleges forming the BIQ, which is incorrect.	The comments relating to consistency between PG3 and GZ4 are noted and agreed. The policies will be reviewed and for the next stage of the Plan Review to ensure they are consistent.

	Birmingham City University	Policy PG3 Central Birmingham	Between Policy PG3 and Policy GZ4, the terms Birmingham Knowledge Quarter (BKQ) and Birmingham Innovation Quarter (BIQ) appear to be used interchangeably. Both should be referred to but distinguished as they are separate initiatives. Express support for the broader BKQ should be added to this policy as it currently only refers to the BIQ. The list of developments that are supported around HS2 Curzon Street Station should include further and higher education uses. With regard to 'Central South', BCU welcomes the support for educational facilities in this area. However, as set out in our response to Policy GZ8 (Hagley Road Corridor), BCU's City South Campus should also be included in this Growth Zone and its growth supported accordingly. The policy wording for PG3 should therefore be updated to reflect updated policy text for GZ8. Furthermore, Birmingham City University should be expressly referenced as one of the institutions that the Hagley Road corridor cluster supports.	The specific comments received in relation to the Growth Zones relating to clarification are welcomed and agreed. These will inform the fine tuning of these policies at Regulation 19/Publication stage.
	Withy Hill Consortium	4.1 Paragraph	Option 6 for further Green Belt release should be taken forward given the housing shortfall, which could be even greater than currently presented - as reflected in our other comments.	Comment noted.

	Walter Smith Farms Ltd, L N Mitchell Ltd and Emmanuel College, University of Cambridge	4.1 Paragraph	Considered that policies should be set to look further ahead by at least 30 years, which would, in effect, necessitate either a lengthening of the plan period from 2020-2042 to 2020-2050 or a reduction in the likely capacity coming forward up to 2042. The approach should reflect para 22 NPPF (2023 and draft 2024) that states strategic policies should look ahead over a minimum 15-year period from adoption	The comments relating to the Plan Period are noted and will be further considered through the Local Plan Review process and to inform the next stage of consultation on the Revised Preferred Options in autumn 2025.
	Church Commissioners	4.1 Paragraph	The proposed Standard Method simply distributes some of Birmingham's current housing need to the wider HMA. Birmingham is a significant driver of this need, and it is appropriate for the district to deliver this additional uplifted need adjacent to Birmingham, in order for the need to be met as close as possible to its source. Land at Druids Heath represents an opportunity to meet this need, as set out at Section 7 of this representation.	The comments relating to the housing need across the wider HMA and land at Druids Heath are noted and will be fully considered to inform the next Preferred Options consultation in autumn 2025.

	Natural England	4.1 Paragraph	There is a significant role that green / blue infrastructure and provision of biodiversity enhancements through a number of ways can contribute to the strategy. In places with a focus for development such as the city centre and other urban centres, retrofitting or provision of new and enhanced green infrastructure, restoration of watercourses, enhancements of corridors such as canals and other active travel routes would be strongly supported as is the desire to protect and enhance existing assets. We recommend reference to the Local Nature Recovery Strategy (LNRS) is included as both strategies are likely to complement each other. It should be recognised that some previously developed land is important for biodiversity as it can contain the open mosaic habitats (dataset), a priority habitat. It is likely that a number of growth zones proposed within the plan are previously developed sites due to the nature of your authority's area. These sites can and do provide benefits to biodiversity in some instances and these should not be dismissed purely because the sites are previously developed. We would like to help your authority develop an urban biodiversity strategy which links with the LNRS to provide opportunities for habitats such as Open Mosaic and other	The comments in relation to green infrastructure and biodiversity are agreed and welcomed. BCC considers these to be essential to place making within the city.

			habitats to be included as sites come forward for redevelopment in order to incorporate a number of benefits that the natural environment can offer such as climate change adaptation, reducing the urban heat island effect, health and wellbeing benefits flood risk reduction and water and air quality improvements. Your authority should give careful consideration of where green and open spaces are located during redevelopment and what constitutes them. Multifunctional green infrastructure can provide multiple benefits for those living and visiting the area but can also contribute more widely to your authority's priorities such as enhancing the attractiveness and connectivity of inner-city areas. Those areas of high biodiversity within the sites should be retained and enhanced if possible and opportunities for large scale enhancement should be considered. Your City of Nature Plan and strategic consideration of biodiversity, green infrastructure could lead to significant improvements. Natural England would welcome involvement in this.	

		4.1 Paragraph	Broadly agree with the Proposed development strategy. Spatial strategy map is too complicated. Developer Contributions and CIL on developments along Bus rapid transit and other transport corridors could contribute towards public transport improvements.	Support for the development strategy is noted. The comments on the Policies Map are noted and will be further developed for the next stage of the Plan Review.
	Gladman Developments Ltd	4.1 Paragraph	A large gap thus remains between the need and supply of housing, and Gladman welcomes the direct acknowledgement that the Council will be reliant on other local authorities to assist in meeting this housing shortfall. As the BLP progresses Gladman would request a further, more robust review of the potential supply of new homes is undertaken in order to ensure that the shortfall is accurately determined and can then be met. Consider it essential for the Council to work collaboratively and in a strategic manner with other authorities of the GBBCHMA to ensure that Birmingham's unmet housing needs, or indeed any other authority within the GBBCHMA for that matter, are met expeditiously. The approach of agreeing an MoU / SoCG represents a suitable and achievable option for the GBBCHMA authorities. It provides the certainty for each authority to prepare their plan, fully aware of the unmet need it would need to plan for early in the process.	The comments relating to the GBBCHMA and the need to continue to work collaboratively are agreed. BCC continues to work with the other West Midlands authorities through the Duty to Co-operate process.

	Midlands Land Portfolio Ltd	4.1 Paragraph	Whilst it is acknowledged that the overall requirement is likely to be reduced as a result of the reforms, and that the Council has identified a supply of approximately 103,000 dwellings, the supply is still unlikely to meet the housing need in full. As such, under the revised NPPF, the Council would need to undertake a Green Belt Review. Concern is raised that some of these additional sites that are identified within the HELAA as contributing towards the supply are already in existing Core Employment Areas, as well as in active use, Clarification is therefore required by the Council on this issue i.e. that there isn't the double counting of some sites. The employment land supply position identified by the Council and set out in the above table is considered to be a best-case scenario, and in reality, the shortfall is likely to be higher as a result of potential double counting. Raises a number of concerns over the supply identified in the evidence base. The Council must look to identify additional sites to meet the needs.	The comments in relation to Housing Land Supply are noted. As part of the Evidence Base to inform the Local Plan Review, a Green Belt Boundary review will be undertaken to help inform the potential identification of grey belt sites for potential inclusion in the Local Plan.
	St Modwen	4.1 Paragraph	View that decision to not release Greenbelt land is not justified.	Noted. In light of the Government's changes to the NPPF, the next stage of the Local Plan Review will be informed by a Green Belt Review.

	West Midlands Housing Association Planning Consortium (WMHAPC)	4.1 Paragraph	The WMHAPC encourages the Council to explore the options set out on page 24 on how to help address the shortfall in housing, and the complementary approaches set out on page 27. Broadly supportive of all of the six options set out by the Council in that they have the potential to help to boost the delivery of affordable housing across Birmingham.	Broad support for the six options is welcomed.
	CPRE Worcestershire	4.1 Paragraph	CPRE is of the opinion that the housing figure should be revised to 10,000 additional houses.	In light of national changes to planning policy, the number of housing will be adjusted accordingly.
	Home Builders Federation	4.1 Paragraph	The HBF considers that the Council may need to keep the end date of the plan period under review to ensure that the Plan will still provide 15 years on adoption.	The comments relating to the Plan end date are noted and agreed.
	Satnam Planning Services Ltd	4.1 Paragraph	Object to assumption that Green belt release is unsustainable form of development. All sources of land supply must be assessed to ensure a comprehensive approach to growth in the city.	Comments are noted. In light of the NPPF changes, a Green Belt Review will be undertaken to inform the next stages of the Local Plan Review.

	Friends of Birmingham Wheels Park including motorsport related clubs, community groups, organisations and businesses formerly operating at the site	4.1 Paragraph	We do not believe this approach has been sufficiently justified. This would seem to represent a significant failure of process which has failed to take full and proportionate account of all the competing demands for land, with scant regard given to the representations of the Friends of Birmingham Wheels Park made at the Issues and Options stage. Concerned with Option on P26 Declassification of strategic employment land in the city and the proposition that 53 hectares of land in South Staffordshire can facilitate reduction in the future supply of land in Birmingham is perverse. The allocation of 120 hectares of land currently identified as Core Employment Land for 12,711 dwellings is not justified. It will lead to the loss of important employment opportunities in various parts of the city. The approach in the plan is strangling the ability of those uses, which means jobs, opportunities and lifestyle to locate in the city. We assume the 66.11 hectares of industrial land includes Birmingham Wheels Park. The proposals in the draft plan do not reflect the approach in the adopted BDP and Bordesley Park AAP. The City Council has acted in a way that contravenes both national and local planning policy in the way in which the development of sports and recreation facilities should be carried out.	The objections and comments in relation to Paragraph 4.1 are noted and the specific references to the Birmingham Wheels Park. These will be fully considered to inform the next consultation on the Revised Preferred Options in autumn 2025.

			Established policy to be reinstated in respect of Birmingham Wheels Park which means either consolidation of the activities on the existing site or location elsewhere. If the latter course is followed, then we anticipate the plan should allocate and provide suitable alternative facilities. We object to the redesignation of employment land to industrial land. The sentence, at this stage of plan preparation, the terms employment and industrial are considered to be interchangeable. This is non-sensical and cannot be justifiable as it suggests the Council themselves are uneasy with what is being proposed. Object to Table on p33. The land in South Staffordshire should be excluded. If that approach is appropriate, then why isn't the housing capacity negotiated under the Duty to Co- operate counted as part of Birmingham's housing land supply. It is also incorrect to include Birmingham Wheels Park as part of the land supply.	
		4.1 Paragraph	Respondent underlines the importance of Birmingham as a regional centre providing services for surrounding towns and villages. This is reflected in the Preferred Options Document with its emphasis on economic growth.	The Local Plan will continue to evolve with economic growth, and with it recognising the city's regional importance, at its heart.

The Tyler Parkes Partnership Ltd	West Midlands Police	4.1 Paragraph	There is no reference to indicate that appropriate types and levels of supporting infrastructure will be required to facilitate and support the levels of growth indicated. The PCCWM requests that an appropriate reference (or perhaps by cross referencing other parts of the plan) to the need for the supporting infrastructure of all types, including that for policing, will be required and that without it, the levels of growth envisaged might not be achieved, or least only achieved with significant compromise to quality.	The request for an appropriate reference to the need for supporting infrastructure of all types, including for policing to support the levels of growth envisaged is noted and agreed.
		4.1 Paragraph	Generally supportive of proposed development strategy for Plan and specifically support reference to sustainable neighbourhoods and regeneration of existing housing areas. Suggested addition to the wording, 'the opportunities to grow existing communities and that existing residents will benefit from new infrastructure, housing and employment opportunities'.	Support is welcomed and agreed that the following wording will be added to Paragraph 4.1: 'the opportunities to grow existing communities and that existing residents will benefit from new infrastructure, housing and employment opportunities'.
		4.1 Paragraph	Supportive of para 4.1 but suggests the Council should be more ambitious in its plans for housing and employment growth to meet the Government's growth agenda.	Support for paragraph 4.1 and greater ambition to meet Government's growth agenda is welcomed.
		4.1 Paragraph	Para 4.1 - the Council should be more ambitious in its plans for growth to enable it to deliver significant level of housing and employment.	Comments on paragraph 4.1 are noted.

	Worcestershire County Council	4.1 Paragraph	Understands there is a shortfall of 46,153 dwellings. There is potential to export this growth through the DTC. Bromsgrove and Redditch are in Worcestershire and therefore any development here would impact Worcestershire's transport network. Worcestershire Highways would welcome further information on the approach to developing the necessary transport evidence base and infrastructure strategies. Supports the approach to meeting employment needs within BCC's administrative area.	Comments in relation to the transport and infrastructure evidence base are noted. BCC will continue to share this information to support the Plan Review process.
		4.1 Paragraph	Delivering housing and employment growth in the most sustainable way will mean increasing housing densities beyond 70dph in local centres and adjacent to, in particular, rail and tram stops and tram corridors.	The comments relating to increased densities are noted.
		4.1 Paragraph	Supportive of recognition that Core Industrial Areas will play an important role in meeting the requirements of a wide range of economic sectors.	Support noted.
		4.1 Paragraph	Supportive of recognition being given to the role that Core Industrial Areas will play in meeting the needs of a wide range of economic sectors.	Support noted.
	Birmingham city council	4.1 Paragraph	Respondent has shared guidance from Greater London Authority in including cultural infrastructure as part of the mix of uses.	Cultural infrastructure will be encouraged as part of any mix of uses.

	Birmingham city council	4.1 Paragraph	Culture should be mentioned alongside leisure.	The reference to culture is agreed.
	Acocks Green Focus Group	4.1 Paragraph	A greater mix of uses other than shopping is needed in local centres and they need to be more accessible by walking rather than by car, particularly during school pick up and drop off times.	Comments are noted and agreed that a greater mix of uses are required in local centres, and this will support the concept of Liveable Neighbourhoods.
	BCC Lead Local Flood authority	4.1 Paragraph	Birmingham LLFA fully supports the wording of paragraph 4.14 relating to climate change and the environment.	Support for Paragraph 4.14 is welcomed.
	MEPC Limited	4.1 Paragraph	Supportive of strategic objectives in Plan, to ensure development is prioritised in the right locations and delivers infrastructure and the optimal use of public transport. Suggest that critical issues are 1) reduce the City's carbon emissions to make more resilient environments, 2) focus growth in locations well served by cycling and walking routes and other amenities and 3) maximise densities to make efficient use of land and support local services. Fully supportive of Climate Change Statement but raises concern as to policies that require zero carbon development as there will be policy tensions with requirement to maximise densities and to respect heritage assets.	Support for the strategic objectives is noted. Recognise that there may be policy tensions with requirement to maximise densities and to respect heritage assets.
	Birmingham city council	4.1 Paragraph	In reference to sustainable development goal 11, heritage and cultural assets should be mentioned.	Agree that heritage and cultural assets should be mentioned.

		4.1 Paragraph	Respondent stresses importance of re-purposing existing buildings over demolishing and re-building.	The importance of repurposing old building is noted in terms of conserving heritage and reducing carbon emissions.
	Calthorpe Estates	4.1 Paragraph	Support the continued focus on the inter-relationship between the BLP and the Birmingham Transport Plan.	Support for the approach to sustainable transport in the BLP Review is welcomed.
	Placefirst	4.1 Paragraph	Spatial distribution of growth is supported to bring about regeneration opportunities and making efficient use of land.	Support for spatial distribution of growth is acknowledged.
	Calthorpe Estates	4.1 Paragraph	Significant work has been undertaken to identify the Growth Zones through the Central Birmingham Framework preparation, and it is positive to see this reflected in the BLP.	Comments noted.
	Handsworth Wood Residents Association	4.1 Paragraph	Criteria for declaration of brownfield sites should be made clearer and more accessible to the public. This would have the effect potential of more sites coming forward as well as greater residents buy in when sites are declared.	Comments noted.
		4.1 Paragraph	Supportive of intention for urban areas to be primarily regenerated through the use of Brownfield land as is a sustainable approach to development.	Support noted
		4.1 Paragraph	Supportive of focus on urban areas being primarily regenerated through Brownfield sites as this is a sustainable approach.	Support noted

	Walter Smith Farms Ltd, L N Mitchell Ltd and Emmanuel College, University of Cambridge	4.1 Paragraph	The declassification of a number of Core Employment Areas will severely constrain the scope for recycling of land suitable for employment uses. The LP also appears to suggest that land in South Staffordshire (at the South Staffs Freight Interchange) could help count towards the 67ha five-year rolling requirement. The logic of this is contested. NPPF 2024 para 84 b) requires appropriate sites for commercial development which meet the needs of a modern economy to be identified and refers specifically to laboratories, gigafactories, data centres, digital infrastructure, freight and logistics. It is considered that these types of commercial sites require suitably sized land with relevant infrastructure, which are considered to be most likely viably delivered on greenfield sites.	The concerns relating to the continued supply of employment land are noted. These issues will continue to be fully considered to inform the next stage of consultation on the Preferred Options consultation.
		4.1 Paragraph	Supportive of identification of Local Centres, Housing Action Areas and Core Industrial Areas across the city as they will contribute significantly to overall levels of growth.	Support for Paragraph 4.19 is welcomed.
		4.1 Paragraph	Supportive of identification of Local Centres, Housing Action Areas and Core Industrial Areas as they will make significant contribution to the overall levels of growth.	Support is welcomed.

	Handsworth Wood Residents Association	4.1 Paragraph	Respondent expresses wish for poorly designed proposals to be refused on design grounds to ensure people do not feel need to out-migrate.	The Council places considerable importance on points of design with the Birmingham Design Guidance shaping schemes positively across the city. This is likely to continue to evolve with the likely introduction of Design Coding which will be more prescriptive on matters of good design.

	South Warwickshire Councils	4.1 Paragraph	Plan identifies a total housing shortfall of 46,153 dwellings. Recognise effort to enable this figure to have been reduced since Issues and Options. Preferred options still looking for assistance from neighbouring authorities to help meet shortfall. However, proposed new housing methodology could reduce Birmingham's shortfall further to the point that it may not need assistance from neighbouring authorities. Birmingham's decision not to do further Green Belt review in this Plan may have to be reviewed in light of proposed NPPF changes including 'grey belt' release. SDC and WDC would see green belt release next to where need arises would be more sustainable and appropriate than further afield. SDC committed to further collaborative working across the GBBCHMA and an update of the 2018 Strategic Growth Study. NPPF reforms will continue to present significant challenges to meeting housing needs across the whole HMA. SDC and WDC also need to consider their contribution towards growth in Coventry and Warwickshire.	The comments relating to the GBBCHMA and the Duty to Co-operate are noted and agreed. In light of the changes to the NPPF, as part of the evidence base to inform the Local Plan Review, a Green Belt Review will be undertaken during 2025 to inform the next stage of the consultation which will take place in autumn 2025.

	Home Builders Federation	4.1 Paragraph	The HBF considers there is potential for the Council to work collaboratively with the home building industry to identify the most sustainable and appropriate way for these potential unmet needs to be met. This could include a review of the Green Belt and / or working with other authorities in the GBBCHMA to ensure that these needs are met. It is essential that any sites included with the housing land supply have a realistic prospect of delivery.	The comments relating to deliverability are noted and agreed. As part of the Local Plan Review Evidence Base a Green Belt Review will be undertaken to inform the next stage of consultation.
	Calthorpe Estates	4.1 Paragraph	Support for partnership working and the production of other local plan documents and masterplans to guide delivery.	Support for partnership working is welcomed.
	Placefirst	4.1 Paragraph	Respondent places importance on private and public partnerships and offers support in unlocking additional government funding for releasing Council-owned brownfield land for regeneration projects.	The Council recognises the importance of such partnerships to deliver large regeneration schemes. This will continue to be important in the future.
	BCC Lead Local Flood authority	4.1 Paragraph	Birmingham LLFA support the wording of paragraph 4.24 and highlight that the City Council will work in partnership with stakeholders to deliver proposals, regeneration and environmental improvements.	Support is welcomed.

The Tyler Parkes Partnership Ltd	West Midlands Police	4.1 Paragraph	The PCCWM requests as a minimum that reference should be made to funding for Emergency Service infrastructure in this reference or any other listing regarding infrastructure.	The request for a reference to funding for Emergency Service infrastructure here is noted and agreed.
	Birmingham city council	4.1 Paragraph	Section 106 and CIL to include cultural contributions, look to Milton Keynes for inspiration for their 5% contribution to culture and arts.	Unsure what economic placemaking work is. MK has different planning authority status.
	Placefirst	4.1 Paragraph	Support for proposed development strategy is expressed by the respondent.	Support for the proposed development strategy is welcomed.

	Walter Smith Farms Ltd, L N Mitchell Ltd and Emmanuel College, University of Cambridge	4.1 Paragraph	The extended plan period to 2050, based on the standard method (5,314pa plus 1,860pa (35% Urban Uplift)) equates to a housing need of 206,569. This would lead to a shortfall of at least 73,807 dwellings. It is considered that the base requirement of the initial two years (2020/21 and 2021/22) should be set out on the basis of the current adopted Standard Method, as these years precede the proposed 2024 Standard Method. It is expected that a Statement of Common Ground will be sought to inform the subsequent stages of the local plan, particularly as significant events highlighted below will have direct implications on housing delivery and unmet needs. As a starting point, it is considered that a minimum contribution of 4,000 dwellings to the GBBCHMA would be proportionate.	The comments relating to the shortfall contribution to the GBBCHMA are noted and will be further considered and discussed through the Duty to Co-operate process and Statements of Common Ground.
	Handsworth Wood Residents Association	4.1 Paragraph	Council should be more proactive in seeking to protect historical value of Handsworth Wood Ward, variety of historical periods and styles. Historic architecture and buildings of Handsworth Wood Ward should form part of wider city Council tourism strategy.	The comment about the protection of heritage is agreed and welcomed. There is a specific policy in relation to the protection of heritage across the city within the Local Plan Review.

	South Warwickshire Councils	4.1 Paragraph	Further work has reduced employment land shortfall for Birmingham from 73.64 ha to just under 38ha since Issues and Options stage which is welcomed particularly as it will not rely on assistance from neighbouring authorities. The PO document does not reference the West Midlands Strategic Employment Sites Study which could help reduce any shortfall even further. In light of proposed NPPF changes, employment land requirements may fall if household projections have also fallen and so it is suggested that the HEDNA will need revising as part of any evidence. Any assistance given in South Warwickshire in accommodating any shortfalls in housing or employment land would need support from BCC should any additional infrastructure be required.	The comments in relation to the West Midlands Strategic Employment Sites Study are noted and agreed as is the need for support from BCC for any associated additional infrastructure associated with strategic employment sites across the region.
	Birmingham city council	4.1 Paragraph	Add arts and culture, innovation and creativity into this section as per other sections.	The comments are noted and agreed.
		4.1 Paragraph	Ensure all buildings and facilities are accessible for individuals with a mobility impairment to increase community engagement.	The comments relating to accessibility are noted and agreed.

	South Staffordshire District Council	4.1 Paragraph	South Staffordshire broadly welcomes the primary objective of the development strategy and the aims of seeking to secure and enhance the regional role of Birmingham and to accommodate as much of the city's growth requirements within the City's administrative area. Supports the further work undertaken to identify additional capacity post Preferred Options. Understands that the city is looking to export the shortfall through DTC agreements. Shortfalls have been identified in Gypsy and Traveller provision and employment land provision but apart from a contribution to B8 from the West Midlands Rail Freight Interchange, the intention is to meet these requirements within the City. Notes that the Plan does not consider amendments to the Green Belt boundary in accordance with the 2023 NPPF.	South Staffordshire Council's comments are noted. Following the amendments to the NPPF, as part of the evidence base, the Local Plan Review will be informed by a Green Belt Review.

	St. Philips Land	4.1 Paragraph	The Councils PO makes no provision for a buffer or headroom within its supply. It is necessary for the Council to identify additional suitable land supply (i.e. Green Belt land) to ensure that there is the flexibility to respond to failures to deliver the required dwellings in the allotted time frames and across the whole plan period. Strongly recommended that greater flexibility be built into the New Local Plans identified housing land supply. Considers that the proposed changes to the NPPF and SM reinforce St Philips position that there is, therefore, a legitimate and cogent need to consider the release of Green Belt land within Birmingham to seek to reduce the level of unmet housing needs arising from the city.	The comments in relation to Green Belt are noted. In light of the changes to the NPPF, the Local Plan Review will be informed by a Green Belt Review which will be undertaken during 2025 and will be taken into consideration to inform the Preferred Options consultation which is scheduled for autumn 2025.
	Calthorpe Estates	4.1 Paragraph	Considered that a specific model of affordable housing provision could be brought forward across Calthorpe Estate to support key workers to live close to their places of work. BCC should continue to be ambitious about the level of housing growth within the city to drive ongoing investment in the economy.	The comments relating to affordable housing provision to support key workers are noted and will be considered through the Plan Review process.

		4.1 Paragraph	Supportive of recognition that land for industrial and warehousing development is needed in locations attractive to the market. These developments can improve deprived areas and bring new employment opportunities for local residents. A flexible approach towards the range of employment uses in these locations should be given.	Support and comments noted.
		4.1 Paragraph	Para 4.42 - supportive of recognition that land for industrial and warehousing is required in location attractive to the market. New development can improve deprived areas and new job opportunities for local residents. A flexible approach to employment uses in these locations should be given.	Support and comments noted.
		4.1 Paragraph	Asks what Paragraph 4.4 means.	Further clarification on paragraph 4.44 will be provided.
	Handsworth Wood Residents Association	4.1 Paragraph	Respondent question's ability to fulfil aim of improving private sector housing.	The Council will explore various routes into improving the overall quality of housing stock across the city.
	Birmingham city council	4.1 Paragraph	Applies also to sustainable public art works.	Noted, will work with Cultural Colleagues to develop a paragraph for this.
	Birmingham city council	4.1 Paragraph	Include public art and landscape architecture here.	Comments noted and agreed.
	Birmingham city council	4.1 Paragraph	Look to LGA work on placemaking or arts council document for placemaking evidence.	Comments in relation to evidence base are noted.

	Satnam Planning Services Ltd	4.1 Paragraph	Object to para 4.6, Green belt land should be assessed as part of overall land supply.	Comments are noted. In light of the NPPF changes, a Green Belt Review will be undertaken to inform the next stages of the Local Plan Review.
	Birmingham city council	4.1 Paragraph	Include social and cultural infrastructure.	Comments are noted.
		4.1 Paragraph	Does not mention the variety and quality of existing buildings	Comments are noted.
		4.1 Paragraph	The Gun Quarter could unlock the necessary land to make up the housing shortfall.	The comments in relation to the Gun Quarter are noted.
	Birmingham city council	4.1 Paragraph	Adjustments wanted related to Balsall Heath arts organisations.	Comments are noted and will be discussed further with cultural colleagues.
	Calthorpe Estates	4.1 Paragraph	Plan should recognise that in locations such as Calthorpe Estate there is opportunity to provide for businesses and retailers, it is important that the development strategy doesn't prevent such clusters from evolving. Support the proposed approach to co-locating employment and residential development. It is important that the BLP provides some flexibility for centres to grow and adapt.	The comments relating to flexibility for centres to grow and adapt are noted and agreed.

	Rainer and Wigley	10.1 Paragraph	Policy GZ5 Gun Quarter, recognises the growing interest by the market in new residential development. Recent planning permissions for new residential-led and student accommodation in this area, such as at Curzon Wharf, are consistent with Rainier and Wigley's ambitions for land south of Pritchett Street.	The growth zone policies will continue to be reviewed and refined as work on the Local Plan progresses. This will include reconsideration of existing boundaries and potential site allocations. It is noted that land to the South of Pritchett Street has been suggested as a suitable location for new residential development.
	Rainer and Wigley	10.10 Paragraph	There are currently no site allocations for the GZ5 the Gun Quarter and Rainier and Wigley would like to propose an allocation for land south of Pritchett Street for residential-led development.	The growth zone policies will continue to be reviewed and refined as work on the Local Plan progresses. This will include a re-examination of potential site allocations.
	Rainer and Wigley	10.4 Paragraph	Strong support for the vision in Policy GZ5 for the Gun Quarter and for the intended masterplan referred to in the supporting text, but this should not delay the submission or determination of planning applications. Also supportive of developments along the canal corridor providing green spaces and enhancing public access. The accompanying Vision Document shows how the proposed allocation site is aligned to the policy requirements.	Support for the policy is noted, including the enhancement of green spaces and accessibility to the canal corridor. The proposed policy approach and potential for future masterplans will be considered further as work on the Local Plan progresses.

	Rainer and Wigley	10.6 Paragraph	Strongly supportive of proposal to remove Gun Quarter from its existing Core Employment Area designation, as this will respond to current market conditions and will attract investment. Request that the policy gives stronger support for residential uses, particularly to sites that retain/include employment uses, subject to passing the tests set out in Policy EC3.	Strong support for removal of Core Employment Area designation is noted. The policy approach for the Gun Quarter and industrial land will continue to be refined as work on the Local Plan progresses.
		10.6 Paragraph	Industrial businesses currently based in the Gun Quarter would be better suited to an industrial cluster next to the M6. The Gun Quarter currently suffers from dangerous roads and antisocial behaviour. The area should be allocated for housing, largely demolished but with some characterful buildings retained.	Support for the removal of Core Employment Area designation, relocation of industrial businesses to M6 clusters, large scale demolition and allocation for new residential development and retention of buildings with character is noted. The policy approach for this area will continue to be refined as work on the Local Plan progresses.
		10.7 Paragraph	The suggested approach to co-locate employment generating uses with residential development on the same site is good.	Support for the co-location of employment uses with residential development is noted.
		10.9 Paragraph	Constitution Hill is the area's local centre, although it is not included in the Growth Zone. There's a lot of potential there with high quality buildings let down by poor maintenance and a domineering highway.	Suggestion for Constitution Hill to be designated as the Local Centre for the Gun Quarter is noted. The policy approach for the growth zones and local centres will continue to be reviewed and refined as work on the Local Plan progresses.
		16.1 Paragraph	Respondent expresses wish for redevelopment of high-quality homes that took place in 1993 in Ladywood to be mentioned.	To consider whether this redevelopment was sufficiently significant to mention in this paragraph.

		16.1 Paragraph	Respondent acknowledges the need for regeneration in Ladywood but expresses that underutilised industrial and brownfield land should be creatively to reduce the amount of demolishing that's required to preserve the essence of Ladywood is retained.	This issue will be considered for the next consultation stage of the Local Plan
		16.2 Paragraph	Respondent questions the benefit of redevelopment of Ladywood for existing residents due to the potential inability to afford to live in new-build properties.	Further engagement with Ladywood will be essential, especially in any future consultation round.
		16.2 Paragraph	The respondent questions the rationale for demolishing relatively recently built good quality homes in Central Ladywood due to the environmental impact of embodied carbon and the amount of social homes across Birmingham that fall beneath the decent homes standard.	This issue will be considered for the next consultation stage of the Local Plan
		16.3 Paragraph	The respondent suggests there is little evidence that the Ladywood regeneration will provide benefits to local people who require support and affordable housing products. To support that view the respondent quotes that the project only provides 1.8% of affordable homes needed for Central Birmingham and 0.3% for the city as a whole.	This issue will be considered for the next consultation stage of the Local Plan
		16.4 Paragraph	Respondent expresses concern for the council to manage 14 hectares of green space.	Long-term of green spaces would be determined as the scheme progresses.

		16.4 Paragraph	The respondent is concerned that BCC will not upkeep the proposed 14 hectares of green space, the existing green spaces have litter issues. A railway station in Ladywood would be beneficial as the main railway runs through the centre of the neighbourhood. Unused land should be utilised to increase density, the respondent questions who will deliver the two new schools proposed in the growth zone.	This issue will be considered for the next consultation stage of the Local Plan
		16.4 Paragraph	This should include the provision of a new Ladywood Station. There are already 750 new homes at Soho Wharf and several thousand proposed at Port Loop that would benefit from fast direct services into the city centre and across the region.	This issue will be considered for the next consultation stage of the Local Plan
		16.5 Paragraph	Respondent questions need for Ladywood to be regenerated due to abandonment from the council and good quality stock from the 1990's.	Further engagement and communication with Ladywood residents will be essential, especially in any future consultation round.
		16.5 Paragraph	The respondent questions the justification for demolishing good-quality family homes built in the last 30 years in Ladywood.	This issue will be considered for the next consultation stage of the Local Plan
		16.5 Paragraph	Deprivation is not exclusive to Ladywood.	Comment noted

		16.6 Paragraph	The respondent feels that the way the policy describes housing estates in Ladywood is negative and inaccurate and does not mention the successes from the last major regeneration in the 1990s. The respondent feels that describing the area as having a lack of transport connectivity is an oversimplification and doesn't consider the area is within walking distance of major city centre attractions. The regeneration should focus on addressing social and environmental issues but should not erase the unique characteristics of the neighbourhood.	Comments are noted and will be considered for the next consultation stage of the Local Plan
		16.7 Paragraph	The respondent raises concerns about St. Joseph's suitability as a development partner, questioning how the area can be safeguarded from gentrification. They emphasize the need for strategies to ensure the delivery of affordable housing and address pressing issues such as homelessness and poverty in Birmingham.	Comments are noted and will be considered for the next consultation stage of the Local Plan
		16.8 Paragraph	The respondent states that the wording of this paragraph, in particular the references to potential compulsory purchase orders, feels like a threat.	Comment noted

	Network Rail	17.11 Paragraph	Initial discussions between Network Rail and BCC have taken place in regard to Duddeston Viaduct. Work will be required at Bordesley Chords to deliver part of the Midlands Rail Hub project although there are no final designs for this yet.	Local Plan will be updated on this matter following further discussion with Network Rail
		17.11 Paragraph	Poor name, totally divorced from the place.	Comment noted
	Network Rail	17.13 Paragraph	Midlands Rail Hub could impact on Shaw's Passage due to the need for additional platforms at Moor Street Station. Moor Street Station might also have potential to include workspace. Consider the interaction between Moor Street Station, HS2 Curzon Street Station and the regeneration of the wider Digbeth area.	Local Plan will be updated on this matter following further discussion with Network Rail
		17.9 Paragraph	Safety needs to be considered when planning Low Line due to fragments of bricks and mortar from underside of viaduct. Bordesley Viaduct would need to be massively widened in order to facilitate Midlands Connect proposals.	Comments Noted
		18.4 Paragraph	The surrounding road network as well as the residential neighbourhoods adjacent to Bordesley Park make it unsuitable for employment land. Site would be better earmarked for a new Bham City Stadium and a Wembley style redevelopment supported by a new St Andrews Station	Comments noted.

		19.12 Paragraph	Soho Road should be downgraded to one lane in each direction. Soho Road local centre is a vibrant high street that would benefit from improved and increased pedestrians' space, trees and places to dwell.	Comments noted.
		19.3 Paragraph	There needs to be mentioning of a railway station at Soho Road to improve connectivity, to achieve modal shift and better access.	A case of deliverability would need to be shown to include such a railway station at Soho Road in policy.
		20.1 Paragraph	The resurrection of a 'Snow Hill Network' including trains from Walsall through to Handsworth Park and Birmingham Snow Hill, which would incorporate two railways to be connected. The development of the area would need to be centred around that.	Comments noted.
		20.4 Paragraph	Respondent supports diverting Metro along Park Road and railway formed from Snow Hill towards the former Soho Pool goods branch and onto existing railway to pass Soho Road and Handsworth Park.	Support noted.
		26.2 Paragraph	The respondent suggests the policy should promote night-time economy uses to counterbalance the perceived dominance of hot food takeaways.	Comment noted. This matter will be considered at the next consultation stage of the Local Plan
		26.7 Paragraph	Despite the opening of the relief road the high street is still traffic dominated and the public realm poor. This should be addressed.	Comment noted. This matter will be considered at the next consultation stage of the Local Plan

	Langleys Road Neighbourhood Watch	27.11 Paragraph	Keep the Selly Oak canal turnaround in good condition. Support and encourage active uses here including use of the arches for food and drink.	Comments noted. This matter will be considered at the next consultation stage of the Local Plan
	Langleys Road Neighbourhood Watch	27.12 Paragraph	Pressure for car parking provision has removed greenery from front gardens and this will be made worse by the Triangle development. Planting more street trees on verges will help.	Comments noted. This matter will be considered at the next consultation stage of the Local Plan
		27.2 Paragraph	Selly Oak shopping park should be included in the site allocations as a new 1000 home residential community.	Comment noted.
	Langleys Road Neighbourhood Watch	27.2 Paragraph	Protecting Heritage should include returning the Selly Oak Library into use.	Comment noted. This matter will be considered at the next consultation stage of the Local Plan

	University of Birmingham	27.6 Paragraph	Suggests additional text within Paragraph 27.6: In collaboration with key stakeholders, the University is working on the development of a proposition for a Life and Health Sciences cluster to provide at-scale research facilities. The scheme consists of a series of future proofed, flexible and adaptable, and efficient research laboratory buildings for the site adjacent to the canal and to the west and north of the new Molecular Sciences Building and new Life and Health Sciences building is the proposed next step of this concept. Birmingham is uniquely placed in that the Queen Elizabeth Hospital Birmingham, one of the largest single-site hospitals in the UK and one of the largest teaching trusts in England, is adjacent to the University. The Life and Health Sciences cluster will fuse the two sites, establishing a centrepiece for training, research and practice in the UK.	Comments noted. This matter will be considered at the next consultation stage of the Local Plan
	University of Birmingham	27.7 Paragraph	Provides more up to date information on the Birmingham Health Innovation Campus for consideration/insertion into paragraph 27.7.	Comments noted. This matter will be considered at the next consultation stage of the Local Plan
		28.6 Paragraph	Support welcomed for library being included as part of "a cluster of educational and cultural activity at the northern edge of the local centre".	Dialogue with stakeholders in the area will be crucial in delivering this cluster, with the library being key in this.

		31.1 Paragraph	Do these factual changes include changes to the misleading name as the development is neither sustainable nor urban?	Comment noted.
	Transport for West Midlands	5.1 Paragraph	We would ask that this is amended to "The City Council will support rapid transit proposals for this corridor including potential options to extend West Midlands Metro to support employment and residential growth, transforming connectivity for communities from Digbeth to St Andrews Stadium, Bordesley Park and beyond to Birmingham Airport. Similarly, The Section on the Gun Quarter (page 76) states that there are longstanding proposals to extend the Metro Tram network along New Town Row to serve the city's northern neighbourhoods like Perry Barr and this should be amended to reflect the delivery of SPRINT measures along the corridor.	The following amendment will be considered for Paragraph 5.1 and the section on the Gun Quarter : "The City Council will support rapid transit proposals for this corridor including potential options to extend West Midlands Metro to support employment and residential growth, transforming connectivity for communities from Digbeth to St Andrews Stadium, Bordesley Park and beyond to Birmingham Airport.
	Network Rail	5.1 Paragraph	Support the identification of the Growth Zones. Consider the interaction between the existing and proposed City Centre railway stations and the visitor experience and development opportunities in the wider area.	Support for the Growth Zones approach is welcomed.

	Commercial Estates Group (CEG)	5.1 Paragraph	CEG is generally supportive of the use of Growth Zones as they help to set out a strategic approach to regeneration and redevelopment, ensure an appropriate mix of uses and set out locational specific opportunities and constraints.	General support for the Growth Zones approach is noted.
		5.1 Paragraph	Remove as no response	Remove this record, no comment
	Gladman Developments Ltd	5.1 Paragraph	It is submitted that Policy PG1 be amended to reflect the contents of the WMS, and as required, revisions to national planning policy.	The comments in relation to PG1 and the Written Ministerial Statement are noted and will be fully considered.
	St. Philips Land	5.1 Paragraph	Consider that the Council review the Green Belt in the north of the city to establish how much additional housing growth could be accommodated to address the Councils unmet housing needs. This part of the city is sustainably located on the edge of Sutton Coldfield/Roughley, where residents have access to a variety of existing services, facilities, and employment opportunities on a daily basis. St Philips is promoting land south of Hillwood Road, Roughley, Sutton Coldfield for residential development. St Philips considers that this Site presents an opportunity to positively and sustainably contribute towards reducing the unmet need of housing within Birmingham. St Philips have submitted an accompanying Vision Document for their promoted site.	The comments in relation to Green Belt to the north of the city are noted. In light of the changes to the NPPF, the Local Plan Review will be informed by a Green Belt Review which will be undertaken during 2025 and will be taken into consideration to inform the Preferred Options consultation which is scheduled for autumn 2025.

	Town Planning and Design Services	5.1 Paragraph	Support the view that some Core Employment Areas with a high concentration of other uses may no longer be appropriate for the future retention of their existing CEA designation and could have their boundaries amended or even de-designated to utilise for future housing provision, speed up the development process and in turn, result in more vibrant and attractive areas with the potential to encourage increased levels of future investment. Consider that future policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.	The comments relating to the long-term protection of employment use sites are noted and will be fully considered alongside the Council's evidence base including assessment of employment needs through the HEDNA and through the HELAA in relation to existing employment sites.

	Home Builders Federation	5.1 Paragraph	The HBF considers that the Councils strategy to accommodate as much of the city's housing need as possible is to be lauded. As set out previously, the Written Ministerial Statement and the emerging change to planning policy, mean that this no longer needs to be limited by Green Belt. Therefore, the Council should be looking to meet their full housing needs. This can still continue to see development generally focused in the existing urban areas and can still support the regeneration of brownfield land and use optimal development densities, it would now just also include consideration of a range of other sites as well.	The comments relating to deliverability are noted and agreed. As part of the Local Plan Review Evidence Base a Green Belt Review will be undertaken to inform the next stage of consultation.
	Satnam Planning Services Ltd	5.1 Paragraph	An additional Growth Zone should be added for Worcester Lane, Roughley, Sutton Coldfield.	The comments relating to an additional growth zone are noted. The site will be fully assessed as part of the Call for Sites and HELAA process and also a Green Belt Review will be undertaken to inform the next stages of the Local Plan Review.
	West Midlands Police	5.1 Paragraph	The identification of Growth Zones where change will be concentrated is sensible, but it will be important to signpost readers to other parts of the plan so that these area policies are not read in isolation.	Support for the growth zone approach is noted. Signposting to other parts of the plan that are relevant to the growth zone is important and will be considered as part of the next stage of plan production.

	Worcestershire County Council	5.1 Paragraph	Supports the overarching strategy and the emphasis on locating growth where it is well served by public transport. The proximity of the plan to North Worcestershire and the potential to export growth there means there is potential for an impact on Worcestershire's transport network and therefore it is suggested that there is a specific priority and objective relating to the safe operation and efficient performance of the transport network meaning that the impact of development on the transport network and deliverability of improvements would be key considerations.	Support for the overarching strategy is welcomed. The request for a specific priority and objective relating to the safe and efficient performance of the transport network and deliverability of improvements is noted and will be fully considered.
	Worcestershire County Council	5.10 Paragraph	Sets out concerns regarding any development which would have an impact on the Worcestershire network. At this stage it is difficult to understand the likely impacts without more detail on the growth, impacts and mitigation measures.	The comments are noted; further work will be undertaken on the transport evidence base to support the Preferred Options Consultation.

	Withy Hill Consortium	5.2 Paragraph	Agree with retaining Langley SUE as a Growth Zone, but the capacity should be reduced to 5,500 to reflect the current planning application. Many of the site allocations have an unknown developer interest, which shows that they are not developable or deliverable and so they should not be allocated. Further land should be released from the Green Belt, in particular larger sites around Sutton Coldfield that are more able to deliver community services and infrastructure as sustainable urban extensions.	Concerns about deliverability are noted. With regard to the Green Belt, as part of the Evidence Base to inform the Local Plan Review, a Green Belt Review will be undertaken to inform the next stage of Regulation 18 consultation scheduled for autumn 2025.

	Bruntwood Sci Tech	5.2 Paragraph	There is no mention in the policies, nor the reasoned justification, of the West Midland Investment Zone nor the Birmingham Innovation Zone. Given that a combination of both public and private investment will be required to give effect to the vision for the Growth Zones, and given that Investment Zone resources are likely to be one key mechanism for delivering some key schemes, it seems surprising that more is not said about the opportunity that the Investment/Innovation Zones represent. It is also our view that a Mayoral Development Corporation could be an extremely helpful delivery vehicle to bring focus to the regeneration of the central area of the city. There is no table showing the employment growth that each of the zones would be capable of accommodating nor any sectoral breakdown of the contributions of each Growth Zone.	Appropriate references to the Investment and Innovation Zones will be considered at the next stage of plan preparation. At the present time there is no proposal for a Mayoral Development Corporation in the West Midlands. This is a decision which sits outside the remit of the Local Plan. If a development corporation is announced, then this will be considered as part of the preparation of the Local Plan. The table referred to at the start of the Growth Zones chapter does include the quantity of industrial development proposed in each zone. It is however agreed that this could be more clearly presented and further consideration will be given to the potential to show a sectoral breakdown within future consultation documents.
		5.2 Paragraph	An overall map of the Growth Zones should be included. General overarching principles for the Growth Zones do not mention heritage or how heritage impacts will be managed.	The Growth Zones are shown on the Draft Policies Map, although further consideration will be given to having a separate map showing all of the Growth Zones within the next consultation version of the Local Plan. Heritage impacts will be managed consistently for all relevant development proposals under proposed Policy CE16. Heritage is referred to within specific Growth Zone policies where there are specific assets or issues present within that zone.

	West Midlands Police	5.2 Paragraph	It is not clear which of the capacity figures in the site allocations will prevail and how much of the capacity can be delivered within the proposed plan period.	Agreed that the site allocations table could be made clearer and the capacity figures could be communicated better. An improved approach on this will be considered at the next stage of plan production.

	National Highways	5.2 Paragraph	As the Policies Map does not detail the site allocations our review has focused on the Growth Zones, with GZs 4, 7, 14, 17, 25, 26 and 27 identified as having potential to impact on the operation of the SRN. GZs 1, 10, 11 and 12 focused on the City Centre are also considered appropriate for further assessment. Should the Growth Zones identified above be taken forward to the next stage of the Local Plan, further assessment work may be required to ascertain the impact on the Strategic Road Network (SRN) and to determine the need for any mitigation, if required. It should be noted that the cumulative impact of the proposed site allocations also needs to be assessed to understand the likely traffic impacts on the SRN. Any site with potential to impact on the SRN (including the cumulative impacts of multiple sites) should be subject to consultation with National Highways and assessed in line with DfT Circular 01/22. Welcome Policy CY5 which states that a Transport Assessment (TA)/Transport Statement (TS) and Travel Plan (TP) will be developed where required to support new developments. Welcome continued engagement during the development of the Local Plan and evidence base to identify the potential impacts of site allocations on the SRN and recommend a	The site allocations are all shown on the Policies Map and individually in Appendix 1 of the Preferred Options Document. Whilst an assessment based on Growth Zones might simplify the process and reflect where there are concentrations of site allocations and therefore cumulative impacts on the highway network, this approach risks excluding site allocations which are not located in a Growth Zone but which might still have an impact on the highway network. A Transport Evidence Base has been produced which indicates limited impact on the SRN. We would be happy to meet with National Highways to discuss the findings.

			robust transport evidence base in the form of a Strategic Transport Assessment (STA) be produced. A Transport Working Group to include key stakeholders should be set up to support the preparation of the Local Plan and its adoption.	
	Worcestershire County Council	5.2 Paragraph	Acknowledges the shortfall of 45,300 homes. WCC requests clarification of which authorities will accept some or all of Birmingham's unmet need as well as the details of proposed locations, proposed land uses and [proposed development quanta. Also requests that consideration is given to planning adequate supporting infrastructure and transport links, including any necessary capacity improvements in Worcestershire to provide for cross-boundary movements.	The request for clarification of arrangements to meet unmet housing need across the HMA under Duty to Co-operate arrangements is noted and will be informed by the Statements of Common Ground to be further developed to inform the next stage of the Plan review.
		5.2 Paragraph	The whole of the Gun Quarter should be an allocation. 15,000 new homes.	The comments in relation to the Gun Quarter are noted.

	Henley Investment Management Ltd	5.7 Paragraph	Criterion 2 should be expressed either as an aspiration or otherwise qualified so that it does not read as a requirement which is not justified or appropriate.	Comments relating to Criterion 2 are noted.
	Hanehouse Ltd	5.7 Paragraph	Asks what is approach to be for areas outside of the identified Growth Zones? A general policy on Growth Zones would be helpful and to explain how they relate to the allocation sites, which is currently unclear. The Growth Zone policy is currently inconsistent, with some identifying capacity for development any others not.	The points relating to a general policy on Growth Zones are noted and agreed, these will be further considered through the next iteration of the Preferred Options Consultation in autumn 2025.
	Canal and Rivers Trust (Planning Manager)	5.7 Paragraph	Supportive of reference of enhancing canal settings.	Support is welcomed.
	Council For British Archaeology, West Midlands	5.7 Paragraph	The high-level growth principles should include protection of heritage assets and the historic environment, to be consistent with other policies and statements in the Local Plan	Comments are noted and agreed.

	West Midlands Police	5.7 Paragraph	There is no mention of safety and security nor reducing crime or fear of crime in the overarching principles for the Growth Zones. The following new policy should replace this paragraph on the overarching principles to ensure that all development in the Growth Zones respects, as appropriate, all other aspects of the local plan that apply: "Policy GZ1 General overarching principles for the Growth Zones The Local Plan contains a vision, strategic objectives and thematic policies that will apply as appropriate to all development and all Growth Zones across the city. Developers should have full regard to the approach and the suite of policies in bringing forward proposals in Growth Zones. Additionally, each Growth Zone is accompanied by a policy setting out the scale and aspirations for development in that particular part of the city. Developers should also have regard to that local context" Each of the subsequent Growth Zone policies should also include the following text: "Full regard should be had to the approach set out in Policy GZ1"	Whilst it is recognised that the overarching principles should include reference to safety and security and reducing crime or fear of crime, the addition of the suggested new policy wording is not considered to be necessary as the principles are intended as a 'framework' for the Growth Zone - i.e. they are intended to act as a guide for the Growth Zone policies and not as requirements that development must strictly adhere to. Any overarching requirements for development within the Growth Zones or elsewhere are already set out within the proposed thematic policies. It is however recognised that there could be better signposting and cross referencing between the Growth Zone policies the thematic policies that are the most relevant to the area.

		5.7 Paragraph	"Be of the highest architectural quality and make best use of land" These are two separate principles and should be separated if they form some part of an assessment.	Comments are noted and will be considered further.
	Aegon UK Property Fund	5.8 Paragraph	Supportive of proposals for Growth Zones, as they will be a strategic tool to encourage regeneration and investment in the city. The intention for masterplans to support Growth Zones is also supported but they should not delay the submission of an application for development in those areas.	Support for the Growth Zones approach is welcomed.
The Tyler Parkes Partnership Ltd	West Midlands Police	5.8 Paragraph	The reference to key infrastructure requirements in the first paragraph should be deleted because it implies that some infrastructure has already been prioritised and means that other infrastructure, such as that for the emergency services might have been excluded. An overarching policy for the Growth Zones as suggested in our previous comments would negate the need for paragraph 5.9 and so this can be deleted.	Agreed that the plan could have greater consideration of the infrastructure required for the emergency services and that references to key infrastructure requirements could be worded more clearly. This will be considered at the next stage of plan production. Please see our previous comments on the suggested new overarching Growth Zone policy.

	Sport England	5.9 Paragraph	Certain proposed growth zone proposals are in conflict with draft policy CE14, in respect of the proposed loss or prejudice the use of existing playing fields, or other sports facilities. We have advised whether our objection could be addressed by either amending the wording of the policy or alternatively to remove or amend proposed allocation so that the existing playing fields or sports facility are not affected.	Sport England's concerns relating to conflicts with Policy CE14 are noted. BCC will continue to discuss amended wording through the consultation process to help address concerns.
		6.2 Paragraph	Add 'nature enriched' to the Vision for Park Birmingham Growth Zone.	The addition of 'nature enriched' to the Vision for Park Birmingham Growth Zone will be considered at the next stage of plan preparation.
	Network Rail	6.6 Paragraph	Network Rail should be engaged in the masterplanning work for the Park Birmingham Growth Zone, in particular to ensure that there is alignment with their work on the Birmingham Stations Programme. HS2 Curzon Street Station, New Street Station and Moor Street Station should be included within the Park Birmingham Growth Zone. References to Grand Central should be replaced with Birmingham New Street Station.	The City Council will engage with Network Rail on any future masterplan for this Growth Zone and to ensure that the next stage of plan production reflects the work being undertaken on the Birmingham Stations Programme. The boundary of the Park Birmingham Growth Zone will be reconsidered at the next stage. This will include consideration of how appropriate it would be to include the three stations. There is one reference to Grand Central in this section of the document which is in relation to 'the eastern entrance of Grand Central off Smallbrook Queensway'. It is acknowledged that there is only an entrance to Birmingham New Street Station off Smallbrook Queensway, so any similar reference will be corrected at the next plan production stage.

	Henley Investment Management Ltd	Policy GZ1 Park Birmingham	Policy GZ1 should be strengthened by a commitment for the Council to use compulsory purchase powers, if requested by landowners seeking to bring forward development. The purpose would be to appropriate land interests in accordance with the Housing and Planning Act 2016 s203 and s206 by acquiring and overriding rights, including rights of light. Such rights may otherwise form the basis of commercially motivated objection to planning applications or injunction post planning permission. This would help all parties to understand that the City Council is committed to delivery of the Growth Zone, which developers can then have confidence that they can rely upon before they submit a planning application. The policy as drafted could be interpreted to mean a public space covering the entirety of the Growth Zone. It may assist to describe the aspiration for the public realm as a linear feature linking through the area to those various boundary locations. Commitments should be included for how the rights of existing traders and entertainers will be addressed. These may need to be relocated or extinguished in order for development to be policy compliant. The requirement for reallocation of highway space for redevelopment and public realm	Whilst the need for greater certainty is recognised, the Local Plan cannot provide a firmer commitment to use CPO powers at the request of landowners. The use of CPO powers would need to reflect the wider benefits of a specific development scheme and would depend on the financial circumstances of the time. The comments relating to the name of the proposed site allocation, the extent of the public space, the future status of existing street traders and proposed highway interventions are noted and will be considered further at the next plan production stage.

			is welcomed but requires explanation and commitment from the Council. For example, does it include stopping up orders or entering into legal agreements with landowners? The single allocation within GZ1 is referred to as Martineau Place and Carrs Lane, which is incorrect. Martineau Place is the site owned by Henley which is in the west of the allocation. The name and plan should be corrected to avoid confusion.	

	Commercial Estates Group (CEG)	Policy GZ1 Park Birmingham	CEG is supportive of Park Birmingham Growth Zone, particularly the development principles and vision for the delivery of residential, commercial and leisure and improved public realm. The approved redevelopment of Smallbrook Queensway (ref: 2022/08496/PA) complements the proposed policy aspirations this Growth Zone as it is residential led but will include a mix of uses, such as commercial and community uses, as well as high quality public realm and new pedestrian connections through to Southside. The Smallbrook Queensway redevelopment will be pivotal in the evolution of the development strategy within this area, including the opening up of connectivity routes within the area and to adjoining areas. The Park Birmingham Growth Zone should be extended to incorporate the Smallbrook Queensway site or alternatively the approved redevelopment should be acknowledged as a key reference point for the future development strategy of this growth zone.	Support for the Growth Zone and its development principles is noted. Further consideration will be given to the relationship with the approved redevelopment of Smallbrook Queensway at the next stage of plan-making. If warranted then this may include the extension of the boundary to include the site, or alternatively making reference to it in the context of the wider area.

	Bruntwood Sci Tech	Policy GZ1 Park Birmingham	A clearer statement about the contribution of the zone to the economy of the city in the future would be helpful, ideally setting out the expected key growth sectors in this area. Greater justification is required for the overall approach in this area and how the 117,500 square metres of commercial floor space will be delivered given the current considerable viability challenges. The deliverability of a large-scale park in this location is questioned. CIL and S106 contributions will not on their own be sufficient to deliver this level of public realm. Other investment and delivery vehicles will be necessary to achieve the vision for this Growth Zone. This could include a Mayoral Development Corporation which would be a good model achieve the level of transformation required. The role of the Investment/Innovation Zone and the areas links to the Knowledge Quarter in delivering the proposals are not mentioned. It would be helpful to say more about the mix of housing types that the city would want to see in this zone. This should include senior living and family accommodation and not just apartments for rent. Support continued efforts to reallocate road space where this is consistent with maintaining accessibility for all. This area	The economic aspects of this Growth Zone, including key sectors, deliverability of the proposed commercial floorspace, contribution to the wider economy, links with Knowledge Quarter and nearby Investment/Innovation Zones will be considered further at the next plan preparation stage. Further consideration will also be given to the mechanisms for delivering the proposed new urban park. A Mayoral Development Corporation is not currently in place nor proposed and it is outside the remit of the Local Plan to facilitate this. However, if a development corporation is set up by the mayor while the Local Plan is being prepared then this will be referred to in future iterations of the plan as a delivery mechanism for relevant development proposals. The types of dwellings to be included in the housing mix for this area will also be considered further. Support for reallocating road space and for maintaining accessibility for all in line with the City Centre Movement and Access Strategy is noted.

			will play an important part in delivering the City Centre Access and Movement Strategy.	
	Schroders Capital	Policy GZ1 Park Birmingham	City Centre House is located at the heart of the city centre and the retail core, but recent lack of investment has impacted on the vitality and vibrancy of the area. The principle of identifying Park Birmingham as a Growth Zone and the resulting investment that will be encouraged and promoted is strongly supported. The aspiration for a new park or public realm is supported but it is clearly a long-term vision that will require significant funding and numerous challenges and constraints to overcome. Identifying City Centre House as the location for the new park/public realm has significant implications for any proposed redevelopment of the site or improvements and upgrades to the existing building. In the absence of any detailed feasibility or viability testing this proposal should be identified as an aspiration and not a 'key infrastructure requirement'. Significant demolition and regeneration in the Growth Zone will also conflict with the proposed sustainability and heritage policies which would place significant weight on the retention of existing buildings.	Support for the overall principle of the growth zone is noted. The specific requirements for the provision of a new park or public realm and the area covered will be considered further at the next plan production stage. This will take in to account any evidence on the deliverability of the proposal and the challenges and constraints that would need to be overcome.

	Hammerson	Policy GZ1 Park Birmingham	The vision for GZ1 Park Birmingham is supported, including its focus on high quality retail, office, leisure and residential development, and the creation of a new area of open space. The potential to deliver at least 2,100 new homes and 117,500 square metres of commercial floorspace is also supported. References to a Masterplan for this area should be deleted, as an existing outline planning permission for Martineau Galleries has already established development parameters and design principles. Request for the Martineau Galleries site to be separated from additional land to the south, as this will delay delivery of an already approved scheme. No objection in principle to the delivery of a 'high quality environment' via S106, but it should be recognised that there is already a S106 Agreement in place for Martineau Galleries.	Support for the overall principles for the growth zone, including the quantities and mix of uses is noted. The references to a proposed masterplan, the extent of the proposed site allocation, the existence of an existing S106 agreement, and the exclusion of sites with an existing planning approval will be considered further at the next stage of plan-making.

The Tyler Parkes Partnership Ltd	West Midlands Police	Policy GZ1 Park Birmingham	The scale of development referred to in the plan is significantly higher than that allocated. This Growth Zone includes existing uses beyond those allocated which could increase high levels of uncertainty. The rationale of for the growth zone boundaries is questioned and appear to have been carried over from the Central Birmingham Framework.	The overall proposed levels of development provide an indication of how much development each growth zone is anticipated to accommodate, whereas the site allocations are made when there is greater certainty that development will be delivered over the plan period and the type and form of development is to be safeguarded and managed through the policies in the Local Plan. The proposed allocations will continue to be refined as work on the Local Plan progresses. The Growth Zone boundary has been informed primarily through the evidence provided by the Central Birmingham Framework but its application within the Birmingham Local Plan will be adjusted as necessary in future plan-making stages by wider evidence and the consultation comments received.

		Policy GZ1 Park Birmingham	We are disappointed in the lack of commitment to the park element of this proposal. We note the support to green spaces that enhance the quality of the environment, increase climate resilience and improve pedestrian connectivity, but this adds conditions to the delivery of green space and opens it up to non-delivery where the criteria are not achieved. Land allocated as green space could therefore be lost to commercial or residential uses. We are concerned that green infrastructure in Central Birmingham is considered as beneficial rather than essential in a climate and energy crisis. No minimum commitment of green infrastructure provision is made in the same way as for housing and commercial/leisure uses. This should be specified for the policy to be meaningful and contribute towards a Central Birmingham green infrastructure network.	The Open Space Assessment 2022 identifies a deficit of all types of open space in the wider Ladywood ward which a new green space within this growth zone would help to address. However further evidence gathering would be required before more detailed policy requirements and a potential allocation could be made for a new green space within the Local Plan, including how such a space could viably be delivered. This will be considered further as part of the next stage of plan production.
	Sport England	Policy GZ1 Park Birmingham	Sport England supports creating a new significant green space within this growth zone, as an exemplar new park at the heart of the City Centre.	Support for an exemplar new park with a focus on activity for all within this growth zone is noted.

	Walter Smith Farms Ltd, L N Mitchell Ltd and Emmanuel College, University of Cambridge	Policy GZ10 Rea Valley Urban Quarter	Respondent considers that all sites should be reduced to half capacity totalling 2,728 dwellings.	This issue will be considered for the next consultation stage of the Local Plan
	Interested Parties of Digbeth High Street Major Development Site	Policy GZ10 Rea Valley Urban Quarter	Co-ordinated approach between Rea Valley Urban Quarter and Digbeth Growth Zones is required. Re-naturalisation of River Rea is a key infrastructure requirement. Emphasis on heritage is supported especially in area between Moseley Street and Digbeth High Street as many buildings are in a poor state.	Noted and support welcomed
		Policy GZ10 Rea Valley Urban Quarter	A L2 SFRA assessment will be required for new homes within the Rea Valley Urban Quarter as L1 SFRA mapping indicates there is Flood Zone 3b along the River Rea corridor. The Council should consider if any site-specific flood risk mitigation measures should be included in Policy GZ10 as a result of L2 SFRA investigation.	This issue will be considered for the next consultation stage of the Local Plan

		Policy GZ10 Rea Valley Urban Quarter	The general approach to the Growth Zone is supported, however, there are a number of amendments that are needed to the policy to make the scheme deliverable. Firstly, the policy should align with the Rea Valley Urban Quarter SPD, so that "opening up of the watercourse" is changed to refer to "realigning of the river channel". Secondly, requirements for developments to contribute to the improvements to the river should be considered in the context of overall viability and reflected in the Whole Plan Viability Assessment. Thirdly, the requirement for a 35m buffer is not deliverable and will render schemes unviable and undeliverable, contradicting the already approved Warners Field scheme in the area. Fourthly, developments providing contributions to delivering river improvements should be exempt from providing SUDs streets.	Amendments to the Growth Zone will be made to incorporate representations from landowners and developers.
POD Consultation Event - Central Birmingham Library		Policy GZ11 Ladywood Regeneration Initiative	More green spaces needed in Ladywood	Comment noted
POD Consultation Event - Erdington		Policy GZ11 Ladywood Regeneration Initiative	Landownership in Ladywood is fragmented and will affect delivery of regeneration scheme.	Comment noted

	Walter Smith Farms Ltd, L N Mitchell Ltd and Emmanuel College, University of Cambridge	Policy GZ11 Ladywood Regeneration Initiative	Consider that all sites should be reduced to half capacity with a total reduction of 2,705 dwellings.	Comment noted and will be considered for the next consultation stage of the Local Plan
		Policy GZ11 Ladywood Regeneration Initiative	Concern that churches will be demolished leaving residents with no place of worship in the area. If new bridges are added, then these should be visually in keeping with original canal bridges. White pipe bridges BCC has approved to be built on the canal in recent years are a visual mess. 30 years old is young for brick-built buildings, in fact Birmingham City council have chosen not to include building made at the turn of the 1900s in this scheme. Opposition to LTNs	Comments are noted and will be considered for the next consultation stage of the Local Plan

	Schools of King Edward VI in Birmingham (SKE)	Policy GZ11 Ladywood Regeneration Initiative	Welcomes the continued recognition that land owned by the Schools of King Edward VI (SKE) at Ledsam Street and Great Tindal Street is a development opportunity and represents a chance to deliver comprehensive residential development that can contribute very positively towards wider place-making objectives as part of Growth Zone GZ11. Generally supportive of the statement in the BLP, in relation to Ladywood. The land is capable of being delivered independently of other sites in the proposed Growth Zone and additional wording should be inserted into GZ11 to make clear that components of the LRI can be delivered independently from others where they will contribute positively to the over-arching aims of the Growth Zone. Not found any evidence to support the BLP that 11,750 sqm of commercial floorspace needs to be provided in Ladywood, nor that the Grade II listed building within SKEs site is the place to provide this (no assessment of the building or viability evidence for the commercial floorspace has been provided). Needs to be reworded to express general support for such business incubation space without being prescriptive about where it is to be delivered. Reference to the delivery of a new bridge should also be removed as this has not been viability tested, or its need evidenced.	Support welcomed and other issues will be considered for the next consultation stage of the Local Plan

			Assume reopening of canal basin is to the basin on the northern side of the canal, west of Lighthorne Avenue, to which there is no existing public access and not the re-instatement of any historic basins that have been previously filled in overtime to which SKE would object. If so, this needs to be made more explicit.	
		Policy GZ11 Ladywood Regeneration Initiative	Concerns about replacement and compensation for potential replacement of homes in Ladywood scheme	Comments noted
		Policy GZ11 Ladywood Regeneration Initiative	Regeneration of Ladywood risks forcing residents out of the area.	Comments noted and will be considered for the next consultation stage of the Local Plan
		Policy GZ11 Ladywood Regeneration Initiative	'Compulsory purchase order' sounds unsettling to residents.	Comment noted
	Canal and Rivers Trust (Planning Manager)	Policy GZ11 Ladywood Regeneration Initiative	Basin is not within CRT ownership.	Comment noted

		Policy GZ11 Ladywood Regeneration Initiative	Concerns over what will happen to Gilby Road Park Unclear over where new canal towpaths will be Opposition to scheme, questions the need to build upwards in Ladywood. Concerns that Council's financial situation will mean that quality of schemes such the Ladywood regeneration scheme is compromised.	Comments noted and will be considered for the next consultation stage of the Local Plan
		Policy GZ11 Ladywood Regeneration Initiative	NPPF refers to early and proportionate engagement with communities in relation to Ladywood proposals. These proposals should therefore be removed from the Local Plan.	Comment noted.

		Policy GZ11 Ladywood Regeneration Initiative	Welcome a specific Ladywood Regeneration Policy but consider it to introduce un-necessary duplication, inconsistency with other policies in the Plan and ambiguity for decision-making. The Policy should be re-worded to align with National Policy and set our overarching framework for the long-term, acknowledging the continued work on masterplanning and community engagement to be undertaken. The Vision for the Growth Zone should state, 'Ladywood HAA will be transformed into a sustainable urban neighbourhood with a mix of new and improved homes and commercial, employment and community uses. As a new high-density urban neighbourhood, it will be defined by a connected landscape of green open spaces including parks, community gardens, green streets and enhanced canal environment. New infrastructure including local facilities and services will meet the needs of the growing community and improved public transport access, and a network of pedestrian and cycle routes will promote sustainable and active transport'. The background info on phasing and timescales should be amended and made broader, stating that, 'the initiative will be delivered over 20 years in a number of phases'. The project needs sufficient flexibility to respond to changed conditions over its lifetime.	Comments noted and issues will be considered for the next consultation stage of the Local Plan

			Other suggested wording is, 'The regeneration will deliver a significant increase in the number of new homes in line with the minimum density for the City Centre and responding to the location and onsite constraints. There is the opportunity to deliver at least 10,000 units based on Policy HN4. Re-provision of existing housing stock where it forms part of the redevelopment proposals. New employment space and other commercial uses will be provided. A network of pedestrian and cycle routes throughout the area including improved routes across the Middleway. New and improved green an open space including urban parks, Re-opening of the canal basin to be publicly accessible, with improved biodiversity and public realm. Delivery of new schools including Primary and Secondary to meet the needs of the growing community. New health, community and leisure uses for the neighbourhood. A proposed masterplan of the area should be prepared in consultation with the local community and used to inform future detailed plans for the area'. HELAA should be used to define the capacity and taking into account site constraints and required infrastructure, we consider the scheme can deliver a minimum of 12,000 homes or 10,000 homes based upon reprovision.	

		Policy GZ11 Ladywood Regeneration Initiative	The respondent expresses concern about the amount of social and affordable housing units that will be provided and suggests it will be insufficient to meet the Labour Government housing agenda for social and affordable homes and the BCC Housing Strategy 2023-28. This requires 1,178 new affordable dwellings to be provided per annum for the Central Birmingham area.	The POD was written before the Labour Government was elected and therefore housing targets will be updated to address this in the next consultation stage of the Local Plan, both in terms of overall and affordable housing provision.
	Sport England	Policy GZ11 Ladywood Regeneration Initiative	Broadly supportive of the reference to delivering two new large urban parks in the north and south of the project area. However, project area does include existing playing fields. Any new playing field within the new parks and the new schools should be additional provision to meet the needs of the proposed housing growth, over and above any mitigation required to address any loss of playing field and the policy wording should make this clear.	Support welcomed and issue surrounding additional playing field provision be considered for the next consultation stage of the Local Plan
	MODA	Policy GZ12 Digbeth	Support for GZ12. It should also include the need for a mix of residential typologies ("The Living Sector")	Support is welcomed for the Growth Zone. The importance of prescribing a mix of residential typologies is acknowledged and will be considered in the next stage of Local Plan making.

	Stoford	Policy GZ12 Digbeth	Support the identification of the Digbeth Growth Zone and the vision for the area. But strongly object to Typhoo Wharf not being included as an allocation. This should be allocated for some new housing alongside other uses. The policy wording should be amended to state that over 10,000 new homes can be delivered in the Growth Zone and to allow a more flexible approach to affordable workspace, so that it isn't required everywhere and only as an element alongside market-rate workspaces. Convenience retail should also be allowed and not prevented by a requirement to prioritise affordable workspace. Due to viability, public funding will be required alongside developer contributions to deliver improvements to highways, public realm, canal corridors, walking and cycling routes, Duddeston SkyPark and the Bordesley Viaduct Low Line. Such wider improvements should also be sought via CIL rather than S106. Developers should be encouraged to prepare their own masterplans for sites, but if a wider masterplan for the area is prepared by the council, then Stoford the Gooch Estate wish to be involved. Any wider masterplan should also not be a pre-requisite to the submission of a planning application.	Support is welcomed for identification and vision for Digbeth Growth Zone. Objection for Typhoo Wharf not being included as an allocation, this will be revisited ahead of the upcoming Preferred Options Document. The suggestion for 10,000 homes in the Growth Zone is noted, and the capacity will be looked at to see if this can be accommodated. Flexibility of ground floor uses so that a range of different services to support more people living in the area alongside affordable workspace is noted. The need for public money to support infrastructure improvements is noted. Emphasis for developers to prepare masterplans for their sites is supported, and while one for the whole area is not underway currently, it would be supported in future.

	Walter Smith Farms Ltd, L N Mitchell Ltd and Emmanuel College, University of Cambridge	Policy GZ12 Digbeth	Adjust Digbeth Hub to align with planning permission for 3,056 dwellings and reduction of Warwick Bar by 2,000, for a total reduction of 2,087 dwellings.	Adjustment to housing numbers noted.

	Interested Parties of Digbeth High Street Major Development Site	Policy GZ12 Digbeth	Scale of development (10,000 new homes) needs to be delivered sensitively and sustainably. Developments must complement and be compatible with existing creative and cultural uses. Southern side of Digbeth High Street may have different character to tight urban drain unique to area. Development of large-scale media uses will be supported provided they complement existing uses. Supportive of proposals which co-locate employment and residential uses where each use does not impact negatively on the other. Employment generated uses should be located at ground floor. Flexibility should be afforded relating to mixed-use ground floor uses through wording "active or animated uses". Requirement for affordable workspace should be subject to viability assessment and considered in the context of other viability pressures. Convenience retail will be supported provided it does not undermine provision of affordable workspace. Developments next to canals should capitalise on the network to encourage more activity fronting the canal. Contributions to public realm and transport improvements such as the Duddeston SkyPark and the Bordesley Viaduct Low Line pedestrian route will be subject to viability assessment. Full and active involvement by landowners	Site Allocation refers to it being in the Rea Valley Urban Quarter, this needs to be changed to it being in Digbeth GZ.

			will be vital in masterplanning the area to create a coherent urban public realm. It is the view that despite the council's financial situation powers to compulsorily purchase land will be important for enabling regeneration in the area.	
	Homes England	Policy GZ12 Digbeth	We are supportive of the updated redline that enables the regeneration of the whole of Digbeth. We are supportive of the proposals for masterplan(s) to come forward but would seek them not to preclude development coming forward ahead of the masterplan, which could impact upon economic growth.	Support noted for boundaries and note point made for masterplans not to preclude development which come forward before masterplan is adopted.
	Knighthood Capital Management	Policy GZ12 Digbeth	Knighthood supports the recognition of Digbeth as a Growth Zone, reflecting its continued development and increasing prominence as a regional hub for creative industries, offices and homes. Also support active and sustainable travel initiatives and the canal network. Remodelling ring road will facilitate connectivity to the east and into Growth Zone 13. Requires a coordinated approach to the regeneration of GZ12 and GZ13 through linkages in the Garrison Quarter and complementary developments for both areas to ensure regeneration of the whole area from the City Centre outwards as part of the Central East area	Support welcomed for recognition of Digbeth as a Growth Zone, reflecting growth across different sectors, housing and sustainable modes of travel. Support for coordinated approach to regeneration across GZ12 and GZ13 through Garrison Quarter welcomed.

	Oval Real Estate	Policy GZ12 Digbeth	Aim to deliver 10,000 new homes in Digbeth Growth Zone needs to be delivered sensitively and sustainability. BLK must maintain appropriate flexibility, especially with regard to affordable workspace requirement and must be proportionate to a scheme's viability. All financial contributions to public realm improvements must be considerate to overall viability. Design codes are supported for this area.	Need for 10,000 new homes in Digbeth to be delivered sensitively and sustainably is supported. Flexibility with regard to affordable workspace is noted, as well as the impact of financial contributions to public realm improvements is an important consideration. Design codes will be explored in this area.
	HUB Residential	Policy GZ12 Digbeth	Supports draft Policy GZ12 Digbeth and the continued growth of the Digbeth area. HUBs Bordesley Junction hybrid consent development, along with the neighbouring Cole Water House scheme, are included within the proposed allocation of Digbeth HUB, which in accordance with draft Policy SA1, holds the capacity to deliver 3,143 dwellings. HUB supports the proposed allocation of Digbeth HUB as a site to deliver future employment and commercial floorspace, open space, canal side improvements and walking/ cycling improvements. The identification of Digbeth as a location for the provision and development of affordable workspace is supported by HUB, and reflects the proposals first suggested to BCC as part of its Bordesley Junction development, which includes 50% of the ground floor retail / commercial space as being affordable to meet the needs of the local community.	Support is welcomed for the different aspirations for this Growth Zone.

	Canal and Rivers Trust (Planning Manager)	Policy GZ12 Digbeth	Two conservation areas in Digbeth should be referenced.	Need for reference of the two conservation areas is noted. Appraisals of these conservation areas will be conducted.
Keira Murphy		Policy GZ12 Digbeth	The River Rea runs through the centre of the site from south-west to north-east but Policy GZ12 include any reference to the River Rea. Environmental improvements to the River Rea, including improved access and remodelling of watercourses and the naturalisation of the River Rea should be included as policy and not just within the key infrastructure requirements section. The policy should include a requirement for a 20m easement from top bank of River Rea as detailed in The River Rea Landscape Vision 2021. GZ12 is close to GZ10, and allowance should be made for the River Rea to be enhanced and improved connectivity between both locations. Within both site allocations, flood zone 3b has been identified and site-specific measures should be included once L2 SFRA is undertaken.	Need for environmental improvements to the River Rea being a core policy ask is supported. The 20m easement will be looked into to enable this to be included in the policy.
	Acocks Green Focus Group	Policy GZ12 Digbeth	Welcome the requirement to provide affordable workspace in new developments as many smaller enterprises are likely to be pushed elsewhere by bigger businesses in the future. This should take account of jobs lost and moved as well as jobs created, as well as impacts on local business networks.	Support for policy welcomed, suggestion for policy to take into account jobs lost, moved, created and impacts on business networks is noted. Work on Cultural Strategy for the area has set out to highlight these business networks.

	Knighthead Capital Management	Policy GZ13 Bordesley Park	Knightheads ambition for the former Wheels site (Sports quarter) is for comprehensive sports-led regeneration. The Sports Quarter will be centred around the relocation of BCFC from their current home at St. Andrews Stadium to a new state of the art stadium together with new elite training facility and training academy at the former Wheels site and its environs, north of the existing stadium. The Sports Quarter would integrate the sporting assets with complementary uses including new community spaces and public realm, in order to create activity in and around the area throughout the week. The Sports Quarter vision seeks to improve pedestrian connectivity between the Site and surrounding neighbourhoods, including Digbeth and Alum Rock. There is an opportunity for new and improved north-south connectivity between the Site and Adderley Park, and between the Site and nearby urban centres at Bordesley Green and Coventry Road. The importance of providing new employment opportunities to stimulate the regeneration of the GZ13 growth zone is recognised and supported. Knighthead believes that the Sports Quarter provides the unique opportunity to deliver jobs, together with transformational investment and environmental improvements that catalyse regeneration in East Birmingham.	Ambitions for the creation of a Sports Quarter and comprehensive Sports-led regeneration of the former Wheels site, with associated new employment opportunities, improved connectivity and community benefits are noted. Due to the release of an updated NPPF in December 2024, a second Preferred Option is being prepared. All Growth Zone Policies will be reviewed as part of this process and the public and stakeholders will have the opportunity to submit additional comment on these during the consultation period.

			Knighthead acknowledges there is a candidate Site of Local Importance for Nature Conservation (SLINC) on the Site and maintain a commitment to deliver biodiversity net gain through the proposals. Knighthead is committed to enhancing green and blue networks through the area where practical and harnessing these as key opportunities to enhance local amenity and connectivity. Suggests the following amendments to Policy GZ13 section and Policy itself: Introduction - Bordesley Park lies immediately to the east of the city centre and comprises the area covered by the Bordesley Park Area Action Plan (BPAAP). It includes the traditional inner areas of Saltley, Bordesley and Small Heath, with a wide variety of housing, business and commercial uses and including important local centres at Alum Rock and Coventry Roads. Bordesley Park has been the home of Birmingham City Football Club for over 100 years, which will continue to be supported as an important community institution, contributor to the regional economy, and a national presence in sport representing Birmingham. The area has a diverse population, and this is reflected in many of the facilities that are present in the area and including its schools and community buildings, shops and services and local community events.	

			Vision for the Bordesley Park Growth Zone Bordesley Park will continue to be the focus for development and regeneration with the delivery of a new Sports Quarter, anchored by a new stadium for Birmingham City Football Club and elite and community training facilities at the Bordesley Park site (the former Wheels site) and environs. The Sports Quarter will also provide opportunities for complementary uses such as hotel, leisure, retail, residential, cultural, community and other employment generating uses (such as workspaces and light industrial). This will be in conjunction with new housing across the area including at Cherrywood Road and Garrison Park Quarter (which forms an area on both sides of the Middleway and in part is also covered by the Digbeth Growth Zone) along with an improved environment and connectivity. Enhanced public transport infrastructure and walking routes will strengthen Bordesley Parks connections to the city centre and Digbeth, as well as to the east towards Birmingham International Airport. Bordesley Park has the opportunity to capitalise on its location at the gateway to the city centre through transformative regeneration which brings new jobs, homes, cultural assets and landmark developments. Its local centres will continue to provide a wide range of facilities for local people and also those from further	

			afield, complementing the existing network of schools, colleges and other community facilities. The Garrison Park Quarter provides the potential for the creation of a new residential neighbourhood with scope for new homes and workspaces, and which can assist with improved connections between the wider Bordesley Park area and the city centre. Background and justification. The Growth Zone will see the further regeneration of the area immediately to the east of the city centre as set out in the Bordesley Park Area Action Plan adopted in January 2020 following significant local consultation. Opportunities have also been more recently set out in the East Birmingham Inclusive Growth Strategy adopted in 2021 and within the Central Birmingham Framework. This will include: Sports Quarter Opportunity Area and the reclamation and transformation of Bordesley Park (former Wheels) site and environs to contribute to the delivery of 3,000 nett additional jobs and training opportunities across the area through sports-led regeneration as part of the Sports Quarter, including a new stadium and training facilities for Birmingham City Football Club together with opportunities for complementary uses such as hotel, leisure, retail, residential, cultural, community, and other employment generating uses (such as workspaces and	

			light industrial). This Opportunity Area is identified as one of the city's major development opportunities to deliver local and city-wide economic growth that will provide a range of opportunities for local people and act as a landmark for this part of the city. St. Andrews Stadium is physically constrained and creates congestion and disturbance for local residents and businesses on match days, due to its location in a high-density urban area, and would preclude this ambitious growth vision coming forward. An appropriate alternative future use for St Andrews will form part of the comprehensive Sports Quarter proposals. Development has the potential to enhance the setting of HMS Forward and the Darul Barakaat Mosque at Venetia/Tilton Roads. Adderley Park - education and community focus, building upon the established principles set out in the BPAAP. This will include further works to enhance the facilities at the park and bring forward the development opportunities that adjoin the park to the west and south. This could include the development of a wider range and mix of uses incorporating employment, education and community uses along Arden Road and Adderley Road. This will also improve the setting of the Adderley Primary School which currently suffers poor relationships with business premises. In	

			addition, the areas adjoining the park to the south are in close proximity to the significant regeneration opportunity presented by the Sports Quarter. The establishment of uses that are complementary to development at the Sports Quarter would therefore be appropriate in these areas, in conjunction with enhanced pedestrian linkages and access points to strengthen the physical and functional north-south connections. This would help to ensure that the communities of Adderley Park are able to share in the benefits that the Sports Quarter proposals would generate. Policy GZ13 Bordesley Park Growth Zone Future growth and development will be brought forward in line with the policies set out in the Bordesley Park Area Action Plan. Future development will need to ensure: Sports Quarter Opportunity Area Reclamation and development of land including the Bordesley Park (former Wheels) site and environs, St Andrews Stadium, and land to the north of the railway line south of Adderley Park, for a new Sports Quarter. The Sports Quarter will be anchored by sporting assets, including a stadium and training facilities for Birmingham City Football Club, and will be appropriate for a range of complementary uses such as hotel, leisure, retail,	

			residential, cultural, community and other employment generating uses (such as workspaces and light industrial). The Sports Quarter will contribute to delivering 3000 nett additional jobs and training opportunities in the AAP area through comprehensive sports-led, mixed-use regeneration. Improved access to the site, both immediately from Garrison Park and Adderley Park, and more broadly from Digbeth, the city centre and east towards Birmingham International Airport, will be promoted. Provision of high-quality public realm detailing will attract visitation and investment and enhance the quality of the environment for local people. The candidate Site of Local Importance for Nature Conservation (SLINC) on the western edge of the site will be safeguarded, or appropriate mitigation put in place, along with further measures to deliver additional green infrastructure. Adderley Park The development of new education, leisure, and business uses surrounding an improved community park and enhanced setting for Adderley Primary School. The development of complementary uses to the south of the park, linked to any wider regeneration of the Sports Quarter,	

			enhanced by improved connectivity which strengthens physical and functional north-south connections, helping to ensure that the communities of Adderley Park are able to share in the benefits that that the Sports Quarter proposals would generate. Key infrastructure requirements Junction and highway improvements to serve the Bordesley Park site. Off-site highway works relating to the Bordesley Park site. Transport infrastructure relating to Metro, Sprint, improvement of Adderley Park and Small Heath railway stations, enhanced pedestrian and cycling facilities and EV charging points. Potential works to the Middleway to enhance pedestrian linkages across the proposed Garrison Park Quarter and linking to the Sports Quarter. Enhanced open space including Small Heath, Sara, Henry Barber, Adderley, Denbigh Street, Kingston Hill, Morris and Garrison Parks) and Playing Fields (including the Former MEB playing fields, Green Lane). Improvements to the Grand Union Canal and the River Rea. Enhancement of school sites and community facilities including the Small Heath swimming pool. Proposed Site allocations within Bordesley Park Growth Zone	

			Sports Quarter Opportunity Area. Humpage Road/Cherrywood Road, Bordesley Green. Land at Cherrywood Road, Bordesley Green. Parkfield Road/Anthony Road. Land bounded by Coventry Road/ Bolton Road/ Arthur Street.	
		Policy GZ13 Bordesley Park	The rail corridor between New Street and Coventry could have extra capacity and an enhanced level of service when HS2 is in operation	Potential for an additional capacity on Railway line between New Street Station and Coventry, once HS2 is operational is noted. The Policy already discusses the wide range of measures that are proposed to improve connectivity between Bordesley Green and the City Centre (SPRINT) and Solihull (Metro). Opportunities for improved connectivity between Bordesley Green and Coventry will be considered at the next stage of Plan production.
	Canal and Rivers Trust (Planning Manager)	Policy GZ13 Bordesley Park	Text should be amended to refer to both canals Grand Union and Birmingham and Warwick Junction Canal.	Agree, Policy GZ13 will be amended to state that key infrastructure requirements exist in relation to both Grand Union Canal and Birmingham and Warwick Junction Canal.

	Friends of Birmingham Wheels Park including motorsport related clubs, community groups, organisations and businesses formerly operating at the site	Policy GZ13 Bordesley Park	The need to deal with and resolve the outstanding issues at Birmingham Wheels Park applies whether the site is redeveloped for industry/warehousing or a new stadium for BCFC. Refers to the Inspectors Main Modifications following the Public Examination into the BDP and subsequently backed by the Inspector examining the Bordesley Park Area Action Plan. There remains a continuing sporting need for the facilities and, in accordance with the provisions of the BDP the sports facilities should EITHER be consolidated on-site in association with any complementary redevelopment OR the uses re-provided and relocated on an alternative site or sites within the city. The following amendments to Policy GZ13 should be made: Policy GZ13 Bordesley Park Growth Zone Future growth and development will be brought forward in line with the policies and commitments set out in the Birmingham Development Plan and Bordesley Park Area Action Plan. Future development will need to ensure: Bordesley Park Reclamation and development for employment purposes of the Bordesley Park (former Wheels) subject either to the consolidation of Birmingham Wheels Park on-site or for the sports and recreation facilities to be relocated and reprovided to at least an equivalent standard on an	Concerns regarding the future redevelopment of the former Wheels site and specifically the re-provision of sports facilities are noted. Due to an updated NPPF being published in December 2024, a second Preferred Option is being prepared. All Growth Zone Policies will be reviewed as part of this process and the public and stakeholders will have the opportunity to submit additional comment, as part of the consultation period that will be held during Autumn 2025.

			alternative site or sites within the city. Until the future of Birmingham Wheels Park is satisfactorily resolved, the demolition of the existing sports and recreation facilities will not be permitted. Subject to the satisfactory resolution of the future of Birmingham Wheels Park the site or to will help contribute to delivering up to 3000 jobs and training opportunities in the AAP area. At present the approach and policy as set out in the draft plan conflict not only with local development policy but also national planning policy as set out in the NPPF. It is understood that the Council has resolved to sell its freehold interest at Bordesley Park to Birmingham City Football Club which has stated its intension to build a new stadium and supporting facilities on the site of Birmingham Wheels Park. Any redevelopment at the Birmingham Wheels site should EITHER incorporate the existing sports facilities on a consolidated basis, or that they could be relocated and re-provided to at least an equivalent standard elsewhere in the City in accordance with extant policy in the BPP. We have contacted BCFC to suggest that all of the sports activities could and should be co-located. The list of site allocations within the Bordesley Park Growth Zone includes 1. Former Wheels Site. This reference should be clarified to remove reference to former and be clear that the quantum of	

			development depends on resolving the long-term future of the existing sport and recreation facilities provided for on the site. Remove reference to former wheels site. It is not used solely because the Council closed the site down. Proposed use: Amend to read - Industrial/ employment uses subject to the consolidation or relocation of the existing sports and recreation facilities. Net Developable area: Amend to read and TBD following resolution over the future of Birmingham Wheels Park. Development timeframe: Amend to read and 5-10 years. Reopen sport and recreation facilities pending resolution of future strategy. Reasons for allocation: Amend to read, Identified as a key opportunity and site allocation in the Birmingham Development Plan and Bordesley Park Area Action Plan for employment use subject to the consolidation of Birmingham Wheels Park as part of the development or subject to the relocation and reprovision of the sports and recreation facilities on a site or sites of equivalent quality within the city and Our City Central Birmingham Framework. Constraints: Add at the start of the text: Future demolition depends on resolution of the future of the sports and recreation facilities comprising Birmingham Wheels Park. Suggests further amendments for	

			consistency with the above throughout linked policies.	
Keira Murphy		Policy GZ13 Bordesley Park	This Growth Zone is primarily within Flood Zone 1 but there are some areas of Flood Zone 2 in the north western area so it is recommended a L2 SFRA is undertaken to investigate the site and site specific measures included within the policy where needed. Supportive of policy to safeguard the Site of Importance for Nature Conservation and enhancements to River Rea, to continue improvements identified in GZ10 and GZ12.	Support for Policy to safeguard SLINC on Western side of Growth Zone is welcomed. All flood risks will be assessed as part of a re-fresh to the evidence base and will inform the next stage of Plan production.

	Sport England	Policy GZ13 Bordesley Park	Sport England has long held an objection to the loss of the Birmingham Wheels site where we seek further information in respect of the relocation of the various motorsport's users and also the relocation of the speedskating users. The Bordesley AAP provides a clear commitment by the City Council to work with stakeholders to successfully relocate the existing sport, and leisure uses at the Birmingham Wheels site. Proposed policy GZ13 sets out no specific reference to relocating the sporting uses and so is not in line with Policy CE14 of the draft plan and paragraph 103 of the NPPF. The policy does not seem to address recent announcements by Birmingham City FC to develop a sports quarter within this growth zone.	Objection to loss of former Wheels site due to the various motor sports it accommodates is noted. Objection to the lack of reference to the relocation of sporting uses at the site in the policy is also noted. Due to the release of an updated NPPF in December 2024, a second Preferred Option is being prepared. All Growth Zone Policies will be reviewed as part of this process and the public and stakeholders will have the opportunity to submit additional comments as part of the consultation period, which will be held during Autumn 2025.

POD Consultation Event - Handsworth		Policy GZ14 Hockley and Soho Hill	Desire for Hockley Growth Zone to include the rest of Soho Road. Public realm needs a lot of investment. Local entre space needs to events, for example Diwali. A railway line runs across Soho Road - need to resurrect the railway station at its intersection. Benson Soho Metro stop has access Soho Road has poor connection and poor access/lighting. Opportunities to have a follow up meeting.	The boundaries for Hockley and Soho Hill Growth have been drawn to specifically exclude Soho Road as it is a defined Local Centre, with specific Policies to guide its development. The Soho Road is also part of the proposed Soho and Handsworth Neighbourhood Plan, which is aiming to deliver a range of improvements to Soho Road and local residents and businesses are encouraged to engage with this process and identify local issues for change. The GZ Policy identifies the need to improve connectivity across the Hockley and Soho areas and enable easier access between them and the City Centre and support its role as a visitor destination. The re-opening of the railway line on Soho Road is outside the remit of the Local Plan, but the Policy does outline the potential for a new Metro stop at Lodge Road.
	Walter Smith Farms Ltd, L N Mitchell Ltd and Emmanuel College, University of Cambridge	Policy GZ14 Hockley and Soho Hill	Remove Hunters Road for a total reduction of 1,645 dwellings.	Due to the publication of an updated NPPF in December 2024, a second Preferred Option is being prepared and will be consulted upon during Autumn 2025. All Growth Zone Policies will be reviewed as part of this process and the public and stakeholders will have the opportunity to submit additional comment and evidence during the consultation period.
	Handsworth Wood Residents Association	Policy GZ14 Hockley and Soho Hill	Supportive of demolition of the Hockley flyover, supporting regeneration of the area, as it is currently a major barrier to active travel.	Support for Policy GZ14 is welcomed, with specific support for the remodelling and/or demolition of the Hockley Flyover being noted.

	Hanehouse Ltd	Policy GZ14 Hockley and Soho Hill	GZ14 Policy is generally supported, as A41 presents opportunity to improve the approach to the City but it is unclear if capacity figure of 1,900 dwellings is combined total of identified site allocations or if capacity for additional sites to accommodate this figure, clarification is required. Agree there are many poor-quality industrial buildings within the Growth Zone which will be a challenge to maintain in this location but will be protected under Policy EC3 unless conditions satisfied. Policies should not contradict each other in the Plan. Part of this Growth Zone is within the Clean Air Zone, and these locations are becoming less attractive to Industrial occupiers and would be better suited to alternative uses such as residential and small-scale commercial. Hanehouse have had Pre-App discussions with Council to progress a residential-led use within the south-east part of the Growth Zone for circa 325 dwellings and circa 370sqm creative commercial space. Hanehouse request that this site is included as an allocation site within the Growth Zone, as it can bring many benefits including bringing a listed building back in to use, improve visual into the city from the North and offer creative commercial spaces, as desired in Jewellery Quarter Neighbourhood Plan.	General support for Growth Zone Policy GZ14 is welcomed. The stated 1,900 dwellings capacity is for the Hunters Rd and Surroundings site allocation and does not include capacity identified in the other Hockley and Soho Hill site allocations or for any other sites that may potentially come forward within the Growth Zone boundaries. The request for an additional site to be added to the site allocations list has been noted and will be considered within the next stage of plan production.

	Canal and Rivers Trust (Planning Manager)	Policy GZ14 Hockley and Soho Hill	Reference should be made to Historic England rather than English Heritage.	Agree - policy wording will be amended to reference Historic England.
	Walter Smith Farms Ltd, L N Mitchell Ltd and Emmanuel College, University of Cambridge	Policy GZ15 Gib Heath	Due to multiple landownerships, reduce capacity to 463 dwellings	Gib Heath Growth Zone Policy acknowledges that growth in the area will be delivered through gradual transition from primarily industrial to a mixed-use environment. Gib Heath presents opportunities for change, in relation to the Benson Road Metro stop and Gib Heath Park which is currently underused and of poor quality. All Growth Zone Policies will be assessed, as part of the second Preferred Option that will be consulted upon during Autumn 2025.
		Policy GZ15 Gib Heath	The gap between Benson Road and the Jewellery Quarter Tram Stops is probably the longest on the Metro network. An additional tram stop should be considered between Soho Benson Road and the Jewellery Quarter to serve Gib Heath.	The Hockley and Soho Hill Growth Zone Policy identified an aspiration for an additional Metro stop at Lodge Road, which would be in-between the Jewellery Quarter Station and Soho Benson Road Station. Due to the Soho Benson Road Station, Gib Heath poses a sustainable location for new residential development.
	Sport England	Policy GZ15 Gib Heath	Sport England supports the reference to enhancing the local parks at Gib Heath to include new sports facilities to meet local needs.	Support for Policy GZ15 Gib Heath is welcomed and specific support for intentions to deliver new sports facilities / enable physical activity within Gib Heath Park noted.

	Aston Villa Football Club	Policy GZ16 Villa Park and Witton	Aston Villa supports the inclusion of Villa Park and Witton as a growth area. Opportunity for policy to be strengthened to further embed Villa Park as a cultural landmark. Reference to sporting and leisure uses to be expanded and strengthened to include wider supporting uses and events, such as hotels, conferencing facilities and entertainment. Removing barriers to improve access, for example between Aston Park, Villa Park and Aston Villa's Inner City Training Academy. Draft policy should refer to provision of acceptable alternative uses, which would enable Villa Park to become further immersed into the local area. The draft policy should specifically reference the acceptability of a hotel use as per draft allocation 3037, creating a landmark, midrise building. Club supportive of enhancements to employment opportunities and residential development within the Growth Zone. The Club also seeks to reduce car parking by supporting interventions to encourage the use of sustainable modes of transport.	Support for GZ Policy 16 is welcomed. Request for the Policy to be strengthened in terms of sporting and wider leisure uses such as hotels, conferencing facilities and entertainment is noted. The Policy does outline a commitment to encouraging more sustainable means of travel for residents and visitors to the Growth Zone and identifies improvements to Witton Railway Station as a key ambition. All Growth Zone Policies will be assessed as part of the second Preferred Option, which will be consulted upon during Autumn 2025.
	Walter Smith Farms Ltd, L N Mitchell Ltd and Emmanuel College, University of Cambridge	Policy GZ16 Villa Park and Witton	Remove Westwood Business Park, reducing capacity to 440 dwellings	Policy GZ16 identifies both short and long-term opportunities for the Villa Park and Witton Growth Zone, with underused and outdated Industrial sites being proposed for gradual transition to more mixed-use environments. All Growth Zone policies will be assessed as part of the second Preferred Option, which will be consulted upon during Autumn 2025.

	Knighthead Capital Management	Policy GZ16 Villa Park and Witton	Acknowledges the recognition in Draft Policy GZ16 of the potential for stadium-led, mixed- use redevelopment to regenerate a Growth Zone, transforming an area of the city into a world-class destination and the need for enhanced visitor experience to support, including improved public transport infrastructure. Knighthead would welcome similar language to be included in Draft Policy GZ13, in support of sports- led, mixed-use regeneration as part of the Sports Quarter and the widespread benefits which can be generated by this use.	Support for Policy GZ16 is noted, along with request for the GZ16 to adopt a similar approach to Policy GZ13: Bordesley Park (i.e. Sports Quarter). All Growth Zone Policies will be assessed as part of the second Preferred Option, which will be consulted upon during Autumn 2025.
	Network Rail	Policy GZ16 Villa Park and Witton	Network Rail does not currently have any plans in its programme in this area, but it is recognised that there is a growing opportunity at Witton which may have implications for rail station redevelopment.	Welcome recognition by Network Rail, that there is increasing opportunities for transformation in Witton and that this may pose implications for Railway Station redevelopment in the future.
		Policy GZ16 Villa Park and Witton	GZ16 is mostly in Flood Zone 1 but there are some Flood Zone 2 and 3 areas on north-eastern corner. Only essential infrastructure can be allowed in Flood Zone 3b, and it is recommended that a L2 SFRA assessment is undertaken to determine site specific characteristics of flooding. Policy should be informed by the findings of the L2 SFRA. Policy regarding enhancements to River Tame should include reference to the removal of hard engineered riverbanks and invasive plant species.	Agree, Policy GZ16 be amended to include requirement for enhancements to River Tame to remove hard engineered riverbanks and invasive plant species. A second Preferred Option is being prepared, and all Growth Zone Policies will be assessed and consulted upon during Autumn 2025. New evidence will be commissioned to support the second Preferred Option, which includes L2 SFRA.

The Tyler Parkes Partnership Ltd	West Midlands Police	Policy GZ16 Villa Park and Witton	Queens Rd: Retain and refurbish. Continue to support existing and additional corporate functions from other planned disposals. Incompatible with the Core Industrial Area designation covering the site.	It is noted that Queen Road Police Station is to be retained and refurbished by WM Police. The facility is situated within the Aston Regional Investment Site boundaries and is also designated as a Core Employment Area, both of which are important locations for high-quality employment uses and contribute to the city's economy.
	Sport England	Policy GZ16 Villa Park and Witton	Sport England supports the reference to seeking opportunities to improve facilities within Aston Park to ensure the community has access to high quality open space, sporting and play facilities.	Support for Policy GZ16, in relation to the improvement of sporting and play facilities within Aston Park is welcomed. The request for the Policy to support the retention of the existing artificial grass cricket pitch and associated pavilion, as part of any redevelopment is noted.
POD Consultation Event - Central Birmingham Library		Policy GZ17 Perry Barr	Respondent asks whether the Perry Barr Village flats are for sale and when closed off areas in Perry Park will be reopened	In August 2024, BCCs Property Cabinet Sub-Committee approved the sale of apartment blocks 6, 7 and 8 within Phase 1 of the new Perry Barr Village. The City Council will retain block 9, to provide Council Housing for those on the Housing Waiting Register. As part of the Commonwealth Games Legacy, new play facilities within Perry Park were recently completed and the space was officially opened in March 2025.

	Walter Smith Farms Ltd, L N Mitchell Ltd and Emmanuel College, University of Cambridge	Policy GZ17 Perry Barr	Remove Perry Barr 1 and 2, One Stop Shopping and River Tame, a total reduction of 2,200 dwellings.	The majority of Perry Barr Village Phase 1 development has now been sold, and Perry Barr Phase 2 is being actively progressed to deliver an additional 500 new homes. The Growth Zone Policy covers both the short and longer term and additional Policy is provided in the Perry Barr 2040: A Vision for Legacy Masterplan. A second Preferred Option will be consulted upon during Autumn 2025.
	Canal and Rivers Trust (Planning Manager)	Policy GZ17 Perry Barr	Reference to Perry Barr Yard and improvement of canal access supported.	Support for the reference to Perry Barr Yard and improved access to the canal is welcomed.
		Policy GZ17 Perry Barr	Concerns that Council's financial situation will mean that quality of schemes is compromised.	Planning for the renewal of Perry Barr commenced when Birmingham City Council received confirmation that it would host the Commonwealth Games 2022. To ensure long lasting benefits for the area, the Perry Barr 2040: A Vision for Legacy Masterplan was created, setting out ambitions for change over the long-term. The Council remains fully committed to the successful renewal of Perry Barr and the Growth Zone Policy identifies allocation sites, where new development will contribute to the delivery of good quality homes, green spaces and community facilities.

		Policy GZ17 Perry Barr	The River Tame flows through the site and is heavily engineered and the Perry Brook main river joins from the north meaning there is a confluence of 2 main rivers so there is some significant flood risk. The L1 SFRA 2023 indicates there is Flood Zone 3b along the River Tame corridor and at Halfmoon Plantation and Perry Hall Park and two site allocations - One Stop Shopping Centre and River Tame corridor. The Growth Zone also includes a reservoir, and the policy should require improved access to it via the rear of the One Stop Shopping Centre. Policy should also include requirements for the removal of hard engineered riverbanks and invasive species. The L2 SFRA will assess the site in more detail and site-specific measures may need to be included in the policy.	Policy GZ17 will be informed by L2 SFRA evidence, which will be commissioned to inform a second Preferred Option that will be consulted upon during Autumn 2025. A request for the Policy to be amended, to include, 1) a requirement for the removal of hard engineered banks and invasive species and 2) the need for improved access from rear of One Stop Shopping Centre to Perry Reservoir are noted.

The Tyler Parkes Partnership Ltd	West Midlands Police	Policy GZ17 Perry Barr	Holford Drive Custody Suite: New central custody suite. Incompatible with the Core Industrial Area designation covering the site.	It is noted that the Holford Custody Suite is a new WM Police facility and is included within the Perry Barr Growth Zone boundaries. The Growth Zone is surrounded by the Hub Core Employment Area (CEA), which contributes to the city's economy and there is no current intention to change this designation. A second Preferred Option will be consulted upon during Autumn 2025, meaning there will be further opportunities for comment on the Growth Zone Policy.
	Perry Barr Sarl	Policy GZ17 Perry Barr	The opportunity for significant regeneration of the Perry Barr Urban Centre is supported by our client. Our client supports the principle of the policy to encourage the phased redevelopment of the One Stop Shopping Centre for commercial, residential; community and learning uses.	Support for Policy GZ17 is welcomed. It is noted that the proposals for the phased redevelopment of One Stop Shopping Centre, to provide new spaces for commercial and residential development and community and learning is specifically supported.

	Sport England	Policy GZ17 Perry Barr	Sport England supports the policy reference to sustaining a future of Alexander Stadium as a regionally significant multi-purpose sports facility and improving Perry Park and better links within the Perry Barr Village to existing sports facilities at Doug Ellis Sport Centre and Holford Drive Community sports hub. Also supports the reference to improving access to Perry Hall Park including the protection of the sports facilities.	General support for Policy GZ17 is welcomed. It is noted that the intention to maintain Alexander Stadium, as a Regionally significant multi-purpose sports venue and improve connectivity between Perry Barr Village and existing facilities at the Doug Ellis Sports Centre and Holford Drive Community Hub are particularly supported. Support for the retention of existing sports facilities at Perry Hall Park and improvements to facilities at Perry Park is also noted.
POD Consultation Event - Central Birmingham Library		Policy GZ18 Greater Icknield	*This should be Edgbaston Reservoir Respondent suggests use of vacant land near Edgbaston Reservoir for Pocket Park to provide a link and to improve people's mental health. Concerns also about loss of public walkway around Edgbaston Reservoir and underlines need for Harborne walkway to remain open.	The Edgbaston Reservoir Masterplan was adopted in 2022 and sets out a commitment to protect and enhance the reservoir for future generations. The Masterplan identifies the former Tower Ballroom site as the main location for new housing development and careful planning has been undertaken to enhance the public space fronting the reservoir and ensure it remains fully accessible to the public both during and after the development is completed. The Masterplan also identifies the need to improve connectivity between the reservoir and local green spaces and routes, such as the Harborne Walkway and Summerfield Park. Opportunities for new green spaces could be explored further via local community and voluntary groups or through a Neighbourhood Plan.

	Places for People	Policy GZ18 Greater Icknield	Support the Greater Icknield Growth Zone and the vision for this area. Viability is a significant issue for the delivery of this growth zone. The plan should reflect the viability challenges that arose through the determination of the planning application for Icknield Square. The policy should include wording to support the delivery of the Icknield Square allocation.	Support for Policy GZ18 is welcomed. The Greater Icknield Growth Zone is located close to the City Centre and includes a large number of Brownfield sites such as those within Port Loop and the former City Hospital. Incremental transformation is now in progress, with the clearing of longstanding vacant sites and delivery of high-density residential development, with future proposals to be assessed as they come forward. The request for specific wording, to support the delivery of Icknield Square is noted and all Growth Zone Policies will be reviewed as part of a second Preferred Option that will be consulted upon during Autumn 2025.
	Icknield Port Loop LLP	Policy GZ18 Greater Icknield	Support this preferred policy. The wording could be updated to reflect that Phase 2 is now partially complete in addition to the first phase. The community benefits and facilities within the development could also be emphasised.	Support for Policy GZ18 is welcomed. Agree, that the Policy can be amended to reflect the current position on the build-out of the Port Loop development i.e. Phase 2 is partially complete and that non-residential elements have already been delivered, to support the whole community, such as the Ladywood Leisure Centre and Port Loop Park.
	Walter Smith Farms Ltd, L N Mitchell Ltd and Emmanuel College, University of Cambridge	Policy GZ18 Greater Icknield	Remove Western Road, Spring Hill and Tower Mount and reduction of the partially developed Port Loop development, a total reduction of 1,334 dwellings.	The Growth Zone identifies areas which pose the potential for redevelopment over the medium to long-term. Successful transformation has already been achieved at Soho Wharf and Port Loop, serving as examples of how the existing character of the area can be positively changed to more mixed-use/ residential. All site allocations will be assessed as part of the second Preferred Option, which will be consulted upon during Autumn 2025.

	Sandwell Metropolitan Borough Council	Policy GZ18 Greater Icknield	Sandwell supports the focus for housing-led regeneration within the Greater Icknield Growth Zone (GZ18), which reflects the ambitions of the Smethwick to Birmingham Corridor Framework and Grove Lane Masterplan including the housing allocation at Molliett Street Park (ref. 2464). Sandwell supports the intention to secure biodiversity improvements to the canal corridor as well as improving active travel and recreational use of the canal corridor.	General support for Policy GZ18 is welcomed, with the intention for housing-led regeneration being particularly supported as it reflects the ambitions within the Smethwick to Birmingham Corridor Framework.
	Canal and Rivers Trust (Planning Manager)	Policy GZ18 Greater Icknield	No mention of Edgbaston Reservoir's role as water supply source for canal network. Two separate paragraphs needed for Port loop and Moilliet Street and correct canal names. Biodiversity enhancements do not affect canal navigation.	General support for Policy GZ18 is welcomed. Agree, that policy can be amended to include reference to a key function of the reservoir being to supply water to the canal network. Any errors on canal names will be corrected and wording amended to remove any inference that biodiversity enhancements adversely affect canal navigation.
	Sport England	Policy GZ18 Greater Icknield	Sport England notes that the policy takes forward to proposals in the Edgbaston Reservoir Masterplan, but disappointing that the role of the site in meeting needs for community sport and physical activity does not come through more strongly and needs to be more explicit. Support the reference to securing developer contributions to enhance the reservoir including enhancing the facilities for sport.	Policy GZ18 is supported by the policies in the Edgbaston Reservoir Masterplan, which was adopted in 2022, setting out a clear commitment to facilitate a range of water-based sports at the reservoir, along with encouraging opportunities for informal activities, recreation and general well-being. All Growth Zone policies will be assessed for a second Preferred Option that will be consulted upon during Autumn 2025.

	Sutton Coldfield Town Council	Policy GZ19 Sutton Coldfield Town Centre	Support for GZ19 as reflected in the approved Masterplan subject to further clarification in relation to the site requirements for the Gracechurch Centre to provide sufficient height to act as a key landmark feature within the built environment. Supports the proposals for comprehensive redevelopment of the Red Rose Wider Area as well aligned with the approved Masterplan subject to amendment of wording "provision of bus service improvement along South Parade" (Appendix 1) to indicate that land here should be made available for improved interchange/mobility hub facilities. Support for more active public sector land assembly, however, needs to be linked to a more coordinated approach on delivery arrangements to be effective. This should be reflected through a statement of intent in the Plan. Needs to be a stronger planning framework to ensure a comprehensive approach and high design quality. Need to include reference to the need for a Design Code for the town centre and more detailed development briefs as appropriate in GZ19. Consolidating and revising the cost of parking in the town centre to prioritise modal shift. Flexibility provided by the reference to ensuring that access to parking will be maintained is welcome. It is essential that this issue is dealt with in a balanced way with improvements to Active	General support for Policy GZ19 is welcomed. The Sutton Coldfield SPD was adopted in 2021, and this will be used to assess proposals, as applications come forward for development. The request for additional policy wording on the intention for land to be provided along South Parade to improve the transport interchange or for a Mobility Hub to be developed is noted. All Growth Zones will be assessed for a second Preferred Option that will be consulted upon during Autumn 2025.

			Travel infrastructure to retain the economic health and vitality of the centre.	
POD Consultation Event - Sutton Coldfield		Policy GZ19 Sutton Coldfield Town Centre	Issues raised include car parking, impact of increased density, affordable housing policy in practice, desire for high sustainable homes and buildings, design codes. Supportive of vision in masterplan, linkages to the plan need to be improved Bus location works at the moment no need for a bus station	Support for the Sutton Coldfield SPD 2022 and request for Policy GZ19 to reflect this, to a greater degree is noted. The policy wording was informed by the SPD and due to its existence, care was taken to not duplicate it in the Local Plan. All Growth Zones will be assessed for the second Preferred Option that will be consulted upon during Autumn 2025.
The Tyler Parkes Partnership Ltd	West Midlands Police	Policy GZ19 Sutton Coldfield Town Centre	Sutton Coldfield: Estates Strategy includes a retained annexe which forms part of the existing site at Anchorage Rd.	The intention for WM Police to retain an annexe of the existing Police Station on Anchorage Road is noted.
	Mills & Reeve LLP	Policy GZ19 Sutton Coldfield Town Centre	Beneficial for Sutton Coldfield Town Centre to have more independent restaurants, bars and cafes.	Suggestion for Policy GZ19 to provide more support for independent food and beverage operators within Sutton Coldfield Town Centre is noted. Policy EC4 Local Centres does discuss the importance for large-scale redevelopment to promote and encourage independent and niche retail uses.
		Policy GZ19 Sutton Coldfield Town Centre	Nothing on the provision of a new station along the Sutton Park line and the opportunities it presents	GZ19 is focused on Sutton Coldfield Town Centre and not surrounding areas, meaning potential locations for new Sutton Stations is not considered. The Birmingham Transport Plan adopted in 2021 provides proposals for new transport infrastructure up to 2031.

	MEPC Limited	Policy GZ2 Western Gateway	Support the aspirations of the Growth Zone, particularly improving connectivity, high quality design and the proposed masterplan. The proposed remodelling of Suffolk Street Queensway is also particularly welcomed. The northern boundary should be amended to include Centenary Square and land up to the Birmingham and Fazeley Canal, as this will incorporate opportunity sites such as the Brindley Drive Multi-Storey Car Park, City Centre Gardens and the wider Cambrian Drive estate. North-south connections should also be improved in this extended area. The Paradise site should also be referred to within the Preferred Options Document.	Support for the aspirations for this Growth Zone are noted. The extension of the boundary northwards and including greater reference to Paradise will be considered at the next stage of plan-making.
	Network Rail	Policy GZ2 Western Gateway	Network Rail must be involved in any discussions regarding proposals to improve permeability and legibility around Birmingham New Street Station where they might affect the approaches and operational areas of the railway. Recent feasibility work may have been undertaken by Network Rail regarding the void spaces around New Street Station.	The City Council will continue to engage with Network Rail as future proposals for this Growth Zone and land around Birmingham New Street Station are considered further as part of the preparation of the Local Plan.

	Commercial Estates Group (CEG)	Policy GZ2 Western Gateway	Support this growth zone and the ongoing importance of Smallbrook Queensway to delivering the objectives for the area. The growth zone should be extended to include the Smallbrook Queensway site as this will crystalise improvements to connectivity, a high-quality public realm, green pedestrian and cycle routes, and the erection of landmark buildings.	Support for the growth zone is noted. The suggested extension of the growth zone boundary to cover the Smallbrook Queensway site will be considered as part of the next stage of plan-making.
	Bruntwood Sci Tech	Policy GZ2 Western Gateway	Support the overall strategy for this zone, particularly reducing the severance effect of the A38 and to further improve the canals in partnership with the Canal and Rivers Trust. It would be helpful to say more about how the proposals will be delivered, particularly the 180,500 sqm of office floorspace and 10,300 sqm of further commercial and leisure space. The West Midlands Investment Zone and the Birmingham Innovation Zone will help bring resources to ensure delivery of the vision for the area.	Support for the growth zone, particularly improving connections and the canal environment, is noted. Further consideration will be given to the mechanisms for delivering the proposed levels of development. Reference to the Investment Zone and Innovation Zone will be included in future iterations of the plan if they can be shown to support specific developments in this area.

	Ardstone Capital	Policy GZ2 Western Gateway	Support the identification of growth zones, particularly that development within them should be of the highest architectural quality and make the best use of land. The aspirations of the Western Gateway Growth Zone are also supported, particularly improvements to connectivity and for high quality design. Addressing the issues caused by the railway voids at New Street Station is also supported. Ardstone Capital would welcome the opportunity to input into any masterplan work and consider that adding Victoria Square House as a site allocation will assist in establishing a firm foundation to support the progression of any scheme for its potential redevelopment.	Overall support for the growth zones and the aspirations of the Western Gateway Growth Zone is noted. The potential to include Victoria Square House as a site allocation will be considered at the next stage of plan preparation. Ardstone Capital will also be engaged where appropriate as part of the future preparation of a masterplan for this area.
	Canal and Rivers Trust (Planning Manager)	Policy GZ2 Western Gateway	Support improved pedestrian links between the westside canals and the retail core, reactivating the canal frontage, enhancing the canal's role as a natural corridor and improved infrastructure provision. Heritage and amenity impacts will have to be considered.	Supporting comments noted. Potential heritage and amenity impacts will be considered further as part of the next stage of plan production.
	Frampton Town Planning Ltd	Policy GZ2 Western Gateway	The features plan for the Western Gateway omits identification of the Conservation Area from the key.	Noted. We will aim to correct this at the next consultation stage.

		Policy GZ2 Western Gateway	Not everything has to be a landmark building. A welcome implication in the policy wording is that 'landmark' and 'high quality' often do not overlap. A generous canal side public space along Gas Street Basin is needed to prevent overcrowding by new buildings.	Comments relating to the terminology of landmarks and high-quality design are noted. These and the suggestion of a generous canal side public space along Gas Street Basin will be considered as part of the next stage of plan production.
	Save Station Street	Policy GZ2 Western Gateway	Station Street, Hill Street and John Bright Street should be triangular 'Sabbath Quarter' that relates to the historically important musical and cultural space that includes The Old Rep, The Crown, The Electric, The Futurist and the old Kodak and demolished Golden Eagle Pub buildings.	Comment noted. We will consider the appropriateness of identifying a 'Sabbath Quarter' or other cultural designation at Station Street, Hill Street and John Bright Street as part of the next stage of plan production.
	Planning Prospects on behalf of @ Indurent	Policy GZ20 Longbridge	The BLP will supersede the Longbridge AAP and the respondent supports this approach. The inclusion of Longbridge as a growth zone will provide a clear and positive policy for the completion of the development opportunities in Longbridge. The respondent suggests that whilst the policy provisions within the plan would benefit from a review in terms of the stated areas within the policy, the principles expressed within the proposals for Longbridge Growth Zone and Longbridge West are generally supported.	General support for Policy GZ20 is welcomed and the request for the development areas within the Growth Zone to be reviewed and take into account recent progress of several sites is noted. All Growth Zones will be assessed for the second Preferred Option that will be consulted upon during Autumn 2025.

		Policy GZ20 Longbridge	The West Works site allocation should include support for Policy GZ10 by requiring the continuation of enhancement works to the River Rea SLINC as the connectivity and flows between West Works to Park Square (underneath the A38 bridge), to remove remaining culverts is key to achieving the overall aims of the works programme. A L2 SFRA should investigate flood risk in the northern Park Square allocation site, and the West Works allocation and site-specific measures may need to be included within the policy.	Agree, Policy GZ20 will be amended to state support for the continuation of enhancement works (i.e. removal of culverts) to the River Rea SLINC, to ensure the connectivity and flows between West Works to Park Square (under A38 bridge) are completed. The L2 SFRA will inform the Local Plan evidence base that is to be refreshed in 2025, as part of preparations for a second Preferred Option that will be consulted upon during Autumn 2025.
	Worcestershire County Council	Policy GZ20 Longbridge	GZ20 Longbridge is adjacent to the Bromsgrove boundary. Improved Park and Ride and links to the station are welcomed as this is the closest rail station for some Worcestershire residents. Cross boundary bus routes are highlighted, and Worcestershire would support enhancing these where possible. WCC requests clarification on how and when the infrastructure improvements to Longbridge station will be funded and delivered and what contingency is in place should sufficient funding not be available. Supports any measures to enhance cycle route 5 which is cross boundary.	In relation to Longbridge Station, improved transport infrastructure has now been delivered, i.e. Park and Ride and general improvements.

		Policy GZ20 Longbridge	The comments on the West Works refer to works underway or already delivered. There is an underutilised multi-storey car park, the surface car park in Longbridge Town Centre could therefore be designated as a development opportunity focused on mix-used retail, hospitality and residential uses.	Suggestion for Policy GZ20 to include an additional allocation site (the surface car park in Longbridge Town Centre) is noted. All Growth Zones will be assessed for a second Preferred Option that will be consulted upon during Autumn 2025.
	Worcestershire County Council	Policy GZ20 Longbridge	The Longbridge Growth Zone (GZ20) has the most potential to impact on WCCs highways and transport network. Northfield, Selly Oak, and South Edgbaston are less likely to impact WCCs network. As the BLP is developed, WCC requests clarification on how and when the key infrastructure requirements for Longbridge, e.g. improvements to Longbridge Rail Station, will be funded and delivered, and the contingency to cover the eventuality that sufficient funding is not available. We support any measures that improve and enhance National Cycle Route 5 which runs through both Worcestershire and Birmingham local authority areas.	General support for Policy GZ20 is welcomed and the request for it to take account of recent progress on several sites is noted. All Growth Zones will be assessed for the second Preferred Option that will be consulted upon during Autumn 2025.

POD Consultation Event - Selly Oak		Policy GZ22 Selly Oak	New development should not compound existing issues. Cycle route needed from university station to Harborne. Cycling needs to be improved from Chapel Lane to Esso garage. Vacant units in Selly Oak District Centre need to be addressed and bring them back into use with a greater diversity. Need more social and family housing. More needs to be done in DMB policies to deal with support exempt accommodation. Medical centre on Katie Road important for community. Importance of retaining character. Selly Oak Library and neighbouring buildings need to be brought back into use. Distinctiveness of Bristol Road needs to be improved.	Comments noted and will be taken into consideration as part of the Selly Oak Growth Zone for the next consultation stage of the Local Plan.

	Bruntwood Sci Tech	Policy GZ22 Selly Oak	We support the vision for the Growth Zone to strengthen the city's standing as a learning city and deliver jobs through ongoing investment in Life Sciences, emphasising the ever-increasing link between education, research and medical outcomes. here currently appears to be some confusion regarding the terminology used to describe different parts of the GZ with references to both the Birmingham Health Campus and the Birmingham Health Innovation Campus (BHIC) used throughout the text. BHIC is a purpose-built life sciences park in a specific location and is described in the first paragraph on page 156 of the document; the Health Campus is being used as a description of the wider collection of hospitals and other facilities and covers a much wider area. The new Metchley Plaza is referred to as a meeting place and event area and a contemporary space that celebrates the rich history of the Metchley Roman Fort. It is described as being within the BHIC which is not correct. While it lies within the Health Campus as a whole, it is some way north of the BHIC and is close to the recently improved new University Station. As far as the substantive Policy GZ22 is concerned, this currently makes no direct reference to the BHIC. Given the facility's importance and the references earlier in the text, we believe this is an omission and would look to the policy	Comments and suggested amendments are noted and will be considered for the next consultation stage of the Plan.

			to provide policy support for the growth of this important facility, including its potential expansion. On page 159 there is currently a designation of a Core Habitat Zone as part of the Nature Recovery Network in the centre of the BHIC. We question whether this is an error. The text for this growth zone could make it clear what contribution it is expected to make to employment growth, in which sectors, over the plan period, as well as the contribution it will make to meeting housing need which is clearly set out in the table on page 56 of the document.	
	Canal and Rivers Trust (Planning Manager)	Policy GZ22 Selly Oak	CRT welcome canal improvements and better connectivity to Selly Oak railway station.	Support welcomed
	Council For British Archaeology, West Midlands	Policy GZ22 Selly Oak	The plan for Selly Oak needs to mark the scheduled monument (Metchley Roman fort), as well as statutorily listed buildings The text needs to acknowledge that improvement works to Metchley Plaza will require scheduled monument consent if they include any of the scheduled monument	These proposed changes relating to marking of Metchley Roman fort as a scheduled monument and statutorily listed buildings will be considered alongside others for the next stage of the local plan.

		Policy GZ22 Selly Oak	The Bourn Brook River crosses the centre of the Growth Zone but most of the area is within Flood Zone 1, with some small areas either side of Bourn Brook in Flood Zone 2 and 3. A L2 SFRA is recommended, and site-specific measures may need to be included within the policy. Policy should also require the removal of weirs along the Canal and Bourn Brook, to create more natural sinuous watercourse.	The Growth Zones proposed in the Preferred Options Document will be reviewed prior to the next stage in the consultation of the Birmingham local Plan alongside the Evidence Base including SFRA to ensure that these issues are fully considered.
	Watkin Jones	Policy GZ22 Selly Oak	WJG supports the allocation of the site within the growth zone relating to extant planning permission (ref. 2022/08427/PA) for the delivery of PBSA. Given the suitability of the site for a variety of forms of residential, it is requested that the allocation states that the site is suitable for all forms of residential including but not limited to build to sell; build to rent; co-living; and PBSA.	This comment relating to the suitability of site for other forms of residential dwelling is noted and the suggested amendment will be considered for the next consultation stage of the Local Plan.
	Sport England	Policy GZ22 Selly Oak	The site allocation for Selly Oak Industrial Estate is a concern due to the lack of reference to the need to relocate the existing Gymnastics Club that occupies part of the site. Should be addressed by adding text to make clear that developing the site is dependent on relocating this use.	The comment relating to the existing Gymnastics Club at the Selly Oak Industrial Estate has been noted and will be considered for the next consultation stage of the Local Plan.

		Policy GZ22 Selly Oak	Selly Oak shopping park is an unsuitable land use for such a well-connected suburb and should be a new centre rather than a car dominated retail park. The congestion caused by the retail park negatively affects the operation of the hospital.	The comments relating to suggestion for redevelopment of Selly Oak shopping park are noted.
	Walter Smith Farms Ltd, L N Mitchell Ltd and Emmanuel College, University of Cambridge	Policy GZ23 Erdington	Removal of Central Square for 200 dwellings	Comment noted and will be considered in the next consultation stage for the Local Plan.
	Birmingham City Council Conservative Group	Policy GZ23 Erdington	The 6 ways end of Erdington High Street should be demolished and replaced with an extra care village and museum collection centre	Comment noted. This matter will be considered at the next consultation stage of the Local Plan

	G.C. No 26 Ltd	Policy GZ23 Erdington	Concerns with Policy GZ23 as it will reduce the residential capacity compared to the capacity identified in the HELAA, which was 200 units. Also, the land now available for development excludes commercial properties fronting the High Street, which have been refurbished and add to vibrancy of Erdington High Street. The remaining land to the rear of the Centre is not suitable for commercial use at GF as it will no longer be part of the retained Shopping Centre so additional residential development should be allowed. Intelligence suggests that the Poundland Store may become available and enable the creation of a new public square, but discussion will be needed with landowner.	The site capacities set out in the Growth Zone should be consistent with the capacities within the HELAA. This, alongside any other suggested changes for this Growth Zone will be reviewed as part of the next consultation stage of the Local Plan.
	Birmingham Airport	Policy GZ24 Tyseley Environmental District	Support the proposals to improve connectivity between the Airport and Tyseley Environmental Enterprise District.	Support noted.
	Logicor	Policy GZ24 Tyseley Environmental District	Support this Growth Zone and the site allocations that have been identified within it. Also support the job creation and connectivity improvements that are referred to within the policy. The proposed policy is also likely to conform to the draft new NPPF.	Support noted.

	Canal and Rivers Trust (Planning Manager)	Policy GZ24 Tyseley Environmental District	Enhancements to Grand Union Canal, number of access points and provision of active frontages to waterside are welcomed.	Support noted.
		Policy GZ24 Tyseley Environmental District	The River Cole is a main river that follows the western edge of the Growth Zone. The area is mostly in Flood Zone 1 but there are also some Flood Zone 2 areas in the north (Hay Mills) and Flood Zone 3 and 3b along the River Cole so a L2 SFRA is recommended, and site-specific policy measures may need to be included. Supportive of references in policy to enhancement of River Cole Corridor.	Comments noted and support welcomed. The need for a Level 2 SFRA in this area will be considered as work progresses on the Local Plan.
	Network Rail	Policy GZ25 Washwood Heath	The proposed railway station at Fort Dunlop/Bromford is not within Network Rails scope for the Midlands Rail Hub.	Comment noted. We will ensure that any wording at future stages of plan preparation that refers to a new railway station at Fort Dunlop/Bromford is accurate and doesn't imply that this will be delivered as part of the Midlands Rail Hub.

		Policy GZ25 Washwood Heath	There is significant risk to the northern part of the zone nearest to the River Tame (Flood Zone 2 and Flood Zone 3). Flood Zone 3b is indicated along the Tame Corridor and touches a small area in north-west corner. A L2 SFRA is recommended, and site-specific policy measures may need to be included. There are some recent or under construction flood defence walls at the River Rea along the northern boundary of the growth zone. Some third-party river walls are on the Lower Rea channel north of Heartlands Parkway which are in varied condition. There is potential for off-site improvements to reduce flood risk from the collapse of walls, by including re-naturalisation and improved access. Supportive of policy to open up culverted part of Wash Brook as a feature of new development, as it will address flood risk issues.	Support for opening up of the culverted part of the Wash Brook is noted. The need for a L2 SFRA, site specific policy measures and potential for off-site improvements to river corridors will be considered at the next stage of plan production.

	HS2 Ltd	Policy GZ25 Washwood Heath	Support the identification of Washwood Heath as a Growth Zone and the aspirations for this area in the policy. But suggest amended wording to address the following; avoid restricting future developments to those only associated with the rail industry a more flexible approach to building design recognise the limited scope for HS2 Ltd to influence the design of development on land outside their ownership remove of the reference to secondary access from Aston Church Road remove references to pedestrian links to Ward End Park, River Tame and Bromford Estate facilitate rather than require enhancements to Ward End Park and improvements to the Wash Brook. Support is also given to the proposed site allocation in this area, but further consideration is required in regard to the Aviva land that already has planning approval for employment development. Concerned that referring to Growth Zones within the Birmingham Local Plan could cause confusion with the existing Growth Zones associated with the East Birmingham and North Solihull Levelling Up Zone.	Overall support and detailed suggested amendments are noted. These will be considered as work progresses on this growth zone throughout the plan preparation process.

	Sutton Coldfield Town Council	Policy GZ26 Langley Sustainable Urban Extension	GZ26 Langley SUE supporting text should be amended in response to concerns expressed about the impact of the development at the urban edge along the sensitive western perimeter of the site boundary. To recognise the importance of mitigating the impact and retention of landscape features.	The Langley SUE Supplementary Planning Document (SPD) was adopted in April 2019. The SPD was developed in partnership with Sutton Coldfield Town Council and recognises the key role it will play in the City's growth plans. The SPD sets out detailed requirements for all new development, with requirements for green spaces and green buffers, new services and community facilities. The Local Plan will not replicate the policies within the SPD but there will be opportunities for further consultation, as second Preferred Option is consulted upon during Autumn 2025.
	Walter Smith Farms Ltd, L N Mitchell Ltd and Emmanuel College, University of Cambridge	Policy GZ26 Langley Sustainable Urban Extension	Reduce by 500 dwellings to accord with the pending outline planning application for 5,500 units.	Suggestion to reduce Langley SUE site allocation capacity total of 6,000, to align with anticipated Outline consent (5,500) is noted. The capacity and proposed uses for all Site Allocations will be assessed to inform a second Preferred Option that will be consulted upon during Autumn 2025.

	Natural England	Policy GZ26 Langley Sustainable Urban Extension	While we have no objections to the inclusion of these sites in the development plan, the delivery of such sites offers important and significant opportunities to provide and enhance green infrastructure, active travel and biodiversity to the area. Important that the delivery of these sites provides important elements of green and blue infrastructure including improvements to watercourses, green corridors, linking the sites to the wider countryside where possible and providing sites of sufficient size and capability to relieve the existing recreational pressure on Sutton Park. Would welcome additional dialogue.	General support for Growth Zone GZ26 is welcomed, with recognition that new development could deliver many benefits in terms of enhancement and improvements to green and blue infrastructure. The Langley SUE SPD that was adopted in 2019, outlines key requirements in regard to the natural environment and the importance of connecting newly created green spaces to the wider green network. There will be further opportunities for Stakeholder engagement, when a second Preferred Option document is consulted upon during Autumn 2025.
	Langley Sutton Coldfield Consortium	Policy GZ26 Langley Sustainable Urban Extension	Supports the ongoing inclusion of the Langley Sustainable Urban Extension (Langley) as a strategic allocation as part of the proposed development strategy and housing land supply for the new Birmingham Local Plan. The Consortium is committed to ensuring the delivery of this significant development. Development is anticipated to commence in 2025. The Consortium makes a number of proposed amendments to the Policy Wording associated with Green Belt, Heritage Assets, Local Nature Recovery Strategy and Highest Standards, to be considered in the next iteration of the Plan to remain on delivery.	Support for Growth Zone GZ26 is welcomed. All Growth Zone Policies will be reviewed to inform the development of a second Preferred Option and Stakeholders will have opportunities for further engagement when public consultation is undertaken in Autumn 2025.

	Sport England	Policy GZ26 Langley Sustainable Urban Extension	Sport England supports the reference to providing on-site playing fields. Needs more detailed reference to the requirement to provide a new sports hub including pitches and a range of outdoor sports facilities ancillary facilities.	General support for Policy GZ26 welcomed and request for additional Policy on sports provision within Langley SUE is noted. All Growth Zone Policies will be reviewed as part of the next stage of Plan making and Stakeholders will have opportunities for further engagement, when a second Preferred Option document is consulted upon during Autumn 2025.
		Policy GZ26 Langley Sustainable Urban Extension	To make Langley sustainable requires increase to density, reduction in parking and maximising public transport including Sprint, a new interchange at Minworth for passenger rail and a Metro spur which connects to the East Birmingham Extension.	The Langley SUE Supplementary Planning Document (SPD) was adopted in April 2019 and sets out detailed requirements for all new development, with new and enhanced public transport and the creation of new 'Green' travel routes to encourage walking and cycling. The Local Plan will not replicate the policies within the SPD but there will be opportunities for further engagement, as second Preferred Option is to be consulted upon during Autumn 2025.
	IM Properties	Policy GZ27 Peddimore	Support the identification of Peddimore as a Growth Zone and a Core Industrial Area, but the wording of the parameters in the policy is out of date given that most of the area has been developed or has planning approval. Policy GZ27 should be updated and simplified as suggested. The main headings can be retained but the Peddimore SPD can be cross referred to for any detailed requirements. There is strong demand for the development of Peddimore and there remains an unmet need the development of larger strategic employment sites.	Support for Growth Zone GZ27 is welcomed and the request to amend the Policy, to more accurately reflect development of the site to date, is noted. All Growth Zone Policies will be reviewed during the next stage of Plan making and Stakeholders will have further opportunities to engage, when a second Preferred Option is consulted upon during Autumn 2025.

	Canal and Rivers Trust (Planning Manager)	Policy GZ27 Peddimore	Identification of canal as heritage asset welcomed.	General support for Policy GZ27 is welcomed, with identification of canal as a heritage asset of the site being specifically supported.
POD Consultation Event - Erdington		Policy GZ3 Nechells	Landownership in Nechells is fragmented which could affect delivery.	It is recognised that land ownership is fragmented and that land assembly will be required. This will be investigated further as work on the preparation of the Local Plan progresses to ensure that the future development proposed in Nechells and elsewhere can be delivered.
	Network Rail	Policy GZ3 Nechells	Network Rail will, where resources allow, support emerging priorities for improvements that are currently outside the Birmingham Stations Programme, such as at Duddeston Station.	The support offered by Network Rail for improvements outside the Birmingham Stations Programme, such as at Duddeston Station, is noted and welcomed. The City Council will proactively engage with Network Rail on proposals affecting railway infrastructure as work on the Local Plan progresses.

	Bruntwood Sci Tech	Policy GZ3 Nechells	Support the vision for Nechells Growth Zone, particularly the aspirations for the future of Heartlands, the proposed minimum residential density of 400 dwellings per hectare, the proposed linear park along Jennens Road, a direct and wide walkway connecting HS2 to Bloomsbury Duddeston and Heartlands via the Knowledge Quarter, and proposed new commercial development of high architectural quality and with active ground floor uses. New residential development should provide a broad range of accommodation, including opportunities for senior living and family housing, and does not focus unduly on rental apartments. No reference is made to the Innovation Zone nor to the wider West Midlands Investment Zone, both of which would bring additional resources and accelerate delivery in the area to overcome inevitable viability challenges. A Mayoral Development Corporation will also help to achieve the level of transformation required.	Support for the growth zone vision, aspirations for Heartlands, minimum 400dph residential density, Jennens Road linear park, a wide walkway and high quality and active commercial uses is noted. The need to provide for a broad range of housing is noted and will be considered further in the context of the overall policies relating to Housing Type and Mix and Housing for Older People and Others with Support Needs and Care. Appropriate references to the Investment and Innovation Zones will also be considered at the next stage of plan preparation. A Mayoral Development Corporation is not currently in place nor proposed and it is outside the remit of the Local Plan to facilitate this. However, if a development corporation is set up by the mayor while the Local Plan is being prepared then this will be referred to in future iterations of the plan as a delivery mechanism for relevant development proposals.

	Canal and Rivers Trust (Planning Manager)	Policy GZ3 Nechells	Need to clarify what opening up the canal for the eastern side of Birmingham Fazeley Canal means, particularly for heritage and amenity.	Further detail on the proposed opening up of the canal is contained later on this section and in policy GZ3 itself, however it is acknowledged that the plan needs to be as specific as possible and so this will be considered further as work on the plan progresses. Particularly in regard to any heritage and amenity issues that may arise as a result of this.
	Sport England	Policy GZ3 Nechells	Sport England supports the reference to protecting and enhancing Nechells Wellbeing Centre as a key local facility for sport and physical activity. The policy must make explicit reference to any proposals to replace this facility only being supported where they are demonstrated to fully accord with policy CE14 of the draft plan, i.e. being equitable or better in quantity, equitable or better in quality, in a suitable location, and subject to equitable or better management and access arrangements Also support opportunities for new or enhanced open space and facilities at the centre of the four schools in the Duddeston area, working with these schools to provide facilities that meet community needs. Existing sports facilities including artificial grass pitches and hard courts should be protected and enhanced.	Support for the protection and enhancement of Nechells Wellbeing Centre and opportunities for new or enhanced open spaces and facilities at the four schools is noted. Policy CE14 will apply to all proposals affecting playing pitches and sports facilities, but further consideration will be given to including greater cross reference to this policy within this and other growth zone policies. A requirement to protect and enhance existing sports facilities will also be considered as part of the next stage of plan production.

	Network Rail	Policy GZ4 Curzon Gateway	Early engagement with Network Rail on a new masterplan for Curzon Gateway is essential given their wider work with stakeholders on the Birmingham Stations Programme and the need to improve links between Curzon Street and Moor Street. Moor Street Station should be included within the Curzon Street Gateway Growth Zone.	The Policy identifies ambitions to improve both walking and cycling routes across Curzon Gateway and accessibility to Moor Street Queensway. All Growth Zone Policies are to be reviewed during the next stage of the Plan-making process and there will be additional opportunities for engagement by Stakeholders such as Network Rail during 2025.

	Bruntwood Sci Tech	Policy GZ4 Curzon Gateway	Support the vision for Curzon Gateway, particularly the statement that Development within this Growth Zone must support the future growth and prosperity of the Birmingham Knowledge Quarter. In particular, proposals for new educational and research and development (R&D) uses will be supported". Policies GZ4 and PG3 use the terms Birmingham Innovation Quarter (BIQ) and Birmingham Knowledge Quarter (BKQ) interchangeably. Both should be referred to but distinguished from each other. The current policy text refers to clusters of universities and colleges forming the BIQ, which is incorrect. The Birmingham Knowledge Quarter is part of the wider West Midlands Investment Zone and is a joint initiative of multiple stakeholders across the Eastside area and comprises comprising Birmingham City University, Aston University, Bruntwood SciTech/Innovation Birmingham Campus, the Woodbourne Group and Birmingham Metropolitan College, Birmingham Ormiston Academy, National College of Advanced Transport and Infrastructure, HS2, Millennium Point, Unite and the City Council. There is no express support in the document for further and higher education institutional growth or innovation ecosystem assets within this Growth Zone. Suggest that these should be referred to and	Support for Growth Zone Policy is welcomed, with recognition of its contribution to the future prosperity of the city being particularly supported. The Growth Zone boundary and the need for clearer terminology regarding Birmingham Knowledge Quarter (BKQ) and Birmingham Innovation Quarter (BIQ) is accepted and will be addressed during the next stage of the Plan-making process.

			the GZ4 map be amended to better reflect the totality of the development opportunities in the Growth Zone, including the Aston University Campus itself. The Growth Zone boundaries should be adjusted to be co-terminus with those of the Investment Zone.	
	Woodbourne Group	Policy GZ4 Curzon Gateway	A list of potential allocation sites and their quantities is not provided for this Growth Zone. However, there is capacity for at least 3,800 homes alongside other educational and research and development uses. Curzon Wharf should be included as a site allocation. It is due to be the first Net Zero Carbon development of its type and will provide a major mixed-use scheme of Class C3, PBSA and new high-quality R&D space.	All Growth Zone Policies are to be reviewed during the next stage of the Plan-making process. The request for Curzon Wharf to be included as a site allocation is noted and will be considered during the review process.
	Canal and Rivers Trust (Planning Manager)	Policy GZ4 Curzon Gateway	Access between canal and new Curzon Station should be better considered as well as Curzon Tunnel being more appealing to walk through.	The Policy identifies the need to for public realm improvements along the Digbeth Branch Canal. All Growth Zone Policies will be reviewed during the next stage of the Plan-making process and Curzon Tunnel will be re-examined as part of this review.

		Policy GZ4 Curzon Gateway	This policy presents the optimum opportunity to commit to deliver the Duddeston Viaduct 'Sky Garden' as a high quality, publicly accessible, free to access green space. The National Trust are party to discussions on the development and delivery of such a project and would be keen to share learnings from previous experiences, such as Castlefield Viaduct in Manchester.	Support for the remodelling of Duddeston Viaduct as a 'Sky Garden' is noted. All Growth Zone Policies will be reviewed during the next stage of the Plan-making process and there will be further engagement opportunities during 2025.

	Aston University	Policy GZ4 Curzon Gateway	Support the policy text, but wording relating to Birmingham Knowledge Quarter (BKQ) and Birmingham Innovation Quarter (BIQ) should clearly show that these are distinct from each other. It should also lend express support to the BIQ as well as the BKQ. The Growth Zone map should be amended to include the Aston University Campus itself as a development opportunity, and the black line boundary should be expanded to incorporate all of Aston University's campus. The University has ambitions to redevelop parts of the site, with initial work being the demolition of the South Wing of Main Building, erection of new atrium and extensive re-landscaping works to the central landscaped area of the campus. Comments also made about the Aston Triangle Major Development site allocation and a further site allocation at Coleshill Street Car Park (see separate comment under SA1).	Support for the policy is noted. The need for better wording to clarify the Birmingham Knowledge Quarter and Birmingham Innovation Quarter is recognised and will be addressed as part of the next stage of plan -making. The boundaries of the growth zone and site allocations will also be reconsidered.

	Birmingham City University	Policy GZ4 Curzon Gateway	The policy text is supported but the growth zone map should include the BCU campus, which is one of the main drivers for growth, together with all of the potential development plots. The black line boundary should incorporate all land bound by Gopsal Street, Belmont Row, Curzon Street, and Cardigan Street (including Curzon Building). The red line boundary of the Millennium Point and Environs site allocation should also be expanded.	Support for the policy text is noted. We will reconsider the boundaries and extent of the growth zones and site allocations as part of the next stage of plan-making.
	Aegon UK Property Fund	Policy GZ5 Gun Quarter	Strongly support the vision for the Growth Zone and the removal of the Core Employment Area designation. High density developments should also be encouraged along the Aston Street/A38(M) corridor. The policy wording should allow more flexibility so that not every individual development will be expected to deliver mixed use and that open space provision will depend on development viability. The Matalan site should be considered as a residential-led allocation or a significant windfall site. Also support the principle of a future masterplan for the area, but this should not delay planning applications for specific developments.	Support for Growth Zone Policy is welcomed and particular support for intention to remove its existing Core Employment Area designation is noted. Growth Zone policies and site allocations will be reviewed during the next stage of the Plan-making process.

	Property Link	Policy GZ5 Gun Quarter	Strongly support the vision for the Gun Quarter Growth Zone. The Growth Zone will provide a significant contribution towards meeting the city's housing needs, being in a sustainable location with good access to services and facilities, and is capable of delivering to high density, good design quality and providing a mixture of uses and housing tenures, types and sizes.	Support for the Growth Zone Policy is noted, with support being particularly given for the vision of new high density residential development, which can contribute to the City's overall need for new homes.

	Volume Property	Policy GZ5 Gun Quarter	Supportive of GZ5 Policy for Gun Quarter but the intended Masterplan should not introduce additional requirements. Timescales for a Masterplan should be provided and its status clarified. Non-statutory documents should be avoided. Support removal of the Core Employment Area designation. Clarification is needed on the application of Policy EC3 in relation to new residential uses, as existing B2 and B8 uses could sterilise surrounding land for other purposes. Supportive of the intention for new Local Centre to be created. Suggest that the junction of Summer Lane and New Summer Street would be preferable as this would be more centrally located within the Quarter and some transformation has already begun in this location. Supportive of higher density development around New Town Row and Summer Lane. The policy wording should explicitly refer to Summer Lane. This growth zones do not include any allocations, and no explanation is given for this omission. The Summer Lane site (shown in HELAA Table 8.1) should be shown as an allocation site for high density residential development with commercial ground floor uses and part of the new Local Centre.	Support for Growth Zone Policy and the proposal to remove the Core Employment Area designation is noted. All Growth Zone policies and site allocations will be reviewed during the next stage of the plan-making process. This will include reconsideration of whether and where a new local centre might be required. Comments regarding the status of future masterplans are noted and will be considered further.

	Town Planning and Design Services	Policy GZ5 Gun Quarter	The Gun Quarter lacks the vitality and vibrancy of the other identified quarters due to the current lack of mixed uses within the area. Other uses including PBSA and residential should be introduced to the area.	Support for a greater mix of uses in this growth zone is noted. All Growth Zone policies will be reviewed as part of the next stage of the plan-making process.
	Canal and Rivers Trust (Planning Manager)	Policy GZ5 Gun Quarter	Supportive, although additional wording to support heritage areas and assets are required.	General support for Growth Zone Policy is noted. We will consider the potential for the growth zone policies to include greater support for heritage areas and assets as part of the next stage of plan-making.
	Cordia UK	Policy GZ5 Gun Quarter	Generally supportive of policy GZ5 and its vision to create a mixed residential and commercial/industrial neighbourhood to the north of the City Centre. There is a potential no-man's land resulting from the combined current boundaries of the Gun Quarter Growth Area, New Town Housing Action Area, Jewellery Quarter Conservation Area, and Birmingham City Centre urban area creates a no-man's land between Great Hampton Row, Hampton Street and Constitution Hill, which in character is very similar to the Gun Quarter, and would benefit from regeneration, but for which there is effectively a policy vacuum. The 4th paragraph of the policy should also be amended, as follows: Development affecting historic areas and assets, such as at Princip Street, Bath Street and bordering the Jewellery Quarter Conservation Area, will be of a more sensitive design and scale in accordance with the Historic Environment policy.	General support for Growth Zone Policy is noted. The boundary to the south west adjoins the Jewellery Quarter Neighbourhood Area and has been drawn to avoid duplication and conflict with the made neighbourhood plan, whilst also avoiding a policy vacuum between the two areas. We will however give further consideration to the growth zone boundary as part of the next stage of plan-making. We will also consider the policy wording you have suggested to include greater reference to the Jewellery Quarter Conservation Area.

	Rainer and Wigley	Policy GZ5 Gun Quarter	Policy GZ5 should make it clear that a single site should contribute to the overall mix of uses in the Gun Quarter, rather than a single site having to contain a mix of all the proposed uses in the Quarter. Supportive of density proposals, particularly for higher densities along New Town Row and this should be extended to surrounding roads, as future residents will benefit from a range of sustainable transport routes.	General support for Growth Zone Policy is welcomed and specific support for high-density development within the New Town Row location is noted. The proposed policy wording would not require all developments to deliver mixed-uses but greater clarity will be provided as the policy approach is refined through the plan-making process.
		Policy GZ5 Gun Quarter	Supportive of intention to remove Core Industrial Area designation from the Gun Quarter. Snow Hill Wharf has encouraged interest in this area and created confidence amongst other developers to consider the Gun Quarter as a location for new development. Recommend that policy for the Gun Quarter is more aspirational and increases the minimum number of dwellings to be delivered, aligning with the City Centre housing density target in policy HN4.	General support for Growth Zone Policy is welcomed and specific support for removal of Core Employment Area designation is noted. The policy approach for the growth zones and housing densities will continue to be reviewed and refined as work on the Local Plan progresses.
		Policy GZ5 Gun Quarter	Extending the tram or rapid transit along Newtown Row to Perry Barr should be referred to.	Suggestion for policy GZ5 to include requirements for public transport improvements along Newtown Row is noted. All Growth Zone policies will continue to be reviewed and refined work on the Local Plan progresses.

POD Consultation Event - Central Birmingham Library		Policy GZ6 Snow Hill	Industry buildings at the back of Snow Hill need to be used better, with more social and green spaces.	Suggestion noted. All Growth Zone Policies will continue to be reviewed and refined as work on the Local Plan progresses.
	MODA	Policy GZ6 Snow Hill	Moda's Great Charles Street, Queensway site (currently under construction) is excluded. For completeness this area should be included within the Growth Zone. The development should also be acknowledged as capable of delivering more than 200 dwellings.	All Growth Zone Policies will be reviewed as part of the next stage of the Plan-making process. This review will include a re-examination of proposed Growth Zone boundaries and Site Allocations.
	Network Rail	Policy GZ6 Snow Hill	Network Rail supports the ambition to change the area around Snow Hill Station, but this is constrained by viability and funding. Further funding will be required, e.g. through S106 developer contributions. Any plans for this area should reflect the Midlands Rail Hub and the Birmingham Stations Programme.	Support for the Growth Zone Policy is noted. All Growth Zone Policies will be reviewed as part of the next stage of the Plan-making process. Policy IM1 outlines how development contributions support the delivery of new infrastructure, and this will also continue to be reviewed and refined.
	HUB Residential	Policy GZ6 Snow Hill	Supports draft Policy GZ6 Snow Hill and the continued growth of the Snow Hill area. HUB is in favour of the increased provision of residential and office use accommodation within this area, but consider that residential provision should be increased, particular given the current planning consent for 462 BTR units at 2 Snow Hill. Draft Policy GZ6 should, therefore, incorporate previously consented schemes that are yet to be built out, i.e. HUBs 2 Snowhill Plaza, as allocated sites.	Support for the Growth Zone Policy is noted. All Growth Zone Policies will be reviewed as part of the next stage of the Plan-making process, which will include a re-assessment of Site Allocations and sites which currently hold consent but are yet to be built-out, such as 2 Snowhill Plaza.

The Tyler Parkes Partnership Ltd	West Midlands Police	Policy GZ6 Snow Hill	This growth zone does not make specific reference to the West Midlands Police HQ at Lloyd House in relation to the potential for significant growth.	Reference to the growth potential at Lloyd House within this growth zone will be considered at the next stage of plan-making.
	Walter Smith Farms Ltd, L N Mitchell Ltd and Emmanuel College, University of Cambridge	Policy GZ7 Newtown	Remove Wheeler Shopping Centre. Newtown Shopping Centre and New John Street West should be reduced to half capacity - a total reduction of 1,169 dwellings.	Suggested additions and /or deletions to the Newtown Growth Zone Policy will be reviewed as part of the second Preferred Option consultation, which will be held during Autumn 2025.

	Legacy Centre of Excellence	Policy GZ7 Newtown	1. Phillips Street Park and St Georges Park should be earmarked for improvements along with redesign for Burbury Park and Great Kings Street Park. 2. Closing of Potters Lane to traffic, to establish North Birmingham Cultural Quarter between Legacy Centre of Excellence, the Barton Arms and Phillips Street Park, including making use of NACRO building which is currently occupied by Coral's bookmakers. "Cultural village" including residential (including affordable housing) and hotel accommodation. 3. Bring in a new high-end supermarket into the area to open a large store in Newtown area 4. Introduction of a box junction between Park Lane, the A34 and Newbury Road to prevent people driving around the area to get to destinations and to reduce accidents. 5. Installation of 20mph speed limit through Newtown 6. Tree planting program in the area, planted along A34 between Newtown to Perry Barr and Burbury Park, with new "green route" from the City through Newtown all the way to Perry Barr. 7. More regular cleaning of streets. 8. Retrofitting of tower blocks long Birmingham Road and New John Street West. 9. Expansion of the tram into Newtown	Suggestions for additions and changes to the Newtown Growth Zone policy will be reviewed as part of the second Preferred Option consultation, which will be undertaken in Autumn 2025.

			providing more connectivity between Newtown, Perry Barr train station and the City Centre. 10. Establishment of leisure facilities to reduce health inequality in the area.	
	MODA	Policy GZ8 Hagley Road Corridor	Policy approach to GZ8 is inconsistent. Should acknowledge that further sustainable transport modes are being considered here including discussions with TfWM for a super crossing across Hagley Road to better connect the neighbourhoods. The policy should acknowledge the New Garden Square site which will deliver up to 2,000 apartments. Include reference to the Living Sector - residential uses such as C3 (BTR and Open Market Sales) Co-Living, PBSA and also later living/retirement living to contribute towards mixed, balanced and diverse communities.	Suggested additions or amendments to the Growth Zone policy will be reviewed as part of the next consultation stage for the Local Plan.

	Calthorpe Estates	Policy GZ8 Hagley Road Corridor	The vision for this growth corridor is strongly supported. Consideration should be given to whether this can be further enhanced by strengthening the text relating to Local Centres. Inclusion of a reference to Edgbaston Village Centre should be given. Additional wording to be included within this section of the policy should state: "Further diversification of uses within Edgbaston Village will be encouraged. This includes, but is not limited to, fostering mixed-use commercial spaces and advancements in Life Sciences, aligning with the Edgbaston Medical Quarter allocation, and promoting high-density city living of appropriate scale and tenures."	Support welcomed. Suggested additions or amendments to the Growth Zone policy will be reviewed as part of the next consultation stage for the Local Plan.
	Canal and Rivers Trust (Planning Manager)	Policy GZ8 Hagley Road Corridor	Proposed emerging city-wide green network via the Worcester and Birmingham Canal and the proposed Chad Brook Way should be shown on a map.	Suggested additions or amendments to the Growth Zone policy and its mapping will be reviewed as part of the next consultation stage for the Local Plan.
	Birmingham City University	Policy GZ8 Hagley Road Corridor	BCU respectfully requests the inclusion of its City South Campus within the policy text, accompanying Growth Zone Plan and the Policies Map. The text of the policy and its preamble would then require updates to support the continued growth of the BCU City South Campus, with education and student accommodation uses supported in the Growth Zone.	Suggested additions and amendments to the Growth Zone policy will be reviewed as part of the next consultation stage for the Local Plan.
	Mills & Reeve LLP	Policy GZ8 Hagley Road Corridor	Questioning Metro being value for money with regard to extensions around the City Centre and Hagley Road.	The Metro extensions around the City Centre and Hagley Road are in place and have brought many benefits to the city.

	Calthorpe Estates	Policy GZ9 South Edgbaston	The respondent welcomes vision for South Edgbaston as it presents an exciting opportunity to nurture a new neighbourhood within the Bristol Road and River Rea corridor. However, within the Play Pitch and Outdoor Play Strategy there is a lack of detailed understanding of what facilities are available for use. The current position is that none of the facilities are accessible to the public. Given that Edgbaston Mill is also identified as a proposed allocated site in GA1 it is considered it should also be listed in the Growth Zone section. The Crown Bowling Green is no longer in use.	This matter will be addressed in more detail in the next consultation stage of the Local Plan.
	Walter Smith Farms Ltd, L N Mitchell Ltd and Emmanuel College, University of Cambridge	Policy GZ9 South Edgbaston	Respondent suggests removal of Tally Ho - a total reduction of 143 dwellings.	This issue will be considered in the next stage of the next consultation stage of the Local Plan.

	Warwickshire County Cricket Club Limited	Policy GZ9 South Edgbaston	Respondent supports South Edgbaston as one of the Growth Zones, including of improvement of green connections to and from the Stadium and the strategic vision of the GZ for co-ordinated growth and connectivity. They would welcome engagement with the council and adjacent landowners to ensure that housing developments are effectively connected to the Stadium and support the mechanisms and methods to achieve the objectives of the growth zone including public-private partnership. This has previously been successful in developing the stadium working together with organisations such as BCC, WMCA, Homes England and Calthorpe Estates.	Support welcomed and engagement with WCCC will continue throughout the development and adoption of the Local Plan.
		Policy GZ9 South Edgbaston	Respondent is supportive of aspiration for renaturalisation of River Rea stretch through the Nature Centre, as it has many small weirs. Flood Zones 2 and 3 partially cover the southern boundary of the site and Flood Zone 3b is shown in the L1 SFRA mapping in the playing field south of Mill Pool Way. The Tally Ho allocation presents some climate change fluvial flood extents partially within the site. Council needs to consider if site specific flood risk mitigation measures should be included in Policy GZ9 and would ask for policy to require enhancements to Bourn Brook, as there are RBMP objectives for the watercourse.	The matters raised will be considered within the next consultation stage of the Local Plan.

	Sport England	Policy GZ9 South Edgbaston	Sport England objects to the proposed allocation for housing led mixed use development at Tally Ho which is in conflict with policy CE14 of the draft Local Plan and paragraph 103 of the NPPF. The proposal would result in the loss of, or prejudice the use of, at least one grass football pitch, cricket pitch, two fine turf bowls greens, three tennis courts, netball court an associated sports and social club pavilion/clubhouse and associated ancillary facilities including changing rooms and car parking. The Councils evidence base of need for playing pitches in the adopted Birmingham Playing Pitches and Outdoor Sports Strategy (PPOSS) 2023 identifies the need to protect and enhance these sports pitches. The policy allocation should therefore be deleted from the plan.	The issue will be addressed in more details for the next consultation stage of the Local Plan.
	Aston University	9.1 Paragraph	There is no mention of supporting the growth of the key educational institutions in this opening paragraph, or indeed throughout the preamble to the policy. Express support should be stated for both further and higher education institutional growth (including Aston University), innovation ecosystems assets and student accommodation at Curzon Gateway.	Consideration will be given to including reference to supporting the future growth of the educational institutions in this growth zone as part of the next stage of plan production.

	Birmingham City University	9.1 Paragraph	There is no mention of supporting the growth of the key higher education institutions in this opening paragraph, or in the preamble to the policy. Express support should be stated for both further and higher education institutional growth (including BCU) and student accommodation at Curzon Gateway in this paragraph.	Consideration will be given to including reference to supporting the future growth of the educational institutions in this growth zone as part of the next stage of plan production.
	Birmingham City University	9.2 Paragraph	In addition to the under-utilised spaces around Millennium Point and Multi-storey Car Park, reference should also be made to the vacant Eastside Plots A and C within the BCU Campus which have outline planning permission (2022/07259/PA).	Your suggestion is noted. All Growth Zone policies will be reviewed as part of the next stage of the plan-making process. This will include a re-assessment of how site allocations and sites with planning consent will be identified in the new Local Plan.
	Aston University	9.4 Paragraph	The last sentence should also provide support for growth of education provision and student accommodation.	Appropriate wording which supports the growth of education provision and student accommodation will be considered at the next stage of plan-making.
	Birmingham City University	9.4 Paragraph	The last sentence of this paragraph should also provide support for growth of higher education provision at BCU and student accommodation.	The suggested amendment is noted. The Growth Zones policies will be reviewed as part of the next stage of the Plan-making process, and we will incorporate wording to support the growth of higher educational institutions where appropriate.
	Birmingham City University	9.5 Paragraph	The Digbeth Branch Canal currently detracts from the quality of the public realm as it is in poor condition, is unkempt and attracts anti-social behaviour. However, it has great potential to be an asset to the area. Therefore, the policy approach to achieving this is welcomed.	Support for the Policy is welcomed.

	National Grid Electricity (South West) Limited	33.3 Paragraph	Development sites and projects need to be included in the National Grid's Distribution Future Energy Scenarios. Sites containing overhead cables and high voltage power lines should be included to ensure they are effectively incorporated into any future development proposals. The LPA should respond annually to the Distribution Future Energy Scenario questionnaire, ensure that NGED are aware of any development proposals and give priority to the retention of overhead cables identified through effective masterplanning.	NGED will be engaged as part of the identification and selection of proposed site allocations in the preparation of the next stage of plan production. This will include the completion of the annual Distribution Future Energy Scenario questionnaire as well as direct engagement once preferred sites have been identified. Feedback received from NGED will inform an update to the assessment of the suitability and achievability of sites in the HELAA, as this is the primary evidence document supporting the proposed allocations.
	MEPC Limited	Policy SA1 Site Allocations	Paradise should be included as an allocation, to support the delivery of phases 2 and 3 of the development. This should reflect the current outline planning permission but provide flexibility for the scheme to evolve in light of changing contextual circumstances. This would be consistent with the approach taken for other City Centre redevelopment schemes such as Martineau Place. A suggested site allocation template has been provided. The site should also be referred to as 'Paradise' or 'Paradise Masterplan Site' rather than Paradise Square.	The potential allocation of Paradise for mixed use development including commercial (offices and retail/leisure), hotel and residential uses to be considered further.

POD Consultation Event - Central Birmingham Library		Policy SA1 Site Allocations	Brownfield site near Spring Road in Acocks Green should be shown as a site allocation.	There are various sites near Spring Road that could be classed as brownfield. However, many of these are currently in use and not available for development. There is a large vacant brownfield site at the eastern end of Spring Road (former Denso site) that is currently under development for new housing. As this site already has planning approval and it is under development it is not appropriate for allocation.

	Lendlease	Policy SA1 Site Allocations	The importance of Smithfield is not emphasised sufficiently within the document, as it is within the Central Birmingham Framework. The Local Plan should promote the key aspects of the Smithfield development include the number of new homes, jobs and wider public benefits that it will bring, reflecting the current hybrid planning application. It should either be included in the Digbeth Growth Zone or as a Growth Zone in its own right as it will support the strategic approach for areas of significant transformation, urban regeneration and being one of the most sustainable sites. It will also help to maximise residential densities and deliver a significant scale of residential development. The proposed allocation of the Smithfield site is supported but the site boundary, site area and capacities should be amended to align with the hybrid planning application.	The capacity, boundary and site area of the proposed Smithfield allocation will be reconsidered in light of the recent hybrid planning application. The appropriateness of including the site allocation within a Growth Zone will also be considered further.

	National Grid Electricity (South West) Limited	Policy SA1 Site Allocations	Details of specific site allocations should include identification and safeguarding of overhead and underground cables and electricity infrastructure. Especially for sites 2145, 2146, 2614, 2748, 3026 and 3045	The presence and safeguarding of electrical infrastructure at proposed allocation sites will be considered further at the next stage of plan production.
	MODA	Policy SA1 Site Allocations	There are inconsistencies in the total potential capacity identified in the site allocations table when compared with the total for allocations in the assessment of available land for housing development table. It would be helpful if the site allocations table included a total capacity figure at the bottom. A consistent approach needs to be followed for sites with planning permission; they should either all be allocated or instead shown as committed sites. The proposed capacity figures for site allocations should be presented as estimates, to allow flexibility for the preparation of detailed development proposals.	Agreed that the next stage of plan production should present the total capacity of site allocations in a clearer and more consistent way. Further consideration will be required on the approach to sites with planning permission. For most sites it will be appropriate to identify them as committed sites, but for some sites where the planning permission no longer reflects what is likely to be delivered it might be appropriate to allocate them for a different mixture and capacity of uses to support the determination of future planning applications for alternative development schemes. The proposed capacity figures need to be presented as minimum figures rather than estimates, so that there is more certainty about the level of development that the new Local Plan can be expected to deliver. However, the minimum capacity figures for specific sites can be adjusted downwards if evidence provided by the site promoter suggests that a higher capacity is not achievable.

	Places for People	Policy SA1 Site Allocations	Support the identification of Icknield Square as a site allocation but suggest that the capacity of the site is increased to reflect the current planning application for 234 dwellings, which only covers part of the site.	Support for the proposed allocation is noted. The capacity and extent of the area covered by the allocation will be reviewed as part of the next stage of plan preparation.

	Stoford	Policy SA1 Site Allocations	Typhoo Wharf should be included as a site allocation, as it will be able to deliver significant new housing to meet needs over the plan period.	The appropriateness of including Typhoo Wharf as a site allocation with potential to deliver residential development will be considered as part of the next stage of plan production.

	Calthorpe Estates	Policy SA1 Site Allocations	It would be beneficial to include all policy text within the main body of the document rather than in an appendix. Five Ways Hub - support this proposed allocation. Ongoing capacity testing of the site suggests a capacity of between 800 and 1000 new dwellings. Suggest flexibility in the proposed capacity and mixture of residential uses. New Garden Square - Five year capacity to be updated to 462 dwellings to reflect new planning approval. 126 - 150 Hagley Road - support this proposed allocation and supporting text. Former Clarendon Suites Site - support this proposed allocation. It has potential to deliver housing within the first five years of the Plan. Tally Ho - potential to deliver closer to 300 residential dwellings alongside c 400,000 sq. ft of employment, commercial and leisure space. This would include retention of 11 acres of playing fields. Remove the reference to generate power for the site from the River Rea due to the significant costs and impacts on viability. Edgbaston Mill - remove reference to generate power from the River Rea. Omission sites: The Garden House, Hagley Road - potential for early release to deliver c50 dwellings in addition to the 320 dwellings proposed at 126 - 150 Hagley Road.	The extent of the information about the proposed site allocations that can be included in the main body of the document rather than in an appendix will be considered. For conciseness only essential information about site allocations should be included in the main Local Plan document. Support for the existing proposed site allocations listed in the representation is noted. Amendments to the details of these will be considered as part of the preparation of the next stage of plan production. The two further site submissions will also be considered as part of the next stage of plan production.

			Richmond Hill Playing Field - potential to deliver c 70 dwellings for retirement living.	
	Icknield Port Loop LLP	Policy SA1 Site Allocations	Supportive of the proposed allocation of Icknield Port Loop, but the indicative capacity should be more flexible and be updated to reflect the newer planning applications for the remaining phases. There should be a single redline boundary encompassing all of the proposed allocation, rather than individual parcels. A map showing the suggested boundary is included in the submission. The policy wording should state that indicative figures are used for the site allocations and are subject to change due to further testing at the planning application stage.	Support for the proposed allocation of Icknield Port Loop is noted. The boundary, capacity and timescales for development will be reviewed as part of the next plan production stage.

	Aston Villa Football Club	Policy SA1 Site Allocations	Draft Allocation 3041 - Site on Witton Road adjacent to entrance to Witton Railway Station Supportive of allocation Part of the site may be required to facilitate enhancements to Witton Station, in line with NPPF paragraph 108 stating that transport issues should be considered from the earliest stages of plan-making Active frontage is required along Station Road to enhance connection between Witton Railway Station and Villa Park, to help transform the area as world-class tourist destination. Draft Allocation 3037 - Corner of Witton Road and Witton Lane Supportive of hotel use for the car park site, with a mid-rise building in this location being able to create a landmark building and would allow the area to become cohesive linked between key destinations The allocation refers to emerging masterplan which aims to create a world-class destination for a wider variety of uses. This should refer to masterplans vision of creating a world-class destination for leisure, sport, entertainment and commercial activity within the area. Draft Allocation 3048 - Land between Railway Line and River Tame Partially within the Club's ownership Indicative capacity is 103 dwellings but there is scope for more, densities should be	Support for proposed allocations 3041, 3037 and 3048 is noted. Suggested amendments to the masterplan vision for site 3037 and the capacity and linkages of site 3048 will be considered further as part of the next plan preparation stage.

			pushed as far as possible to mitigate housing shortfall and capitalise on key location at a transport hub. Development in the area has significant opportunity to facilitate a link throughout Witton, overcoming a significant barrier which is created by the railway line	
	Logicor	Policy SA1 Site Allocations	The proposed allocation of Tyseley Energy Park for B2 and B8 uses is strongly supported.	Support for the allocation of Tyseley Energy Park for B2 and B8 uses is noted.

	Lambert Smith Hampton	Policy SA1 Site Allocations	Western Road Site Allocation should be revised to become residential led, as employment led proposal presents a lost opportunity at key canal side location. Also, nearby allocation 3045 is predominantly residential. Opportunity to increase density in this area in light of Soho Wharf located nearby being 14 storeys. This location would capitalise on the canal front location providing high-quality placemaking. Could be final piece of transformation of area focused along the canal to complete the residential triangle of Soho Wharf, the City Hospital and Western Road Employment/retail use would be best placed at Motorway junctions and strategic highway locations more appropriate for vehicles entering employment land. If limited employment was still continued as part of allocation, suggestion of most southern area i.e. the 'Tooling 2000 unit', lying immediately adjacent to the electricity substation.	Suggested amendments to the proposed allocation to make it more residential led, have a higher density and maximising the canal side setting will be explored further as part of the next stage of plan preparation.

	Walter Smith Farms Ltd, L N Mitchell Ltd and Emmanuel College, University of Cambridge	Policy SA1 Site Allocations	Considered that further evidence should be provided to demonstrate that each of the allocated sites can be delivered within the plan period. This should include evidence of landowner and/or developer interest for each site, as it is understood that, at this time, some of the proposed allocations were based on BCCs assessments rather than landowner/developer interest. The availability of sites is an essential aspect of demonstrating deliverability. Strongly recommend additional site allocations that will be able to deliver additional dwellings and/or employment uses. The draft BLP has already maximised development potential across all brownfield sites. The council undertake a review of additional sites that would classify as grey belt and additionally undertake a review of all of its green belt land and, where sites would not fundamentally undermine the function of the green belt, to include additional allocations for development, particularly on land that is sustainably located with good access to public transport, immediate services and facilities. A mixed-use SUE at Fox Hill could incorporate a large number of dwellings in addition to potential employment uses alongside existing local shops at the Mitchells Centre and Chase Farm.	Further work will be undertaken as part of the next stage of plan preparation to ensure that any proposed allocations will be supported by evidence regarding their delivery. The need for a Green Belt Review to release further land for housing development as potential allocations, such as at Fox Hill, will be considered further in light of the new government's proposed amendments to national planning policy.

	Interested Parties of Digbeth High Street Major Development Site	Policy SA1 Site Allocations	Digbeth High Street Major Development Site Support the principle of allocation this site. Draft site allocation references the site within Rea Valley Urban Quarter Growth Zone but does not correspond with GZ boundaries showing the site in the Digbeth Growth Zone. This should be amended to reflect this. Scope for the site to be increased from 770 dwellings as this corresponds to the previous planning permission, now potential scope to increase the residential density on the site Requirement to resolve river flooding risk is vague and especially onerous as site's owners/developers cannot be responsible for the management of the river across the length of its channel, as same responsibility is also referenced in CE7. Site has potential for wider 'residential' products such Purpose Built Student Accommodation (PBSA) and large-scale shared accommodation. Approach in HN8 restricting co-living on land which is identified for conventional housing is unduly restrictive. In areas of transformation and a focus on creative industries such flexibility is important. Such an approach risks the city missing out on opportunities new residential products can offer as seen in cities across the globe.	Support for the principle of the proposed allocation is noted. Details for the site requirements including the growth zone that it falls within, potential capacity, references to the Central Birmingham Framework, flood risk matters and the range of acceptable residential uses will be considered as part of the work on the next stage of plan production.

	Knighthead Capital Management	Policy SA1 Site Allocations	Site Allocation Ref 2748 and Former Wheels Site The area covered by the site allocation in the Draft Local Plan has been reduced to include only the extent of the now-vacant Wheels leisure facility. This is in contrast to the equivalent site allocation in the Bordesley Park AAP, Wheels Site and Environs, which in addition to the core 16-hectare former Wheels site also includes the surrounding area comprising largely industrial land. Establishing a Sports Quarter, centred around a new world-class stadium facility at the Site, will bring significant wider regeneration opportunities for the surrounding area, including demand and opportunity for complementary leisure, retail, residential, cultural and community uses, as well as the employment uses for which it is currently allocated. Any comprehensive approach to redevelopment of the Site must consider existing sensitive uses within the Opportunity Area (including particularly the mosque and school) and immediately adjacent uses, as well as the future use of the existing St. Andrews stadium. To best maximise the spatial impact of this development's benefits, Knighthead intends to develop a masterplan for the proposals, supported by an appropriate evidence base. Knighthead is committed to collaborating	The suggested amendments to the proposed allocation will be considered as part of the next plan preparation stage.

			with BCC throughout the development of the masterplan, to capitalise on the full scale of the opportunity. Propose the boundary of the Bordesley Park (former Wheels) site allocation is amended and extended comprising the Sports Quarter Opportunity Area which provides far more regenerative potential than the smaller Wheels site could provide. Proposed amendments to the allocation are therefore suggested as follows: HELAA 2023 Site Reference: 2748(covers the part of the Site Allocation at the former Wheels site)Growth Zone: Bordesley Park Site Name: Sports Quarter Opportunity Area Site Address: Adderley Road South Ward: Bordesley and Highgate; Bordesley Green; Alum Rock Site Area: 65ha Existing use(s): Vacant former leisure facility, and various industrial uses, retail, residential, community uses and St Andrews Stadium Proposed use(s):Sports-led regeneration, including a new stadium facility and associated sporting infrastructure, with the opportunity for complementary uses such as hotel, leisure, retail, residential, cultural, community and other employment generating uses (such as workspaces and light industrial).Development timeframe: 5-10 years Supporting documents: Bordesley Park Area Action Plan (2020) Central Birmingham Framework (2024)Reasons for allocation: Identified as a key opportunity	

			area and a site allocation in the Bordesley Park Area Action Plan and Our City Central Birmingham Framework. Accessible location close to the both the city centre and areas of the city which are recognised as suffering significant disadvantage. Opportunity to capitalise on improved links to the city centre and eastwards to Birmingham International Airport, to create a new nationally significant area for the city. Deep existing roots to sport in the area, having been home to Birmingham City Football Club for over a century. Constraints: Remediation to address the history of the site as former brick works and subsequent landfill. Change in levels requiring reprofiling of the site. Adjoining and nearby sensitive uses. Site requirements: Suitable for a new Sports Quarter, anchored by a new stadium and elite training facility for Birmingham City Football Club, as well as community sports facilities. Opportunities for wider sports-led regeneration, to create a new visitor destination with complementary uses such as hotel, leisure, retail, residential, cultural, community and other employment generating uses (such as workspaces and light industrial). Broaden the activities in the area to ensure development opportunities result in the regeneration of the surrounding areas and deliver benefits for the	

			community. Integration with existing public transport links and with planned transport improvements between the city centre and Birmingham International Airport, to ensure that proposals benefit from increased connectivity across East Birmingham. Provide improved and new access arrangements into the site from Venetia Road and Bordesley Green Road and a new estate link road through the site to serve future individual development plots. Provide improved pedestrian access from Adderley Road South and to/from Adderley Park station. High quality design and landscaping including the creation of landmarks and gateways. Importance given to pedestrians and cyclists accessing the scheme. Provide a wide range of training and employment opportunities particularly for local people. Site remediation and reprofiling to create development plateaus. Enhancement of the candidate SLINC or mitigation if required.	

	Church Commissioners	Policy SA1 Site Allocations	Land South of Druids Lane, Druids Heath extends to approximately 47.8 hectares and is located immediately south of the Birmingham conurbation. The supporting Vision Statement demonstrates how the Site (exclusive of Birmingham City Councils landholding) is sustainably located and can deliver benefits in meeting the city's housing needs by delivering approximately 700 dwellings, a primary school and associated landscaping and open space. The Site does not make a significant contribution to the prevention of the further growth of the West Midlands conurbation which currently extends further south. It adjoins the urban edge of Birmingham and does not make a significant contribution to the safeguarding of the open countryside which currently extends some 15 kilometres to Redditch to the south. The A435 corridor and the south western boundary vegetation are effective buffers in the landscape and filter views towards the urban edge, thereby reinforcing the gap between the southern Birmingham urban edge and the north western edge of Wythall. As such land to the east of the A435 contributes to maintaining a perceived gap between settlements. The Site is therefore ideally positioned to the south of the conurbation to deliver housing closest to where the need arises. In our view, meeting Birmingham's unmet need	The potential to review Green Belt boundaries and consideration of whether or not this land will be suitable for release from the Green Belt will be considered as part of the next stage of plan production.

			would constitute an exceptional circumstance that would justify an alteration to the Green Belt boundary in this location. The CCfE is working collaboratively to establish a clear vision for the Site and to inform the production of a comprehensive masterplan to include housing, education, supporting facilities, green infrastructure and highways infrastructure which delivers a single holistic development that also supports the existing community surrounding Druids Heath.	
	Natural England	Policy SA1 Site Allocations	Pleased to see that your allocations do not appear to impact directly upon Designated Sites. However, there is the possibility for these developments to impact on indirectly on designated sites, Air quality impacts can occur at significant distances, depending on the authorised activity or related travel routes and water quality impacts can occur alongside the hydrological route. Many of your site allocations and growth zones have significant opportunities for wider benefits including provision of GI and watercourse restoration.	General support for the proposed site allocations is noted. Potential indirect impacts on designated sites and the wider environment will be considered as part of the next stage of plan preparation, as well as any potential benefits that can be derived from new development. We will engage directly with Natural England where necessary to further refine the approach to the site allocations.

	Oval Real Estate	Policy SA1 Site Allocations	Digbeth Framework area has not been included, even though this scheme has planning approval, an allocation would provide a clear policy framework to guide future development over the plan period. This would provide requisite support and flexibility for the project to evolve over its lifetime to adapt to changing circumstances.	The potential allocation of the Digbeth Framework Area, and a consistent approach for sites with existing planning permission will be considered as part of the next stage of plan preparation.

	Hanehouse Ltd	Policy SA1 Site Allocations	Can a total be added to the bottom of the allocation site table, as a manual calculation suggested capacity of 54,699 dwellings but this to be confirmed by the Council. It is also unclear how this total capacity relates to the assessment of available land for housing development table on p.28, as it states a total of 30,104 dwellings so, please can this be clarified too. There appears to be no consistency in approach to how site allocations have been selected, as some hold planning permission and others do not. If it is decided that those with permission be excluded, they could be referred to as 'Committed' sites within the Growth Zones? Stated capacity should also be noted as an estimate of net capacity, particularly for larger sites where proposals are not fully developed and may change. The site allocations are shown in an appendix to the Plan and not presented as a Policy, meaning the site requirements will have limited weight in decision making. If the Council expects these requirements to be incorporated into future developments, then they should be included within a specific Policy. Any requirements should not be unduly onerous or could lead to delays in delivery.	Agreed that the next stage of plan production should present the total capacity of site allocations in a clearer and more consistent way. Further consideration will be required on the approach to sites with planning permission. For most such sites it will be appropriate to identify them as committed sites, but for some sites where the planning permission no longer reflects what is likely to be delivered it might be appropriate to allocate them for a different mixture and capacity of uses to support the determination of future planning applications for alternative development schemes. The proposed capacity figures need to be presented as minimum figures rather than estimates, so that there is more certainty about the level of development that the new Local Plan can be expected to deliver. However, the minimum capacity figures for specific sites can be adjusted downwards if evidence provided by the site promoter suggests that a higher capacity is not achievable.

	Bruntwood Sci Tech	Policy SA1 Site Allocations	The Aston Triangle allocation currently indicates it is to be developed solely for residential uses, with a capacity of 800 units. It is not the University's ambition to develop the whole site for residential uses as stated. Instead, the majority of the site will be for commercial uses, such as education, incubator units, research and development and offices, reflecting that this site is at the heart of the Birmingham Innovation Quarter (BIQ). A modest amount of residential development would be supported as part of the overall development mix.	Noted. We will amend the proposed mix of uses for this potential allocation at the next stage of plan-making.
	Woodbourne Group	Policy SA1 Site Allocations	Total residential capacity is 54,699 dwellings, calculated manually. It would be helpful to include a total at the bottom of the table within the policy.	Agreed that the total capacity should be presented in a clearer way. This will be addressed at the next stage of plan production.
	Ardstone Capital	Policy SA1 Site Allocations	Given Victoria Square Houses prominent position and the redevelopment potential to contribute to the key ambitions of the Growth Zone, the VSH site should be allocated to support its potential redevelopment over the plan period. A 'Call for Sites' submission form has completed to that effect.	The submission of the site being promoted for allocation will be assessed in the Housing and Employment Land Availability Assessment and will be considered at the next stage of plan production.

		Policy SA1 Site Allocations	The site allocation table should include a column indicating which growth zone it falls within. Seeks clarification that Millennium Point/Think Tank has been identified for development. Is it appropriate to suggest an allocation for Lancaster Circus and Five Ways Hub when they are currently in the planning application/pre-application process?	Agreed that the presentation of some of the site allocation information could be clearer. This will be reconsidered at the next plan production stage. Millennium Point is identified as a proposed site allocation for a greater mixture of uses including residential and employment, alongside the retention of the existing educational and cultural uses. Sites currently in the planning application or pre-application process have only been included as proposed site allocations if the overall principle of the development would be considered as acceptable when assessed against suitability, availability or achievability constraints.
	Birmingham City Council Conservative Group	Policy SA1 Site Allocations	Harborne Police station should be earmarked for high quality family housing, with adequate gardens and off-street parking, with design-based on surrounding homes on Rose Road or as an extension of the style of the Moorpool Estate	We will consider the potential to identify Harborne Police Station to accommodate future residential development and engage with the landowner to determine their willingness to bring it forward for development.
	Midlands Land Portfolio Ltd	Policy SA1 Site Allocations	Submitted site details for Minworth Greaves. The site is under the sole ownership of MLPL, who are actively promoting the site for commercial development. The site is available and suitable for development, and commercial development is considered to be achievable and viable. As such, it represents a deliverable employment site that can be delivered quickly to meet the shortfall identified.	The submission of this site being promoted for employment development will be considered at the next stage of plan preparation. However, as it is located within the Green Belt its potential for allocation will be dependent on a Green Belt Review if one is ultimately required under the new national planning policy.

	Bloor Homes	Policy SA1 Site Allocations	Bloor Homes are promoting land at Frankley as a proposed residential-led Sustainable Urban Extension (SUE) extending to approximately 3,000 homes along with the delivery of new schools, local centres, public open space and a country park, recreation opportunities and areas for ecological mitigation and biodiversity net gain. The site straddles the administrative boundary between Birmingham and Bromsgrove District and whilst the greater proportion of the site is located within Bromsgrove, part of the site is in Birmingham and would accommodate 250 of the 3000 homes. The part of the site in Birmingham directly abuts the existing built-up area and which will enable access to the wider site to be reached from it. A masterplan has been prepared and submitted as part of the call for sites. BH feel that the unmet housing need being experienced in Birmingham warrants a further green belt review and release. Releasing employment sites for housing is also difficult and may lead to further undersupply due to vitality of existing employment areas or preclusive delivery issues such as clean-up/redevelopment costs. This will further widen the housing shortfall.	The site will be considered as part of the next stage of plan preparation, but only if it becomes evident that a review of Green Belt boundaries is required. Comments made in relation to the suitability and deliverability of other HELAA sites will be considered in the next annual update to the HELAA.

	Mondelez International	Policy SA1 Site Allocations	The Cadbury Club, Bournville (CFS Ref: 50f381), Data Centre, Bournville (CFS Ref: b7b720), Corner of Linden Road and Bourneville Lane, Bournville (CFS Ref: 2592d5) and Cadbury Car Park (CFS Ref: ee02b1) should all be included as allocations. The following comments are made against the findings of the HELAA 2023. Cadbury Car Park is identified as a suitable site for housing in the HELAA and so should be allocated. The Cadbury Club site does not include any tennis courts, only the now demolished Cadbury Club. It is suitable for a range of uses. The Corner of Linden Road and Bournville Lane was previously promoted for community uses but is now being promoted for residential development and community use and should be allocated. The existing use of the Data Centre for employment is noted.	The sites being promoted will be reconsidered through the next annual update to the HELAA and as part of the next stage of plan preparation.

	G.C. No 26 Ltd	Policy SA1 Site Allocations	Allocation site for Central Square Erdington requires a 'distinctive food and drink offering, retail, family, leisure and workspaces' but these uses will only be viable on units that front the High Street and not spaces to the rear of the site. Efforts have previously been made to secure new mixed-use development but due to market demand and location, a scheme cannot be brought forward without external funding. The allocation site policy should be amended to recognise these challenges, and the site boundaries should be revised. The remaining land can deliver new homes to the required density rate in HN4.	The mix and location of uses within this proposed site allocation will be reconsidered at the next stage of plan production. This will take in to account the issues raised within this representation.
	Brookes and Adams Ltd	Policy SA1 Site Allocations	Land at Shady Lane is being promoted for alternative uses to the existing industry. Contend that the site is easily accessible with good access to local services and connectivity. With a mix of uses in the vicinity.	No specific future use for the site has been stated within the representation.

	Hammerson	Policy SA1 Site Allocations	The principle of allocating Martineau Galleries is supported but it should be split out from the wider Carrs Lane allocation and all other land which is outside Hammerson ownership. The overall proposed mixture of uses is supported but the 2,000 dwelling capacity is inconsistent with the 2,100-dwelling capacity of GZ1, although Hammerson may be able to support further delivery of housing. There should also be some flexibility in how the policy requirements for the site are applied. References to the preparation of a Masterplan should be removed and it should be clear that an outline permission and Section 106 Agreement are already in place. The Edgbaston Street Car Park allocation is also supported, but PBSA uses here should also be supported. The indicative capacity of 2,500 dwellings should be applied flexibly given the multiple ownerships in the area, the scale of housing needs and the scale of development that is capable of being promoted. Policy SA1 is unclear as to how single sites can meet the requirements for the wider allocation. Regard should be had to overall site character and constraints.	The support for the overall principle of allocating of Martineau Galleries and Edgbaston Street Car Park is noted. The suggested changes to the allocations, including boundaries, proposed uses and site requirements will be considered as part of the next stage of plan preparation.

	Home Builders Federation	Policy SA1 Site Allocations	The HBF has no comments on the specific site allocations or growth zones but strongly recommends that the plan allocates more sites than required to meet the housing requirement as a buffer. The Council should identify at least 10% of its housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target in line with the NPPF requirements.	The council will seek to identify a sufficient quantity and range of potential development sites as possible to meet the needs over the plan period. The Preferred Options Documents identifies a shortfall of sites due to the very high housing needs. This will be considered further at the next plan-making stage.
	Bloor Homes	Policy SA1 Site Allocations	Proposed site allocations N177, 3024, 3034, 2445 E494 are all well occupied sites and would be difficult to deliver for residential redevelopment. Sites E493, E511, E512. E45, E522, 3026, 3045, 2851, E58, 3051, N593, 3048, 2823, 3033, 3046, 3047, N98, N1116, 2825, 2124, 3025, 2145, 2146, 2614, 2835, 2621, 3044, N545, 3049. 3050, 2486, N900, 3039, 2842 and 2746 have constraints that will make them difficult to deliver, including existing uses and multiple ownerships. Removing all of these sites from the identified supply will reduce it by 12,774 dwellings and the shortfall will increase to just over 58,000 dwellings. The size of the city's land supply is overstated, and the non-delivery of proposed site allocations will only serve to increase development pressure in adjoining authority areas.	The proposed site allocations, including those specifically referred to in the comment, will be subject to further review at the next plan making stage to ensure that they are deliverable and that there is clear and transparent supporting evidence to demonstrate this.

	Planning Prospects on behalf of @ Indurent	Policy SA1 Site Allocations	The site allocation for the West Works is not up to date and should be amended. The area covered by the site boundary includes completed industrial development and approved residential development which is now under construction. The boundary should be amended to only cover the remaining land to be developed. The mix of uses indicated in the allocation table is not consistent with GZ20. B8 uses should be permissible within the site in accordance with proposed Core Industrial Areas policy EC2. The proposed allocation should not be prescriptive over how much industrial floorspaces is to be developed. Many of the site requirements have been copied over from the Longbridge Area Action Plan and need to be removed or updated, including; 25ha gross employment land, references to the provision of a Technology Park, provision of up to 25,000 sq. M. of office space, and a maximum total of 10,000 sq. m of services and amenities.	The extent of the site allocation boundary, range and mix of uses and site requirements will be reviewed as part of the next stage of plan production.

	Canal and Rivers Trust (Planning Manager)	Policy SA1 Site Allocations	Detailed comments are made on the following proposed site allocations; The Wharf/Gas Street Basin, Five Ways Hub, Warwick Bar, Spring Hill, Icknield Port Loop, Hermatic Rubber Factory, H-Suite Edgbaston, Selly Oak Industrial Estate, Hay Hall Business Park and Hockley Port Canal Basin. For The Wharf, Gas Street Basin amendments to the text are suggested to ensure that heritage impacts are properly considered. For Warwick Bar heritage assets, Grand Union Canal SLINC and canal side improvements are suggested text amendments. Various amendments are suggested for Icknield Port Loop including recognising the previously approved design codes, public accessibility/linkages and connectivity, protection of the reservoir dam and allowing for new residential moorings and Paddlesport facilities. The boundary is also requested to be amended to only include the areas that are yet to be developed and receive planning permission. For Hockley Port Canal Basin the main suggested changes are to remove references to it being a basin, to emphasise the need to provide for residential moorings whilst protecting the dry dock and to make more specific reference to the Birmingham Canal SLINC. It is also requested that the	The suggested amendments to the listed site allocations will be considered as part of the next stage of plan preparation.

			site boundary is amended to exclude land in the ownership of the Canal and River Trust. For all other sites the comments are more minor and mainly relate to typographical or factual corrections.	
The Tyler Parkes Partnership Ltd	West Midlands Police	Policy SA1 Site Allocations	There are inconsistencies in the presentation of the quantum of growth in the document. This section comprises of a table of sites and no policy. Comments raised through the consultation on the Central Birmingham Framework have not been taken into consideration in the preparation of the Birmingham Local Plan. For Tally Ho these comments are repeated in this representation. The main focus of these is that the police training facility is still in use and is expected to continue to be in use for the foreseeable future as it is on a long lease.	The presentation of information relating to site allocations and levels of growth will be reviewed and made clearer at the next plan making stage. Comments relating to the police training facility within the Tally Ho site allocation and therefore its availability will also be considered at the next stage.

	Perry Barr Sarl	Policy SA1 Site Allocations	Support the proposed allocation of the One Stop Shopping Centre and the adjoining land to the west as a site allocation and the proposed uses referred to including the ambition for re-orientation and active frontages without the Policy being too over-prescriptive. However, it is also suggested to allow for employment related uses under Use Classes B1c, B2 and B8 on the adjoining land only, to provide greater flexibility and therefore more certainty that development will come forward on this site. Support the phased nature of the allocation, the retention of some shopping facilities and the ambition for a greater range of uses to serve the community and wider visitors. Support the creation of a more walkable place with east-west pedestrian links and a new area of activity at the gateway to Perry Park but suggest references to cafes/restaurant are too prescriptive at this early stage. Support the aspiration to improve the River Tame and the site's accessibility to bus and rail interchange but a continued need for car parking is required.	Support for the proposed allocation, including its accessibility and the proposed phased approach to retain some retail uses whilst delivering a wider range of uses to serve the community and visitors is noted. Removing specific reference to cafes and restaurants and your proposed inclusion of uses B2, B8 and E(g)(iii) (which replaces B1c uses) will be considered at the next stage of plan preparation.
	Rainer and Wigley	Policy SA1 Site Allocations	Request for Rainer and Wigley site on Pritchett Street to be added as an additional site allocation, with a capacity of 570 dwellings or 1100 PBSA bedspaces.	The promoted site will be assessed through the Housing and Economic Land Availability Assessment and if appropriate will be considered for allocation at the next stage of plan-making.

	Aston University	Policy SA1 Site Allocations	Support the allocation of Aston Triangle Major Development but request the proposed uses are amended to commercial-led mixed use incorporating education, incubator units, research and development, offices, and a small element of residential or student accommodation (less than 800 units). A further allocation should also be included for the car park encompassed by Coleshill Street, Woodcock Street and Jennens Road. This will be for commercial development or a hotel associated with the BIQ.	Support for the allocation of Aston Triangle Major Development Site is noted. The proposed mixture of uses will be considered further as part of the next stage of plan production. The further allocation of land at Coleshill Street, Woodcock Street and Jennens Road will also be considered as part of the next stage of plan production.
	Birmingham City University	Policy SA1 Site Allocations	Support the allocation of Millennium Point and Environs but the proposed boundary should be amended so that 'Eastside Plot C (2022/07259/PA) and all other plots of land to the south of Jennens Road are included. The expanded boundary should follow Jennens Road, the northern part of Cardigan Street, Belmont Row, the southern part of Cardigan Street, Curzon Street, White Rose Walk and Park Street. The allocation should also support new further and higher education development and not simply retain the existing. Office uses and PBSA should also be appropriate uses within the allocation.	Support for the allocation is noted. Suggested amendments to the boundary and mix of proposed uses will be considered as part of the next stage of plan preparation.

	Sport England	Policy SA1 Site Allocations	Sport England objects to the proposed allocation Hockley Port Canal Basin (HELAA 2023 site reference 2823) as it is in conflict with policy CE14 of the draft plan, Sport England's Playing Fields Policy and Guidance and para 103 of the NPPF as it comprises existing playing fields and is home to North Edgbaston Sports Club and Birmingham Shooting Centre - there should be reference in the policy to either retaining the existing sports pitches or mitigating their loss.	The proposed allocation of HELAA site 2823 will be reviewed at the next plan-making stage and this will include consideration of adjustments to the site boundary and/or requirements relating to the playing fields and shooting club where necessary, in accordance with the proposed for playing fields and sports facilities.
	Boldmere Neighbourhood Forum	Policy SA1 Site Allocations	Redevelop Union Drive area to move industrial units elsewhere although some commercial uses are appropriate to remain, such vehicle maintenance. The Gate Lane area could also be better used as it currently contains an incompatible mix of uses and has poor access for HGVs.	The design and mix of uses in the Union Drive and Gate Lane area will be considered as part of the next stage of plan-making.
		35.5 Paragraph	Suggests that co-living should be explored to enable young people to have options for moving out of the family home.	Comments are noted. The draft Local Plan includes a proposed policy on Co-Living (HN8 Large-scale Shared Accommodation) and this will be considered further as work on the Local Plan progresses.
		36.1 Paragraph	Respondent supports idea of having no parking for affordable homes due to people in need of such housing not as likely to own cars. Parking wastes spaces, encroaching on viability for affordable housing.	Reducing parking wherever possible both for affordable and ordinary market housing is supported. A joined-up approach relating developments to active travel and public transport options to enable this is the aim.

	Placefirst	36.21 Paragraph	Build to Rent model can be applied to benefit single family housing, as well as attracting workers into the city.	The Council acknowledges the demand for Build to Rent and looks to harness it to bring benefits to key workers and families.
	Frampton Town Planning Ltd	38.1 Paragraph	Agree	Agreement noted.
	Frampton Town Planning Ltd	38.3 Paragraph	Agree	Agreement noted.
		38.4 Paragraph	Disagree with the methodology that has been undertaken to identify the new density assumptions as this means it is based on outdated planning policy. Higher densities have previously been resisted in highly sustainable locations outside the city centre such as in Harborne and Selly Oak, due to arguments such as insufficient parking or the need for family housing. But these are locations where higher densities would be appropriate and can be achieved.	The analysis that has been undertaken of approved and completed development schemes has shown that higher densities than the current BDP policy are already being achieved and therefore the new thresholds are not based existing planning policy. The thresholds are intended to be ambitious in maximising the development potential of land in the city, whilst being realistic in terms of what can actually be delivered. The proposed densities will be kept under review as work on the Local Plan progresses, taking in to account updated evidence of development patterns in the city and public consultation comments received.
		38.7 Paragraph	Comments relate for the wish for higher density development not just to be concentrated to city centre locations but rather also to locations outside the city centre and suburban areas.	The paragraph relates to the fact that we would typically expect lower-density housing to occur in suburban locations and locations outside the city centre. This is due to family housing requiring more space which is most appropriate for such locations. This does not preclude higher density housing around transport nodes and appropriate areas in locations outside the city centre.
		38.8 Paragraph	Respondent disagrees with some Issues and Options consultation responses relating to higher densities either being detrimental to delivery of other housing or not being a green option.	All comments in response to the Issues and Options consultation are required to be noted and presented in the Preferred Options document. Officers' role is to reflect on these to decide whether or how to incorporate them into the policy formulation.

		39.4 Paragraph	Respondent favours flatted development for older people's housing in the city area.	Housing for older people needs to reflect different needs which the type of housing should be in keeping with. Flatted developments for older people has precedent in the city and will continue to be a prominent housing type moving forward.
		39.9 Paragraph	Respondent suggests a five-storey minimum in order to accommodate a lift which in turn would accommodate more people.	Each case will be dependent on viability and the demand for such a volume of housing.
		42.6 Paragraph	Respondent questions the data set in conclusions about co-living preferences among young people.	Co-living will be an important delivery of housing moving forward especially among young professionals and families.
	Birmingham City Council Housing Department	43.7 Paragraph	The supporting text to Policy HN9, at paragraph 43.7 identifies that the site will deliver around 3,000 homes. The plans for the regeneration Druids Heath have increased and it is envisaged that the site will include demolition of existing housing that is not up to modern standards and not financially viable for investment. The new proposals include regeneration of the site with approximately 1,800 homes being demolished and redevelopment for in the region of 3,500 homes being constructed over a 20-year period. Along with new homes, open space, leisure provision and new retail provision will be provided as part of the renewal of the estate. This will reduce car dependency and improve sustainability as residents will be able to access services and facilities using new and improved cycle and pedestrian links.	Up-to-date estimates on the capacity of the Druids Heath Estate, once complete, will be incorporated into the next consultation stage of the Local Plan.

		44.2 Paragraph	Respondent stresses importance of planning for gypsy and traveller sites respecting their way of life.	The Council shares the respondent's view on planning for gypsy and traveller sites to respect their way of life. The Council has an obligation to maintain a supply of sites suitable for different gypsy, traveller and travelling showpeople needs and has a criteria for assessing the suitability for such sites.
	South Staffordshire District Council	44.8 Paragraph	South Staffordshire District Council has a shortfall of Gypsy and Traveller pitches and has written to neighbouring authorities to request assistance in meeting this need. SSDC requests that all authorities explore the same options as they have and therefore request that the plan preparation process evidences that the following options have been explored - intensifying existing sites; expanding existing sites; exploring all public land options in the city for new sites and approaching sites proposed for housing to see if landowners would be willing to set aside part of the site for pitch needs. SSDC would welcome an indication that all such options have been explored.	The City Council is continuing to carry out extensive site searches to identify sites for Gypsy and Traveller accommodation. Further information will be provided for the next consultation stage.
		46.10 Paragraph	Physical infrastructure should be taken to include new street trees - on pavements or replacing parking spaces through a developer funded TRO and also productive food growing spaces. Nutritious food, clean air and reductions in the urban heat island affect are all beneficial to our health and should count as healthcare.	The role design plays in healthy placemaking is acknowledged and will continue to form an important part of further design guidance and coding.

	Developers Consortium - Barratt Homes, Bloor Homes, Bromford, Catesby Estates, Heyford Developments & IM Land	Policy HN1 New Residential Development	Believe that the shortfall of 46,153 dwellings is inaccurate due to an overstating of the identified housing capacity/supply. This is further complicated by the Government's proposed changes to the NPPF and the Standard Method, but we believe that the Council will still be facing a housing shortfall of 31,110 dwellings. The Council must do more to address this shortfall through the BLP, including releasing land from the Green Belt as an exceptional circumstance under the draft NPPF.	The evidence base for the BLP includes an extensive list of proposed site allocations, with clear capacities and proposed densities forming the overall capacity figures contained in the document. The approach taken is compliant with the current NPPF. Any subsequent changes to the NPPF and Standard Method for housing need will be considered at the next stage of plan production.
	Lendlease	Policy HN1 New Residential Development	Supportive of Policies HN1 and HN3 for sustainable places that are accessible. Suggest amended wording (p.189) to allow sites to best respond to current housing needs within a location which would be aligned to NPPF (para 86d of the December 2024 version) which states policies should 'be flexible enough to accommodate needs not anticipated in the plan and enable a rapid response to changes in economic circumstances'. The HEDNA 2022 found that broadly the same mix can be applied across all of Birmingham, but the location and quality of sites will impact the housing mix that can be accommodated, for example, the City Heart may be more suited to flatted development.	Policies HN1 and HN3 provide sufficient flexibility as required by the NPPF in terms of mix and type of housing on all sites across the City, particularly when the Policies are taken in conjunction with each other. Bullet points 3,4 and 5 of Policy HN3 allow for up-to-date evidence of need, the locality and ability of the site to accommodate a mix of housing and the ability to take account of market signals and local market trends which together provide the necessary flexibility required.

	MODA	Policy HN1 New Residential Development	Replace "New Residential Development will be supported where it" with "Proposals for residential development will be approved where they" Define "residential" in reasoned justification in line with reference to the living sector as per previous comments.	The current wording which uses the phrase 'will be supported' rather than the suggested 'will be approved' provides more flexibility for planning decisions to take account of detailed policy issues and preferences.
	Stoford	Policy HN1 New Residential Development	Not all sites can cater for every housing need, particularly City Centre sites which respond to very different demands than in suburban locations. The policy wording should be expanded to allow sites to best respond to needs within that location, taking a site-specific approach.	Proposed policy HN1 provides sufficient flexibility as required by the NPPF in terms of mix and type of housing on all sites across the City, particularly when read in conjunction with other proposed policies such as HN3.
	Calthorpe Estates	Policy HN1 New Residential Development	Criterion 6 " The Proposals Do Not Conflict with any other policies of the Local Plan" appears overly restrictive. There needs to be a balancing of priorities. Suggest this part of the policy is removed to provide flexibility in considering applications.	The criterion is intended to highlight that this policy should not be considered in isolation and that other plan policies will be important to consider as part of the overall planning balance. A whole plan viability assessment has been undertaken to determine the cumulative impact of the proposed policies.

	Icknield Port Loop LLP	Policy HN1 New Residential Development	Generally, support proposed policies HN1 and HN3 but HN1 should include some flexibility to recognise that housing types and needs will be different within and around the City Centre, in line with paragraph 86d) of the NPPF. Current wording from BDP policy TP30 which recognises the local context of development sites could be carried over to the new policy.	Policies HN1 and HN3 provide sufficient flexibility as required by the NPPF in terms of mix and type of housing on all sites across the City, particularly when the Policies are taken in conjunction with each other. Bullet points 3,4 and 5 of Policy HN3 allow for up-to-date evidence of need, the locality and ability of the site to accommodate a mix of housing and the ability to take account of market signals and local market trends which together provide the necessary flexibility required. The same flexibility also applies to Policy HN2 regarding market viability and location of affordable housing levels.
	Property Link	Policy HN1 New Residential Development	Support policy HN1. Despite national policy changes, shortfall still remains and thus contributions from areas such as the Gun Quarter will play a key role.	Support noted. We will keep the proposed policies and land supply under review and will refine them as required in order to accord with changes to national planning policy.
Jon Sayer	Homes England	Policy HN1 New Residential Development	Support the policy for the delivery of new residential development including the creation of sustainable places. There needs to be flexibility in the application of the minimum density standards and the housing types to allow sites to best respond to the most up to date information on housing need whilst adopting a location and site-specific approach.	The proposed policy approach is intended to provide sufficient flexibility as required by the NPPF in terms of mix and type of housing on all sites across the City, particularly when the policies are considered in conjunction with each other. Bullet points 3,4 and 5 of Policy HN3 allow for up-to-date evidence of need, the locality and ability of the site to accommodate a mix of housing and the ability to take account of market signals and local market trends which together provide the necessary flexibility required. The same flexibility also applies to Policy HN2 regarding market viability and location of affordable housing levels.
	Knighthead Capital Management	Policy HN1 New Residential Development	Support aims of Draft Policy HN1 to ensure new housing development contributes to creating sustainable places.	Support noted

	Commercial Estates Group (CEG)	Policy HN1 New Residential Development	The wording for draft Policy HN1 should be expanded to allow sites to best respond to current housing needs (and other market and viability related factors) based upon a more location and site-specific approach. This would also ensure the policy wording reflects the guidance provided at paragraph 86(d) within the NPPF, which requires policies to be flexible enough to accommodate needs not anticipated in the plan and to enable a rapid response to changes in economic circumstances.	The proposed policy approach provides sufficient flexibility as required by the NPPF in terms of mix and type of housing on all sites across the City, particularly when the policies are considered in conjunction with each other. Bullet points 3,4 and 5 of Policy HN3 allow for up-to-date evidence of need, the locality and ability of the site to accommodate a mix of housing and the ability to take account of market signals and local market trends which together provide the necessary flexibility required.
	Hanehouse Ltd	Policy HN1 New Residential Development	Request amendments to HN1 Policy wording, as follows: 1) 'New residential development will be supported where it is' be replaced with, 'Proposals for residential development will be approved where they' and 2) the term residential is defined in HN2 and in HN1 it should be clarified that residential includes Class C together with other typologies that fall outside of this Use class, such as PBSA and Co-Living.	The current wording which uses the phrase 'will be supported' rather than the suggested 'will be approved' provides more flexibility for planning decisions to take account of detailed policy issues and preferences.

	Woodbourne Group	Policy HN1 New Residential Development	The wording "New residential development will be supported where it..." should be replaced with "Proposals for residential development will be approved where they..." It should also be clarified that the term "residential" includes Class C together with other typologies which fall outside of the Use Class including PBSA and large-scale shared housing (co-living) (i.e. Living sectors)	The current wording which uses the phrase 'will be supported' rather than the suggested 'will be approved' provides more flexibility for planning decisions to take account of detailed policy issues and preferences. Purpose built student accommodation and co-living (large scale shared accommodation) both have their own draft policies within the PO document (Policies HN7 and HN8) and so do not need specific mention within Policy HN1.
Mr John Pearce	Bloor Homes	Policy HN1 New Residential Development	Generally, support the policy.	Support noted
	West Midlands Housing Association Planning Consortium (WMHAPC)	Policy HN1 New Residential Development	The impact of a brownfield led approach on the delivery of affordable homes needs to be considered. Strongly recommend that the Council words its housing delivery target as a minimum requirement to ensure that additional housing can be facilitated where necessary in Birmingham.	Due to its urban nature, Birmingham's land supply has always been brownfield-led. A whole plan viability assessment has been undertaken to consider the cumulative impacts of the proposed policies on the delivery of development. The policy approach will continue to be reviewed and refined as work on the Local Plan progresses. National policy requires housing requirements to be minimum, so this will also apply within the Birmingham Local Plan.
	G.C. No 26 Ltd	Policy HN1 New Residential Development	Supportive of Policy HN1.	Support noted

	Glenbrook Property Limited	Policy HN1 New Residential Development	Support the policy objectives but clarification is required in regard to the types of housing needed in the city centre. "City Centre" also requires a precise definition in the glossary. Policy PG3 refers to "Central Birmingham" and identifies the "City Heart" as the City Centre. Do references to the "City Centre" elsewhere in the plan refers to the City Heart or Central Birmingham? Clarification is also required on whether the 400m measurement in the density policy is a radius or measured as the crow flies.	Comments noted. We will give further consideration to the definitions of City Centre and Central Birmingham so that they can be more clearly defined in the next consultation stage.
	Picton Jones (Asset Management) Ltd	Policy HN1 New Residential Development	Supportive of Policy HN1 as development proposals should be encouraged in accessible locations. There are a number of City Centre sites that are likely to come forward during the Plan period to provide high quality residential development.	Support noted
	University Hospitals Birmingham NHS Trust	Policy HN1 New Residential Development	Encouragement of new dwellings in areas already developed and that standards of existing dwellings can be enhanced to reflect the new developments e.g. lighting and insulation.	Policy HN1 confirms that the majority of new homes will be delivered on Brownfield sites in existing urban locations. Policies CE1 to CE6 cover issues in relation to energy generation and use within homes and the potential for higher levels of energy efficiency within new developments.

	Home Builders Federation	Policy HN1 New Residential Development	Strongly recommends that the plan allocates more sites than required to meet the housing requirement as a buffer. The Councils overall HLS should include a short and long-term supply of sites by the identification of both strategic and non-strategic allocations for residential development. The Council should identify at least 10% of its housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target in line with the NPPF requirements.	The evidence base for the BLP includes an extensive list of site allocations including capacity and proposed density figures in order to arrive at the overall capacity figures contained in the document. These are intended to maximise the development potential of the city. The sites proposed for allocation will be kept under review to ensure that sufficient land is identified to meet the minimum needs and the requirements of national planning policy.
	Canal and Rivers Trust (Planning Manager)	Policy HN1 New Residential Development	Supportive of wording relating to accessibility to local facilities by active travel means and historic, cultural and natural assets.	Support noted

The Tyler Parkes Partnership Ltd	West Midlands Police	Policy HN1 New Residential Development	The policy could be strengthened by the following amendments: Criterion 3 and include reference to safety and security being fully taken into account, as well as well designed, sustainably constructed and climate resilient Criterion 4 and should say. fully serviced by existing, improved or new infrastructure instead of adequately serviced by existing or new infrastructure. The supporting text should also refer to the following, Development should maximise the extent, safety and security of the built environment (both internal and external) including integration of Secured by Design and Park Mark principles including liaison with West Midlands Polices Design Out Crime Officers	The Council recognises that safety and security are important elements for built development and design. To this end, the wording of policies and supporting text will be reviewed for the next consultation stage.
	Birmingham City Council Housing Department	Policy HN1 New Residential Development	The wording of this policy is supported. The regeneration of Druids Heath will meet these policy requirements, particularly reducing car dependency, improved cycle and pedestrian links, having a range of affordable and open market housing to assist in meeting identified housing needs, highest standards of design, and new infrastructure. Above and below ground ecological and landscape considerations should also be taken into account in new residential development proposals.	Support noted. Ecological and landscape matters are covered under the proposed CE policies. All proposed policies will be kept under review and will be refined as work on the new Local Progresses.

		Policy HN1 New Residential Development	Ensure that new buildings are planning and built according to up-to-date government guidance on regulations on accessibility and inclusivity.	All policies in the BLP will be developed and finalised in accordance with latest relevant government policy and guidance.
		Policy HN1 New Residential Development	Support Policy HN1, particularly in terms of the reuse of brownfield land and regeneration aims including the creation of vibrant and sustainable communities.	Support noted.
	Handsworth Wood Residents Association	Policy HN10 Gypsies, Travellers and Travelling Showpeople	Supportive	Support is welcomed
	Dudley Metropolitan Borough Council	Policy HN10 Gypsies, Travellers and Travelling Showpeople	Expected Birmingham's requirements for gypsy, traveller and travelling showpeople provision can be accommodated within the city boundaries	The City Council will accommodate for the identified needs of Gypsies, Travellers and Travelling Showpeople over the Plan-period as much as possible in accordance with draft Policy HN10. Any shortfall in provision will be addressed through the Duty to Co-operate in accordance with national planning policy.
	Knighthood Capital Management	Policy HN11 Education Facilities	Fostering development of higher and further educational facilities is supported by Knighthood, who recognises the key role of academic facilities in driving forward the knowledge economy in Birmingham.	Support for Policy HN11 is welcomed.
	Bloor Homes	Policy HN11 Education Facilities	Support policy on new education facilities and development and have incorporated into their masterplanning for Frankley.	Support for Policy HN11 is welcomed.

		Policy HN11 Education Facilities	Object to Policy HN11 as it fails to respond to the circumstances where comprehensive regeneration is proposed and the opportunities that new and replacement buildings can achieve in relation to improving existing provision and delivering better placemaking. Suggest final sentence on p.255 by replaced by, 'This provision may be in the form of on-site provision, new or replacement facilities or the enhancement of existing facilities through financial contribution secured through S106 agreement of direct delivery'. Also suggest the following addition, 'The effects of the obligations on the financial viability of development may be a relevant consideration as to re-provision'.	Comments are noted and will be further discussed with Education colleagues when finalising the Preferred Options Policy for autumn 2025.
		Policy HN11 Education Facilities	Changes to schools/new school buildings are co-created with children with mobility impairments and their parents.	Comments are noted and agreed.

	Sport England	Policy HN11 Education Facilities	Sport England supports the reference in the policy to ensuring suitable provision for outdoor facilities for sports and recreation within schools, though we are unclear why this only references outdoor provision, since the provision of indoor sports facilities also play a key role in meeting the needs of education providers. Policy wording should make it clear that the development, expansion and upgrading of all education establishments will be supported subject to demonstrating that the proposals fully accord with policy CE14. Policy wording should also be extended to cross refer to the wording in policy CE14 that supports securing community use of sports facilities, including playing fields at the Citys education establishments.	Support for Policy HN11 is welcomed and the cross references to Policy CE14 for securing community use of sports facilities will be further considered through the development of the policy in the Preferred Options consultation scheduled for autumn 2025.
	Boldmere Neighbourhood Forum	Policy HN11 Education Facilities	New school facility is required in Boldmere as existing junior and infants' school is over-subscribed. Suggests a new school along with community sports facility at Gate Lane and Union Drive area. Secondary school provision in the area also needs a review.	Comments are noted. Policy HN11 is developed in discussion with education colleagues who assess local pupil yields and establish needs for new education provision based on local catchment areas.
	Worcestershire County Council	Policy HN11 Education Facilities	WCC recognises that there is a need to consider the cross-boundary impacts of growth on other infrastructure within Worcestershire, including education infrastructure. We look forward to constructive engagement over these potential impacts as the Birmingham Local Plan progresses	Comments are welcomed and further discussion and co-operation with Worcestershire County Council relating to needs and impacts is encouraged to inform policy development for the Preferred Options Consultation stage in autumn 2025.

		Policy HN11 Education Facilities	Educational facilities should follow residential density guidance. It is not appropriate for a city centre school to be a single storey building on a large footprint.	Comments are noted. Educational facilities are informed by needs assessments of the local catchment areas as well as density requirements.
POD Consultation Event - Handsworth		Policy HN12 Healthy Neighbourhoods	Respondent stresses importance of library.	Protections as far as the planning system can provide in protecting these important community assets are proposed.
POD Consultation Event - Central Birmingham Library		Policy HN12 Healthy Neighbourhoods	Importance of public spaces, community hubs and good-quality housing in integration and reducing loneliness.	Protections as far as the planning system can provide in protecting these important community assets are proposed.
POD Consultation Event - Handsworth		Policy HN12 Healthy Neighbourhoods	Respondent highlights importance of libraries in bringing community together.	Planning does not play a role in organising community events, however, it is noted the importance of such community centres in bringing members of public together and as such policy must as far as planning can achieve protect these spaces.
	NHS Property Services	Policy HN12 Healthy Neighbourhoods	NHSPS supportive of Health Impact Assessment policy proposal and encourage the council to engage with them further on this matter.	Policy approach and content is supported which is welcomed. Further engagement with NHSPS will be important in development of the policy and the HIA structure and implementation.

	Calthorpe Estates	Policy HN12 Healthy Neighbourhoods	Requirement for a HIA to be submitted with every application risks adding another document to an already significant list of submission requirements. Significant potential overlap with other assessments.	The requirement set out in the Preferred Options Document is for Health Impact Assessments (HIA) to be submitted for proposals of 50 dwellings or more (1,000 sq. m. or more for commercial developments) so this would mean that not every proposal would need to be accompanied by a HIA. More work is required through the determining the validation process to determine how this can be included within a Design and Access Statement, for example, and to ensure that submitting a Health Impact Assessment has a distinct function in measuring the impact of health and wellbeing of existing and future populations to an area, rather than focussing on what other assessments do best.
	Knighthead Capital Management	Policy HN12 Healthy Neighbourhoods	Sustainable development, and the creation of spaces in which the health and well-being of local people is maximised, is at the heart of Knightheads vision for the Sports Quarter and the aims of Draft Policy HN12 are therefore strongly supported. Knighthead seeks to collaborate with local groups and stakeholders, such as the emerging Small Heath Neighbourhood Planning Forum, to identify ways in which community health and well-being can be maximised through the proposals for the Sports Quarter. In the case of the Sports Quarter, it is recognised that providing a range of uses can maximise public benefit in a way that industrial uses alone could not, to enhance the health of local residents and neighbourhoods.	Knighthead's willingness to embed community involvement in sports and recreation proposals are welcomed and would form a key component to contributions as required by the emerging Health Impact Assessment (HIA).

	Picton Jones (Asset Management) Ltd	Policy HN12 Healthy Neighbourhoods	Supportive of Policy HN12 but the requirement for Health Impact Assessments should be raised from proposed 50 or more threshold to a threshold of over 300 residential units.	The role design plays in healthy placemaking are acknowledged and will continue to form an important part of further design guidance and coding. Much research was undertaken to come to the figure of 50 units as the threshold for a HIA, which was also based on what other local authorities have set.
	University Hospitals Birmingham NHS Trust	Policy HN12 Healthy Neighbourhoods	High concentration of fast-food outlets in areas which are deprived adds to the cycle of poor health so limiting them and hours of operation will start to address this problem as well as litter and rat infestation. Initiatives to support healthier eating should be encouraged. Support reference to Birmingham Children's hospital as part of the Snow Hill Growth Zone. Ensure that future health provision is factored into wider plans and future service provision.	Changes to the NPPF in December 2024 as per paragraph 97 included the requirement to refuse fast food applications where these are located within walking distance of school or other places where children and young people congregate. However, there is more health planning policy can do in terms of wider environments to promote health lifestyles. Although not within the planning system's remit, the Council will continue to work with Business Improvement Districts and other stakeholders to support Farmers Markets where these come forward. Support for inclusion of Birmingham Children's Hospital within Snow Hill Growth Zone is welcomed. Ensuring that new development corresponds with health facilities is part of work with NHS colleagues.

	Home Builders Federation	Policy HN12 Healthy Neighbourhoods	In preparing its local plan the Council should normally consider the health impacts with regard to the level and location of development. Collectively the policies in the plan should ensure health benefits and limit any negative impacts and as such any development that is in accordance with that plan should already be contributing positively to the overall healthy objectives of that area. Consequently, where a development is in line with policies in the local plan a HIA should not be necessary. Only where there is a departure from the plan should the Council consider requiring a HIA. Any requirement for a HIA should be based on a proportionate level of detail in relation the scale and type of development proposed. Not justified by reference to the PPG. Only if a significant adverse impact on health and wellbeing is identified should a HIA be required, which sets out measures to substantially mitigate the impact.	The point regarding if a proposal is in alignment with the Local Plan, then a HIA would not be necessary due to other policies covering health and wellbeing is noted. However, it is our view that health issues are best tackled through a HIA where other policies do not analyse proposals through the lens of impact on residents' health and wellbeing.
	Birmingham City Council Housing Department	Policy HN12 Healthy Neighbourhoods	Support is given to the wording of this policy. In particular, the recognition of the importance that design can place on supporting healthy lifestyles and addressing health and well-being needs in Birmingham.	The role design plays in healthy placemaking is acknowledged and will continue to form an important part of further design guidance and coding.

	Acocks Green Focus Group	Policy HN12 Healthy Neighbourhoods	Need more detail on what a Health Impact Assessment would involve, e.g. enabling the purchase of healthy food as well as growing food. Also need more detail on what facilities should be accessible via walking and cycling.	Health Impact Assessment template is still subject to further refinement and as such this level of detail was not included in this stage of plan making. HIA will be a part of policy across different areas of Council functions and as such will learn from that in preparation for adoption in planning. There are certain ways in which planning can impact health food choices, for example through controlling the level of fast-food takeaways as part of local centres policy and refusing these within walking distance of schools. More details regarding cycle and walking facilities will be detailed in future plan making stages.
	Sport England	Policy HN12 Healthy Neighbourhoods	Sport England supports the policy and the reference to ensuring all developments support healthy lifestyles and we would advocate that reference is added to applying relevant guidance, including Sport England's Active Design Guidance, produced in partnership with Public Health England, in the reasoned justification. There is a lack of reference to the Council's Physical Activity Strategy and Sports Strategy, which will have interlinkages to the physical activity strategy which are key references for this policy. We would advocate that the reasoned justification should recognise that the planning policy needs to be as part of a wider approach to addressing inactivity, since planning policy alone cannot address these issues.	Support is welcomed for general approach of the policy. The policy will be reviewed at the next plan making stage to ensure that other Council strategies such as the Physical Activity Strategy and Sports Strategy are appropriately referenced whilst also future proofing the policy so that it can apply to future strategies.

		Policy HN12 Healthy Neighbourhoods	Productive growing spaces supported as these have been shown to improve mental and physical wellbeing, reduce reliance on carbon intensive global supply chains used by supermarkets.	Support for productive growing spaces welcomed.
	Save Smallbrook	Policy HN2 Affordable Housing	Difference in reduction in proportion of affordable housing unlikely to make difference as delivery is currently low. Council must take policy seriously so that it is delivered by developers.	Comments are noted. Ensure new affordable housing targets are being met by developers.
	Developers Consortium - Barratt Homes, Bloor Homes, Bromford, Catesby Estates, Heyford Developments & IM Land	Policy HN2 Affordable Housing	Despite an overwhelming and evidence affordable housing need, Birmingham City is delivering a net loss of affordable housing each year. On historic affordable housing delivery rates, this would require total delivery to far exceed the standard method based LHN. Birmingham's need for affordable housing provides a rationale for exceeding the standard method LHN.	The comments relating to under delivery on affordable housing are noted and acknowledged. However, the affordable housing policy and targets needs to be deliverable over the plan period and should be informed by the whole plan viability assessment.
	Lendlease	Policy HN2 Affordable Housing	Generally supportive of approach to affordable housing targets based on different value zones as referenced in HN2 but projects should be assessed on a case-by-case basis. So, part 2 of the Policy is supported for inclusion, as it acknowledges there may be circumstances where a viability assessment is required.	Policies HN2 provides sufficient flexibility as required by the NPPF in terms of market viability and location of affordable housing levels.

	MODA	Policy HN2 Affordable Housing	The affordable housing targets proposed are not achievable as supported by the Aspinall Verdi Whole Plan Viability Assessment. BtR should be included within Use Class C3. Following amendments should be made to Policy HN.2: a) Policy targets are adjusted to be consistent with the WVPA evidence base, which recommends maximum targets b) Policy wording is refined to remove reference to any restrictive or exceptional circumstances required for an applicant to submit a financial viability assessment should this be deemed necessary on viability grounds c) Policy wording is refined to remove reference to any requirement for agreement of circumstances or securing of permission from the Council as a precursor for the submission of a financial viability assessment at the decision making stage.	The comments relating to viability are noted and will be further considered alongside an updated viability assessment to be undertaken to inform the next stage of consultation on the Local Plan Review - the Preferred Options consultation. A balanced approach will be required given the significant shortage in Affordable Housing throughout the city.

	Stoford	Policy HN2 Affordable Housing	Supportive of new approach to Affordable Housing, with a zoned approach based on location, as it acknowledges the challenges and opportunities for different land types. Typhoo Wharf is located within a Core Zone Value and the proposed 20% is not consistent with the WPVR, which suggests 10% would be viable. The Plan provides no evidence as to why a higher proportion of affordable housing has been set and it is unclear if other Policy requirements have been factored into the 20% figure? There is concern that the Policy will fail to meet the NPPF soundness test.	Support for the zoned approach to Affordable Housing provision is welcomed. The comments relating to viability are noted and will be further considered alongside an updated viability assessment to be undertaken to inform the next stage of consultation on the Local Plan Review - the Preferred Options consultation. A balanced approach will be required given the significant shortage in Affordable Housing throughout the city.

	NHS Property Services	Policy HN2 Affordable Housing	Consider the need for affordable housing for NHS staff and those employed by other health and care providers; importance of workers being anchored in a specific geography to carry out their role. Additional health services are required for growing population in areas of new housing development. NHS staff will need to grow in order to serve this population growth. Engagement with partners such as Integrated Care Board (ICB), NHS Trusts and other Integrated Care System (ICS) partners. Consider affordable housing for NHS staff in relation to site allocation policies in particular where these are near larger healthcare employers.	The comments are noted and agreed.

	Aegon UK Property Fund	Policy HN2 Affordable Housing	Generally supportive of Policy HN2, with percentages for affordable housing based on zoned area but the evidence base suggests that in some areas such as the Gun Quarter and Digbeth only 10% provision is viable. This means that the current Policy is unsound. Policy should consider projects being assessed on a case-by-case basis and Part 2 which allows for financial viability assessments to be undertaken is supported. As the Gun Quarter is on periphery of the City Centre, viability is very challenging currently and an appropriate Policy balance must be adopted by the new Plan if the overall growth ambitions for the City are to be achieved.	Overall support is welcomed. The comments relating to viability are noted and will be further considered alongside an updated viability assessment to be undertaken to inform the next stage of consultation on the Local Plan Review - the Preferred Options consultation. A balanced approach will be required given the significant shortage in Affordable Housing throughout the city.
	Calthorpe Estates	Policy HN2 Affordable Housing	There is the opportunity to bring forward different models of affordable housing across the Calthorpe Estate to meet the needs of those living and working within and around it.	Comments are noted and welcomed.

	Calthorpe Estates	Policy HN2 Affordable Housing	Policy HN2 sets affordable housing targets that aren't demonstrably achievable. The preparation of policies in the Local Plan which substantially depart from the WPVA evidence base creates a primary risk for failure of the tests of soundness. Will place reliance on a brownfield housing land supply that is financially unviable and undeliverable at the affordable housing target level. b) set an affordable housing policy that isn't justified and places the deliverability of sites at risk. c) will necessitate sites in the Core Zone, Medium Value Zone and Low Value Zone resorting to submission of financial viability assessments alongside planning applications. Recommends a number of modifications to Policy HN.2: 1) Adjust policy targets to be consistent with WPVA evidence base and recommend Maximum targets 2) Refine policy wording to remove reference to any restrictive/exceptional circumstances 3) Refine policy wording to remove reference to requirement for agreement of circumstances/securing permission from the Council as a precursor for FVA submission. 4) Amendments to BtR development - rerun BTR typology appraisals to correctly reflect the APR discount requirements. Remove requirement for DMR units to have rents	The comments relating to viability are noted and will be further considered alongside an updated viability assessment to be undertaken to inform the next stage of consultation on the Local Plan Review - the Preferred Options consultation. A balanced approach will be required given the significant shortage in Affordable Housing throughout the city.

			restricted to 50% of the Government's Annual Maintenance Loan 5) Modify HN2/HN7 to remove blanket city wide target	
	Birmingham Fair Housing Campaign	Policy HN2 Affordable Housing	Reduction severely undermines the city's ability to provide housing for those in need. Remains vague on whether this lowered requirement will be binding, concerns over its effectiveness. Wish to see an affordable housing target of 35% across all brownfield sites in our city. Call for clearer commitment to the substantial provision of social rents. Labelling homes at 80% of the market price as affordable fails to address the severe challenges. Wish to see the tenure mix of affordable housing provided comprise of 70% social rent and 30% affordable home ownership.	The comments are noted and will be fully considered. Amendments to the NPPF will mean that it is possible to reconsider the tenure mix in favour of a higher % of social rent.
	Volume Property	Policy HN2 Affordable Housing	Concerns regarding affordable housing requirements for PBSA sector of up to 50% and discount market rent for Build to Rent at 35%. The requirement for First Homes will need to be reassessed against revised NPPF.	These comments are noted and will be further considered under an update to the Whole Plan Viability Assessment to inform the Preferred Options consultation in autumn 2025.

	Walter Smith Farms Ltd, L N Mitchell Ltd and Emmanuel College, University of Cambridge	Policy HN2 Affordable Housing	Welcome that brownfield and greenfield site affordable housing requirements vary in principle. However, considered essential that affordable housing requirements consider viability to determine deliverability at each site. The policy aspirations for affordable housing on residential developments should be set to realistic and deliverable levels. It is further noted that the affordable housing requirements exceed some of the recommended percentages set out in the Viability Assessment. Evidence should be provided to justify these levels accordingly. With reference to the affordable housing requirements, the tenure mix on brownfield and greenfield sites should also reflect the circumstances related to greenfield and brownfield sites. For example, large-scale greenfield sites with a higher requirement for affordable housing and a tenure mix proposing 70% social or affordable rent would likely result in large clusters of social/affordable rent, rather than a balanced mix throughout the development.	The comments relating to viability are noted and will be further considered alongside an updated viability assessment to be undertaken to inform the next stage of consultation on the Local Plan Review - the Preferred Options consultation. A balanced approach will be required given the significant shortage in Affordable Housing throughout the city. The comments relating to tenure mix are noted and will be further considered through the Plan Review process.

	Henley Investment Management Ltd	Policy HN2 Affordable Housing	The policy needs to be sufficiently flexible to foresee this possibility and enable development in appropriate circumstances. Considers that the table target of 20% is the appropriate target for BTR and shared living, as it accords with national policy in Planning Practice Guidance. A similar target for PBSA which has similar characteristics to residential BTR is more appropriate than a target of 50%. Part 4 of the policy sets a requirement for 30% of affordable provision to be affordable home ownership. Such provision is not compatible with BTR, PBSA or shared living schemes which is only reflected partially by parts 5 and 7. Part 7 sets a requirement for BTR to provide affordable provision at 35%through affordable private rent at a minimum discount of 20%, not to exceed the Local Housing Allowance level. The 35% requirement is not adequately justified, neither is the additional rent control. The policy seeks the commuted sum to be equivalent to the uplift in value attributable to the affordable units not being provided. Such a policy requirement is too rigid, as it fails to account for the possibility that a commuted sum or off-site provision may be required for viability reasons. If a commuted sum is required to equal the value release from not making provision on site, that would negate the purpose of the exercise	The comments and suggested policy amendments relating to Build to Rent schemes are noted and will be further considered alongside an updated viability assessment to be undertaken to inform the next stage of consultation on the Local Plan Review - the Preferred Options consultation. A balanced approach will be required given the significant shortage in Affordable Housing throughout the city.

			and maintain the unviability of development.	
	Homes England	Policy HN2 Affordable Housing	The move from a city-wide requirement of 35% affordable housing to the more granular requirements based upon the type of the development site (greenfield or brownfield) or located in a core, high, medium or low value location is welcomed. The balance of tenure mix between 70% social rent and 30% affordable on balance is a reasonable approach. The affordable product could be strengthened if a greater mix of affordable ownership options could be offered to meet the housing need of a wider cohort of the local population. It would be useful to understand the reasoning for the 35% affordable threshold for Build to Rent housing and why this does not follow the high and low value approach as adopted elsewhere.	General support for the approach in Policy HN.2 is welcomed. The comments relating to viability are noted and will be further considered alongside an updated viability assessment to be undertaken to inform the next stage of consultation on the Local Plan Review - the Preferred Options consultation. A balanced approach will be required given the significant shortage in Affordable Housing throughout the city. The comments relating to tenure mix are noted and will be further considered through the Plan Review process. The Viability Assessment found that there was capacity in the modelled Build to Rent schemes to absorb 35% affordable housing. This will be further assessed through the Viability Assessment update.
	Handsworth Wood Residents Association	Policy HN2 Affordable Housing	Supportive of areas in Medium Value Zone such as Handsworth Wood having higher targets for the provision of affordable housing. Supportive of appointment of an independent professional to conduct a financial viability assessment. Warn against over reliance of ward-based approach as areas of the ward (Handsworth Wood), favouring small area data, have higher deprivation.	Support is welcomed and the comments are noted on the ward-based approach.

	Commercial Estates Group (CEG)	Policy HN2 Affordable Housing	CEG welcome the new approach to affordable housing, which sets a tiered requirement for affordable housing based on a sites location within the Birmingham Land Value Zones Map. This approach acknowledges the different challenges and opportunities for differing land types with regards to affordable housing provision within the City, particularly within the context of market factors such as land values and viability. Supportive of lowering the requirement figure for the city centre locations (Core Zone), although consider the 20% proposed is not consistent with the viability evidence supporting the Plan which suggests only 10% would be viable at a strategic level. No evidence has therefore been provided as to why a higher percentage of affordable housing has been set against WPVR recommendations and it is not clear if other policy requirements have been factored into the 20% figure. Concerned that this draft policy will fail to meet the test of soundness as set out in paragraph 35 in the NPPF.	The comments relating to viability are noted and will be further considered alongside an updated viability assessment to be undertaken to inform the next stage of consultation on the Local Plan Review - the Preferred Options consultation. A balanced approach will be required given the significant shortage in Affordable Housing throughout the city.

	Hanehouse Ltd	Policy HN2 Affordable Housing	The proposed affordable housing targets are not achievable, which is supported by evidence base of Aspinall Verdi Whole Plan Viability Assessment (WPVA) - which recommends a maximum of 10% housing in the City Core. Constrained viability applies specifically to the City Core Zone and the Low Value Zone and Medium Zone as well as other residential typologies such as PBSA and Col-Living. A 10% level of affordable has been secured in the majority of recent schemes and due to Industry wide pressures and additional requirements (i.e. BNG and UGF) will place further pressure on viability. Build to Rent - Criterion 3 is incorrect in defining it as falling outside of Use Class 3 and should be amended. It is not appropriate to place more onerous requirements on Build to Rent than other C3 residential, as the affordable housing percentage sought is not reflected in relation to its location. NPPF para 66 states that ' the level of affordable housing to be sought from developments comprising solely of Build to Rent developments, alongside other specified exemptions... should be less than the minimum 10% level defined for other forms of residential development'. There are technical errors in the WPVA, with implications for Policy HN2 and also HN7 and HN8.	The comments relating to viability are noted and will be further considered alongside an updated viability assessment to be undertaken to inform the next stage of consultation on the Local Plan Review - the Preferred Options consultation. A balanced approach will be required given the significant shortage in Affordable Housing throughout the city. The technical errors will be re-examined as part of the updated whole plan viability assessment.

	MEPC Limited	Policy HN2 Affordable Housing	Generally supportive of Policy to set a zoned approach to affordable housing depending upon location. Supportive of Part 2 of Policy which allows for a financial viability assessment to be undertaken and recommend that Policy remains flexible enough to adapt to wider and changing market conditions.	Support for Policy HN.2 is welcomed.
	Woodbourne Group	Policy HN2 Affordable Housing	Only 10% and 15% affordable housing targets in City Core Zone and Low Value zone and Medium Value (brownfield) Zone respectively can be delivered. 10% for City Core Zone is more reflected of completed schemes in the area. Increased burdens from Selective Licensing and BNG has placed more pressures on viability. Wording of Criterion 3 defines BtR as falling outside of Use Class C3, this is incorrect and should be amended. Not appropriate to adopt a more onerous approach to BtR compared to other forms of Use Class C3.	The comments relating to viability are noted and will be further considered alongside an updated viability assessment to be undertaken to inform the next stage of consultation on the Local Plan Review - the Preferred Options consultation. A balanced approach will be required given the significant shortage in Affordable Housing throughout the city. The comments relating to BtR are noted and will be given further consideration during the development of the Revised Preferred Options consultation document.
	Walsall Council	Policy HN2 Affordable Housing	Policy HN2: we note that the policy states that it will apply to changes of use, however it should be noted that vacant building credit (NPPF paragraph 65) will reduce its effectiveness with respect to such developments.	The comments relating to Vacant Building Credit are noted.

		Policy HN2 Affordable Housing	It appears rare that affordable housing is ever viable regardless of the location and so greater pressure should be placed on developers to provide.	Comments are noted. Viability is a key consideration in the development of Policy HN.2 to ensure that it is deliverable.
	South Worcestershi re Councils	Policy HN2 Affordable Housing	Queries the reduction in affordable housing requirements against the adopted plan. Given that the core zone will have the lowest % of affordable housing and the highest densities the consequence will be a reduction in the number of affordable homes delivered.	Comments are noted and these are as evidenced by the viability assessment and the Core Zones approach.
		Policy HN2 Affordable Housing	Concern for the reduction of 35% affordable housing to 20%.	Concerns are noted.

	Churchill Retirement Living	Policy HN2 Affordable Housing	Recommends a number of changes to policy HN.2: Insert bullet 8 to draft policy HN2 stating that in line with the findings of the councils plan wide viability assessment, proposals for older persons housing will not be required to provide affordable housing under the requirements of this policy. Bullet 2 of draft policy HN5 is amended to state that homes for older and disabled people will be encouraged to provide a mix of tenure options where feasible, recognising the findings of the councils plan wide viability assessment which clearly demonstrates viability constraints. The council will work with local registered providers and Homes England to seek to enable the provision of affordable housing options within this typology and encourage the provision of market options with private providers. The draft policies themselves should fully reflect the findings of these studies rather than the supporting text for the plan to be justified, effective and consistent with national policy.	The proposed amendments to Policy HN.2 are noted and will be fully considered to inform the development of the Preferred Options Consultation stage for Autumn 2025.
	Bloor Homes	Policy HN2 Affordable Housing	Development of more viable sites such as the greenfield site promoted at Frankley by the respondent would yield a greater proportion of affordable housing. Green belt release following a green belt review would also help with affordable housing yields.	Comments are noted; the Council has commissioned a Green Belt Assessment to inform the Regulation 19/Publication version of the Plan. This will assess whether there are Grey Belt/Green Belt sites that could be released and subject to the Golden Rules requirement for 50% affordable housing provision.

	West Midlands Housing Association Planning Consortium (WMHAPC)	Policy HN2 Affordable Housing	It is welcomed that the draft policy aligns with national policy requirements for affordable housing. This is supported by the WMHAPC in principle, particularly given the reasons in the reasoned justification, however, the Council should be cautious to veer from the findings of the viability exercises as this could lead to the policy being found unsound at examination. The WMHAPC is pleased that the Council wishes to deliver a range of affordable tenures in line with the NPPF definition. The WMHAPC is pleased that Birmingham is taking proactive measures to facilitate the delivery of affordable housing through alternative avenues, which will help to ensure that affordable housing needs are met over the Plan period. However, it is important to consider that given the constrained opportunities for meeting housing supply in Birmingham, granting and supporting build to rent developments may be at the expense of meeting wider housing and affordable housing needs as these developments do not meet demand for market housing or particular affordable housing tenures such as social rent and shared ownership. It is noted on page 194 that the Council would require pepper potting affordable housing across sites, but we ask the Council to consider the practical implications of this requirement for housing associations when it comes to the	The comments relating to viability are noted and will be further considered alongside an updated viability assessment to be undertaken to inform the next stage of consultation on the Local Plan Review - the Preferred Options consultation. A balanced approach will be required given the significant shortage in Affordable Housing throughout the city. The comments relating to tenure mix are noted and will be further considered through the Plan Review process as will the role of Community Land Trusts.

			management of their housing stock. We would like to use this opportunity to highlight the successful proven track record that Community Land Trusts (CLTs) have in delivering affordable housing for local people.	
	G.C. No 26 Ltd	Policy HN2 Affordable Housing	Objection to Housing Policy HN2 as it is inflexible in its requirement for split of 70% social or affordable rent and 30% home ownership. Alternative splits should be able to be considered where appropriate.	The Objection to the tenure split is noted and will be further considered to inform the Revised Preferred Options consultation.

	Glenbrook Property Limited	Policy HN2 Affordable Housing	The respondent objects to parts of this policy: Criteria 2: Requiring agreement on "exceptional circumstances" before considering a viability appraisal is inconsistent with national planning guidance. Criteria 7: The reasoned justification text includes alternative policy options considered. That text recognises that only 10-15% affordable housing is achievable in the City Core Zone but sets a 35% requirement for BTR schemes which is unrealistic and unsupported by recent projects. The respondent also comments on the Aspinall Verdii report and has the following concerns: BTR developments in lower and medium value zones yield negative residual land values (RLVs), they question if development scenarios tested with correct assumptions around tenure, design, and additionality. High BLVs exceeded achievable RLVs, including in higher-value zones, they question if the BLV set was appropriate. Policies like Biodiversity Net Gain. Net Zero and high construction costs impose financial burdens. They suggest that more robust scenario testing is required with realism to the funding market. Small changes in costs or values severely impact project viability, the respondent	The Objection to Policy HN.2 is noted. The comments relating to viability are noted and will be further considered alongside an updated viability assessment to be undertaken to inform the next stage of consultation on the Local Plan Review - the Preferred Options consultation. A balanced approach will be required given the significant shortage in Affordable Housing throughout the city. The comments relating to BtR are noted and will be given further consideration during the development of the Revised Preferred Options consultation document.

			states this highlights g the assessments' lack of resilience to market fluctuations from a funding and delivery perspective. The affordable housing target for BTR is unattainable without external grant support, they are concerned that there is not a strategy to facilitate BTR development across the different value zones.	
	St. Philips Land	Policy HN2 Affordable Housing	Councils risk not meeting even more of their affordable housing needs. This is because even with the proposed affordable housing typologies proposed in Policy HN2 (Affordable Housing) (i.e. Greenfield/Brownfield and Value Zones), the provision of affordable housing is likely to be lower in reality on brownfield sites. The Council's proposed approach to meeting their needs through the urban regeneration of 25 Growth Zones will likely result in the delivery of exclusively flatted developments on brownfield land within the city, with limited to nil affordable housing delivered on-site. This would be contrary to the NPPF (Paras 60 and 64) and would significantly impede the Councils ability to meet Objective 6.	The concerns relating to the delivery of affordable housing within the growth zones are noted and will continue to be addressed and evidenced through the development of the Preferred Options Consultation in autumn 2025.

	Picton Jones (Asset Management) Ltd	Policy HN2 Affordable Housing	Supportive of proposals aligned to Land Values Map, to provide a lower quantum of affordable housing on Core zone sites at 20%. It is important there is flexibility for lower levels of affordable housing to be provided on sites where there are viability issues.	Support for the approach to affordable housing provision in Policy HN.2 is welcomed.
	University Hospitals Birmingham NHS Trust	Policy HN2 Affordable Housing	Consideration of temporary and adapted units for immediate homelessness challenges. Need incentives for developers to have a significant level of affordable homes as part of any new housing. Also, UHB exploring initiatives such as Homeshare to support Key workers into affordable homes.	The comments are noted.
	Hammerson	Policy HN2 Affordable Housing	The current Policy is not aligned to NPPF para 58, which states, 'it is up to the applicant to determine whether particular circumstances justify the need for a viability assessment at the application stage'. An expectation for development to provide affordable housing unless there are 'Exceptional circumstances' is unfair in view of the current challenges facing the Development industry as a whole, which are not site specific. The different Affordable Housing threshold for PBSA and Build to Rent should also be subject to viability considerations, to ensure consistency with Policy HN7.	The Objection to Policy HN.2 is noted. The comments relating to viability are noted and will be further considered alongside an updated viability assessment to be undertaken to inform the next stage of consultation on the Local Plan Review - the Preferred Options consultation. A balanced approach will be required given the significant shortage in Affordable Housing throughout the city. The comments relating to BtR are noted and will be given further consideration during the development of the Revised Preferred Options consultation document.

	Home Builders Federation	Policy HN2 Affordable Housing	The Council should be mindful that it is unrealistic to negotiate every site on a one-by-one basis because the base-line aspiration of a policy or combination of policies is set too high as this will jeopardise future housing delivery. The HBF would be interested to know what the Councils evidence is for going above the figures recommended by the Viability Assessment. Considers that it is appropriate for the policy to not seek any affordable housing provision from older persons housing due to the viability constraints. However, the HBF considers that it may be beneficial for this to be set out in the policy not just within the justification text. The HBF recommends that the Council amend this policy to better reflect their own evidence. This will mean reducing the affordable housing requirements and increasing the flexibility within the policy. It will also be essential for the viability study to test of Green Belt sites to see if they can deliver 50% affordable housing, as is currently being suggested through the proposed revision to the NPPF. This must therefore be fully tested through the Viability Appraisal.	The comments relating to viability are noted and will be further considered alongside an updated viability assessment to be undertaken to inform the next stage of consultation on the Local Plan Review - the Preferred Options consultation. A balanced approach will be required given the significant shortage in Affordable Housing throughout the city. The comments relating to Green Belt Review and potential sites are noted and agreed.

	HUB Residential	Policy HN2 Affordable Housing	HUB notes and supports, in principle, the aspirations for new affordable housing. Whilst HUB considers the overarching aims of draft Policy HN2 to be laudable, and supports the clarity and more nuanced lower target for traditional affordable housing in the City Centre Zone, it has significant concerns about the approach to affordable housing targets for other residential products such as BTR, co-living, and PBSA, and cannot accept the conclusions of the April 2024 viability evidence that do not reflect HUBs own experience of delivering such products elsewhere. In particular, HUB considers that draft Policy HN2 should be amended to reflect the following: There should be a uniform approach to affordable housing targets across the various residential products that are supported in the LPPOD, namely traditional residential, BTR, co-living, and PBSA. In the City Centre Zone this should be 20%. A generic approach to setting higher targets for BTR, co-living, and PBSA based on assumed viability evidence is not helpful and will undoubtedly compromise the deliverability of these residential projects in a regional city. HUB considers that setting different affordable housing targets for traditional residential and BTR on brownfield land will compromise delivery of purpose built BTR schemes and does not reflect policies in	The comments relating to viability are noted and will be further considered alongside an updated viability assessment to be undertaken to inform the next stage of consultation on the Local Plan Review - the Preferred Options consultation. A balanced approach will be required given the significant shortage in Affordable Housing throughout the city. The comments relating to Build to Rent and Co-Living Schemes are noted and will be further considered to inform the next stage of Plan Review.

			other major cities. In addition, the policy as drafted is not achievable as BTR rents at local housing allowance level are significantly lower than a discount of 20% to local market rents. HUB considers that a desire to include for a range of discounts as part of an affordable BTR offer should not be set out explicitly in policy, but should allow for discussions with BCC on a case-by-case basis having regard to the overall affordable offer, the location of the site, and any site specific constraints. Insisting on 35% affordable housing at local housing allowance levels will considerably compromise the deliverability of this housing product in Birmingham, and drive developers to consider investing in other centres or obtaining sub-standard BTR consents by stealth to provide less affordable housing. The anecdotal evidence on the viability of co-living schemes in Birmingham is not based on a robust sample size given the infancy of the market in the area. HUB strongly suggests that the target for co-living schemes is set at 20%, which it considers deliverable and consistent with the LPPOD targets for traditional residential in the City Centre Zone. This is a significantly more onerous target than other major cities such as London and Manchester and could have a major impact on the City's ability to attract new students and retain the	

			competitiveness of its Universities and Higher Education Institutions. HUB supports draft Policy HN2s inclusion of reference to exceptional circumstances in which the delivery of affordable housing may be reduced following the production of a viability assessment which will be agreed with by the Council.	
		Policy HN2 Affordable Housing	The respondent suggests reducing the affordable housing requirement in brownfield sites undermines the city's ability to provide housing for those in need and is concerned the affordable housing policy is subject to viability. The respondent highlights that 70% of affordable housing provided should be social or affordable rent but stresses there are differences in affordability between them, that there should be clearer commitment to social rent as affordable rent will not address homeownership challenges in Birmingham.	The comments are noted and will be fully considered. Amendments to the NPPF will mean that it is possible to reconsider the tenure mix in favour of a higher % of social rent.
		Policy HN2 Affordable Housing	Affordable housing provision should be based on the site context, especially where large scale housing redevelopment is proposed.	Comments are noted.

	Cordia UK	Policy HN2 Affordable Housing	The proposed City Centre zone for affordable housing contains a wide disparity in values within the one area. Accept that further sub-division of the Centre cannot be done but Policy needs to be more flexible to enable negotiation on a case-by-case basis. Suggest that 35% on Build to Rent is unviable and should be caveated for when gap funding is available.	The comments relating to viability are noted and will be further considered alongside an updated viability assessment to be undertaken to inform the next stage of consultation on the Local Plan Review - the Preferred Options consultation. A balanced approach will be required given the significant shortage in Affordable Housing throughout the city. The comments relating to Build to Rent Schemes are noted and will be further considered to inform the next stage of Plan Review.
	Perry Barr Sarl	Policy HN2 Affordable Housing	Generally supportive of the proposals to set a tiered approach to affordable housing. One Stop Shopping Centre and the adjoining land fall within the lower value zone of 20% but viability of projects should be determined on a case-by-case basis so we therefore support the text at Part 2 of the policy which allows for exceptional circumstances, which will require a financial viability assessment to be undertaken. Recommend that the Policy wording presents an additional option to offer affordable housing at a discounted sale price (between 25% - 50% discount).	Support and comment noted.

	Birmingham City Council Housing Department	Policy HN2 Affordable Housing	It appears that this is a sensible approach to try and ensure a suitable level of affordable housing is provided. The affordable housing policy does require a flexible approach to be adopted and lower levels of affordable housing to be provided on sites where there are financial viability issues. On identified regeneration and renewal sites within the Local Plan, it is important to recognise other funding mechanisms are in place to support affordable housing provision. In consideration of planning applications on these types of sites, there is a need for a flexible approach to be adopted. It is important that planning applications of this nature are not refused on the basis of not meeting the Local Plan affordable housing policy when other funding mechanisms are available to bring forward affordable housing requirements.	The comments relating to the deliverability of affordable housing are noted, particularly relating to funding mechanisms. This will require careful consideration as to how it can be ensured that alternative delivery mechanisms will actually be implemented on planning approval for schemes.
		Policy HN2 Affordable Housing	Do not support proposed 20% affordable housing target for Core Zone, as it is not justified by the evidence base. The Aspinall Verdi Whole Plan Viability Assessment concluded that the maximum potential for the Core Zone is 10% with Build to Rent at 20% of units being affordable Private Rent. The other value zones also show different percentage requirements to the evidence base, and all the targets should be changed.	The comments relating to viability are noted and will be further considered alongside an updated viability assessment to be undertaken to inform the next stage of consultation on the Local Plan Review - the Preferred Options consultation. A balanced approach will be required given the significant shortage in Affordable Housing throughout the city.

		Policy HN2 Affordable Housing	Strong objections to policy HN2 primarily to do with the 35% requirement for Build to Rent (BtR) and 50% requirement for purpose built student accommodation (PBSA) to be affordable, which is not viable for many schemes in the current market and is not backed up in the evidence base. This is further made difficult due to high development costs and limited rental income in the case of the 50% requirement for PBSA schemes. Evidence base with regard to the 35% affordable requirement for PBSA is flawed as the assessment has been undertaken on the basis of 20% discount in rent levels whilst elsewhere in HN2 requires rent levels of at least 20% discount but no greater than Local Housing Allowance (LHA) levels. The overly stringent requirements on both BtR and PBSA schemes would deter investors and developers thus reducing the supply of such schemes, putting pressure on open market housing to meet the needs of renters and students. The policy would not pass the NPPF tests of soundness, through it not being justified, effective or consistent with national planning policy.	The comments relating to viability are noted and will be further considered alongside an updated viability assessment to be undertaken to inform the next stage of consultation on the Local Plan Review - the Preferred Options consultation. A balanced approach will be required given the significant shortage in Affordable Housing throughout the city. The comments relating to Build to Rent and PBSA Schemes are noted and will be further considered to inform the next stage of Plan Review.

	Watkin Jones	Policy HN2 Affordable Housing	WJG considers approach for affordable housing within BTR (Build to Rent) sector is not sound, and therefore objects to the approach suggested by Part 7 of Policy HN2. It is not supported by an evidence base which seeks to justify the approach, and it is not consistent with national policy. It will stifle the delivery of much need rental homes in the borough, a form of housing which has been popular in recent years, as they will not be viable. To make Part 7 of draft Policy HN2 sound, and in the absence of evidence to justify the current approach, we suggest that the current wording is replaced by the following: 7. Build to Rent schemes should provide 20% of units as Affordable Private Rent at a minimum discount of 20% of local market rents for equivalent dwellings. Given that BTR may not even be viable with 20% affordable housing as demonstrated by the Aspinall Verdi Viability Study, it is essential that Part 2 of draft Policy HN2 remains, enabling the quantum of affordable housing to be reduced on viability grounds.	The comments and suggested policy amendments relating to viability and Build to Rent schemes are noted and will be further considered alongside an updated viability assessment to be undertaken to inform the next stage of consultation on the Local Plan Review - the Preferred Options consultation. A balanced approach will be required given the significant shortage in Affordable Housing throughout the city.
	Acocks Green Focus Group	Policy HN2 Affordable Housing	Policy should also support self-build, community land trusts and co-operative housing.	Comments are noted.

		Policy HN2 Affordable Housing	These should be 100% social or affordable rent, not affordable home ownership. The council should not be seeking to reduce its stock of council housing.	Comments are noted.
	Placefirst	Policy HN3 Housing Type and Size Mix	Policies should not be overly prescriptive relating to housing tenure, mix and housing accessibility and standards. Going above 30% accessible and adaptable Part M4(2) dwellings for developments 15+ dwellings puts too much burden on developer and poses risk to viability. This does not account for specific circumstances.	The comments relating to a site's specific circumstances are noted and will be further tested through the viability assessment update to inform the Preferred Options Consultation in autumn 2025.

	Withy Hill Consortium	Policy HN3 Housing Type and Size Mix	Increasing densities and relying on the delivery of sites in Central Birmingham will make it more difficult to meet the needs for larger family housing and affordable housing. The SA also identifies significant negative effects of higher density development in the City Centre, particularly in regard to the historic environment. More suburban sites and sites in the Green Belt will be required to rebalance future development in line with the identified needs. The implementation of the housing mix through policy HN3 contradicts the HEDNA which recommends that the recommended mix is used as a monitoring tool and a starting point for negotiations, rather than a requirement to be implemented through policy. The policy should also include more flexibility to recognise the specific setting and constraints of individual development sites.	The concerns relating to viability and flexibility within Policy HN.3 are noted and will be further considered through the updated HEDNA and Viability Appraisal which will be undertaken to inform the Preferred Options Consultation in autumn 2025. A Green Belt Review will also be undertaken to inform the Preferred Options.
POD Consultation Event - Handsworth		Policy HN3 Housing Type and Size Mix	Overcrowding a real issue, seems to becoming more of a problem. Maintenance of parks key.	Overcrowding of homes are a real issue for the city and new housing will help to address this in the future.
POD Consultation Event - Central Birmingham Library		Policy HN3 Housing Type and Size Mix	More social housing needs and highlighting their importance in affecting meaningful change and providing housing. Policy needs to mention accommodation for care leavers in housing type policy.	The comments are noted and agreed.

	Developers Consortium - Barratt Homes, Bloor Homes, Bromford, Catesby Estates, Heyford Developments & IM Land	Policy HN3 Housing Type and Size Mix	Just 21% of 0-5 year capacity and 35% of total capacity is at a density of 100 dph or under. Remainder likely to represent apartments. Dominance of higher density, especially on sites with a higher capacity. All sites with a capacity (0-5 years) of 500 dwellings or more have a density of at least 300 dph. At densities 100 dph apartments dominate and few properties with 3 or more bedrooms are provided. 79% of capacity identified within the next 0-5 years is at a density of 100 dph or more.	The concerns relating to density are noted and the evidence provided is noted.

	Lendlease	Policy HN3 Housing Type and Size Mix	Supportive of Policies HN1 and HN3 for sustainable places that are accessible. Suggest amended wording (p.189) to allow sites to best respond to current housing needs within a location which would be aligned to NPPF (para 84d) which states policies should 'be flexible enough to accommodate needs not anticipated in the plan and enable a rapid response to changes in economic circumstances'. The HEDNA 2022 found that broadly the same mix can be applied across all of Birmingham, but the location and quality of sites will impact the housing mix that can be accommodated, for example, the City Heart may be more suited to flatted development. Generally supportive of approach to affordable housing targets based on different value zones as referenced in HN2 but projects should be assessed on a case-by-case basis. So, part 2 of the Policy is supported for inclusion, as it acknowledges there may be circumstances where a viability assessment is required.	Policies HN1 and HN3 provide sufficient flexibility as required by the NPPF in terms of mix and type of housing on all sites across the City, particularly when the Policies are taken in conjunction with each other. Bullet points 3,4 and 5 of Policy HN3 allow for up-to-date evidence of need, the locality and ability of the site to accommodate a mix of housing and the ability to take account of market signals and local market trends which together provide the necessary flexibility required. The same flexibility also applies to Policy HN2 regarding market viability and location of affordable housing levels.

	Stoford	Policy HN3 Housing Type and Size Mix	Stoford wish to comment that there is a balance to be struck between providing mixed-tenured inclusive communities and acknowledging that housing needs may vary from place to place / site-by-site basis, which should be acknowledged with policy wording. For example, Policy HN3 should incorporate wording similar to that in the current Birmingham Development Plan Policy TP30, which states: on assessing the suitability of new residential development, full consideration will need to be given to the site and its context. Stoford is supportive of Policy HN3 (Pages 173 and 174). Current Policy (Policy TP30 The type, size and density of new housing) states that the council will consider the current and future demographic profiles which have been replaced in the BLP with other up-to-date evidence of need. This change is supported and allows the housing mix to be updated according to the latest needs of the city at the time of a planning application or reserved matters submission.	Support and comments noted.
	Henley Investment Management Ltd	Policy HN3 Housing Type and Size Mix	Should be clear that it is not a requirement of every individual development proposal to provide a mix of types and tenures. The policy purpose is to require a mix of sizes, types and tenures across the city as a whole, with appropriate account to be taken of the need and market indicators listed. The policy should be made clear in this regard.	The comments on Policy HN3 are noted particularly to have regard to need and market indicators.

	Handsworth Wood Residents Association	Policy HN3 Housing Type and Size Mix	Assessment needed to find out areas best placed to accommodate affordable housing Supportive of new market provision to be 2- and 3-bed properties addressing demand for newly forming households and older household downsizing. More demographic data is utilised to co-locate near existing family and friend networks, with a focus on the role Mature Suburbs play in providing family housing.	These comments are noted, and full consideration of data is undertaken to inform the housing policies and through the HEDNA process.
	Walsall Council	Policy HN3 Housing Type and Size Mix	Policy HN2: we note that the policy states that it will apply to changes of use, however it should be noted that vacant building credit (NPPF paragraph 65) will reduce its effectiveness with respect to such developments.	The comments relating to Vacant Building Credit are noted and agreed.
	Birmingham City Council Conservative Group	Policy HN3 Housing Type and Size Mix	Restrict and ban shared living arrangements in suburban streets in order to protect family homes. Where permission is granted for the conversion of family homes into establishments such as nurseries of old people's homes there should be strict policies preventing their subsequent conversion into other non-family uses such as HMOs. Restrictions on the number of build-to-rent developments, in favour of developments that provide ownership and affordable\social rent options	The concerns relating to HMOs are noted and are also being addressed through an Article 4 direction under a separate process.

	St Modwen	Policy HN3 Housing Type and Size Mix	Neither POD nor HELAA quantifies identified capacity based on sub-areas. Proposed strategy with greater proportion of flats does not accord with current housing profile in Birmingham. 1- bedroom dwellings targets had been exceeded, while family and affordable housing had fell dramatically short of targets. Recommended that the Council should consider potential for sites in neighbouring authorities as well as consideration of Green Belt release within City limits.	The comments and concerns are noted. Particularly in relation to the delivery of family housing. A Green Belt review will be undertaken to inform the Preferred Options consultation in autumn 2025.
	Bloor Homes	Policy HN3 Housing Type and Size Mix	Higher densities will deliver higher numbers but would be predominantly 1-2 bedroom dwellings and not meet need for 3-4 bedroom family dwellings. A suitable range of sites therefore needs to be allocated in order to deliver the required mix.	The concerns relating to the delivery of family housing are noted and will be considered further through the development of the Preferred Options consultation in autumn 2025.
	West Midlands Housing Association Planning Consortium (WMHAPC)	Policy HN3 Housing Type and Size Mix	Pleased that the Council has emphasised the importance of new housing proposals which provide a variety of choice of accommodation with a balanced mix of both market and affordable housing at different price points, tenures, sizes and shapes. The WMHAPC is pleased that the Council recognises this, and that draft Policy HN3 is sufficiently flexible to allow applications to respond to changing local needs throughout the Plan period while signposting readers to the last evidence base for housing mix.	Support for Policy HN3 is welcomed.

	G.C. No 26 Ltd	Policy HN3 Housing Type and Size Mix	Supportive of Policy HN3 but requires distinction between new homes that will be delivered in City Core and other areas. Policy HN4 makes it clear that there is a different market in the City Core to others, but this is not explicitly stated in Policy HN3 and should be.	The cross reference to Policy HN4 will be further considered in the Preferred Options Consultation document, due for publication in autumn 2025.
	Glenbrook Property Limited	Policy HN3 Housing Type and Size Mix	The respondent supports the aspiration of the policy but considers it would be beneficial to clearly define the types of housing that would be appropriate within the city core, similar to the approach for policy HN4.	The cross reference to Policy HN4 will be further considered in the Preferred Options Consultation document, due for publication in autumn 2025.

	St. Philips Land	Policy HN3 Housing Type and Size Mix	This approach in isolation does not tend to deliver family housing at policy-compliant levels. The corollary of this is that greenfield and Green Belt land is typically less constrained by such financial constraints and site size and can deliver policy-compliant densities that facilitate the provision of family housing and an approach which also aligns with the NPPF (Paras 60 and 63). This is particularly important as the Councils HEDNA has identified a market housing mix markedly tilted towards 3+ bedrooms (see Table 1.1), with 60% of the need for market housing being for larger family homes. The Council's proposed approach to meeting their needs through the urban regeneration of 25 Growth Zones will likely result in the delivery of exclusively flatted developments on brownfield land within the city, with limited scope for the delivery of family housing. This would be contrary to the NPPF (Paras 60 and 63) and would significantly impede the Councils ability to meet Objective 4.	The concerns relating to density and type of housing within the Growth Zones is noted. Further work will be undertaken on the development of Preferred Options (due for consultation in autumn 2025), this will be informed by a Green Belt Review.
	Picton Jones (Asset Management) Ltd	Policy HN3 Housing Type and Size Mix	Policy HN3 should recognise that not every site can deliver a mix of dwelling types and tenures. In City Centre locations, sites are not always suitable for family homes and smaller units are most appropriate.	Comments are noted. Policy HN3 provides indicative guidance to inform future housing developments in line with local housing needs and place making.

	Home Builders Federation	Policy HN3 Housing Type and Size Mix	Important that any policy is workable and ensures that housing delivery will not be compromised or stalled due to overly prescriptive requirements, requiring a mix that does not consider the scale of the site or the need to provide significant amounts of additional evidence. The increased prioritisation of social rented housing within affordable housing will also impact on deliverability and viability. It will be important for the viability appraisal to fully consider this issue.	Comments are noted. Policy HN3 provides indicative guidance to inform future housing developments in line with local housing needs and place making. An updated viability assessment will be undertaken to inform the next stage of the Local Plan Review - the Preferred Options consultation in autumn 2025.

	Langley Sutton Coldfield Consortium	Policy HN3 Housing Type and Size Mix	Objects to the proposed wording for Policy HN3 on the basis that it is not currently considered to be consistent with the wording of other proposed Policies within the emerging Local Plan. In order to achieve consistency between Local Plan Policies the Consortium accordingly proposes that Policy HN3 is amended through minor deletions (as shown below via strikethroughs) and additions (as shown below via bold underlined text) to state as follows: Account will need to be taken of: 1. The Birmingham Housing and Economic Development Needs Assessment 2022 (or any subsequent revision);2. Detailed local housing needs assessment (where relevant); 3. Other up-to-date evidence of need;4. The locality and ability of the site to accommodate a mix of housing;5. Any site-specific Local Plan policy housing mix requirements; and6. Market signals and local housing market trends.	Comments and objections are noted. Policy HN3 provides indicative guidance to inform future housing developments in line with local housing needs and place making. An updated viability assessment will be undertaken to inform the next stage of the Local Plan Review - the Preferred Options consultation in autumn 2025.

	Cordia UK	Policy HN3 Housing Type and Size Mix	Pleased to see that the matters that will be taken into consideration when assessing housing mix include the locality/ability of the site to accommodate a mix, and market trends. As currently drafted, the locality/ability of a site to deliver a wide mix of units is just one of five factors to be taken into account, but in reality, it is a more fundamental constraint. To better reflect this limitation, the policy should be redrafted as follows: New housing developments should provide a mix of dwelling sizes, types and tenures in order to meet local needs and support the creation of mixed, sustainable and inclusive communities, where this is consistent with the nature of the locality and the ability of the site to accommodate a mix of housing. Where the locality is appropriate and the site is able to deliver a housing mix, the mix to be provided should take account of: the Birmingham Housing and Economic Development Needs Assessment 2022 (or any subsequent revision); detailed local housing needs assessment (where relevant); other up-to-date evidence of need; and market signals and local housing market trends.	Comments and objections are noted. Policy HN3 provides indicative guidance to inform future housing developments in line with local housing needs and place making. An updated viability assessment will be undertaken to inform the next stage of the Local Plan Review - the Preferred Options consultation in autumn 2025.

	Birmingham City Council Housing Department	Policy HN3 Housing Type and Size Mix	Overall, the wording of this policy is supported. It is beneficial to ensure a mix of dwelling sizes, types and tenures are provided where possible to support the creation of mixed, sustainable and inclusive communities.	Support for Policy HN3 is welcomed.
		Policy HN3 Housing Type and Size Mix	Welcome the Policy, as it considers a range of evidence and factors to determine the mix, but bullet point 4 should be split into two separate elements and suggest the following bullet point be added, 'The specific locational characteristics of an area'. The Policy should also recognise that apartments are most appropriate in some locations, such as the City Centre and these schemes are only made viable with 1 and 2 bed units. It is important to make efficient use of land and respond to market demand and would object to a Policy which sets out specific housing mix requirements.	Support for Policy HN3 is welcomed. The comments relating to apartments are noted.
		Policy HN3 Housing Type and Size Mix	Ensure that houses for those with mobility impairment are co-designed with disabled people and that housing is available near to accessible schools.	Comments are noted and are also applicable to Policy HN.5 and considered more fully under this policy relating to specific housing needs.
		Policy HN3 Housing Type and Size Mix	Objection to Policy HN3 due to the prescriptive ask for a prescribed mix of bedrooms for new developments. These need to be more flexible to meet the practical needs of different housing projects reflecting changes based on various factors such as economic conditions, demographic shifts and local preferences.	The comments and objections are noted that further flexibility needs to be afforded to the Housing Type and Size Mix policy.

	Watkin Jones	Policy HN3 Housing Type and Size Mix	WJG supports the approach advocated by draft Policy HN3. Whilst WJG is not recommending any changes at this stage, it is important that any future revision of draft Policy HN3 continues to recognise that Build To Rent homes have a different housing mix requirement to their for sale equivalent and the Council takes account of this in its assessment of planning applications.	Support is welcomed.
	Acocks Green Focus Group	Policy HN3 Housing Type and Size Mix	Need a clear definition of what constitutes the city centre - i.e. the ring road or the area covered by the Central Birmingham Framework?	Comments are noted and agreed, this will be further clarified within Policy PG.1.

	Save Smallbrook	Policy HN4 Residential Densities	Supportive of the principle of applying minimum residential densities but 400 dwellings per hectare in the city is too high. There is also too much of a difference with the 70 dwellings per hectare figure for local centres which is considered to be more appropriate. Densities should take into consideration urban form not just express this in numerical form.	The minimum density figures were identified from an assessment of recently approved and constructed developments, with many of those in the city centre already achieving or exceeding the 400 dwellings per hectare figure. The proposed policy states that full consideration needs to be given to the site and its context, and that there may be occasions when a lower density would be appropriate in order to preserve the character of the locality of an area. This will include consideration of the urban form. We will keep the minimum density figures under review as work on the Local Plan progresses and will amend them if it apparent there is too much of a difference between the 70 and 400 dwelling per hectare figures.
POD Consultation Event - Central Birmingham Library		Policy HN4 Residential Densities	Densities can be significantly increased on urban sites.	Comment noted. The proposed approach reflects an aspiration to make more efficient use of urban sites, whilst also reflecting what is realistically achievable as evidenced by recent planning approvals and dwelling completions.

	Lendlease	Policy HN4 Residential Densities	Supportive of Policy HN4, reflects the densities that are currently being approved and built within the City Centre. Also supportive of policy wording that where density falls below target, applicants will have an opportunity to provide supporting information in justification.	Support for the proposed policy is noted.
	Stoford	Policy HN4 Residential Densities	Supportive of Policy HN4 and City Centre density targets, which will apply to Digbeth, as this will be in accordance with paragraph 128 of the NPPF. Locations such as Typhoo Wharf can accommodate higher density developments and make efficient use of semi-vacant land, even in the context of Conservation Areas.	Support for the proposed policy is noted.
	Aegon UK Property Fund	Policy HN4 Residential Densities	Supportive of Policy HN4, particularly the target for high densities in the City Centre, as this is more reflective of schemes that are currently being delivered. The wording in the reasoned justification that states densities should be maximised, subject to the density being appropriate is supported.	Support for the proposed policy, and particularly the higher minimum densities at the City Centre, is noted.
	Calthorpe Estates	Policy HN4 Residential Densities	It is critical that densities are applied flexibly so that best use can be made of available land alongside the balance of all other considerations. Important for the distances set out in the policy to be applied with a sense of realism.	The proposed policy will require full consideration of the site and its context, and that there may be occasions when a lower density would be appropriate in order to preserve the character of the locality of an area. We will keep the distance thresholds under review as work on the Local Plan progresses and will amend them if it becomes apparent that they might be difficult to achieve.

	Icknield Port Loop LLP	Policy HN4 Residential Densities	Welcome the proposed increase in the minimum density requirements which will be in accordance with paragraphs 60 and 128 of the NPPF. There do however need to be caveats and flexibility within the policy to take account of other matters such as local character, design, viability, market conditions, providing an appropriate housing mix and the need to provide supporting infrastructure.	Support for the minimum residential densities is noted. The proposed policy states that full consideration needs to be given to the site and its context, and that there may be occasions when a lower density would be appropriate in order to preserve the character of the locality of an area. We will give further consideration to whether specific reference also needs to be made to design, viability, market conditions, providing an appropriate housing mix and the need to provide supporting infrastructure as reasons to justify a lower density figure for certain sites.
	Folkes Holdings Limited	Policy HN4 Residential Densities	Although increasing housing densities makes more efficient use of space, it works more successfully in City Centres than elsewhere. However, higher densities may not address needs of some sections of the community such as for 3-4 bedroom family housing where private garden space is preferred. 40dph across the rest of the city will also be challenging if also to include POS, car parking, space standards and BNG requirements. Higher densities have also under-achieved in terms of the delivery of affordable homes. To achieve an adequate level of affordable housing, a broad range of sites and mix of development types, including family housing, should be identified.	The lower density figures for locations away from the City Centre reflect the larger types of family housing that are typically approved and constructed in these areas. The minimum density figures are based on an assessment of the net developable area of recent residential developments. The net developable area takes account of land required for open space, biodiversity enhancements and traffic infrastructure, so these will be factored into the determination of future site capacities under this policy. It is recognised that there are viability challenges to the provision of affordable housing on certain sites. This is reflected in proposed policy HN2. Mechanisms to overcome this will be considered further as work on the Local Plan progresses.
	Volume Property	Policy HN4 Residential Densities	See comment on definition of "City Centre" made under PG3.	We have responded to your comment under PG3.

	Walter Smith Farms Ltd, L N Mitchell Ltd and Emmanuel College, University of Cambridge	Policy HN4 Residential Densities	A minimum requirement will unlikely be deliverable throughout. It is considered that the policy should be amended to require average densities of 400dph, 70dph and 40dph accordingly, particularly when considering larger scale phased sites where density variations will inevitably occur. The policy should ensure that density aspirations do not lead to undesirable conflicts with other policies, including residential amenity, open space, space standards, tenure mix, etc.	Support for the proposed density requirements to be applied as averages rather than minimums is noted. The proposed policy is intended to maximise the capacity of housing developments in the city and make the most efficient use of land, but it does also allow for lower densities where sufficient justification is provided. Further consideration will be given as to whether it is appropriate to refer to viability as part of this justification.
	Homes England	Policy HN4 Residential Densities	There is a need for flexibility when considering the minimum density standard, as, due to wider site and market consideration, it would not benefit Birmingham if future development sites stalled if it was not viable for land promoters and developers to meet the density requirement due to site constraints. The policy could be enhanced if it explicitly references considering the needs for different types of housing, viability/local market conditions, infrastructure capacity and local character ensuring that sites are to be assessed on their own merits.	The proposed policy states that full consideration needs to be given to the site and its context, and that there may be occasions when a lower density would be appropriate in order to preserve the character of the locality of an area. We will give further consideration to whether specific reference also needs to be made to viability, market conditions, providing an appropriate housing mix and the need to provide supporting infrastructure as reasons to justify a lower density figure for certain sites.

	Zero Carbon House	Policy HN4 Residential Densities	Policy Exchange document Tall Buildings: A Policy Framework for Responsible High-Rise and Better Density shows that more tall buildings are not the solution to the UK housing crisis. Gentle density like Vienna, Copenhagen, Helsinki etc, up to seven stories will be ideal for Birmingham and will achieve densities of 400/ha with much better social quality and much better sustainability. The higher you go, the more inefficient the building becomes in terms of the net area measured against carbon emissions from operation, construction and maintenance.	It is recognised that a density of 400 dwellings per hectare can be achieved on sites without the need for a tall building of over 7 stories to be constructed. The minimum density figures were identified from an assessment of recently approved and constructed developments, with many of those in the city centre not being taller than 7 stories. The Design Guide provides more detailed guidance on tall buildings. Further consideration will be given to making greater reference to the Design Guide within this proposed policy will be considered at the next stage of plan production.
	Commercial Estates Group (CEG)	Policy HN4 Residential Densities	Welcome the draft Policy HN4 (Pages 201 and 203) including the target densities of at least 400 dph in the City Centre noting that development proposals should make the most efficient and effective use of land including in terms of appropriate densities	Support for the proposed policy is noted.

	MEPC Limited	Policy HN4 Residential Densities	Supportive of Policy HN4 and welcomes the recognition that new housing should be provided at a target density related to the site, its context and housing need, with at least '400 dwellings per ha in and within 400m of the City Centre'. It is vital that increased densities are balanced alongside maintaining quality standards, particularly for tall buildings which should benefit the surrounding development.	Support for the proposed policy is noted. The proposed policy will need to be considered alongside wider policy requirements which seek to provide a high standard of living, amenity and design.
	Victorian Society	Policy HN4 Residential Densities	Good that standards for minimum residential densities are being specified. However, 400 dph is too high in the City Centre producing an uninhabitable environment and a hostile context for almost all the city centres historic buildings. Differential with other areas in the city is also too great.	Support for the minimum residential densities is noted. The proposed policy states that there may be occasions when a lower density would be appropriate in order to preserve the character of the locality of an area. Conservation areas are provided as an example of this, but further consideration will be given as to whether reference also needs to be given to wider historic assets. The difference with other areas of the city is noted. The minimum density figures will be kept under review as work on the Local Plan progresses and will be amended if it appears there is too much of a difference between the 70 and 400 dwelling per hectare figures.
	Walsall Council	Policy HN4 Residential Densities	No response submitted	N/A - no comment to respond to

	South Worcestershire Councils	Policy HN4 Residential Densities	Queries whether a higher density could be applied outside of the city core. 40dph represents no change from the adopted plan and is the density applied to the Worcester City Core and the small market towns in the SWDPR area. Given the opportunities for creating sustainable development in a greater urban area the BLP should consider higher densities. This will both help to meet housing need and achieve carbon reduction targets.	The minimum density figures are based on an assessment of recently approved and completed residential developments, so they reflect what is already considered to be appropriate and achievable across the city. The lower density figures for locations away from the City Centre reflect the larger types of family housing that are typically approved and constructed in these areas. We will keep the minimum density figures under review as work on the Local Plan progresses and will amend them if it becomes apparent that different levels would be appropriate and can be delivered.
	Birmingham City Council Conservative Group	Policy HN4 Residential Densities	No high rises outside the A4550 Middleway Ring road. Arterial routes such as the Hagley Rd, Harborne Rd, Bristol Rd, and Pershore Rd should provide density through traditional mansion style blocks only. Existing suburbs should not face any increase in density requirement unless this can be achieved without compromising on character and space standards. No proposal should compromise on minimum space standards or adequate outside space. The mature suburbs policy should be retained and strengthened. Measure to protect and improve shop frontages on local estates (e.g. falcon lodge)	Proposed policy HN4 sets out minimum residential density figures to be achieved, but it also states that there may be occasions when a lower density would be appropriate in order to preserve the character of the locality of an area. The exact form of development on a site would need to be considered on a case-by-case basis, taking in to account the local context of a site and wider policies relating to design and residential amenity. Some of these policies and supporting guidance already exist within the Development Management in Birmingham document and the Birmingham Design Guide. It may be appropriate to give greater reference to these wider policies, and this will be considered as part of the next stage of plan production.

	Bloor Homes	Policy HN4 Residential Densities	Higher densities will affect other policy goals such as open space delivery, parking standards and NDSS. Providing these will make higher densities unachievable.	The minimum density figures are based on an assessment of the net developable area of recent residential developments. The net developable area takes account of land required for open space, biodiversity enhancements and traffic infrastructure, so these will already be factored into the determination of future site capacities under this proposed policy approach.
	G.C. No 26 Ltd	Policy HN4 Residential Densities	Supportive of Policy HN4 - densities should be maximised in Town Centres such as Erdington Town Centre.	Support for the proposed policy, particularly maximising densities in town centres, is noted.
	Glenbrook Property Limited	Policy HN4 Residential Densities	The respondent supports this policy.	Support for the proposed policy is noted.
	CPRE Worcestershire	Policy HN4 Residential Densities	Supportive of higher densities, as this is evidenced in the city centre and around public transport nodes.	Support for the proposed policy for higher densities, particularly in the city centre and around transport nodes, is noted.
	Picton Jones (Asset Management) Ltd	Policy HN4 Residential Densities	Supportive of Policy HN4 for higher density rates in the City Centre and Brownfield sites should be maximised.	Support for the proposed policy for higher densities, particularly in the city centre and on brownfield sites, is noted.
	Hammerson	Policy HN4 Residential Densities	Policy HN4 Residential Densities is supported.	Support for the proposed policy is noted.

	Home Builders Federation	Policy HN4 Residential Densities	The Council will need to ensure that these increases in density still allow for other policy requirements to be delivered and that the housing mix provided still meets the local housing needs. Policies such as open space provision, urban greening, biodiversity net gain, cycle and bin storage, housing mix, residential space standards, accessible and adaptable dwellings, energy efficiency, street trees, parking provision and EV charging, and any implications of design coding will all impact upon the density which can be delivered upon a site. There is an inherent tension between the deliverability of green roofs and green walls within an urban context and very high-density requirements.	The minimum residential density figures are based on an assessment of the net developable area of recently approved and completed residential developments. The net developable area takes account of land required for open space, biodiversity, residential space standards, design requirements and supporting infrastructure. Such matters will therefore be factored into the determination of future residential site capacities under this policy.

	Langley Sutton Coldfield Consortium	Policy HN4 Residential Densities	Objects to the proposed wording for Policy HN4 on the basis that it is not currently considered to be consistent with the wording of other proposed Policies within the emerging Local Plan. The Consortium proposes that these identified exceptions should explicitly reference the fact that some of the proposed site-specific allocations specify a particular density approach which deviates from the proposed Policy HN4 densities. For example, proposed Policy GZ26 (Langley Sustainable Urban Extension) requires a primary focus on the delivery of family housing at densities averaging 35-40dph. This is less than the minimum of 40dph specified within the proposed Policy HN4 wording. In order to achieve consistency between Local Plan Policies the Consortium accordingly proposes that Policy HN4 is amended through additions (as shown below via bold underlined text) to state as follows. There may be occasions when a lower density would be appropriate in order to preserve the character of the locality of an area, for instance, within a conservation area or mature suburb, to take account of any site- specific Local Plan housing density requirements or where a proposal would make a significant contribution to the	It is recognised that some of the proposed site allocations will deviate from the proposed minimum residential density figures. This is because they have already been considered on a site-specific basis in regard to their local context, as advocated within the proposed policy. The proposed policy is intended to maximise the capacity and efficient development of future development sites, whilst still allowing for lower densities where this might be appropriate to reflect local character and context. We will consider your suggested amendments as part of the next stage of plan preparation.

			creation of mixed and balanced communities.	
	Canal and Rivers Trust (Planning Manager)	Policy HN4 Residential Densities	Questioning of whether higher densities are appropriate for canal side locations.	Proposed policy HN4 sets out minimum residential density figures to be achieved, but it also states that there may be occasions when a lower density would be appropriate in order to preserve the character of the locality of an area. This might for example apply where a higher density would have an unacceptable negative impact on the character of a canal.
	Perry Barr Sarl	Policy HN4 Residential Densities	Agree that the policy should aim for target densities to make efficient use of land and agree that there will be instances where it is not appropriate to develop at these densities or where market conditions will not be favourable.	Support for the proposed policy is noted.
	Birmingham City Council Housing Department	Policy HN4 Residential Densities	It is recognised that the density policies within the emerging Plan have markedly increased across the administrative area since the previous Local Plan was adopted in 2017. In particular the City Centre density requirement has increased from 100 to 400 dwellings per hectare and within Urban Areas this has increased from 50 to 70 dwellings per hectare. This is partly due to the demanding housing requirements that the LPA are experiencing and the priority for developing brownfield development ahead of greenfield sites. Support is given to maximising densities, particularly on brownfield land and sustainable sites and for good design to be a key consideration.	Support for the proposed policy for higher residential densities, particularly on brownfield land and sustainable sites, is noted.

		Policy HN4 Residential Densities	Generally supportive of Policy but it fails to take into account major regeneration projects, which will alter the character of an area in order to make efficient use of the land. The following wording should be included in the opening sentence, 'The regeneration objectives for an area'.	General support for the proposed policy is noted. The proposed policy wording makes reference to consideration of local context, but we will consider your suggested amendment as part of the next stage of plan preparation.
	Frampton Town Planning Ltd	Policy HN4 Residential Densities	Policy HN4 and it is considered that the circumstances identified in the policy may be appropriate should include: The re-purposing or refurbishment of existing buildings. The Plan should also make reference to the expectations derived from national planning policy (Framework 124(e)). It is submitted that the following wording should be added to Policy HN4: The opportunity to use the airspace above existing residential and commercial premises to provide new homes is supported in principle. Upward extensions of existing premises should be consistent with the prevailing height and form of neighbouring properties and the overall street scene be well designed and maintain safe access and egress for occupiers.	The suggested wording is too detailed for an overarching policy that sets minimum requirements for the density of future residential developments. As proposed policy HN4 states, consideration will need to be given to the local context of the site in determining the actual density to be achieved. Specific matters such as upward extensions and utilising air space above existing residential properties are more appropriately considered against national planning policy and locally adopted design guides.
		Policy HN4 Residential Densities	Supportive of residential densities policies to meet objectives.	Support for the proposed policy is noted.

	Dudley Metropolitan Borough Council	Policy HN4 Residential Densities	Supportive of higher density standards set out within the policy	Support for the proposed policy is noted.
		Policy HN4 Residential Densities	Should be promoting and exploring ways of delivering larger apartments with balconies and green spaces for families as is the norm in Europe. High densities cannot be accomplished without creating higher density housing options for families than we are typically used to.	It will be possible to achieve larger apartments under the proposed new minimum density requirements. Whilst these have been based on an assessment of recently approved and completed residential development schemes. Although many of these schemes will contain smaller apartments, they also include schemes that have successfully achieved larger apartments whilst still be constructed to higher densities. The type and size of dwellings to be delivered will need to be considered against wider policies, such as proposed policy HN3 Housing Type and Mix.
	Sutton Coldfield Town Council	Policy HN5 Housing for Older People and Others with Support Needs and Care	Concerned over the imbalance between the market provision of housing for older people and availability of affordable housing in this sector. Review Policy HN.5 to address the question of affordability.	Comments are noted. Policy HN.2 Affordable Housing, sets out the requirements relating to affordable housing for older people.

	Withy Hill Consortium	Policy HN5 Housing for Older People and Others with Support Needs and Care	The lack of a specific target for the provision of specialist housing contradicts the majority view at the Issues and Options consultation stage. The 10% requirement for major development sites to deliver Building Regulations Part M4(3a) 'wheelchair adaptable dwellings' should be adjusted to take in to account past trends in delivering this type of accommodation. The Whole Plan Viability Assessment should take account of the lower densities and reduced developable area of development sites to accommodate a greater proportion of M4(3) dwellings, not just the build costs associated with them.	The comments are noted. A potential specific target for housing for older people will be further considered and informed through an update to the HEDNA to be undertaken during 2025 to inform the Preferred Options Consultation. An update to the Viability Assessment will also be undertaken to inform the Local Plan Review.
POD Consultation Event - Central Birmingham Library		Policy HN5 Housing for Older People and Others with Support Needs and Care	Special needs children need to be catered more for in housing.	Comments are noted and agreed.
POD Consultation Event - Selly Oak		Policy HN5 Housing for Older People and Others with Support Needs and Care	More needs to be done for supported housing, care in community should start at base.	Comments are noted and agreed.

	Henley Investment Management Ltd	Policy HN5 Housing for Older People and Others with Support Needs and Care	Building Regulations Part M4(2) and M4(3a) standards are optional, rather than mandatory. Accordingly, it is not appropriate for policy to impose requirements for Part M4(2) and Part M4(3a) compliant design which are Building Regulation matters, in excess of the levels required by the Building Regulations. Consequently, Policy HN5 parts 1 and 5 are considered unnecessary and should be deleted. It is inconsistent (albeit not in direct conflict) with adopted Development Management in Birmingham Policy DM10 which sets a requirement for housing developments of 15 or more dwellings to seek to provide at least 30% of dwellings as accessible and adaptable homes in accordance with Building Regulation Part M4(2) unless demonstrated to be financially unviable. DM10 sets no M4(3) requirement. Policy DM10 already goes beyond what is appropriate.	The comments relating to parts 1 - 5 or Policy HN.5 are noted and will be fully considered. It should be noted that the Plan Review once adopted will replace the Adopted Development Management DPD and we will also need to take account of the Government's proposals for National Development Management Policies.

	Unite Group Plc	Policy HN5 Housing for Older People and Others with Support Needs and Care	Asks for several comments to be noted: The requirements for conventional residential accommodation should not be applied to student housing as, in reality, the typical demand from students per annum falls significantly below the 10% mark. This is a steady and consistent trend as evidenced by Unites longer term experience. Unite have over 157 PBSA properties across the UK with 32 buildings in the London portfolio. Of these c.12,712 London bedrooms, they have provision for 728 students that may need a wheelchair room. This is over 5.7% of the total London rooms. For the 2022/2023 academic year, Unite had 6 students in need of wheelchair sized rooms out of an approximate total of c.12,712 bedrooms. This equates to a 0.05% take up and thus demonstrates the exceptionally low need for accessible bedrooms. The majority of wheelchair students are housed by the universities close to campus for ease of travel. The 10% requirement was introduced in order to help meet a shortfall in wheelchair accessible housing within conventional housing. Generally, those who live in conventional dwellings are of an older demographic thus the percentage of those who have a disability and require wheelchair	The comments relating to wheelchair accessibility and deferring to the Building Regulations requirement are noted and will be further considered. The statistics from Unite are helpful and will again be further considered for the next iteration of the Policy in the Preferred Options Consultation due in autumn 2025.

			accessibility is far greater than the demographic affiliated with student accommodation. The normal age range of students is between 18 and 25, explaining why there has never been a shortfall in wheelchair provision within student housing. Unite operate a policy of meeting the needs of an individual user and not applying a one size fits all policy. Indeed, should individual bedrooms need to be adapted; this can be done quickly and relatively easily to meet requirements. The Policy should clarify that the 10% requirement for wheelchair accessible bedrooms does not apply to PBSA. The standard for PBSA should instead defer to Building Regulations requirements for 1% fitted out an additional 4% adaptable.	

	Churchill Retirement Living	Policy HN5 Housing for Older People and Others with Support Needs and Care	Have some concerns with aspects of the draft policy and in particular the requirement that 10% of dwellings on major developments being provided to Building Regulations Part M4(3). We consider this requirement is not justified. We cannot locate evidence that the council has proven the requirement to provide M4(3) housing is viable. Note that there is a cumulative impact of the Net Zero, Biodiversity Net Gain and Urban Greening factors additional policy expense and, in accordance with the Written Ministerial Statement, we recommend that only minimum policy requirements are reflected from national policy for older persons housing. Recommendation and in line with the councils plan wide viability evidence base, the requirement to provide 10% of dwellings on major older persons housing developments should be removed. Bullet point 4 of draft Policy HN5 should be deleted as the requirements set out within it is not justified.	The comments relating to viability and M4(3) housing requirements are noted and will be further considered through the development of the Preferred Options consultation.
	Bloor Homes	Policy HN5 Housing for Older People and Others with Support Needs and Care	Clarity on accessible and adaptable dwelling requirements is welcomed. However, more clarity on the requirements for meeting the needs of older people is required in the policy and whether this is in addition to the M4(2) compliance.	The comments relating to further clarity are noted and will be considered through the development of the Preferred Options Consultation in autumn 2025.

	Home Builders Federation	Policy HN5 Housing for Older People and Others with Support Needs and Care	The HBF note that the 10% requirement appears high and would need to be fully justified and tested for viability. the HBF considers that the Council needs to work closely with the providers of older persons housing to identify appropriate sites or to provide appropriate policies. If the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG. PPG7 identifies the type of evidence required to introduce a policy requiring the M4 standards, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability.	The 10% requirement will be further considered through the development of the Preferred Options consultation and the viability of the higher optional standards for accessible homes and will be further considered through the Viability Assessment Update.

	Langley Sutton Coldfield Consortium	Policy HN5 Housing for Older People and Others with Support Needs and Care	Objects to the approach set out within proposed Policy HN5 on the basis that it is not considered to be appropriately justified. The evidence base is currently considered to be deficient in this regard. Furthermore, the Consortium has wider concerns relating to the viability of this proposed Policy. The achievement of a specific target for Older Persons Housing is not a formal Building Regulations Requirement and is not a National Policy. The achievement of the additional Building Regulations Part M4(2) and M4(3) standards are also optional, rather than mandatory. It is noted that the Proposed Local Plan also does not include a specific exemption for older persons housing from the affordable housing target. In this regard the viability evidence base for the Local Plan accordingly does not appear to support the inclusion of the proposed M4(2) and M4(3) Policy requirement within the Local Plan alongside the other additional policy.	The Objection to Policy HN.5 is noted. The comments relating to Part M4 standards and viability are noted and will be fully considered and additional evidence commissioned through the Viability Assessment update to inform the Preferred Options Consultation in autumn 2025.
	Birmingham City Council Housing Department	Policy HN5 Housing for Older People and Others with Support Needs and Care	Overall, support is given to the wording of this policy, however, a flexible approach is required and the addition of unless otherwise agreed should be incorporated into the wording of this policy. Schemes that provide a higher percentage than recommended in this policy should be supported.	The comments relating to flexibility to be incorporated into the policy wording will be fully considered to inform the Preferred Options consultation in autumn 2025.

	Acocks Green Focus Group	Policy HN5 Housing for Older People and Others with Support Needs and Care	Consider the needs of people with disabilities in tall buildings.	Comments are noted and agreed.
POD Consultation Event - Selly Oak		Policy HN6 Protecting Existing Housing	Concern expressed over loss of quality homes and family homes in the area.	Policies are designed to ensure that the mix and quality of homes is appropriate to their location and maintained as much as possible.
POD Consultation Event - Erdington		Policy HN6 Protecting Existing Housing	Communities will be displaced by estate regeneration and will need housing in the meantime whilst schemes are being implemented.	Policies are designed to ensure that the mix and quality of homes is maintained and appropriate to their location as much as possible.

	Handsworth Wood Residents Association	Policy HN6 Protecting Existing Housing	Preferred Options Document fails to mention Loss of C3 family housing to C2 children's homes. Implementation of preference for 'large, detached properties set in their own grounds' should be reviews as it appears abandoned. Consideration should be given to restricting the loss of family housing to C2 by prioritising changes of use from HMO C4 and Sui Generis housing to C2 to safeguard family housing. Limit loss of C3 housing to Exempt Accommodation. Needs to be a much more joined up approach between Housing Benefit/Finance, Housing and Planning with greater vetting of Enhanced Housing Benefit claims and their refusal where required physical standards and support standards are not met in line with the practice of other Pilot Authorities. Recommend a task force independent of Housing Benefit to thoroughly investigate this, possibly using external consultants. Council should take its Key Lines of Enquiry from the findings of the EA Scrutiny Review 2021-22 and the lessons from the DHULC National Pilot 2020-21 and avoid repetition.	The Council recognises the issue of loss of family housing to other uses in the City which is why draft Policy HN6 (Protecting Existing Housing) has been put into the BLP. Separate policies on housing for older people, students and co-living accommodation have also been included to provide policy requirements to ensure that these types of accommodation do not develop at the expense of other residential types.

	Birmingham City Council Housing Department	Policy HN6 Protecting Existing Housing	There are some areas of the city, including Druids Heath, where the existing housing stock is not fit for purpose, not meeting modern standards and requires demolition and rebuild. Recognition of this needs to be identified within this policy.	The redevelopment and regeneration of older and poorer housing is dealt with in Policy HN9 (Housing Regeneration) where the redevelopment of Druids Heath is specifically mentioned within the Policy as a Housing Action Area.
		Policy HN6 Protecting Existing Housing	Should include reference to losses being acceptable where it forms part of a wider regeneration project and replacement accommodation is provided. Such losses will be necessary to achieve comprehensive schemes and deliver the regeneration benefits	The redevelopment and regeneration of older and poorer housing is dealt with in Policy HN9 (Housing Regeneration) where the redevelopment of such areas are listed within the Policy as Housing Action Areas.
	Acocks Green Focus Group	Policy HN6 Protecting Existing Housing	Support this policy.	Support welcomed
		Policy HN6 Protecting Existing Housing	Policy is weak given that most homes that are being eyed up for conversion to HMOs already have more than 3 bedrooms.	Properties more than 3 bedrooms are dealt with and assessed in accordance with Policy DM11 and DM12 of the adopted Development Management in Birmingham DPD.

	Langleys Road Neighbourhood Watch	Policy HN6 Protecting Existing Housing	There are too many HMOs and exempt accommodation properties in Langleys Road, Selly Oak. These properties need to be managed better, including requiring high accommodation standards, property inspections and support for the occupants.	The Development Management in Birmingham (DMB) document was adopted in 2021 and contains policies to manage the prevalence of HMOs and non-family housing, and to ensure that they are provided to a decent standard. These policies are supported by further guidance in the Houses in Multiple Occupation SPD and the Large-Scale Shared Accommodation SPD. As these documents are recently adopted it is not proposed that they will be replaced through the preparation of the Birmingham Local Plan. Other matters raised such as property inspections and support for occupants fall outside the scope of the Local Plan, but the City Council's Planning service continues to work collaboratively and positively with other colleagues and stakeholders to ensure that high standards are being met in these types of housing.
POD Consultation Event - Selly Oak		Policy HN7 Purpose Built Student Accommodation	In the possibility that demand for student housing falls, accommodation should go to families and elderly people in supported accommodation.	Comments are noted and agreed.

	MODA	Policy HN7 Purpose Built Student Accommodation	A nomination agreement should not be a prerequisite for PBSA where need is shown by other evidence/a clear and robust assessment of supply and demand. Recommend that Policy Criterion 1 be amended to read: "There is a demonstrated need for the development which could include evidence of a nomination agreement with one or more higher education providers and/or an assessment of supply and demand for the specific type of accommodation that is being proposed." Setting an affordable housing level at 50% from PBSA significantly deviates from the intent of national planning policy and should be reconsidered.	The proposed amended wording is noted and will be considered when reviewing Policy HN7 to inform the next stages of the Local Plan Review. The Viability Appraisal indicates that 50% affordable housing provision from PBSA would be viable and will be further considered through an updated Appraisal during 2025.

	Calthorpe Estates	Policy HN7 Purpose Built Student Accommodation	Vital that BCC ensures that the policy framework exists to support the delivery of good quality PBSA. Can also lead to a reduction in the loss of family housing as traditional HMOs become less popular with students. Policy must be attuned to the growth and expansion of universities over the longer term. The BLP has to offer flexibility closely monitoring live accommodation needs. Vital that Policy HN7 allows for developers to bring forward their own assessment of need based on the most up to date information and following engagement with relevant institutions. Students are increasingly looking to live in city centre locations to benefit from the wide range of cultural and leisure facilities available there. There must be flexibility in the application of part 2 of the policy to ensure that choice is offered to students. The wording of clauses 7 and 8 of draft policy HN7 should be amended to provide flexibility for scenarios where a 50% provision of affordable units would render an otherwise acceptable scheme unviable.	The comments relating to flexibility are noted. The specific points in relation to the policy wording are noted and will be further considered through the development of the Preferred Options consultation document scheduled for autumn 2025 and the updated viability report.
	Property Link	Policy HN7 Purpose Built Student Accommodation	Overall policy supported. Design and scale should be carefully considered to fit with the character of the area, incorporating active ground floor uses where feasible to engage the streetscape and engage with the surrounding community.	Support for Policy HN7 is welcomed. the points relating to design and scale are noted and agreed.

	Volume Property	Policy HN7 Purpose Built Student Accommodation	Objection to Policy HN7 PBSA as worded - clause 1 for nomination agreements in unworkable as institutions prefer not to enter into such agreements and clause 7 for 50% affordable rooms, as it is too onerous.	The Objection to Clause 1 is noted. This will be further considered through the development of the Preferred Options Consultation scheduled for autumn 2025 and the updated Viability Assessment to inform this.
	Henley Investment Management Ltd	Policy HN7 Purpose Built Student Accommodation	Part 6 of the draft policy sets a requirement which goes beyond what is lawful or within the ability of developers / operators to achieve. It is not the role of the planning system or student accommodation operators to interfere with the rights of individuals within the law. Parts 7 and 8 regarding the requirements for affordable provision are overly onerous and will impact the viability of PBSA development contrary to the strategic objectives of the Plan and national policy.	These comments are noted and will be further considered through the development of the Preferred Options Consultation scheduled for autumn 2025 and the updated Viability Assessment to inform this.

	Unite Group Plc	Policy HN7 Purpose Built Student Accommodation	Generally supportive of overall approach to delivery of off-campus PBSA but concern that current Policy could hinder development. Policy HN7 Part 1 -Unite do not object to the broad principle of this requirement, the following comments are raised: The policy requires evidence of a nomination agreement. It is suggested that evidence of a nomination's agreement should not constitute the actual agreement itself; It is not possible for a nominations agreement to be in place prior to the grant of planning permission. Unite have found that universities are often reluctant to engage in such agreements where they are liable to pay void payments if they are unable to fill rooms or take a risk on losing a development (and therefore committed rooms) if it falls behind in the planning and/or construction process, which can take between 4-5 years. Unite consider that it should not be required that all bedrooms within a development must be subject to a nomination's agreement. Only a portion should be required. This would assist with the viability of PBSA schemes; Adopting the approach above would afford the applicant a greater degree of flexibility and enable rather than hinder the delivery of	The concerns relating to HN7 and particularly on nominations agreements are noted. These points will be further considered through the development of the Preferred Options Consultation scheduled for autumn 2025 and the updated Viability Assessment to inform this.

			high-quality student accommodation schemes which is essential to addressing the student accommodation shortfall over the plan period. An additional principle is that older PBSA is generally unattractive to universities, meaning new development is more likely to attract nomination agreements. There is also growing evidence that second and third year students are now seeking to occupy PBSA due to on-site amenities and inclusion of bills, meaning that PBSA has the ability to alleviate pressure on housing supply. Policy HN7 Part 2 - Supportive of Policy but PBSA developments must be located in areas where students actually want to live. Policy HN7 Part 3 - Objection due to the following: There is no tangible evidence to suggest that the development of PBSA causes harm to the balance or mix of uses in an area, affecting its character and function. The assumption that concentrations of university students are liable to give rise to residential amenity issues to neighbours and be detrimental to the cohesiveness of communities is discriminatory and a distorted generalisation of a single category of people. Unite argue that the provision of PBSA in fact contributes to the creation of mixed	

			and balanced communities, rather than harms existing communities. It is important to note that PBSA developments are managed buildings with staff on-site. Additionally, PBSA developments are subject to Student Management Plans which outline processes for the protection of surrounding residential amenity. PBSA is a form of housing. National guidance states that all student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can in principle count towards contributing to an authority's housing land supply (NPPG, Paragraph: 034. In addition, the NPPG also states that encouraging more dedicated student accommodation may provide low-cost housing that takes pressure off the private rented sector and increases the overall housing stock (Paragraph: 004 Reference ID: 67-00420190722). It is considered unsound to seek to restrict development of PBSA where no evidence is provided to justify the perceived harmful impact this would have Requests that the Policy should be removed from the Plan. Policy HN7 Part 4 - second half of Policy should be considered as a separate criteria	

			and requirement for active frontage clarified. Policy HN7 Part 5 - Supportive. Policy HN7 Part 6 - Supportive. Policy HN7 Part 7 and Part 8 - Object to both part for the following reasons: The requirement to provide 50% of bedrooms as affordable student rooms will significantly hinder the viability and deliverability of student schemes. Rooms which are let via nominations agreement, as required by the draft policy, are generally already let at a lesser rate than direct-let bedrooms. There are numerous additional costs associated with PBSA development over conventional residential development, including the employment of staff to enforce Management Plans. The CIL rate for PBSA schemes is typically higher than that of conventional Use Class C3 residential schemes. There is no mechanism to obtain CIL relief from the provision of affordable student rent in the same way as there is for conventional affordable housing. Recommend that Part 7 and Part 8 are removed from the Policy	

	Hanehouse Ltd	Policy HN7 Purpose Built Student Accommodation	Criterion 1 - the requirement for a Nomination Agreement should not be the only acceptable form of evidence to demonstrate need. A clear and robust assessment of supply and demand could provide evidence instead. The need to provide a Nomination Agreement may also adversely impact delivery timescales and the Criterion should be amended to, 'There is a demonstrated need for the development which could include evidence of a nomination agreement with one or more higher education providers and/or an assessment of supply and demand for the specific type of accommodation that is being proposed'. Criteria 7 and 8 - need to amend proposed affordable percentage targets due to constrained viability on all residential typologies including PBSA.	The comments on Policy HN7 are noted. These points will be further considered through the development of the Preferred Options Consultation scheduled for autumn 2025 and the updated Viability Assessment to inform this.

	Bruntwood Sci Tech	Policy HN7 Purpose Built Student Accommodation	Support for Policy HN7. Agree that unchecked PBSA can have a range of negative impacts on neighbourhoods, however our understanding is that there is currently a shortage of student accommodation in the city. Suggests that evidence of demand at the outline planning permission stage is the key requirement and that it would be unrealistic to require a nomination agreement at this stage. Also question the feasibility of points seven and eight relating to the proportion of affordable rooms and levels of rent which could be seen as unduly onerous.	Support is welcomed. The specific points are noted. These will be considered through the development of the Preferred Options consultation document scheduled for autumn 2025 and an update to the viability assessment.
	Woodbourne Group	Policy HN7 Purpose Built Student Accommodation	Recommended that criterion 1 be amended to read There is a demonstrated need for the development which could include evidence of a nomination agreement with one or more higher education providers and / or an assessment of supply and demand for the specific type of accommodation that is being proposed. Affordable accommodation from PBSA needs to be considered against the provisions of contemporary national planning policy. Setting 50% affordable housing from PBSA significantly deviates from the intent of national planning policy and should be reconsidered.	The comments relating to criterion 1 are noted and will be considered through the development of the Preferred Options Consultation. The affordable housing requirements will be further considered through an update on the Viability Appraisal to inform the Local Plan Review.

	West Midlands Housing Association Planning Consortium (WMHAPC)	Policy HN7 Purpose Built Student Accommodation	Unclear at present what qualification criteria there would be for affordable student accommodation. The WMHAPC raises concern that it may be unsuitable for the affordable housing criteria to mirror the student loan or living allowance threshold. We would suggest that unless a clear criterion can be provided, off-site provision should be supported and is utilised in a way that delivers additional affordable housing elsewhere.	The comments relating to offsite provision of affordable housing are noted and agreed. This will be further considered through the development of the Preferred Options consultation scheduled for autumn 2025.
	Town Planning and Design Services	Policy HN7 Purpose Built Student Accommodation	Support the importance and value of students to the local economy, regeneration, and the general vitality of the city. Support the Plan's acknowledgement of a current under-provision of PBSA and the value of students to both the local economy and the areas diversity and cultural / social mix. Support the view that, where necessary, there should be some form of justification regarding the proposed future provision of PBSA.	Support is welcomed.
	Picton Jones (Asset Management) Ltd	Policy HN7 Purpose Built Student Accommodation	Policy HN7 - concerned at requirement for 50% of units to be made affordable rent as it will make a number of sites unviable and there will be a shortfall in student provision.	The concerns relating to viability are noted, however, the Viability Assessment does evidence that there is viability for this level of provision within PBSA schemes. A further update will be undertaken to inform the Preferred Options Consultation scheduled for autumn 2025.
	Hammerson	Policy HN7 Purpose Built Student Accommodation	Supportive of Policy HN7 in general but objects to proposals for Nomination Agreements and the requirement for buildings to be adaptable to standard residential as both are unduly onerous.	Support is welcomed, the concerns relating to Nomination Agreements are noted.

	HUB Residential	Policy HN7 Purpose Built Student Accommodation	Whilst HUB welcomes the acknowledgement of continued demand for PBSA in the City, it has queries and concerns about the wording of the draft policy. It is not clear how BCC intends to define very well located to the educational establishment with reference to it being reachable within 20 minutes. Does this include by car, public transport, and walking? This should be clarified. HUB considers that the policy should ensure that Digbeth (and the Digbeth HUB site allocation) meet the criteria set out in the draft policy. HUB also questions why affordability criteria is repeated in this draft Policy when it is covered elsewhere in the draft LPPOD under a specific policy.	These comments are noted, and accessibility will be further clarified in the policy, the 20-minute accessibility would relate to walking, cycling and public transport and not the private motor car, in the interests of sustainable development.
	Canal and Rivers Trust (Planning Manager)	Policy HN7 Purpose Built Student Accommodation	Supportive of recognition "detrimental impact on local amenity and or balance and mix of uses within it affecting its character and function"	Support is welcomed.

The Tyler Parkes Partnership Ltd	West Midlands Police	Policy HN7 Purpose Built Student Accommodation	The PCCWM would recommend strengthening of the policy on the following lines: Proposals for purpose-built student accommodation provided on campus will be supported in principle subject to satisfying design and amenity considerations including consideration of Secured by Design principles both internally and externally. Proposals for off campus provision will be considered favourably where: 4. A site management and maintenance plan is submitted which demonstrates that the accommodation will be managed and maintained over its lifetime so as to ensure an acceptable level of amenity, safety and security for its occupiers and nearby residents. The scale, massing and architecture of the development is appropriate for the location and active ground floor uses are incorporated wherever possible; The supporting text should also refer to the following, Development should maximise the extent, safety and security of the built environment (both internal and external) including integration of Secured by Design and Park Mark principles including liaison with West Midlands Polices Design Out Crime Officers.	The PCWWM's comments and suggestions for amendments will be fully considered in the development of the Preferred Options consultation document scheduled for autumn 2025.

	Rainer and Wigley	Policy HN7 Purpose Built Student Accommodation	Policy HN7 - disagree with requirement for Nomination Agreements to evidence demand for new PBSA development, as Universities do not tend to offer agreements to private developers, prior to them securing planning permission. Nomination Agreements will be negotiated afterwards so this requirement is impossible to achieve. Object to policy requirement for 50% of student rooms to be affordable due to viability issues and significant CIL levy in city which is non-negotiable. So, support inclusion of policy wording that states the requirement will be 'subject to viability testing at the point of a planning application'.	The suggestion for the inclusion of policy wording that states the requirement will be "subject to viability testing at the point of a planning application" will be balanced against the findings of the Viability Appraisal Update to be commissioned to inform the development of the Preferred Options consultation scheduled for autumn 2025.

	Aston University	Policy HN7 Purpose Built Student Accommodation	Supports the policy basis for on campus PBSA. With regard to off campus PBSA, Aston University objects to this aspect of the policy. It is unfeasible for universities to provide a nomination agreement to PBSA providers at planning application stage. Furthermore, Aston University considered the requirement for 50% affordable student rent at 50% of a student's income is also unworkable. This could deter all PBSA investment from the city. greatest issue in the PBSA market in Birmingham is an undersupply, which then leads to high rents, hence why a high proportion of students have stated that it is unaffordable. A positive policy framework to achieve growth of the PBSA in suitable off campus locations is therefore required. as currently drafted the policy would serve to constrain supply (potentially significantly), which would only cause rents to increase for existing supply and would therefore exacerbate the affordability issue. To redress this, we contend that the first bullet point of the policy should not require a nomination agreement but should provide evidence of demand only. The seventh and eighth bullet points relating to affordable student rent should be omitted.	The objections with regard to off campus PBSA is noted and the concerns relating to a nomination agreement are noted and will be further considered through the development of the Preferred Options consultation document scheduled for autumn 2025.

	Birmingham City University	Policy HN7 Purpose Built Student Accommodation	BCU supports the policy basis for on campus PBSA. With regard to off campus PBSA, BCU objects to this aspect to the policy. It is unfeasible for universities to provide a nomination agreement to PBSA providers at planning application stage. Furthermore, BCU considers the requirement for affordable student rent at a minimum of 50% provision at 50% of a student's income is also unworkable. This could deter all PBSA investment from the city. The greatest issue in the PBSA market in Birmingham is an undersupply, which then leads to high rents, hence why a high proportion of students have stated that it is unaffordable. The Universities and the PBSA providers work together to provide the supply, and policy should support this. To achieve lower rents, greater supply is required to generate more competition. A positive policy framework to achieve growth of the PBSA in suitable off campus locations is therefore required. Instead, as currently drafted the policy would serve to constrain supply (potentially significantly), which would only cause rents to increase for existing supply and would therefore exacerbate the affordability issue. This contradicts the Councils objectives. The first bullet point of the policy should not require a nomination agreement but should	The objections with regard to off campus PBSA is noted and the concerns relating to a nomination agreement are noted and will be further considered through the development of the Preferred Options consultation document scheduled for autumn 2025.

			provide evidence of need/demand only. The seventh and eighth bullet points relating to affordable student rent should be omitted.	
		Policy HN7 Purpose Built Student Accommodation	Ensure student accommodation is accessible for individuals with a mobility impairment/wheelchair users.	Comments are noted and agreed
		Policy HN7 Purpose Built Student Accommodation	As per comments on HN2, the burden of delivering 50% affordable housing on student accommodation schemes would render schemes unviable and limit the amount of schemes being built therefore further applying pressure on open market. There needs to also be a clear framework of integrating student accommodation into the broader urban development strategy.	The concerns relating to viability are noted and will be further considered alongside an update to the Viability Appraisal to inform the Preferred Options consultation in autumn 2025.

	Watkin Jones	Policy HN7 Purpose Built Student Accommodation	WJG objects to Part 1 of draft Policy HN7 in the requirement for a Nominations Agreement with a University or Higher Education Institution. The approach is not justified and will not be effective in delivering the future PBSA which is clearly needed within the city. A similar approach in Manchester restricted the delivery of PBSA, pushed up the costs of accommodation and resulted in students residing within mainstream housing. To make Part 1 of Policy HN7 sound, WJG suggests that it is replaced with the following: there is a demonstrated quantitative need for the development, which may include a letter of support from a higher education providing demonstrating that they intend to enter a nomination agreement. WJG objects to Parts 7 and 8 of draft Policy HN7 which requires off-campus PBSA to provide affordable student accommodation on the grounds of insufficient evidence for need, the level of rent and viability of PBSA schemes. Suggests that assumptions made in the BWPVA on development efficiency, yield, management costs, construction costs and land costs are inaccurate.	The concerns relating to the robustness of the viability and its assumptions are noted. These will be further considered through an update of the Viability Assessment report to inform the Preferred Options Consultation to be undertaken in autumn 2025.

	Lendlease	Policy HN8 Large-scale Shared Accommodation	Supportive of Policy HN8 in general but consider that the requirement for a single upfront financial contribution is too onerous and is likely to deter private developers due to cashflow limitations. Contributions will only be possible at a later stage when a certain level of occupancy has been achieved. The trigger for payment should be reviewed.	Support for Policy HN8 is welcomed. The comment relating to the trigger for payment is noted and will be further considered through the Viability Appraisal update to inform the Local Plan Review.
	MODA	Policy HN8 Large-scale Shared Accommodation	Criterion 1 - examining availability and potential affordability should be on the location where development is proposed. Criterion 7 is unreasonable and should be removed. Co-living can positively add to the creation of mixed neighbourhoods and is an identified residential typology. It isn't justified why Co Living is treated differently to other land uses in relation to this criterion. Need to amend current affordable % targets to reflect the constrained viability position.	The concerns and comments are noted and will be further considered through the Local Plan Review and the updated Viability Appraisal to inform the Preferred Options Policy.

	Stoford	Policy HN8 Large-scale Shared Accommodation	Supportive of Policy HN8 - HENDA 2022 suggests that Co-Living will be focused in the central area of the City, to be meet demand from young professionals and students. It is recommended that Digbeth is included as a suitable area for Co-Living as it is well connected to local services and transport and would support the night-time economy. Some concerns with Policy are Point 3 (p.216) - recommend that minimum size of single occupancy unit should be 18sqm, which is current average size of schemes across the UK (GLA Design Guidance June 2024), as 25sqm would push up rents. Point 3 - flat minimum of 4.5sqm amenity per resident is over provision based on current schemes in UK and can make the spaces less inviting and are underutilised, plus higher rents have to be charged, which runs contrary to intention to provide a more affordable housing option. Paragraph 7ii) - clarity is required as it implies that if the site is allocated or general housing it cannot come forward for Co-Living use, and the Policy is too inflexible and hinders the developer's ability to respond to market demands and contradicts NPPF Para 86d and Policy HN3. Part 7ii should be removed. It should also be recognised that large City Centre sites such as Typhoo Wharf can accommodate a mix of residential tenures	Support for HN8 is welcomed. Note the request to include Digbeth area for co-living schemes and this will be further considered through the Digbeth Growth Zone policy. The specific points in relation to the policy wording are noted and will be further considered through the development of the Preferred Options consultation document scheduled for autumn 2025 and the updated viability report.

			e.g. PBSA, market, Build to Rent and Co-Living all together.	
	Calthorpe Estates	Policy HN8 Large-scale Shared Accommodation	Consider that the requirement for a single upfront financial contribution (based on at least 20% of the market of 50% of the units) is onerous and is likely to deter development being brought forward. This should be removed and affordable provision sought in line with the approach take to market housing.	The comments are noted. The comments relating to affordable housing are noted. The specific points in relation to the policy wording are noted and will be further considered through the development of the Preferred Options consultation document scheduled for autumn 2025 and the updated viability report.
	Property Link	Policy HN8 Large-scale Shared Accommodation	This model will help to retaining graduates who come to university in the city. These should be in central locations with good local services and walking and cycling connectivity. Proposed policy ensures that development of shared accommodation does not interfere with delivery of self-contained housing.	Support for Policy HN8 is welcomed.
	Henley Investment Management Ltd	Policy HN8 Large-scale Shared Accommodation	The requirement to adhere is too strong here, as the SPD is not DPD which has been subject to public examination. Should be amended to have regard to or similar. The term upfront is unclear but appears to mean prior to use. If so, it would be helpful to re-phrase. The requirement for 50% of the units to be affordable is considered unjustified and unviable and not in accordance with national policy for BTR development.	These comments are noted and will be further considered through the development of the Preferred Options Consultation scheduled for autumn 2025 and the updated Viability Assessment to inform this.

	Commercial Estates Group (CEG)	Policy HN8 Large-scale Shared Accommodation	CEG is supportive of draft Policy HN8. CEG is concerned about the penultimate paragraph within draft Policy HN8 which identifies affordable housing within co-living schemes is to be sought as a single upfront financial contribution based on at least 20 per discount off the market value (including any service charges) of 50% of the units, and secured through a section 106 legal agreement (subject to viability). The requirement for a single upfront financial contribution could have cashflow and viability implications, particularly for larger schemes. It is therefore suggested that the policy wording is amended to allow for flexibility in payment of any contributions to ensure this does not impact on the viability and delivery of co-living developments that can be shown to be acceptable in overall terms, and which help to meet identified housing needs.	Support for Policy HN8 is welcomed. The concerns relating to a single upfront financial contribution and the request to allow for flexibility in the policy are noted. These points will be further considered through the development of the Preferred Options Consultation scheduled for autumn 2025 and the updated Viability Assessment to inform this.

	Hanehouse Ltd	Policy HN8 Large-scale Shared Accommodation	Criterion 1 - suggests that Policy should make it clear that alternative rental options should be examined only within the location where the development is proposed as looking outside of the City Centre would not be appropriate (as Co-Living Policy focuses this form of development in the City Centre). Criterion 7 - this is unreasonable and should be deleted from Plan. Similar restrictions are not included in policies for other land uses and there is no justification why Co-Living is being treated differently. Co- Living - need to amend currently proposed affordability targets due to constrained viability on all residential typologies including Co- Living.	The specific comments on Policy HN8 are noted. These points will be further considered through the development of the Preferred Options Consultation scheduled for autumn 2025 and the updated Viability Assessment to inform this.
	Woodbourne Group	Policy HN8 Large-scale Shared Accommodation	Availability and potential affordability of rental options should be explored. Inclusion Criterion 7 is unreasonable and should be removed.	The comments relating to criterion 7 are noted and will be considered through the development of the Preferred Options Consultation. The comments relating to rental options are noted and agreed.
	Walsall Council	Policy HN8 Large-scale Shared Accommodation	We note that this policy is aimed at developments of at least 50 units, however we wonder if it might be appropriate to also apply it to proposals for large houses in multiple occupation.	These comments are noted.

	West Midlands Housing Association Planning Consortium (WMHAPC)	Policy HN8 Large-scale Shared Accommodation	The WMHAPC endorses the requirement of an affordable housing financial contribution in lieu of on-site provision due to the fact that large-scale shared accommodation is not an affordable housing product and does not provide stable long-term accommodation suitable for most households in need of affordable housing. By opting for a financial contribution, affordable housing can be developed in more suitable locations that better meet the needs of the community.	Support for Policy HN8 is welcomed.
	Hammerson	Policy HN8 Large-scale Shared Accommodation	It is unclear how Policy HN8 relates to Co-Living schemes - how will need for this type of accommodation be identified?	Need for accommodation types will continue to be assessed through updates to the Housing and Economic Development Needs Assessments.

	HUB Residential	Policy HN8 Large-scale Shared Accommodation	Have some fundamental concerns about several details elements of the draft policy that, in its opinion, are critical to get right and amend if co-living is to be successful and, importantly, deliverable in Birmingham. Concerns with both the validity of the evidence base given the infancy of the product in Birmingham and regional cities, and some of the specific points set out in the draft policy that, in HUBs view, will both detract from the appeal of Birmingham as a genuine co-living market for investors, and compromise the design and deliverability of co-living schemes. HUB is concerned that maintaining reference to the 25 sqm minimum size in the policy itself will compromise the design and deliverability of co-living schemes, such as its own developments referenced here, and that a more appropriate solution would be to offer a range of sizes as per the London Plan and leaving BCC officers to use their planning and design judgement to decide on the most appropriate design and layout of units. HUB is also concerned about references in the policy to an average internal communal amenity space of at least 4.5 sqm per bedspace. Again, this is a greater number than set out in the LPG that gives a minimum benchmark for internal communal amenity as starting at 4 sqm per resident (Table 3.1 of the LPG). HUB	HUBs concerns are noted and will be further considered in the Preferred Options consultation with regard to the Viability Assessment update. However, there will be a continued need to provide sufficient space standards to deliver improved standard of living and encourage people to live in the city centre.

			considers this to be a more appropriate reference if BCC insists on including figures within the policy itself. HUB questions whether the policy wording should, in fact, include reference to the SPD being updated in the future, and whether it would be more appropriate for minimum space standards to be included within the SPD (and any future update) as opposed to being enshrined in the Local Plan policy itself. HUB notes that there is no direct policy relating to Build to Rent (BtR) schemes within the draft LPPOD.	

	Cordia UK	Policy HN8 Large-scale Shared Accommodation	Supports the introduction of a policy to provide clarity on the Councils approach to Large Scale shared accommodation/co-living schemes and framed positively with a view to supporting this form of accommodation. However there are some objections to the wording: 1st bullet point - need has already been established so does not need to be proved again 2nd bullet point - the word 'central' should have a capital and cross referenced to Policy PG3 3rd and 4th bullet points - no material evidence has been submitted to support the standards quoted. 6th bullet point - should be deleted as policies cannot be adhered to SPDs Affordable housing reference at the stated levels should be removed without justification provided. Communal space paragraph should be in the supporting text. Needs additional bullet to provide standard for outdoor amenity space as this is only contained in the SPD and needs to be tested at examination. Cordia happy to advise on any of the above.	General support is welcomed. The specific comments on the wording are noted and will be fully considered to inform the Revised Preferred Options Consultation scheduled for autumn 2025.

The Tyler Parkes Partnership Ltd	West Midlands Police	Policy HN8 Large-scale Shared Accommodation	The PCCWM requests a strengthening of this policy on the following lines: “Development proposals for large scale shared accommodation will be supported where:5. The development will be subject to satisfying design and amenity considerations including consideration of Secured by Design principles both internally and externally and a satisfactory management plan is provided; The supporting text should also refer to the following, Development should maximise the extent, safety and security of the built environment (both internal and external) including integration of Secured by Design and Park Mark principles including liaison with West Midlands Polices Design Out Crime Officers.	The PCWWM's comments and suggestions for amendments will be fully considered in the development of the Preferred Options consultation document scheduled for autumn 2025.

	Watkin Jones	Policy HN8 Large-scale Shared Accommodation	WJG objects to points 1 (demonstration of need), 2 (location of co-living), 3 (co-living room sizes), 4 (communal space standards), 6 (adherence to the Councils Large Scale Shared Accommodation SPD), 7 (compromising delivery of self-contained housing), and the affordable housing requirement within draft Policy HN8. Also encourages the Council to revisit and update the SPD in response to comments received through this consultation process. The quantum of external amenity space is far too high as set out in the SPD. There is no need to provide a demonstration of need as this has already been established in the HEDNA so Part 1 of the policy should be deleted. WJG therefore suggests that Part 2 of the draft Policy HN8 is replaced with the following to ensure that the policy is effective: It is located in areas highly accessible by non-car modes of travel and well served by a range of local services and facilities. This will ensure that co-living can be developed in accessible, sustainable, and suitable locations outside of central Birmingham. It is recognised that co-living is an evolving model and will change as different developers and operators develop variations of the product. To ensure that evolutions of the product can be delivered	The specific comments and objections are noted and will be fully considered through the development of the Preferred Options Consultation document to be published in autumn 2025.

			within Birmingham, it is important for the Council to deliver a flexible approach. Draft Policy HN8 states exceptions to the minimum space standards will only be considered where a robust justification has been provided to the satisfaction of the Council. WJG considers that this is an essential requirement of Part 3 of the draft policy and supports its inclusion, to ensure that it remains effective.	
		Policy HN8 Large-scale Shared Accommodation	Co-living should be considered more of an option in neighbourhoods where overcrowding is common, not in the city centre. Co-living in areas of multi-generational households with more traditionally religious communities would enable young people to move out, have some independence but also stay close to their families and communities.	These comments are welcomed and noted for further consideration.
	Homes England	Policy HN9 Housing Regeneration	The policy could be enhanced with reference to ensuring that the relevant social infrastructure is provided as part of the housing regeneration programme along with connectivity to green space and access to training and employment opportunities. In balancing the desire to reduce the carbon footprint of the city, and in particular through building reuse, that the opportunity for housing renewal and replacement is not lost that will help to address the housing need and meet the objectives of An inclusive city, a city of thriving neighbourhoods and a city of growth for all.	We think that the draft Policy makes provision for relevant infrastructure in the final paragraph. Buildings will still be reused and retained where appropriate to assist in reducing the carbon footprint of the city but there will still be a need for renewal and redevelopment where feasible

	Zero Carbon House	Policy HN9 Housing Regeneration	The proposed reallocation to housing action area of green open space beside Balsall Heath Road and Clevedon Road contradicts the 2015 Balsall Heath Neighbourhood Plan, as agreed by residents, which preserves this as an open space with potential for wildlife, play or allotments, not for housing The BLP should also reference the creation of a new lake and new blue/green infrastructure in Calthorpe Park, as included in Balsall Heaths progressive 2015 local plan	The term Housing Action Area, in this case, applies to the regeneration of the area as a whole in housing terms and does not mean that housing will be built exclusively within that area. Valuable and well used open spaces will continue to be protected as part of the regeneration of such Housing Action Areas and in line with other policies in the Local Plan which protect open spaces. The Neighbourhood Plan is part of the overall development plan for the city and details contained within it do not need to be repeated within the wider Local Plan.
	Handsworth Wood Residents Association	Policy HN9 Housing Regeneration	Resurrect Neighbourhood working approach to provide a more holistic approach to service delivery,	The Council notes the suggestion to resurrect the neighbourhood working approach. However, this is a matter that goes beyond the remit of the Local Plan.
		Policy HN9 Housing Regeneration	Support for increasing densities in areas in need of renewal such as Ladywood and Druids Heath	Support welcomed
	CPRE Worcestershire	Policy HN9 Housing Regeneration	Supportive, although individual schemes have not been considered in detail.	Support welcomed. Individual schemes will be considered in more detail outside of the Local Plan process.

	University Hospitals Birmingham NHS Trust	Policy HN9 Housing Regeneration	Prioritisation for developments which can support and enhance community safety. Emphasis on housing delivery but needs more emphasis in the Plan for the Health and Community facilities required to support the expanding population. Concern on the level of poor-quality housing exposing damp, safety and noise. The Local Plan needs to address existing housing conditions alongside proposing standards new developments.	Health issues are addressed throughout the document and has a strong foundation in National Planning policy and in the draft policy HN12 (Healthy Neighbourhoods). Further evidence on this matter will develop for later stages of the Local Plan.
	Balsall Heath Is Our Planet Ltd	Policy HN9 Housing Regeneration	Concerns around redevelopment of Balsall Heath/Sherborne Road Housing Action Area impacting on valued Green Space bounded by Balsall Heath Road, Mary Street and Clevedon Road.	Valuable and well used open spaces will continue to be protected as an important part of the regeneration of such Housing Action Areas and in line with other policies in the Local Plan which protect open spaces. The Neighbourhood Plan is part of the overall development plan for the city and details contained within it do not need to be repeated within the wider Local Plan.
		Policy HN9 Housing Regeneration	Green space which currently exists at the junction of Balsall Heath Road and Cleveland Road and the Apna Ghar Centre is now within a Housing Action Area. This should not mean that the green space should be developed as it contains mature trees and provides a valuable source of biodiversity and recreation for the area. Strong support for its retention.	Valuable and well used open spaces will continue to be protected as an important part of the regeneration of such Housing Action Areas and in line with other policies in the Local Plan which protect open spaces. The Neighbourhood Plan is part of the overall development plan for the city and details contained within it do not need to be repeated within the wider Local Plan.

The Tyler Parkes Partnership Ltd	West Midlands Police	Policy HN9 Housing Regeneration	PCCWM requests that the supporting text should also refer to the following, The remodelling or regeneration of existing residential areas should maximise the extent, safety and security of the built environment (both internal and external) including integration of Secured by Design and Park Mark principles including liaison with West Midlands Polices Design Out Crime Officers.	References to safety and security for new and existing developments will be reviewed as part of the next stage of Plan-making. A second Preferred Option will be consulted upon during Autumn 2025, meaning Stakeholders will have further opportunities for engagement.
	Birmingham City Council Housing Department	Policy HN9 Housing Regeneration	Support is given to the identification of Druids Heath as a housing regeneration site. It is considered that due to nature and scale of the regeneration proposals that the importance of Druids Heath should be recognised as it will maximise development needs through land assembly and being a comprehensively planned redevelopment opportunity. Druids Heath will see wholesale regeneration and redevelopment and will experience significant transformation over the lifetime of the plan. Consideration should be given within the emerging Local Plan for a standalone policy for Druids Heath, whether this be a sub-policy to HN9, a site allocation or a Growth Zone. As currently worded, it is not considered that the importance of Druids Heath and its opportunities for housing provision are recognised.	Druids Heath is identified as one of the Housing Action Areas under Policy HN9 (Housing Regeneration) as it is earmarked for wholesale regeneration. Further detailed policy is currently being progressed by master-planning work.

		Policy HN9 Housing Regeneration	Welcome the inclusion of Ladywood in Policy HN9 but concerned that the wording fails to cover the strategic objective for comprehensive regeneration of these areas. Suggest following wording is added, 'Comprehensive redevelopment will be supported where this is part of a regeneration plan for an area that will deliver a significant uplift in new homes, investment in infrastructure and environmental improvements'. Request that the specific number of units is removed from the Policy (as per comments regarding flexibility made on Policy GZ11). Suggest addition of following wording, 'The regeneration will deliver a significant increase in the number of new homes in line with the minimum housing density for the City Centre and responding to the location and onsite constraints. There is the opportunity to deliver at least 10,000 units based upon Policy HN4'.	The wording of Policy GZ11 (Ladywood) will be reviewed at the next stage of Plan-making. A second Preferred Option will be consulted upon during Autumn 2025, meaning Stakeholders will have further opportunities for engagement with the new Local Plan.
	Fruit and Nut Village	Policy HN9 Housing Regeneration	Oppose any changes in the land use around Clevedon Road and the River Rea in north-west Balsall Heath. The areas of concern are spaces that the Fruit and Nut Village project have been given permission to develop as orchard and forest garden space. Development of these areas would be severely detrimental to the area, and the city.	Valuable and well used open spaces will continue to be protected as an important part of the regeneration of Housing Action Areas such as Balsall Heath and in line with other policies in the Local Plan which protect open spaces.

		Policy HN9 Housing Regeneration	Policy HN9 identified a Housing Action Area for Balsall Heath Road but within these boundaries is the public open space known as Redgra pitch which is an important community resource. The pitch is included in the Balsall Heath Neighbourhood Plan and identified for improvements meaning housing development isn't appropriate and the Neighbourhood Plan area should be removed from the Housing Action Area.	The term Housing Action Area, in this case, applies to the regeneration of the area as a whole in housing terms and does not mean that housing will be built exclusively within that area. Valuable and well used open spaces will continue to be protected as an important part of the regeneration of such Housing Action Areas and in line with other policies in the Local Plan which protect open spaces. The Neighbourhood Plan is part of the overall development plan for the city and details contained within it do not need to be repeated within the wider Local Plan.
	Acocks Green Focus Group	Policy HN9 Housing Regeneration	Existing residents need to be at the heart of redevelopment proposals, as happened in the 1980s and 1990s.	Comment noted. Draft policies will be reviewed again as part of the next stage of Plan-making.
	Sport England	Policy HN9 Housing Regeneration	Sport England supports the need to identify and provide opportunities to improve playing fields and sports facilities referenced in the Policy and reserves the right to object to any proposals that do not meet the criteria set out in draft Policy CE14.	Support is welcomed.
		8.19 Paragraph	Duddeston Station capacity should be increased, including rebuilding the rail sheds as a major concourse and building a new local centre around a square/plaza in front of the new station. Given the densities proposed here mechanisms such as the Transport Innovation Fund, developer contributions and borrowing against future business rates could help to deliver the Metro to a much a shorter timeframe.	Suggestions for the future redevelopment of Duddeston Station are noted and will be considered as part of the next stage of plan preparation. Potential mechanisms such as the Transport Innovation Fund, developer contributions and borrowing against future business rates will also be explored further.

		8.5 Paragraph	Opening up the canal-side is essential to ensure continuous overlooking and activation through Heartlands to the city centre. The existence of the former gas holders should be referenced through circular landscaping design or blocks.	The potential opening up of the canal side and ensuring greater reference to the former gas holders will be considered further as part of the next stage of plan production.
	Save Smallbrook	47.1 Paragraph	Retention and conversion of existing buildings should be included in the Policy CE1 Climate Change Principles.	We agree that retrofit should be added to CE1. This comment will be considered in the next iteration of the preferred options document.
	Aston University	47.1 Paragraph	Aston University supports the policy objectives but stresses the importance to differentiate between outline and detailed planning stages. Information should be requested at reserved matters stage.	Comment is noted and support is welcomed. We will consider the production of a checklist for developers at each planning stage.
	Birmingham City University	47.1 Paragraph	BCU supports the Council's policy objectives. Can be hard for outline applications to submit adequate detail, it is therefore important that all policies require detailed climate and environmental considerations at reserved matters stage or with full applications, and not at outline application stage, and that such matters are dealt with via Planning Conditions.	We welcome this suggestion and will consider the production of a checklist for developers at each planning stage, however we will still require some information at outline stage, as we do now.
	BCC Lead Local Flood authority	47.4 Paragraph	Suggest that water is added to the list of hierarchies in paragraph 47.4 of CE1.	Comment is noted and support is welcomed. We agree that water should be added to CE1. This comment will be actioned in the next iteration of the preferred options document.

	Withy Hill Consortium	47.6 Paragraph	No objection in principle to the inclusion of policies that seek to improve the sustainability of development (specifically policies CE1, CE2, CE3 and CE6) but these should not go beyond national policy, particularly given the Written Ministerial Statement dated 13 December 2023 and High Court case AC-2024-LON-000621. The combination of the policy requirements would be a significant burden on development and is contrary to the recommendations of the Whole Plan Viability Assessment and will lead to a shortfall in affordable housing. The Future Homes Standard will supersede local policies for zero carbon homes when it is introduced in 2025.	Thank you for the comprehensive comments. We acknowledge the comment about the knock-on effect on viability; further viability testing will be undertaken. The Written Ministerial Statement (WMS) represents a regression in achieving net-zero new development and poses risks related to the Future Homes Standard (FHS) reliance on grid decarbonization. The WMS unlawfully constrains powers conferred to Local Planning Authorities (LPAs) by statute. Specifically, Section 1 of the Planning and Energy Act 2008 permits LPAs to set energy efficiency requirements that surpass building regulations. Additionally, the WMS misdirects local authorities by contravening Section 19 of the Planning and Compulsory Purchase Act 2004 (PCPA), which mandates that local plans contribute to climate mitigation and adaptation. The most recent report to the government (2024) from the Committee on Climate Change identifies the WMS as a barrier to achieving net zero. The UK Green Building Council (UKGBC) is lobbying for the withdrawal of this statement. Moreover, the 2024 amendment to the National Planning Policy Framework (NPPF) Paragraph 161 (formerly Paragraph 157) explicitly refers to the transition to net zero by 2050; this is the first instance where the NPPF has done so, despite the net zero obligation having been mandated in Section 1 of the Climate Change Act 2008 since 2019. The amendment requires the planning system to support this transition and adds to the requirements that must be fully considered. The Council will continue to monitor this situation closely.

	BCC Lead Local Flood authority	48.2 Paragraph	Include reference to preferred policy CE7 in this paragraph as flood risk management is intrinsically linked to climate change adaptation and mitigation.	Agree, we will add a reference to CE7 into CE1 as part of the preferred options consultations.
		48.9 Paragraph	Respondent supports inclusion of net zero in policies.	Comment is noted and support is welcomed
		49.3 Paragraph	Remove references to 'Birmingham City' - should just be Birmingham	We agree with the removal of reference to Birmingham City; this will be changed in the next preferred options stage.
		49.4 Paragraph	Rainwater reuse should be compulsory.	We acknowledge the comment around water consumption targets. An alternative approach to setting water targets will be explored and put forward in the next preferred options consultation.
		62.6 Paragraph	Respondent is questioning why the Council is not reviewing Green Belt in the face of Government requiring Local Authorities to look at 'grey belt' sites. The Preferred Options Document was written before the new Government were elected.	The Preferred Options Document was written before the new Government came in with their policy to look at 'grey belt' sites. This may be something that is looked at in future consultation rounds.
POD Consultation Event - Central Birmingham Library		Policy CE1 Climate Change Principles	Respondent stresses the importance of being ambitious on climate change and net zero policies.	Comment is noted and support is welcomed.
	Lendlease	Policy CE1 Climate Change Principles	Lendlease support the principles of CE1.	Comment is noted and support is welcomed

	MODA	Policy CE1 Climate Change Principles	Remove "Significant" from Policy CE1. Further details are required in the reasoned justification to define the expectations of Part 1 of the Policy - how each element of the energy hierarchy will be addressed and offsetting expectations. Energy and Carbon Statements - reword Criterion 5 to read "Maximisation of on site or building integrated renewable heat and electricity generation and storage, including solar energy where possible."	We agree with removing the word significant. Rewording around solar will be considered and offsetting will be re considered for the next consultation.
	NHS Property Services	Policy CE1 Climate Change Principles	Supportive of measures to promote carbon neutral development on the NHS estate.	Comment is noted and support is welcomed
	Calthorpe Estates	Policy CE1 Climate Change Principles	Support for Policy CE1 and its principles.	Comment is noted and support is welcomed
	Henley Investment Management Ltd	Policy CE1 Climate Change Principles	CE1 does not set any required standard or measure. It is not clear therefore how or why the use of offsetting as a last resort comes into play.	Offsetting will be explored in further detail for the preferred options consultation. This comment will be considered for the next preferred options consultation.

	Homes England	Policy CE1 Climate Change Principles	The policy needs to ensure that the statutory minimum standard is the minimum delivery standard and advocate the development below these levels would not be acceptable. Balance the approach between retaining buildings to limit the carbon footprint and wider plan objectives including creating an inclusive city and a city of thriving neighbourhoods.	Further viability testing on how policies interact will be undertaken at the next preferred options stage.
	Unite Group Plc	Policy CE1 Climate Change Principles	The overall approach of policy CE1 is supported but further clarity is required on the timelines for a Climate Change Principles checklist to be monitored through the construction and implementation of developments.	Comment is noted and support is welcomed. We will consider the production of a checklist for developers at each planning stage.
	Knighthead Capital Management	Policy CE1 Climate Change Principles	Strongly support the aim of mitigating and adapting to climate change and the measures set out in Policy CE1. However, flexibility is required in part 1 (d) of the policy and so the suggested wording is d. Using offsetting only in exceptional circumstances, to be agreed with the Council on a per-development basis as set out in Policy CE3.1. instead of d. Using offsetting as a last resort.	Comment is noted and support is welcomed. Offsetting will be considered for the next consultation. This comment will be considered for the next preferred options consultation.

	BCC Lead Local Flood authority	Policy CE1 Climate Change Principles	Support this preferred policy. In particular most of the measures listed under 'adapting and increasing the resilience of place and communities to climate change risks and impacts'.	Comment is noted and support is welcomed
	Zero Carbon House	Policy CE1 Climate Change Principles	The performance targets cited in the draft Plan are partial and incomplete leading to ambiguity, easy evasion and disappointing sustainability outcomes. Need to cover all the eight criteria of RIBA Climate Challenge 2030 targets. The intention of CE1 is correct, but it needs to be clarified. At CE 6.1, item 1, the operational energy targets should be specifically stated, adding at this section: i.e. non-domestic buildings 60 kWh/m2. yr Domestic buildings 35 kWh/m2. yr. The new BLP should contain strong clear guidance that EIAs must follow progressive best practice recommendations on climate and ecological emergency and carbon emissions. BCC should reference RIBA Climate Challenge 2030, Central Lincolnshire Energy Efficiency Guide, LETI Climate Emergency Design Guide, LETI Embodied Carbon Primer, LETI Climate Emergency Retrofit Guide and RICS Whole Life Carbon Assessment. BLP should clarify that RICS WLCA is just a methodology to enable consistent measurement of whole life carbon emissions	Thank you for the comprehensive comments. We agree that it should be made clear that RICS is a guidance methodology, this will be reviewed. Whilst the Council wishes to be as ambitious as possible, in terms of choosing higher energy performance requirements, this may not be viable when considered alongside other plan policies e.g. affordable housing. However, these suggestions will be explored, and further viability testing will be completed for the next preferred options stage.

	Jaguar Land Rover	Policy CE1 Climate Change Principles	JLR are generally supportive of Policy CE1 and ambitions to mitigate and adapt to climate change but needs to be more measured in wording. Development should contribute to change but it should be recognised that depending upon the context of the proposal, it may not be possible to provide evidence of positive impacts. The policy should recognise a need for a transition period towards achieving Net Zero.	This comment will be considered in the next iteration of the preferred options document.
	South Warwickshire Councils	Policy CE1 Climate Change Principles	Welcome the emphasis on tackling climate change and key role in collaborating and taking a policy lead as the largest City in the region and 2nd largest in the UK. There is an error on page 236 of the document where the definitions of Climate Change Mitigation and Climate Change Adaptation are the wrong way around. SDC reiterate commitment to cross boundary working and Duty to Cooperate obligations.	We acknowledge the error. The definitions are muddled and will be corrected for the next iteration of the preferred options document. Comment is noted and support is welcomed.
	Natural England	Policy CE1 Climate Change Principles	Natural England support the policies.	Comment is noted and support is welcomed

	Hanehouse Ltd	Policy CE1 Climate Change Principles	Request that Policy CE1 removes the word 'significant' as the level of contribution will be influenced by a range of factors such as the scale of the proposed development. Further details are required to define expectations of Part 1 of the Policy of how each element of energy hierarchy is to be addressed and what is expected in relation to offsetting (in practice)? Off-setting is included in Policy CE3.1, where it is noted, this is a relatively new concept with constantly evolving data, so it is difficult for developers to assess potential impacts upon development, particularly its viability. More guidance is required.	We agree with the suggestion to remove the word 'significant' from CE1, this will be actioned. Offsetting will be re considered ahead of the next consultation. This comment will be considered for the next preferred options consultation.

	Bruntwood Sci Tech	Policy CE1 Climate Change Principles	Bruntwood Sci Tech fully supports the aim of the city Council to make rapid progress in working towards a net zero carbon future and a climate-resilient city. While we fully support the Council aims, we also believe that a careful balance needs to be struck between ambition on the one hand and the need to avoid placing undue burdens on those wanting to develop in the city. Our view would be that a better yardstick to apply would be the mandatory Energy Performance Certificate (EPC) system which is familiar to all developers and all buildings have to work with. It is also worth noting that the new Net Zero Carbon Buildings Standard is due to launch this, Autumn. This is the UK's first cross-industry standard that brings together stringent requirements for all major building types, based on a 1.5 trajectory. We note that the EPC system is proposed as a means of assessing the energy performance of retrofit projects. We believe however that the standard of energy performance aimed for in a major refurbishment should be as challenging as in a new build and that modern techniques are capable of delivering non-residential retrofit schemes with at least a grade A or B rating. We would therefore suggest that the requirement in the policy for a simple improvement in rating could be made more challenging. While we fully support the objectives of this	Thank you for the comprehensive comments. We will consider the new UKGBS for inclusion in the next preferred options document. We note the comments around EPC targets for retrofit and this will be explored further. Amendments will be made for the next preferred options consultation, which will also include further viability work.

			policy we question whether making submission of such statements mandatory is appropriate in all cases. Given the continued need to ensure decisions on planning applications are made in a timely way, we have a concern that these assessments and potential negotiation over their content could lead to delay and would contend that a negotiated process with respect to individual proposals could deliver better outcomes. We support the objective of exploring ways of maximising local energy generation in the city and are broadly supportive of policy CE5. We would however suggest that the city should not just look within its boundaries for sources of supply for renewable energy generation but, in common with other major urban authorities, consider opportunities for remote investments outside the city where wind or solar generation can support the overall aim of delivering a zero-carbon future.	
	MEPC Limited	Policy CE1 Climate Change Principles	Fully supportive of Policy CE1 - principle 3 is particularly important in regard to achieving a balance between protecting heritage assets, promoting densification and achieving housing growth.	Comment is noted and support is welcomed

	Victorian Society	Policy CE1 Climate Change Principles	Welcome that emphasis is given to the retention and conversion of existing buildings in Policy CE2 and Policy CE4 but also deserves inclusion as part of Policy CE1.	We agree that retrofit should be added to CE1. This comment will be considered in the next iteration of the preferred options document.
	Woodbourne Group	Policy CE1 Climate Change Principles	Recommend removal of "...and significant" from draft policy as term is not quantified. Further details needed for approach to off-setting and how each element of the energy hierarchy is to be addressed. Due to relative infancy of technology, it is difficult to properly calculate impact on viability. Necessary heritage response may be at odds to ability to incorporate renewable energy. Therefore recommended that Criterion 5 of draft Policy CE6.1 be reworded to read: Maximization of on site or building integrated renewable heat and electricity generation and storage, including solar energy, where possible.	Thank you for the comprehensive comments. We agree with the removal of significant from the policy. The suggested amendments around incorporation of solar are useful and will be considered for the next preferred options document. Offsetting will be re considered for the next consultation.

	Churchill Retirement Living	Policy CE1 Climate Change Principles	There is a cumulative impact of the Net Zero, Biodiversity Net Gain and Urban Greening factors additional policy expense and, in accordance with the Written Ministerial Statement, recommends that only minimum policy requirements are reflected from national policy for older persons housing. It is therefore important that the Council does not set higher standards for development that differ from those already being introduced at a national level on a gradual, measured and costed basis. There is a danger that if individual authorities push beyond the curve of change too quickly, and particularly where viability is a concern, necessary development and housing delivery will become unviable. At present, there is no justification for the inclusion of mandatory sustainability targets which go beyond the requirements set nationally or within Building Regulations. We recommend that each of these policy requirements is amended to ensure the baseline requirements accord with nationally prescribed requirements with encouragement for improvement only where viable and feasible.	Thank you for the comprehensive comments. More viability work will be done at the next preferred options stage. Detailed requirements for the elderly are covered under policy HN5. The Written Ministerial Statement (WMS) represents a regression in achieving net-zero new development and poses risks related to the Future Homes Standard (FHS) reliance on grid decarbonization. The WMS unlawfully constrains powers conferred to Local Planning Authorities (LPAs) by statute. Specifically, Section 1 of the Planning and Energy Act 2008 permits LPAs to set energy efficiency requirements that surpass building regulations. Additionally, the WMS misdirects local authorities by contravening Section 19 of the Planning and Compulsory Purchase Act 2004 (PCPA), which mandates that local plans contribute to climate mitigation and adaptation. The most recent report to the government (2024) from the Committee on Climate Change identifies the WMS as a barrier to achieving net zero. The UK Green Building Council (UKGBC) is lobbying for the withdrawal of this statement. Moreover, the 2024 amendment to the National Planning Policy Framework (NPPF) Paragraph 161 (formerly Paragraph 157) explicitly refers to the transition to net zero by 2050, this is the first instance where the NPPF has done so, despite the net zero obligation having been mandated in Section 1 of the Climate Change Act 2008 since 2019. The amendment requires the planning system to support this transition and adds to the requirements that must be fully considered. The Council will continue to monitor this situation closely.

	West Midlands Housing Association Planning Consortium (WMHAPC)	Policy CE1 Climate Change Principles	Urge the Council to be mindful of how such policies might affect development viability and potentially limit the provision of affordable housing within Birmingham. The policies would impose a target that is 25% higher than the Government Future Homes Standard (FHS). Differing standards for compliance creates a fragmented approach to net zero target, which can result in a lack of clarity on what is considered compliant and creating a postcode method of compliance. The draft net zero and carbon policies should be carefully considered against Building Regulations and the Future Homes Standard which is being introduced from 2025 to avoid duplication and any potential inconsistencies. With the introduction of Building Regulations Part O (overheating), parts of draft Policy Low and Zero Carbon Energy and Heat Production overlap with statutory requirement and is therefore unnecessary.	This will be considered through further viability testing. The Written Ministerial Statement (WMS) represents a regression in achieving net-zero new development and poses risks related to the Future Homes Standard (FHS) reliance on grid decarbonization. The WMS unlawfully constrains powers conferred to Local Planning Authorities (LPAs) by statute. Specifically, Section 1 of the Planning and Energy Act 2008 permits LPAs to set energy efficiency requirements that surpass building regulations. Additionally, the WMS misdirects local authorities by contravening Section 19 of the Planning and Compulsory Purchase Act 2004 (PCPA), which mandates that local plans contribute to climate mitigation and adaptation. The most recent report to the government (2024) from the Committee on Climate Change identifies the WMS as a barrier to achieving net zero. The UK Green Building Council (UKGBC) is lobbying for the withdrawal of this statement. Moreover, the 2024 amendment to the National Planning Policy Framework (NPPF) Paragraph 161 (formerly Paragraph 157) explicitly refers to the transition to net zero by 2050, this is the first instance where the NPPF has done so, despite the net zero obligation having been mandated in Section 1 of the Climate Change Act 2008 since 2019. The amendment requires the planning system to support this transition and adds to the requirements that must be fully considered. The Council will continue to monitor this situation closely.

	Picton Jones (Asset Management) Ltd	Policy CE1 Climate Change Principles	Support the policy as it will help to ensure that developments make a positive and significant contribution to mitigating against and adapting to climate change. Exemplary schemes should be supported.	Comment is noted and support is welcomed
	University Hospitals Birmingham NHS Trust	Policy CE1 Climate Change Principles	Developments which address clean air and minimise poor quality should be prioritised over developments which have the converse impact.	Comments noted.

	Hammerson	Policy CE1 Climate Change Principles	Hammerson stress the importance that the Plan strikes the correct balance between sustainability objectives, encouraging development and ensuring scheme viability. Overall principle of CE1 is supported, however concern that draft Policies CE2-CE6 collectively set a series of overly prescriptive requirements (many of which duplicate Part L of the Building Regulations) to be evidenced at the application stage which places a significant additional burden on development proposals at the outset. Urge the Council to defer to building regulations and government standards on this matter.	The Written Ministerial Statement (WMS) represents a regression in achieving net-zero new development and poses risks related to the Future Homes Standard (FHS) reliance on grid decarbonization. The WMS unlawfully constrains powers conferred to Local Planning Authorities (LPAs) by statute. Specifically, Section 1 of the Planning and Energy Act 2008 permits LPAs to set energy efficiency requirements that surpass building regulations. Additionally, the WMS misdirects local authorities by contravening Section 19 of the Planning and Compulsory Purchase Act 2004 (PCPA), which mandates that local plans contribute to climate mitigation and adaptation. The most recent report to the government (2024) from the Committee on Climate Change identifies the WMS as a barrier to achieving net zero. The UK Green Building Council (UKGBC) is lobbying for the withdrawal of this statement. Moreover, the 2024 amendment to the National Planning Policy Framework (NPPF) Paragraph 161 (formerly Paragraph 157) explicitly refers to the transition to net zero by 2050, this is the first instance where the NPPF has done so, despite the net zero obligation having been mandated in Section 1 of the Climate Change Act 2008 since 2019. The amendment requires the planning system to support this transition and adds to the requirements that must be fully considered. The Council will continue to monitor this situation closely.

	Home Builders Federation	Policy CE1 Climate Change Principles	The HBF considers that it is important that the Council does not set its own standards for development which may differ from the approach being taken by national Government, and that any such policy in relation to low carbon, local heat and energy solutions are implemented on a flexible basis, and that the Council recognise the decarbonisation of the national grid. This would be in line with the Written Ministerial Statement of December 2023. The Council will also be aware that the Future Homes and Buildings Standards: 2023 consultation has been released covering Part L (conservation of fuel and power), Part F (ventilation) and Part O (overheating). The HBF notes that the Viability Assessment (paragraph 8.7) states that they also recommend that the policies in respect of Net Zero energy and other design costs are set at a minimum Building Regulations / national policy level. Requirements should be simplified to enable the delivery of affordable housing.	The Written Ministerial Statement (WMS) represents a regression in achieving net-zero new development and poses risks related to the Future Homes Standard (FHS) reliance on grid decarbonization. The WMS unlawfully constrains powers conferred to Local Planning Authorities (LPAs) by statute. Specifically, Section 1 of the Planning and Energy Act 2008 permits LPAs to set energy efficiency requirements that surpass building regulations. Additionally, the WMS misdirects local authorities by contravening Section 19 of the Planning and Compulsory Purchase Act 2004 (PCPA), which mandates that local plans contribute to climate mitigation and adaptation. The most recent report to the government (2024) from the Committee on Climate Change identifies the WMS as a barrier to achieving net zero. The UK Green Building Council (UKGBC) is lobbying for the withdrawal of this statement. Moreover, the 2024 amendment to the National Planning Policy Framework (NPPF) Paragraph 161 (formerly Paragraph 157) explicitly refers to the transition to net zero by 2050 this is the first instance where the NPPF has done so, despite the net zero obligation having been mandated in Section 1 of the Climate Change Act 2008 since 2019. The amendment requires the planning system to support this transition and adds to the requirements that must be fully considered. The Council will continue to monitor this situation closely.

	Langley Sutton Coldfield Consortium	Policy CE1 Climate Change Principles	The Consortium is supportive of the overall goal which Policy CE1 seeks to achieve of contributing to, mitigating against and adapting to climate change. However, the Consortium considers that the measures summarised within Policy CE1 parts 1b/c/d and 2b are not supported by appropriate evidenced-based justification, particularly in terms of viability. These are expanded upon in the responses made by the Consortium to Local Plan Preferred Options Policies CE3, CE6 and CE12.	This will be considered through further viability testing.
	Canal and Rivers Trust (Planning Manager)	Policy CE1 Climate Change Principles	Supportive of recognition of role canal network plays in urban cooling and nature recovery.	Comment is noted and support is welcomed
	Birmingham City Council Housing Department	Policy CE1 Climate Change Principles	Supports that CE1 helps to ensure that development should make a positive and significant contribution to mitigating against and adapting to climate change. Schemes that demonstrate an exemplary contribution should be supported.	Comment is noted and support is welcomed

		Policy CE1 Climate Change Principles	Welcome prioritisation of Climate Change Principles within the Plan. Support Policy CE1 and intention for it to cover both mitigation and adaptation but the adoption of low and zero carbon generation requires investment and grid transition. Currently, heat network connections may not always be appropriate or suitable for small scale sites and as FHS is to be introduced shortly, the Policy should be aligned to these regulations.	Comment is noted and support is welcomed. Further detail on where heat network zones will sit are emerging, but more information can be found here https://assets.publishing.service.gov.uk/media/671761349242eccc6c849bad/heat-network-zone-map-Birmingham__2_.pdf and here https://www.gov.uk/government/publications/heat-network-zoning-maps .
	Acocks Green Focus Group	Policy CE1 Climate Change Principles	Generally supportive but further design guidance, particularly in regard to building orientation and landscaping, is required. Clarification is also required on what the Heat Network Zones are and whether a potential energy user/producer co-op in Acocks Green could fit in with them.	Comment is noted and support is welcomed. More information on heat network zoning in Birmingham can be found here: https://assets.publishing.service.gov.uk/media/671761349242eccc6c849bad/heat-network-zone-map-Birmingham__2_.pdf and here https://www.gov.uk/government/publications/heat-network-zoning-maps . We will publish guidance on what we expect from energy/sustainable construction statements which will contain reference to useful links.
		Policy CE1 Climate Change Principles	Should adopt some design requirements through internal infrastructure in buildings in new apartments to make waste management easier.	This issue is addressed through policy CE2, which requires developers to "Provide adequate space to enable and encourage greater levels of re-use and recycling."

	Friends Of Hill Hook Local Nature Reserve	Policy CE10 Biodiversity and Geodiversity	The wording of Policy CE10 should be amended to read designated sites and their boundaries should be safeguarded in the Policies Map. The draft plan says that provisions of the Environment Act 2021 strengthen biodiversity requirements in the form of a new requirement for Public Authorities to conserve and enhance biodiversity but needs to make clear how this will be delivered in the case of Hill Hook Local Nature Reserve and other LNRs in the city? The representation also raises detailed queries on the evidence base.	Policy CE10 is associated to a wider Environmental Policy framework, such as the City of Nature Plan 2022 and the West Midlands Combined Authority Local Nature Recovery Strategy (LNRS). The existing policy refers to the 'designated sites' and therefore the boundaries of these sites are implicit. Policy CE10 states that Local Nature Reserves (LNR) such as Hill Hook will be protected from development proposals through a range of measures, such as a mitigation hierarchy and buffers between any proposed new development and the LNR.
	Knighthead Capital Management	Policy CE10 Biodiversity and Geodiversity	Part of the former Wheels site is designated as a SLINC. The new owners will enhance ecological features and mitigate impacts where appropriate.	It has been noted that part of the former Wheels site is designated as a Site of Local Importance for Nature Conservation (SLINC) and that required mitigation measures and ecological enhancements will be undertaken by the owners.

	Natural England	Policy CE10 Biodiversity and Geodiversity	We are pleased to see this policy that protects biodiversity and geodiversity. We welcome the wording of the policy which aims to protect internationally, nationally and locally designated sites. It is important to note however that there may be important assets which are not currently designated which may nevertheless have significant value. The direct and indirect impacts of proposed development on designated should be considered, including impacts on water quality, recreational impacts and the impacts on air quality from increased traffic and industrial developments. The Plan should identify and map local wildlife sites and include appropriate policy for their protection and enhancement, reflecting their role in the wider ecological network and for nature recovery. Should include application of the mitigation hierarchy and how the direct, indirect and cumulative impacts of development on designated sites will be addressed. Criteria-based policies to guide development should include application of the mitigation hierarchy and how the direct, indirect and cumulative impacts of development on designated sites will be addressed.	General support for Policy CE10 is welcomed. The Policy is associated to a wider Environmental Policy framework, such as the City of Nature Plan 2022 and the WMCA Local Nature Recovery Strategies (LNRS), which will map natural assets and identify opportunities for environmental improvements and enhancements. The existing Policy recognises 'Potential Sites of Importance' (PSIs) and sites of geological value, which contribute to the overall quality of the environment in Birmingham.

	Midlands Land Portfolio Ltd	Policy CE10 Biodiversity and Geodiversity	No comment	Acknowledged.
	RSPB	Policy CE10 Biodiversity and Geodiversity	The RSPB supports Policy CE10 in principle but recommends refinements to maximise the benefits for wildlife and to follow established precedent from other local plans. The policy should require ecological design features, including swift specific measures, for all development, including those subject to BNG. The policy should recommend universal integral nesting bricks instead of bird nest boxes. The RSPB also suggest that a Supplementary Planning Document is produced to complement this policy to provide detailed guidance on how to incorporate nesting opportunities for Swifts and other Red-Listed bird species in accordance with best-practice guidance such as BS 42021 or CIEEM.	General support for Policy CE10 is welcomed. The Policy already includes requirements for ecological design features and species- specific interventions. An SPD for Swifts and Red-Listed bird species is not proposed but your reference to existing Best Practice guidance is noted.
		Policy CE10 Biodiversity and Geodiversity	All developments should include species-specific interventions such as swift bricks, because these are excluded from the Biodiversity Net Gain metric. Swift bricks are better than bird boxes, these should be installed in accordance with best-practice guidance.	Policy CE10 already includes requirements for ecological design features and species- specific interventions.

		Policy CE10 Biodiversity and Geodiversity	All developments should include species-specific interventions such as swift bricks, because these are excluded from the Biodiversity Net Gain metric. Swift bricks are better than bird boxes, these should be installed in accordance with best-practice guidance.	Policy CE10 already includes requirements for ecological design features and species- specific interventions.
	Picton Jones (Asset Management) Ltd	Policy CE10 Biodiversity and Geodiversity	Supportive of Policy CE10 but it should be recognised that there will be some circumstances where a flexible approach should be adopted.	General support for Policy CE10 is welcomed. The Policy already includes a mitigation hierarchy and references 'wholly exceptional circumstances' for instances where development results in loss or negative impacts upon protected habitat

	Hammerson	Policy CE10 Biodiversity and Geodiversity	Requests an amendment to Policy CE10 to provide clarity - 'All BNG exempt developments must incorporate ecological design features such as biodiversity roofs and walls, water features, native trees, shrubs and wildflowers, and species specific interventions such as integrated bat roost features, bird nest boxes for swifts and other target species, hedgehog highways in walls and fences and insect homes'.	Agree, that Policy will be amended to provide clarity, that there is a range of ecological design features that new development can select for its development proposals, depending upon site context and conditions and that each site is not expected to provide every one of these design features.
	Canal and Rivers Trust (Planning Manager)	Policy CE10 Biodiversity and Geodiversity	Supportive of policies protecting and enhancing SINC's and SLINC's in context of canal network.	Support for Policy CE10 is welcomed, specifically in reference to enhancing SLINC's, many of which are located along or adjacent to the Canal Network.
	Swifts Local Network: Swifts and Planning Group	Policy CE10 Biodiversity and Geodiversity	The respondent supports Policy CE10 in principle but that the policy should explicitly require species-specific interventions in all developments, including those subjected to the Biodiversity Net Gain metric. They identify best practice guidance, such as BS 42021 and CIEEM which outlines that swift bricks, rather than nest boxes are the best intervention to protect small bird species. The respondent lists other Local Authorities that define the number of swift bricks that are required per dwelling in their emerging local plans, including Tower Hamlets, Wiltshire and the Cotswolds and suggest that Birmingham adopt similar standards.	General support for Policy CE10 is welcomed. The Policy already includes requirements for ecological design features and species- specific interventions.

	Birmingham City Council Housing Department	Policy CE10 Biodiversity and Geodiversity	This policy is generally supported. Whilst it is recognised that there is a requirement through the Environment Act that strengthens biodiversity requirements, it is considered that there are some circumstances where a flexible approach should be adopted.	General support for Policy CE10 is welcomed. The Policy already includes a mitigation hierarchy and references 'wholly exceptional circumstances' for instances where development results in loss or negative impacts upon protected habitats.
		Policy CE10 Biodiversity and Geodiversity	All developments should include species-specific interventions such as swift bricks. CE10 should be considered alongside CE12 and other biodiversity and green infrastructure requirements. The commitments in the Government 25-year Environment Plan should be reflected in the policy and on this basis the wording needs to be reinforced. All development should enhance biodiversity, even sites with no existing biodiversity value. Swift bricks are more suitable than bird boxes and these should be installed in accordance with best-practice guidance such as BS 42021 or CIEEM.	Policy CE10 already includes requirements for ecological design features and species-specific interventions and sets out a clear requirement that all development proposals, including those exempt from mandatory BNG, must deliver biodiversity and geodiversity enhancement measures. It should be noted that Policy CE10 is part of a wider Environmental Policy framework which includes Policy CE9: Green Infrastructure and Nature Recovery, CE11: BNG and CE12: Urban Greening Factor, along with the City of Nature Plan and West Midlands Combined Authority Local Nature Recovery Strategy (LNRS).

	Frampton Town Planning Ltd	Policy CE10 Biodiversity and Geodiversity	The sixth bullet point with reference to all development proposals is overly restrictive. It is considered that this bullet point should be reworded as follows: All development proposals, including those that are exempt from mandatory Biodiversity Net Gain requirements will be expected to provide biodiversity and flow diversity enhancement measures which are appropriate and proportionate to the form and scale of development for which planning permission is sought, the location of development and the practical opportunity to provide enhancement measures.	Agree, the Policy will be amended to provide clarity, that there is a range of ecological design features that new development can select for its development proposals, depending upon site context and site conditions and that each site is not expected to provide every one of these design features.
	Shropshire Swift Group	Policy CE10 Biodiversity and Geodiversity	This respondent requests revisions to policy CE10, the provision of swift nest sites should be extended to all developments. BNG does not include provision for swifts or other dependent species. Integrated swift bricks are the accepted solution, not bird boxes, BS42021 or CIEEM gives best practice guidance. The local plan could ensure that swifts have a future in the city.	Policy CE10 already includes requirements for ecological design features and species- specific interventions.

	Woodland Trust	Policy CE11 Biodiversity Net Gain	Biodiversity Net Gain requirements should deliver 20% improvements rather than 10%, which should also seek other investment sources to deliver this including both private and public sources. BNG units should be required to be maintained for 50 years not 30 years as set out in Environment Act. These should deliver a rich mix of habitats informed by LNR's.	Biodiversity Net Gain will be associated to a wider Environmental Policy framework, including the Urban Forest Masterplan 2021, City of Nature Plan 2022 and the West Midlands Combine Authority Local Nature Recover Strategy (LNRS). This comprehensive approach to preserving, sustaining and enhancing the natural environment will deliver a wide range of benefits, through different mechanisms and all focused on the long-term. Policy CE11 outlines an intention to establish a Birmingham City Council and Local Nature Recovery Strategy Habitat Bank to determine strategically significant sites and networks across the City. Options for a BNG requirement above 10% were assessed, as well as a range of percentages based on site typologies but in considering the planning balance and the potential for a flexible policy to dilute the gains overall, the uniform approach of 10% net gain is proposed.
POD Consultation Event - Central Birmingham Library		Policy CE11 Biodiversity Net Gain	BNG provision also needs to consider off-site as on-site can be difficult to deliver.	The proposed policy states that developers must provide a specified proportion of the BNG improvements on-site unless there is robust evidence where it is not feasible to do so.
	Henley Investment Management Ltd	Policy CE11 Biodiversity Net Gain	The justification for such a policy which goes beyond the significant statutory requirements is unclear. The hierarchy set out in the policy omits a lawful extension of the second preference (off-site provision to be made on land beyond the boundary of the LNRS or West Midlands Natural Character Area). The requirement to retain biodiversity units after the 30-year statutory period will be difficult to monitor in practice.	The Policy sets out a hierarchy for biodiversity units to be delivered via three options, one of which is the use of the National Statutory Biodiversity Credit scheme. Habitat and Monitoring Plans will be used to confirm how BNG will be delivered and monitored over the required 30-year period and the contribution will be secured formally, via the use of Conditions, Section 106 Agreements or Conservation Covenants.

	Knighthead Capital Management	Policy CE11 Biodiversity Net Gain	Support the inclusion of Policy CE11 on BNG.	Support for Policy CE11 is welcomed.
	Natural England	Policy CE11 Biodiversity Net Gain	As previously mentioned, open mosaic habitat on brownfield sites may be a under considered resource. Natural England would be interested in discussing your authority's Net Gain strategy and implementation	An invitation to discuss specific habitats (i.e. open mosaic habitat on Brownfield sites) is welcomed.
	Bloor Homes	Policy CE11 Biodiversity Net Gain	Duplicates national statutory requirement so Policy not required.	Policy CE11 has been included in the new Local Plan, as it ensures that those bringing forward development proposals in Birmingham, are aware of all requirements. The Policy also highlights connections to other Environmental Policies and documents such as the City of Nature Plan 2022 and the Local Nature Recovery Strategy prepared by the West Midlands Combined Authority (WMCA).
	West Midlands Housing Association Planning Consortium (WMHAPC)	Policy CE11 Biodiversity Net Gain	It is positive to see that recognised Habitat Banks could have their role in providing off site delivery where in some instances, delivery on site would not be financially viable, achievable (due to site constraints), or ecologically suitable. Supports the Council's decision to produce a BNG SPD which will provide more detailed guidance on how on-site and off-site BNG will be delivered across the city.	Support for Policy CE11 is welcomed. The support for a BNG SPD, to provide more detailed guidance on on-site and off-site BNG delivery is also noted.

	Picton Jones (Asset Management) Ltd	Policy CE11 Biodiversity Net Gain	Supportive of Policy CE11 but in regard to off-site BNG, a flexible approach should be taken to acknowledge there will be instances where developers will need to purchase credits, which is stated in National Policy.	Support for Policy CE11 is welcomed.
	Hammerson	Policy CE11 Biodiversity Net Gain	Supportive of Policy CE11 as aligned to National Policy.	Support for Policy CE11 is welcomed and reference to alignment to National Policy is noted. Agree to suggested typo amendment for removal of word 'be'.

	Home Builders Federation	Policy CE11 Biodiversity Net Gain	The HBF notes that there is a lot of new information for the Council to work through and consider the implications of, in order to ensure that any policy on BNG policy so that it complies with the latest policy and guidance now this has been finalised. It is important that mandatory BNG does not frustrate or delay the delivery of much needed homes. It is HBFs opinion that the Council should not deviate from the Governments requirement for 10% biodiversity net gain as set out in the Environment Act. The HBF also notes that there are significant additional costs associated with biodiversity gain, which should be fully accounted for in the Councils viability assessment. As this is still a new policy area and the market for off-site provision, and statutory credits are not yet known, any figure used for BNG costs will need to be kept under review as BNG implementation progresses and a greater understanding of actual costs become available. Any figure used for BNG costs will need to be kept under review as BNG implementation progresses and a greater understanding of actual costs become available. should set out how the Council intends to manage the interaction between LNRS, the planning system, and the implementation of BNG. The Local Nature Recovery Strategy, should map ecological	Policy CE11 is aligned to National Policy, and the Statutory Biodiversity Metric will be used to establish the baseline biodiversity value and post development gain. It is recognised that BNG is a new area of policy but learning from its operationalisation will be gained throughout 2025. Policy CE11 proposes a hierarchy for off-site BNG delivery, with option 2 offering developers the option to contribute to a Habitat Bank within the Local Nature Recovery Strategy (LNRS) boundaries. The WMCA is due to consult on the LNRS during Summer 2025, and it will serve as a strategic policy document for the natural environment.

			assets, set conservation principles, identify opportunities for habitat creation, restoration and enhancement, and to set measures for the recovery of species population.	
		Policy CE11 Biodiversity Net Gain	Policy CE11 should refer to the Humber River Basin Management Plan and River Rea Landscape Vision 2021 so applicants know they can count on-site or off-site measures that deliver RBMP objectives or River Rea vision as part of BNG. Supportive of minimum 10% BNG for all three Biodiversity Unit types. Policy CE11 should reference Policy CE7 to link role of delivering BNG to multiple benefits from watercourse improvements in terms of biodiversity, water quality and flood risk. Supportive of intention to produce a BNG SPD.	General support for Policy CE11 is welcomed and specific support for BNG to cover all three Biodiversity unit types and for a BNG SPD is noted. The Humber River Basin Management Plan is discussed in Policy CE7 Flood Risk Management, but the River Rea Landscape Vision 2021 is not referenced or association made to linkages between the two Policy areas. Both Policies will be amended.
	Birmingham City Council Housing Department	Policy CE11 Biodiversity Net Gain	Overall, this policy is supported. 10% BNG as a minimum in line with national requirements is the correct approach and should not be increased as this will make many sites unviable. In respect of off-site BNG a flexible approach should be adopted to acknowledge that this may not be possible and there are circumstances where credits will need to be purchased. This is an approach supported nationally.	Support for Policy CE11 is welcomed.
		Policy CE11 Biodiversity Net Gain	We are supportive of Policy CE11	Support for Policy CE11 is welcomed.

	Withy Hill Consortium	Policy CE12 Urban Greening Factor	The policy is not sufficiently flexible as it requires all developments to achieve an urban greening factor of at least 0.4. There should be flexibility to apply a lower factor for developments that have competing requirements. The proposed policy approach is contrary to the recommendations of the Whole Plan Viability Assessment.	The policy is based upon the Urban Greening Factor for England developed by Natural England. The model allows a wide range of surface covers to be used within a Major development, providing flexibility for different types of development and a variety of site locations/conditions. During the Issues and Options consultation over 70% of responders supported the introduction of UGF and due to the Climate Change Vulnerability mapping evidence, which demonstrated that all areas of the city are vulnerable to Climate Change, a consistent and standardised approach is considered the most equitable response.
	MODA	Policy CE12 Urban Greening Factor	Undertake sample assessments of schemes within Birmingham to assess the UGF levels achieved to date to determine whether the proposed policy levels are achievable and impacts on attainment of other Plan policies. Policy doesn't make allowance for circumstances where the UGF isn't reached and if a financial contribution to improve greening would be sought.	Comment noted
	Stoford	Policy CE12 Urban Greening Factor	Broadly supportive of the policy but note that this is likely to result in significant costs on developments.	General support for Policy CE12 is welcomed. The potential for UGF requirements to impact the overall costs of Major development is noted.
	Aegon UK Property Fund	Policy CE12 Urban Greening Factor	Broadly supportive, although this will result in significant additional costs for developments where no consideration is given to local circumstances and constraints.	General support for Policy CE12 is welcomed. The potential for UGF requirements to impact the overall costs of Major development is noted.

	Henley Investment Management Ltd	Policy CE12 Urban Greening Factor	It would be helpful if the policy and reasoned justification are clear as to how the UGF numeric targets of 0.4 and 0.3 are proposed to be used.	The Policy sets out the requirement for all major developments to achieve a minimum UGF score of 0.4 or 0.3, depending upon the exact type of development being delivered. The Policy will be delivered by the UGF tool developed by Natural England, which provides a wide range of green surface cover types that a development can incorporate into its design, along with an associated factor score. The tool is user-friendly and will provide developers with a quick means of assessing their design proposals, prior to application submission or allow designs to be evolved during the application process.
	Homes England	Policy CE12 Urban Greening Factor	The BLP should also incorporate similar flexibility, allowing the UGF requirements to be adapted to local conditions and constraints. Policy wording should be amended to state: All major developments that comprise residential uses should aim to achieve a target urban greening factor score of 0.4.	General support for Policy CE12 is welcomed. The UGF tool provides a large variety of surface cover options, which can be used on a range of site conditions and locations, meaning developers can decide their response on a site-by-site basis. Due to the Climate Change Vulnerability Mapping evidence, which demonstrated all areas of the city are vulnerable to the impacts of Climate Change, it is proposed that developers should recognise UGF as a requirement on all Major developments.
	BCC Lead Local Flood authority	Policy CE12 Urban Greening Factor	Support the urban greening factor requirements for major developments in the first three bullet points. Overall, the policy is complementary to the inclusion of SuDS within development.	Support for Policy CE12 is welcomed. The Policy recognises the potential to incorporate SUDs within designs for new major developments and contribute to the UGF score.

	Commercial Estates Group (CEG)	Policy CE12 Urban Greening Factor	CEG is broadly supportive of draft Policy CE12 Urban Greening, although it should be noted that this puts a significant cost strain on major development that will need to be taken into account when considering proposals in the overall planning balance. EG propose the policy wording is amended to require an Urban Greening Factor target score of 0.4, to allow for flexibility, enabling Urban Greening Factor requirements to be assessed depending on local circumstances and other relevant constraints such as viability.	General support for Policy CE12 is welcomed. The UGF tool provides a large variety of surface cover options, which can be used on a range of site conditions and locations, meaning developers can decide their response on a site-by-site basis. Due to the Climate Change Vulnerability Mapping evidence, which demonstrated all areas of the city are vulnerable to the impacts of Climate Change, it is proposed that developers should recognise UGF as a requirement on all Major developments.
	Natural England	Policy CE12 Urban Greening Factor	Natural England is very pleased that you have included the UGF as an integral part of your plan. This should align with the LNRSS requirements and general green infrastructure requirements, as demonstrated by your evidence base.	Strong support for Policy CE12 is welcomed and recognition of the contribution it can make towards the achievement of the wider Environmental Policy framework, such as Local Nature Recovery Strategies (LNRSSs).

	Hanehouse Ltd	Policy CE12 Urban Greening Factor	A UGF Policy has only been adopted by a few Local Authorities so to justify its inclusion as a Policy in the new Local Plan, a sample assessment of recent schemes should be undertaken to determine what UGF levels have been attained. Any impacts upon minimum density standards should be assessed. Policy CE12 should explain what happens in instances where the UGF level is not achieved - is there an alternative such as the provision of a financial contribution to improve greening in the local area?	The Policy is based upon the Urban Greening Factor for England developed by Natural England. The model allows a wide range of surface covers to be used within a new development, providing flexibility for different types of development and a variety of site locations/conditions. Due to the range of green surfaces that could be adopted by a development, it is considered unlikely that the achievement of a 0.4 or 0.3 UGF score will impact upon density levels of a development. The opportunity for green roofs and vertical greening means the degree of land lost to urban greening will be minimal, in most instances. Where more comprehensive greening is incorporated into the design of a new development there will be opportunities for green infrastructure within public realm areas and the wider landscaping elements, which again means adverse impacts on density rates are not envisaged.
	MEPC Limited	Policy CE12 Urban Greening Factor	Broadly supportive of the proposed policy approach, although it will result in significant addition costs for developments without due consideration of local circumstances and constraints.	General support for Policy CE12 is welcomed. The potential for UGF requirements to impact the on overall costs of major development is also noted. The UGF tool provides a large variety of surface cover options, which can be used on a range of site conditions and offers a flexible tool to developers.
	Woodbourne Group	Policy CE12 Urban Greening Factor	Evidence base should undertake sample assessments in Birmingham to assess whether UGF levels achieved to date to determine have been attained. Policy does not make allowance for circumstances where UGF is not reached, for example due to viability reasons, and whether a financial contribution in lieu of direct provision in the area is acceptable.	The Policy is based upon the Urban Greening Factor for England developed by Natural England. The model allows a wide range of surface covers to be used within the designs for new development, providing flexibility for different types of development and a variety of site locations/conditions. Due to the Climate Change Vulnerability Mapping evidence, which demonstrated all areas of the city are vulnerable to the impacts of Climate Change, it is proposed that developers should recognise UGF as a requirement on all Major developments.

		Policy CE12 Urban Greening Factor	Support for increasing tree coverage in the City Centre, Town Centre and other local centres to allow for shade. Use of Urban Greening Factor is appropriate and welcome.	Support for Policy CE12 is welcomed. The Policy relates to a wider suite of Environmental Policies, including Policy CE9: Green Infrastructure and Nature Recovery and CE10: Biodiversity and Geodiversity, which all discuss the importance of trees to the natural environment of the city and the role they play in addressing Climate Change impacts. i.e., providing shade through canopy cover.
	Bloor Homes	Policy CE12 Urban Greening Factor	Seeking to achieve this policy objective is not compatible with achieving high density developments of 40dph+.	The Policy is based upon the Urban Greening Factor for England developed by Natural England. The model allows a wide range of surface covers to be used within a new development, providing flexibility for different types of development and a variety of site locations/conditions. Due to the range of green surfaces that could be adopted by a development, it is considered unlikely that the achievement of a 0.4 or 0.3 UGF score will impact upon density levels of a development. The opportunity for green roofs and vertical greening means the degree of land lost to urban greening will be minimal, in most instances. Where more comprehensive greening is incorporated into the design of a new development, there will be opportunities for green infrastructure within public realm areas and the wider landscaping elements, which again means adverse impacts on density rates are not envisaged.

	Picton Jones (Asset Management) Ltd	Policy CE12 Urban Greening Factor	Supportive of Policy CE12 but maintenance and operational management should be secured through planning conditions.	General support for Policy CE12 is welcomed. Achievement of the UGF score will be assessed through the planning application process, as individual proposals come forward. To support the determination of applications, an overarching Policy framework is required to set out the UGF calculation and provide options for the different types of green infrastructure that can be incorporated into the design of new development.
	Home Builders Federation	Policy CE12 Urban Greening Factor	The HBF considers that the Council may need to ensure that this policy is applied flexibly taking into account other considerations such as the density of development, embodied carbon, design, energy efficiency, proximity to open spaces, local character, and other site-specific elements. It may be that in some cases the urban greening target means that other policy requirements cannot be met or become significantly more costly. Additional evidence is needed to justify the standards being sought and more work is needed on the impact of this policy on deliverability.	The Policy is based upon the Urban Greening Factor for England developed by Natural England. The model allows a wide range of surface covers to be used within the designs for new development, providing flexibility for different types of development and a variety of site locations/conditions. As Climate Change Vulnerability Mapping evidence developed by the University of Birmingham confirms that that all areas of the city are being impacted, it is proposed that developers should recognise UGF as a requirement on all Major developments.

	Langley Sutton Coldfield Consortium	Policy CE12 Urban Greening Factor	Objects to the proposed Policy CE12 based on the conclusions of the BCC viability evidence reporting. The Consortium is accordingly proposing that development schemes like Langley, which will already have received planning permission at the point the new Local Plan is adopted, will not have the Urban Greening Factor applied to them in order to ensure that the delivery of these schemes can viably progress as quickly as possible. The achievement of a specific urban Greening Factor for new development is not a Building Regulations Requirement and is not a National Policy. The viability evidence base for the Local Plan accordingly does not appear to support the inclusion of an Urban Greening Factor Policy requirement within the Local Plan. Policies should not be included within the Local Plan which result in new development being demonstrated to be unviable. It is also noted that the Viability Report has not tested the implications of the proposed policy approaches on an urban extension of 5,500 dwellings which is considered to be a significant omission given that the Langley Sustainable Urban Extension is the largest allocation in the Local Plan and requires the delivery of a large and costly quantum of strategic infrastructure. The Langley development scheme is not simply a multiple of lots of 200 unit or 450-unit development schemes, it is a	A general objection to the Policy is noted, along with a specific objection to the application of the Policy to the Langley Sustainable Urban Extension (SUE) in Sutton Coldfield. The new Local Plan is seeking to develop a new Policy framework for future years up to 2042, during which period of time issues of Climate Change are forecast to become more significant and the Plan must respond to these challenges. A Climate Change Emergency was declared by the Council in 2019 and mapping evidence produced by the University of Birmingham to determine Climate Change Vulnerability demonstrated that all areas of the city are currently being impacted and that measures are needed to prevent their amplification. Climate resilience will only be achieved by the adoption of a uniform approach to increasing green infrastructure across the whole of city, to protect the daily living conditions for both existing and new residents. Whilst Langley is unique, in being the only large-scale urban extension within Birmingham, its SPD sets out defined expectations for a new sustainable and green community to be created, with green corridors and substantial landscaping. This vision presents a multitude of design options for green infrastructure and thereby the achievement of the UGF score.

			comprehensive development in its own right and should be tested as such. The viability evidence base is therefore considered to be further deficient in this regard.	
	Perry Barr Sarl	Policy CE12 Urban Greening Factor	Broadly supportive of the proposed Policy CE12 Urban Greening. However, the London Plan Policy (G51) provides flexibility in applying the Urban Green Factor (UGF), allowing it to be tailored to local conditions and a minimum target score is not mandated. This flexibility should be reflected in the BLP.	General support for Policy CE12 is welcomed. The Policy is based upon the Urban Greening Factor for England developed by Natural England. The model allows a wide range of surface covers to be used within the designs for new development, providing flexibility for different types of development and a variety of site locations/conditions. Due to the Climate Change Vulnerability Mapping evidence, which demonstrated all areas of the city are vulnerable to the impacts of Climate Change, it is proposed that developers should recognise UGF as a requirement on all Major developments.
	Birmingham City Council Housing Department	Policy CE12 Urban Greening Factor	Overall, this policy is supported however details of maintenance and operational management should be achieved through planning conditions.	General support for Policy CE12 is welcomed. Achievement of the UGF score will be assessed through the planning application process, as individual proposals come forward. To support the determination of applications, an overarching Policy framework is required to set out the UGF calculation and provide options for the types of green infrastructure that can be incorporated into the design of new development.

		Policy CE12 Urban Greening Factor	Whilst we acknowledge viability concerns with smaller developments, all development should be subject to considerations around urban greening and how even small developments can make a contribution towards addressing climate change. We consider that the policy should be revised to acknowledge that urban greening is the responsibility of all developers in Birmingham, not just those that have the opportunity to deliver major schemes.	Policy CE12 is proposed for application to Major development schemes only. UGF is a relevantly recent policy tool, to contribute to the Climate Change challenge and is particularly important in densely developed locations such as Birmingham, where manmade surfaces make up more than 90% of ground cover in central Birmingham. Major development schemes pose the potential to materially alter the existing environment of the site to be developed and contribute to the incremental transformation of the surrounding area, which may require phased regeneration over a long time period. These types of development opportunities are expected to generate significant advances in enabling the built environment of the city to become more climate resilient and create the building blocks for small developments to connect to and make small-scale contributions towards a greener city.
		Policy CE12 Urban Greening Factor	substitute the Mayor of London / London Wildlife Trust 'Urban Greening for BNG: A Design Guide' for Natural England's National Standard Urban Green Factor Scoring Table as more appropriate in terms of an entry for value from walls that include features such as bird nest bricks, bat bricks, bat boxes etc.	The Policy is based upon the Urban Greening Factor for England developed by Natural England. The model allows a wide range of surface covers to be used within the designs for new development, providing flexibility for different types of development and a variety of site locations/conditions. The Policy is associated to the broader Environmental Policies of CE9: Green Infrastructure and Nature Recovery, CE10: Biodiversity and Geodiversity and CE11: Biodiversity Net Gain, where the suggested types of environmental measures (e.g., bird nest bricks and bat boxes) are supported.
POD Consultation Event - Handsworth		Policy CE13 Open Space	There is a need to protect open space for development.	Policy CE13 along with other related policies in the Local Plan are put in place to protect Open space

POD Consultation Event - Central Birmingham Library		Policy CE13 Open Space	Respondent stresses need for open spaces to be safer and better quality to use.	New developments will consider safety and surveillance in animating existing open spaces and ensure that there is a long-term management plan for the maintenance of new open spaces.
	Aegon UK Property Fund	Policy CE13 Open Space	The new open space standard of 2.35 HA per 1000 persons is a good intent but is likely to create additional viability issues, particularly for high density developments on constrained sites. The Policy should provide flexibility for some non-conformity, if due to its location, scale, proximity to existing open space and the need for housing delivery across the City this space standard cannot be achieved.	It is important to protect existing open space and increase capacity of open space in areas where it is currently underprovided. Viability of schemes will be taken into account when considering the requirements for open space depending on the specific circumstances of each development.
	Henley Investment Management Ltd	Policy CE13 Open Space	The second part of the policy should include provision to allow for flexibility in the application of the Appendix 2 requirement. Particularly relevant to GZ.1 where the provision of public open space at significant costs.	It is important to protect existing open space and increase capacity of open space in areas where it is currently underprovided. Viability of schemes will be taken into account when considering the requirements for open space depending on the specific circumstances of each development.
	MEPC Limited	Policy CE13 Open Space	The new open space standard of 2.35 hectares per 1000 persons has good intent but is likely to heighten viability challenges for high density development on constrained sites, where on site provision will be limited. Allowance should be afforded for a sites capacity to deliver the required standards, based on location, scale and proximity to existing open space.	It is important to protect existing open space and increase capacity of open space in areas where it is currently underprovided. Viability of schemes will be taken into account when considering the requirements for open space depending on the specific circumstances of each development.

	Birmingham City Council Conservative Group	Policy CE13 Open Space	Accessible play areas within public open spaces, such as in cities like Barcelona and consideration of Make Space for Girls design guides	Safe and accessible play spaces for all is an important consideration and a key aim of Policy CE13. Onsite play space provision will be sought on developments which meet the thresholds set out in Appendix 2 of the Preferred Options Document (Open Space Standards) as well as contributions sought elsewhere to improve safety and facilities on existing parks and open spaces.
	CPRE Worcestershire	Policy CE13 Open Space	Supportive overall though specific sites would need to be examined.	Support is welcomed. The evidence base for the Open Space policies draws on survey work done of all the open space areas within the City.
	Picton Jones (Asset Management) Ltd	Policy CE13 Open Space	Supportive of Policy CE13.	Support is welcomed
	Council For British Archaeology, West Midlands	Policy CE13 Open Space	Suggest rewording to say "the protection and setting of heritage assets" to ensure protection of heritage assets within the open space as well as their setting	The proposed wording for Policy CE13 bullet point f. will be considered for the next consultation stage.
		Policy CE13 Open Space	Policy CE13 should reflect both the quantity of open space and the quality provided, as well as a balanced approach to the maintenance of these spaces and need to make efficient use of land. Object to current policy wording and suggest alternative, ' the Council will consider open space requirements on an individual scheme basis and consider existing open space provision, the intended users and the setting'.	Appendix 2 of the Preferred options document sets out the requirements for open space provision in more detail dealing with both quantitative and qualitative issues as well as future maintenance.

		Policy CE13 Open Space	Highlights the concept work that we are undertaking on the regional park alongside the delivery of pocket parks in East Birmingham reflect this strategic focus. It is our view that planning policy presents the opportunity to enhance this access. Whilst we are supportive of policy CE13, we consider that the Council can go further to ensure that open space and access to open space by communities is prioritised. We object to the loss of public open space and consider that greater consideration needs to be made by the Council in respect of the impact that the loss of public open space would have upon communities. Further consideration should be made towards how public open space can be retained and we consider that initiatives and partnerships should be explored to ensure that public open space is retained for public benefit of recreation, wellbeing, nature and community use. on site amenity green space could form stepping stones to the 8 Hills Regional Park or potentially extend into the Regional Park, depending on its location. The National Trust has big ambitions for the Regional Park with a desire for the benefits to be as far-reaching as possible and the support for new amenity green spaces in residential development is proportionate to the contribution such could have towards the Regional Park and how it could best serve its audience. Where	Policy CE13 promotes the protection and retention of open space and the provision of new open space areas, particularly in the Wards where provision is currently below the quantity standards set out in the Policy. Other policies in the Local Plan such as Policy CE9 (Green Infrastructure and nature recovery) seek to maintain and expand Birmingham's green infrastructure network using the Local Nature Recovery Strategy and the City of Nature Plan. This will ensure and improve links to wider parks and open spaces including to and from the proposed 8 Hills Regional Park.

			on site amenity green space cannot be delivered, we are supportive that a financial contribution will be required towards new or improving nearby off-site public open space areas or play equipment which are well linked by means of cycling and walking. We consider that the Regional Park would be able to deliver such requirements and as set out above would recommend that the 8 Hills Regional Park is identified in any Infrastructure Funding Statement going forward to ensure that the benefits can be secured long term for the residents of Birmingham.	
	Sport England	Policy CE13 Open Space	Sport England supports this policy but since playing fields are dealt with separately in policy CE14, the reasoned justification for this policy should make it clear that the policy does not apply to playing fields. This is because the protection criteria in policy CE13 are different to those in CE14. Reference to the Birmingham Playing Pitch Strategy (October 2023) should also be removed for this reason.	Comments noted, Policy CE13 will be reviewed and references to playing pitches removed as these are discussed under Policy CE14. The reference to the Birmingham Playing Pitch Strategy evidence will also be removed from Policy CE13 to prevent any confusion.

	Boldmere Neighbourhood Forum	Policy CE13 Open Space	Support the incorporation of green infrastructure and improved public realm. Plan needs to ensure that ensure more play facilities are created in areas such as Boldmere where family housing is present.	Policy CE13 will protect existing open space and play spaces and advocate for the creation of new spaces where possible, as proposals for new development come forward.
	Knighthead Capital Management	Policy CE14 Playing Pitches and Sport Facilities	Knighthead supports the policy aim of CE14 in protecting playing pitches and sports facilities and enhancing existing sports facilities including safe accessibility through a variety of means. Supports the provision of large sporting facilities near to centres or in highly accessible locations which the new 'Sports Quarter' near to St Andrews aspires to be. Suggests that the Policy should recognise that complementary uses within large sporting facilities can enhance the strength of retail uses in nearby designated urban centres identified in Draft Policy EC4 through enhanced footfall.	Support is welcomed. It is not the aim of the policy to enhance the strength of retail uses in nearby designated centres. This is a matter for Draft Policy EC4 amongst others.

	Friends of Birmingham Wheels Park including motorsport related clubs, community groups, organisations and businesses formerly operating at the site	Policy CE14 Playing Pitches and Sport Facilities	The approach in this, and related policies is inconsistent with the approach to promoting healthy and safe communities in Section 8 of the NPPF. The draft plan policies (and linked tourism policies) are inconsistent and represent an inappropriate interpretation of national policy. The up-to-date assessment of needs for sports facilities is deficient as it does not embrace all necessary sports including two and four wheeled sports. The absence of their consideration is a significant gap in the evidence base. It demonstrates that Council decisions affecting these sports have and could still be mis-informed. Policy CE14 Playing pitches and sports facilities. All existing playing pitches, and sports and recreation facilities in Birmingham shall be protected and only considered for redevelopment under the following circumstances: The development proposal is supported by a carefully quantified and documented up to date assessment of current and future needs which demonstrates that there is an excess of playing field/sports facility/recreation provision in the catchment and has no special significance to the interests of the sport(s) affected, based on up to date evidence and consultation with all relevant governing bodies and clubs evidence within the latest Playing Pitch and Outdoor Sports Strategy (PPOSS) for the city. The proposed	Policy CE14 will be reviewed as part of the next stage of Plan making, when the suggested amendments will be considered. A second Preferred Option document will be consulted upon during Autumn 2025 and there will be opportunities for further engagement by Stakeholders.

			development is for ancillary facilities supporting the principal use of the site as a playing field/sports/recreation facility and does not affect the quantity and quality of playing pitches/sports/recreation facilities at that location or otherwise adversely affect their use. The proposed development affects only land incapable of forming part of a playing pitch/ sports/recreation facility and does not: i. Reduce the size of any playing pitch or facility; ii. Result in the inability to use any playing pitch or facility (including the maintenance of adequate safety margins and run-off areas); iii. Reduce the sporting capacity of the playing field/ facility to accommodate playing pitches or the capability to rotate or reposition or share playing pitches or facilities to maintain quality and maximum usage and shared usage of the pitches of facilities; iv. Result in the loss of other sporting or recreational provision or ancillary facilities such as spectator facilities on the site; v. Prejudice the use of any remaining areas of playing field/ facilities on the site. The sport or recreation facilities, playing field or fields to be lost as a result of the any proposed development would be replaced, prior to the commencement of development (including demolition), by a new facilities playing field site or sites: i. Of equivalent or better quality and ii. Of	

			equivalent or greater quantity; iii. In a suitable location and iv. subject to equivalent or better management arrangements. the proposed development is for an indoor or outdoor facility for sport and recreation, the provision of which would be of sufficient benefit to the development of sport/recreational activity as a whole as to outweigh the detriment caused by the loss, or prejudice of use, of the area of the playing field/sports facility. For new major residential developments, where an assessment has demonstrated that it will place additional demands on any type of sport facilities (determined and informed through Sport England's Playing Pitch Calculator and the latest PPOSS), a contribution towards sports facilities and playing pitches will be secured through a S106 agreement, or equivalent. Any such agreement must also include contributions to cover appropriate maintenance payments for a substantial period into the future to be agreed by the Council in conjunction with Sport England. Where possible, options should be explored to allow community access and use of the City's educational establishments, in order to reduce shortfalls in provision of playing pitches and sports facilities. Where new schools or colleges are provided, these should be designed to facilitate community access where possible in partnership with	

			Sport England and relevant national governing bodies for sport. Provision of new community facilities for sport should be located in easily accessible sites, with safe pedestrian and cycle access as well as being close to local public transport routes. Facilities for participation sport which attract large numbers of visitors and incorporate elements of entertainment, retail or leisure uses which operate for many hours of the day should be located in highly accessible locations, preferably in or adjacent to one of the network of centres identified in Policy EC4. Clearly there is a tourist dimension (such as away fans attending and/or international events) but, first and foremost they should be regarded as key community assets for Birmingham.	
	Birmingham City Council Housing Department	Policy CE14 Playing Pitches and Sport Facilities	Overall support is given to this policy. It is recognised that the provision of sports facilities and playing pitches is important to improve access and health for the local community.	Support is welcomed

	Sport England	Policy CE14 Playing Pitches and Sport Facilities	Sport England supports this policy which reflects our Playing Fields Policy Exception criteria. However, recommend amendments to the Policy to its first line, the first bullet point and references to the NPPF.	Support for the Draft Policy is welcomed. Suggested amendments to the first bullet point of the Policy to change 'carefully quantified and documented assessment' to 'a robust and up-to-date assessment', as this is consistent with NPPF para 102 is noted and will be considered during the next stage of Plan making. The suggestion to also rename the Policy to 'Playing Fields and Sports Facilities', as it is fields that are to be protected, rather than pitches is also noted.

	Birmingham City Council (Investment and Valuation)	Policy CE15 Green Belt	Highlights the need for Bromsgrove District to review their Green Belt boundary to meet Bromsgrove's needs to 2040. Suggest that the BLP Review should undertake a Green Belt Review in the context that BCC acknowledges the need to direct growth towards neighbouring authority areas to meet its own development needs. Cross boundary consideration of the strategic review and release of Green Belt in the Frankley area should be discussed with Bromsgrove District Council through local plan process to explore how this proposition could contribute to meeting both Authorities' housing needs and set a new Green Belt boundary in this location. If considered by the two authorities as a reasonable cross border proposition, strategic growth at Frankley could meet some of the growth needs and address climate change and inclusive growth objectives including the delivery of the National Trust's 8 Hills Regional Park proposal and support a more sustainable travel for the conurbation and its hinterland and improved accessibility of the urban population to the wider countryside.	Comments are noted. Following the publication of the Revised NPPF, a Green Belt Review will be undertaken to inform the Preferred Options consultation which will take place in autumn 2025. An update to the HEDNA will also be undertaken to provide a more up to date picture of local housing needs.

	Sutton Coldfield Town Council	Policy CE15 Green Belt	Support the decision not to review the Green Belt boundary, given the comprehensive review as part of the last Local Plan. Support the strategy of focusing development predominantly within the urban area to meet future growth needs.	Support for Policy CE15 is welcomed.

	Withy Hill Consortium	Policy CE15 Green Belt	We do not agree that there are no exceptional circumstances to justify further Green Belt release for the following reasons: The existing NPPF requires local plans to meet their housing needs, but at present there is no clear strategy for how the shortfall will be met in Birmingham. The proposed new NPPF will require a Green Belt Review to be undertaken. The previous Green Belt Review from 2013 cannot be relied on as up to date evidence as circumstances have changed and there is now a much larger housing shortfall. No evidence has been provided to support the assertion that call for site submissions in the Green Belt are subject to other significant constraints. Evidence from the preparation of the BDP which refers to the market being unable to deliver more than one SUE is out of date and should not be referred to. A Green Belt Review should be undertaken, and this should include Land South of Withy Hill, Sutton Coldfield. The 2013 Landscape and Visual Character Assessment is also out of date and should not be referred to for the Birmingham Local Plan.	Comments are noted. Following the publication of the Revised NPPF, a Green Belt Review will be undertaken to inform the Preferred Options consultation which will take place in autumn 2025. An update to the HEDNA will also be undertaken to provide a more up to date picture of local housing needs.

POD Consultation Event - Erdington		Policy CE15 Green Belt	Stresses need for Green Belt boundaries to be reviewed so that the Council can take its housing need within the city boundaries.	Changes to national policy will likely necessitate a review of the Green Belt to release 'grey belt' land for housing. Comments are noted. Following the publication of the Revised NPPF, a Green Belt Review will be undertaken to inform the Preferred Options consultation which will take place in autumn 2025. An update to the HEDNA will also be undertaken to provide a more up to date picture of local housing needs.

	Walter Smith Farms Ltd, L N Mitchell Ltd and Emmanuel College, University of Cambridge	Policy CE15 Green Belt	the justification for avoiding green belt review and possible release is not in accordance with the approach taken by the current Government, as set out in the draft NPPF 2024. it is clear that more allocations will be necessary to meet local needs and to contribute to the wider GBBCHMA needs. It is therefore considered that BCC should review all potential grey belt sites and review its green belt, particularly in areas with land that is sustainably located, with immediate access to public transport, local facilities and services. BCC undertook a review of the green belt within its boundary in the late 1970s following local government reorganisation which transferred Sutton Coldfield into the city. In 1975, around the time of the transfer, this included an area defined as Green Belt and an Interim Green Belt (IGB). Whilst the map prepared in 1975 notes that the classification of interim Green Belt shown on the map should for the purposes of development control be treated the same as the Green Belt which the Secretary of State has approved. We therefore strongly recommend undertaking a green belt review which should consider grey belt and green belt sites, and also consider the benefits that large scale allocations such as the site at Fox Hill can deliver, including a mix of uses to increase its sustainability by virtue of requiring fewer trips beyond the locality due to its	Comments are noted. Following the publication of the Revised NPPF, a Green Belt Review will be undertaken to inform the Preferred Options consultation which will take place in autumn 2025. An update to the HEDNA will also be undertaken to provide a more up to date picture of local housing needs.

			immediate facilities, services and employment opportunities, as well as its potential to incorporate substantial publicly accessible open space.	
	CPRE Warwickshire	Policy CE15 Green Belt	Support Policy CE15 proposing no change to the Green Belt.	Support for Policy CE15 is welcomed.
	South Worcestershi re Councils	Policy CE15 Green Belt	The SWCs question whether the 2013 Green belt review can still be considered to be up to date. Refers to paragraph 1.12 of the Procedure Guide for Local Plan examinations which states that evidence dating from two or more years before the plan's submission date risks having been overtaken by events. This may be a soundness issue unless updated, particularly given the shortfall in housing and the Government's stance on Green belt in the NPPF consultation.	Comments are noted. Following the publication of the Revised NPPF, a Green Belt Review will be undertaken to inform the Preferred Options consultation which will take place in autumn 2025. An update to the HEDNA will also be undertaken to provide a more up to date picture of local housing needs.
	Gladman Development s Ltd	Policy CE15 Green Belt	Gladman considers that, as a matter of urgency and necessity, the Council reconsider its decision not to review Green Belt in this Local Plan. Despite having considered a range of other reasonable options, the Council recognises that a significant shortfall in housing supply relative to housing needs will arise over the plan period. To be compliant with the WMS and national planning policy, Gladman consider that the BLP should be supported by an up-to-date Green Belt Review that fully assesses the role, function and purposes of the Green Belt across the authority area.	Comments are noted. Following the publication of the Revised NPPF, a Green Belt Review will be undertaken to inform the Preferred Options consultation which will take place in autumn 2025. An update to the HEDNA will also be undertaken to provide a more up to date picture of local housing needs.

	Midlands Land Portfolio Ltd	Policy CE15 Green Belt	A number of neighbouring authorities highlighted concern with the approach taken by BCC, with a number commenting that the Council should maximise Green Belt release within its own boundary before seeking help from other authorities, particularly as this would involve Green Belt contributions from other local authorities. The respondent has included details of their site at Minworth Greaves which is a Green Belt Site. It is considered that the site would meet the definition of grey belt under the revised NPPF, as set out above. In this regard, the site is considered to be a suitable site for employment development which will not result in significant Green Belt harm	Comments are noted. Following the publication of the Revised NPPF, a Green Belt Review will be undertaken to inform the Preferred Options consultation which will take place in autumn 2025, this will include the potential identification of suitable grey belt sites. An update to the HEDNA will also be undertaken to provide a more up to date picture of local housing needs.
	Bloor Homes	Policy CE15 Green Belt	Green belt review required otherwise it could be viewed that BCC has not exhausted all options to meet shortfall before considering exporting need to neighbouring authorities. Given the shortfall and the fact that the last review was done in 2013, an updated green belt review should now be done.	Comments are noted. Following the publication of the Revised NPPF, a Green Belt Review will be undertaken to inform the Preferred Options consultation which will take place in autumn 2025, this will include the potential identification of suitable grey belt sites. An update to the HEDNA will also be undertaken to provide a more up to date picture of local housing needs.
	Walmley Golf Club Ltd	Policy CE15 Green Belt	Disappointing that green belt review has not been undertaken despite significant housing shortfall. Promoting site at Walmley Golf club for residential use as a potential 'grey belt site' and sequentially preferable to other green belt sites.	Comments are noted. Following the publication of the Revised NPPF, a Green Belt Review will be undertaken to inform the Preferred Options consultation which will take place in autumn 2025, this will include the potential identification of suitable grey belt sites. An update to the HEDNA will also be undertaken to provide a more up to date picture of local housing needs.

	St. Philips Land	Policy CE15 Green Belt	St Philips has significant concerns regarding the overreliance on the Growth Zones to meet the Councils housing needs and the Council's justification for not reviewing the Green Belt. It is entirely reasonable and consistent with the NPPF for the Council to release Green Belt land to assist in addressing their own housing needs. clear that: a There is insufficient brownfield land to meet the city's development needs (i.e., point a); b By reason of this, the optimisation of densities on brownfield land is also unlikely to meet the city's development needs (i.e., point b); and c Given the emerging c.83.000 dwelling scale of the unmet needs across the GBBCHMA, it is unlikely that other authorities within the GBBCHMA could meet these cumulative needs in full. The Council has derived a contrived spatial strategy designed specifically not to release Green Belt, the consequence of which the Council is proposing that their unmet housing need of c.46,000 dwellings should be met by other GBBCHMA authorities on top of the BCAs c.37,000 dwelling shortfall, which is an approach which is neither positively prepared nor aspirational.	Comments are noted. Following the publication of the Revised NPPF, a Green Belt Review will be undertaken to inform the Preferred Options consultation which will take place in autumn 2025, this will include the potential identification of suitable grey belt sites. An update to the HEDNA will also be undertaken to provide a more up to date picture of local housing needs.
	CPRE Worcestershire	Policy CE15 Green Belt	Release of Green Belt should be rejected.	The Preferred Options Document aims to keep new development to brownfield sites in the city area as much as possible to reduce the need to build on Green Belt land.

	Sandwell Metropolitan Borough Council	Policy CE15 Green Belt	Proposed changes to the NPPF may strengthen the requirement to review Green Belt boundaries to meet development needs, with first consideration given to previously developed land and grey belt. Birmingham CC should ensure that it takes all possible steps to seek to accommodate its own housing need and should also consider whether there is potential to accommodate the unmet need arising from nearby areas including Sandwell.	Comments are noted. Following the publication of the Revised NPPF, a Green Belt Review will be undertaken to inform the Preferred Options consultation which will take place in autumn 2025. An update to the HEDNA will also be undertaken to provide a more up to date picture of local housing needs.
	Home Builders Federation	Policy CE15 Green Belt	The HBF considers that this decision not to review the Green Belt will need to be reconsidered by the Council. It will be important for the plan to be supported by an up-to-date Green Belt Review that fully consider the purposes of the Green Belt within the assessment.	Comments are noted. Following the publication of the Revised NPPF, a Green Belt Review will be undertaken to inform the Preferred Options consultation which will take place in autumn 2025, this will include the potential identification of suitable grey belt sites. An update to the HEDNA will also be undertaken to provide a more up to date picture of local housing needs.

		Policy CE15 Green Belt	The National Trust support this definition and welcome the opportunities that promoting the multi-function of the Green Belt can offer towards recreation and wellbeing of the residents of Birmingham and the wider West Midlands. The National Trust care for Frankley Beeches on the Birmingham boundary and located within the Green Belt. In the circumstances that development is proposed on the Green Belt, whether this be planned or speculative, we consider that any development would be required to be justified in the context of very special circumstances or exceptions to the purpose of the Green Belt, whilst maintaining the multi-functional purpose of the Green Belt The National Trust are promoting a Regional Park on the southern fringe of Birmingham. The boundary recommendations incorporate areas within Birmingham in Hawkesley, Bartley Reservoir and Frankley Reservoir, which are all understood to be covered by the Green Belt. We consider that the regional park presents the opportunity to enhance Green Belt policy by promoting the multi-functional purpose of the Green Belt in terms of outdoor recreation which can be enhanced through improved access to open space in the regional park area but also requiring any development which takes place in the Green Belt to secure the highest quality green infrastructure that would	Support for Policy CE15 is welcomed and we note the references to the regional park and also cross policy implications for green infrastructure provision here too.

			connect into the regional park and hold developers to greater account in respect of how development can contribute to the regional park within the area, and the prevailing character of the area, which will also deliver public benefits beyond addressing the housing needs of the Housing Market Area. We would be keen to discuss the contribution that the Regional Park could make towards achieving a number of objectives set out within the Preferred Options consultation with Officers, including relating to Green Belt, open space, biodiversity, health and wellbeing, and equitable access to nature.	
	Sport England	Policy CE15 Green Belt	Sport England supports the reference in policy CE15 to outdoor sport and recreational facilities. Wording should make clear that this relates to both the construction of new buildings and also to changes of use of land.	Support for Policy CE15 is welcomed.
	Dudley Metropolitan Borough Council	Policy CE15 Green Belt	Welcomes the policy references to improve the quality of Green Belt areas and public access to them, particularly in respect of the Woodgate Valley as this area connects into Dudley borough and offers the opportunity for cross boundary active travel links and potential wildlife corridor links.	Comments are welcomed and agreed.

	Stoford	Policy CE16 Historic Environment	There is no Statutory duty in relation to the conservation of a Conservation Area and current legislation only relates to the setting of Listed buildings. The wording of the Policy does not align with NPPF (para 203) whereby the significance of the asset should be protected, including elements of its setting that contribute to its significance, meaning the Policy should be amended. The Policy on (page 251) fails to take into account the existing condition of the building or structure which could be unsuitable for retention. The Policy also states that an existing building cannot be demolished until a contract for replacement building has been agreed but this fails to recognise that existing buildings could be replaced by landscaped places or public realm which would contribute to the heritage asset, local character and its distinctiveness (NPPF, Para 204), rather than another building. The Policy wording should be amended.	Comments are noted and the policy wording will be considered as part of the next stage of Plan-making. A second Preferred Option will be consulted upon during Autumn 2025, when Stakeholders will have further opportunities for engagement with the new Local Plan.

	Calthorpe Estates	Policy CE16 Historic Environment	Support for the aspirations of Policy CE16, however important to involve all significant stakeholders. The Council has also consulted on the Historic Environment SPD - it is important that the SPD is updated prior to adoption to accord with the draft policies set out in the BLP.	Support is welcomed. The City Council will ensure that the Historic Environment SPD aligns with the Local Plan Policy.
	Henley Investment Management Ltd	Policy CE16 Historic Environment	Blanket protections for unspecified reasons are not appropriate and create ambiguity as to what would need to be considered as a significant element contributing to historic identity. The list of significant elements and reference to their consideration should be deleted from the Policy.	Further consideration will be given to this wording as part of the next stage of Plan-making. A second Preferred Option will be consulted upon during Autumn 2025, meaning Stakeholders will have further opportunities for engagement in the new Local Plan.
	MEPC Limited	Policy CE16 Historic Environment	Greater accessibility and understanding of Birmingham's history and heritage is important and can assist in identifying development opportunities to enhance it but Policy must be mindful of impacts upon development viability. Overly prescriptive policy or policy that is too rigidly applied will hinder development.	Comments noted. The viability of individual developments which impact on the historic environment will be considered on an individual case-by-case basis and not a matter specifically for the Local Plan.

	Victorian Society	Policy CE16 Historic Environment	Content mostly appropriate but anomalous with other policies in section as only a small part relates to climate change. BCC needs to ensure that character appraisals and management plans are done for all conservation areas and not just a few. Policy only deals with heritage assets themselves and not the buildings which surround them and their context. Cross reference needs to be made to ensure this is picked up.	Further consideration will be given to this wording in the next stage of Plan-making. A second Preferred Option will be consulted upon during Autumn 2025, meaning Stakeholders will have further opportunities for engagement in the new Local Plan.
	Ardstone Capital	Policy CE16 Historic Environment	Victoria Square House is Grade II Listed but the 1990s office extension behind the Chateau is not of heritage significance and would be suitable for significant upgrade or redevelopment.	Comment is noted.
		Policy CE16 Historic Environment	The list of assets reflecting historic identify are comprehensive and welcome. The majority of the city's Conservation Areas do not have Conservation Area Character Appraisals and Management Plans in place despite being a statutory requirement. Requires a commitment from BCC to prepare CACAMPs for the remainder of the city. Is the recognition to consult the Birmingham Civic Society in policy / scheme making to be reflected in the plan?	Further consideration will be given to this wording in the next stage of Plan-making. A second Preferred Option will be consulted upon during Autumn 2025, meaning Stakeholders will have further opportunities for engagement with the new Local Plan.

	Midlands Land Portfolio Ltd	Policy CE16 Historic Environment	It is considered that the site can be sensitively developed whilst respecting the Listed Building and its setting. It is considered that this is not an overriding constraint, and the site can be developed in a manner which respects the Listed Building.	Comments on individual Historic Assets and Listed buildings will be dealt with on a case-by-case basis and are not part of the Local Plan consultation.
	University Hospitals Birmingham NHS Trust	Policy CE16 Historic Environment	The Queen Elizabeth Hospital is partially located on a Roman Fort which presents some restrictions in terms of development and enhancement. Potentially, could some restrictions be lifted where the enhancements are not only sensitive to the historic nature of the site but also displays some long-term social enhancement e.g. Health benefits.	Historic Environment considerations and mitigation as part of any development would need to be considered separately on a case-by-case basis and not as part of Local Plan consultation.
	Canal and Rivers Trust (Planning Manager)	Policy CE16 Historic Environment	Canal network should be considered as a non-designated heritage asset due to their appearance on the LPA's 'Historic Landscape Character Records'.	This issue will be considered during the next stage of Plan-making.
	Council For British Archaeology, West Midlands	Policy CE16 Historic Environment	Strongly support this policy	Support welcomed.

	Birmingham City Council Housing Department	Policy CE16 Historic Environment	Overall, this policy is supported. It should be recognised however that not all parks, gardens and public open spaces are significant elements that contribute to the distinct historic identity of Birmingham. The part of the policy in respect of heritage assets is supported. The part of the policy on archaeological assets is also supported. It is agreed that archaeological remains of significance discovered should be incorporated into the design, however, this should be in accordance with and contribute to Policy PG2 regarding place making.	Support is welcomed. There is a particular Historic Environment designation for those parks specifically identified and allocated as an historic park and garden and does not apply to all parks, gardens and open spaces.

		Policy CE16 Historic Environment	The National Trust welcome this policy, alongside the Historic Environment SPD, to which comments have been submitted separately. will create more solid foundations for the preservation, enhancement and conservation of our heritage assets which reflect so much of Birmingham's social history alongside exemplary architecture and historical significance. Recently, several examples of Birmingham's built heritage have been lost and there is great concern that significance can be downgraded or underplayed by developers in their submissions. We would however expect that great scrutiny is assigned to any supporting heritage impact assessment submitted in support of development which propose the loss of significant assets. the National Trust maintain that any development should enhance the setting of surrounding designated and non-designated heritage assets, with new development required to be of exceptional quality to reflect the character and spirit of Birmingham. Any loss of a non-designated heritage asset should be sought to be avoided and fully justified and scrutinised if proposed. The loss of a designated heritage asset should be wholly exceptional.	Comments noted and support is welcomed

	Acocks Green Focus Group	Policy CE16 Historic Environment	Generally supportive. Local rules for designating conservation areas, such as the Oxford Guide, could be put into place.	Further consideration will be given to examples elsewhere such as the Oxford Guide prior to the next stage of consultation of the Local Plan.
	Knighthead Capital Management	Policy CE17 The Canal Network	Welcomes the recognition of the canal networks value and contribution towards tourism, culture, ecology and leisure.	Support of Policy CE17 is welcomed, as it will improve connectivity between new development and blue infrastructure.
		Policy CE17 The Canal Network	Support for the Canal Action Plan to identify development opportunities and allow those opportunities to contribute towards improvements to the network.	Support of intention for a Canal Action Plan to be formulated is welcomed. The Action Plan will allow locations for interventions to be identified, that will enable improvements to the Canal Network.
	Canal and Rivers Trust (Planning Manager)	Policy CE17 The Canal Network	Suggestion of wording changes/additions: * addition of mention of anti-social behaviour in first bullet point * mention of increasing site surveillance, improving access, signage and opening up the canal as to encourage usage. Developments which respect heritage value and offer opportunity to boost tourism, leisure, recreation and cultural value will be supported.	General support of Policy CE17 and the proposal for a Canal Action Plan is welcomed. Minor changes to the Policy can be incorporated to strengthen the policy and additional wording will be included to acknowledge that new development can create land instability, which can pose impacts for canal operations and the maintenance of functional waterways. The Policy already outlines the requirement for new development to facilitate increased canal usage and create safe routes, respect canal heritage and promote opportunities to boost tourism, leisure, recreation and culture.

		Policy CE17 The Canal Network	We are supportive of the inclusion of Policy CE17 which acknowledges the importance of Birmingham's canal network in respect of its part in Birmingham's story but also the potential that the network offers as habitats and corridors for wildlife and biodiversity, as well as leisure and tourism opportunities whilst retaining their character and heritage. We consider that any development proposed within the context of the canal network needs to both acknowledge and respect the character and heritage of the canals whilst also considering other material planning considerations, such as heritage assets and the impact that the development could have upon these. The pedestrian and cyclist friendly nature of this network should be enhanced by any development with opportunities explored to enhance footpaths and towpaths and improve connectivity with new bridges and pedestrian routes.	Support of Policy and its intentions to protect canal wildlife corridors, biodiversity levels and the heritage value that canals contribute to the overall history of the City of Birmingham is welcomed. The Policy already outlines all of these issues and recognises the need for new development to support increases levels of active travel and to improve connectivity between new homes and the Canal Network. The Canal Action Plan will discuss how new development must take account of canal heritage and wider industrial heritage in canal side locations.

	Heidelberg Materials	Policy CE18 Minerals	Given that development is considered a key development factor for the Plan and government policy, this light touch is inappropriate. To provide context it would be helpful if the quantities of construction materials that are imported into the City are provided, plus a discussion if the policies in the rest of the plan are reliant on these amounts being maintained or changed (up or down). Should also make the obvious follow on point that it is and will be in the future be completely reliant on neighbouring (or distant) authority areas to meet all its needs, and there is an assumption that this will happen. Should more strongly emphasise that the existing infrastructure to import and distribution aggregates is critical to the function of the economy. The third bullet point should refer to rail fed aggregate depots of primary aggregates (e.g. Heidelberg Materials facility at Landor Street amongst others), the current wording refers to only recycled and secondary aggregates. Reference should be made to the significant reduction in HGV road miles provided by rail supplied locations in the urban area over the alternative of road import from neighbouring counties. The 3rd bullet point relates to different subjects, safeguarding mineral infrastructure and prior extraction of known mineral resources. For ease of reading the	Request to Strengthen and expand Policy CE18 is noted, with specific reference to be made to the rail-fed aggregate depots of primary aggregates, as these enable significant reduction in HGV road miles that are generated by imports from neighbouring counties. Policy CE18 will be reviewed during the next stage of Plan making.

			latter should be made the subject of a new bullet point.	
Tarmac Trading Ltd		Policy CE18 Minerals	Given the significant development aspirations for the city centre up to 2042, it is imperative that existing critical operations that support the sustainable development agenda and climate emergency are safeguarded. Safeguarding of infrastructure such as Small Heath Rail Head must be recognised and supported in the emerging Local Plan, a view which is enshrined in the NPPF and the Birmingham Development Plan. Further consideration should be given to the siting and proximity of new development to existing businesses to ensure that adequate mitigation is in place to ensure their continued effective operation without giving rise to complaint. Tarmac considers that there is a need to include a specific mineral infrastructure safeguarding policy/position for rail fed sites within the scope of the emerging Local Plan. This would enhance the sustainability of draft framework for development and go some way to detailing how the strategic vision and future levels of growth can be delivered.	Request to strengthen and expand Policy CE18 is noted, with specific reference to be made to the rail-fed aggregate depots of primary aggregates and need to safeguard existing rail depots and infrastructure such as Small Heath Rail Head and ensure their continued unimpeded operation. Policy CE18 will be reviewed during the next stage of Plan making.

	Worcestershire County Council	Policy CE18 Minerals	Policy CE18 appears to conflate the safeguarding of mineral resources with the safeguarding of mineral infrastructure. The first paragraph on page 300 concerns minerals infrastructure and states that Proposals that would lead to the loss of such facilities without adequate replacement will normally be refused, unless exceptional circumstances, such as one of the following, can be demonstrated. The exceptional circumstances that follow all relate to the safeguarding of mineral resources, rather than mineral infrastructure. It is unclear whether the circumstances are intended to be policy tests related to the final paragraph on page 299 - which does concern mineral resources - and/or whether there should also be policy tests specifically relating to the safeguarding of minerals infrastructure. We would support the BDP including clear safeguarding policy tests for both mineral resources and mineral infrastructure. Recognises that there are limited opportunities to extract minerals within the city. Welcomes the reference to recycled and contraction and demolition waste making an important contribution to meeting the demands for aggregates within the city. Similarly, the policy to safeguard recycled aggregates is welcomed. It is important to understand the scale of any cross boundary minerals supply and we	General support for Policy CE18 is welcomed, along with the request for greater clarity to be provided on the safeguarding of Mineral resources and Mineral infrastructure. The need for correct references to the Annual Monitoring Report produced by the West Midlands Aggregate Working Party is also noted. Policy CE18 will be reviewed during the next stage of Plan making.

			would welcome the publication of the aggregates assessment and for the BLP to set out the broad balance of minerals that will be sourced from within Birmingham and beyond, particularly in terms of landbanks if sand and gravel and crushed rock required under national policy. The final paragraph on page 300 is somewhat confusing in that it talks about the seven authorities of the West Midlands Minerals Authority, the West Midlands Metropolitan Area, and the Annual Monitoring Report which we assume to be the report produced by the West Midlands Aggregate Working Party covering the whole of the West Midlands region, including the county Mineral Planning Authorities in addition to the Metropolitan Authorities. Greater clarity would be welcome.	

	Lendlease	Policy CE2 Sustainable Design and Construction	Supportive of Policy CE2 in general but concerns with some aspects - 1) CE2.1 Water - Building Regs provide a higher water efficiency standard for development which Local Authorities can use but standards above this are difficult to implement and would need to be assessed as part of the evidence base/viability assessment, 2) CE2.2 Materials and Resource Efficiency - the principles of Circular Economy are supported but there are not currently sufficient materials in the market with EDPs so the Policy should encourage their use rather than require, 3) CE2.4 Non-Residential - the need to consider development over 1,000m2 should only be required where feasible as in developments just over the threshold there may be challenges in achieving the BREEAM Excellent standard, 4) CE2.5 Residential - the Policy should be reviewed to determine if it is setting an effective requirement for development as overheating element could be incorporated into Policy CE2.3 It should be recognised that the 2025 Future Homes Standard will significantly improve the performance of dwellings, delivering a 75% carbon reduction beyond Part L 2013. Where requirements beyond Building Regs are required, this should be assessed as part of the evidence base/viability testing or alternatively encouraged as a voluntary option.	Policy CE2 already includes a clause that allows for alternative approaches where it can be demonstrated that the approach is equivalent to or exceeds BREEAM excellent. We acknowledge the comment around the lack of availability of EPDs. This will be looked into and the potential of either removing the requirement or making it optional will be explored. We acknowledge the comment around water consumption targets. An alternative approach to setting water targets will be explored and put forward in the next preferred options consultation. The policy (and evidence base) only encourages the use of certification standards for residential development. The Council considers that mandating this for all residential development would compromise viability. The inclusion of overheating in CE2 will be revisited and reconsidered for the next preferred options document.

	Calthorpe Estates	Policy CE2 Sustainable Design and Construction	Support the objectives of Policy CE2. Make the following specific comments on the Policy: - Amend Draft Policy CE2:1 to remove reference to the RIBA climate change water efficiency targets and the following text is included as a replacement: For all non-residential development, it is required that, where practical and viable, at least two BREEAM Water Efficiency credits (wat 01) are obtained. - Considers that the requirement for non-residential development to be assessed against BREEAM is appropriate. However, the need to consider development over 1,000m2 should only be required where feasible and practical. In particular for Development which only just exceeds the threshold, and where there may be challenges in achieving this standard due to the proposed use or site constraints. - Policy CE2.5 as currently drafted the policy does not set a specific requirement, rather an encouragement for assessment linked to Policy CE3. this Policy should be reviewed to determine if it is setting an effective requirement for development. For example, the element regarding overheating could be incorporated into Policy CE2.3. As currently drafted the policy does not set a specific requirement, rather an encouragement for assessment linked to Policy CE3. Where additional requirements beyond the	Thank you for the comprehensive comments. The inclusion of overheating in CE2 will be revisited and reconsidered for the next preferred options document. We acknowledge the comment around water consumption targets. An alternative approach to setting water targets will be explored and put forward in the next preferred options consultation. This will be considered through further viability testing. Acknowledge the comment re: adding flexibility around BREEAM, this is to be considered. The policy (and evidence base) only encourages the use of certification standards for residential development. The Council considers that mandating this for all residential development would compromise viability

			Building Regulations are included, such as PassivHaus, Calthorpe consider that this should be assessed as part of the evidence base and viability assessment prior to being adopted as policy or alternatively be referenced as a voluntary option.	
	Walter Smith Farms Ltd, L N Mitchell Ltd and Emmanuel College, University of Cambridge	Policy CE2 Sustainable Design and Construction	The Council should provide evidence to demonstrate that the stricter requirements are justified and evidently viable, particularly where the requirements exceed Building Regulation standards.	This information is provided in our low carbon evidence base, however more viability work will be done for the next preferred options document.
	Unite Group Plc	Policy CE2 Sustainable Design and Construction	Supportive of Policy CE2.1 but it fails to specify a clear approach to validating the 75 litres per person/day. Suggest that the Policy uses BREEAM credits scores as a mechanism. Policy CE2.2 - supportive of Part 2 of Policy. Policy CE2.3 - Overheating Policy could create design limitations due to the locations of the development sites and it's unclear what the future weather resilience definitions are and what would be appropriate for Birmingham? Not clear what weather scenarios should be used. Policy CE2.4 - supportive of Part 4 of Policy.	Thank you for the comprehensive comments. Policy CE2 already includes a clause that allows for alternative approaches where it can be demonstrated that the approach is equivalent to or exceeds BREEAM excellent. We acknowledge the comment around the lack of availability of EPDs. This will be looked into and the potential of either removing the requirement or making it optional will be explored. We acknowledge the comment around water consumption targets. An alternative approach to setting water targets will be explored and put forward in the next preferred options consultation. The policy (and evidence base) only encourages the use of certification standards for residential development. The Council considers that mandating this for all residential development would compromise viability. The inclusion of overheating in CE2 will be revisited and reconsidered for the next preferred options document.

	Knighthead Capital Management	Policy CE2 Sustainable Design and Construction	Knighthead strongly supports the aims of Draft Policy CE2 and expresses its shared commitment to sustainable construction and circular economy principles.	Comment is noted and support is welcomed
	BCC Lead Local Flood authority	Policy CE2 Sustainable Design and Construction	Support the 'Futureproofing' section of this preferred policy.	Comment is noted and support is welcomed
	Zero Carbon House	Policy CE2 Sustainable Design and Construction	BREEAM is now widely regarded as an outmoded standard, with RIBA, LETI, and UKGBC standards now preferred; and noting the cross-industry Net Zero Buildings Standard under development.	Birmingham City Council commissioned Jacobs to product a low carbon evidence base for the local plan. Within this, a variety of different construction standards were appraised, including LETI, UKGBC and LEED. The study concluded that BREEAM was the most appropriate measure "BREEAM Excellent is the most common level of performance referred to, both in planning policy and corporate strategies. According to BREs study, typical energy reduction of meeting this level of performance is approximately aligned to a 25% reduction over Building Regulations. Based on our review of BREEAM New Construction version 6, we did not identify any significant technical barriers that could prevent buildings with GIA less than 1000m2 from achieving BREEAM Excellent." The policy also states, "Alternative approaches will be accepted, where it can be demonstrated the proposed standards targets align or exceed the mandatory credits required to achieve BREEAM excellent standard appropriate to the type of development."

	Jaguar Land Rover	Policy CE2 Sustainable Design and Construction	Recognition of need transition towards more sustainable practices as proposed in CE2 but the policy is too onerous and may constrain the continued operation of employment uses. Sub-sections CE2.1, CE2.2 and CE2.3 may impact viability particularly when upgrading or refitting legacy industrial buildings. The policy requirements will be challenging to monitor and lead to a redundant policy. The requirement in CE2.4 for new build, non-residential development of 1,000smq and over or a site over 0.5HA to achieve BREEAM Excellent should be changed to 'BREEAM or Equivalent' as this is more appropriate for manufacturing buildings. BREEAM Excellent is difficult to achieve particularly on legacy industrial buildings and wording for CE2.4 should provide a caveat regarding viability.	Thank you for the comprehensive comments. We acknowledge the comment around water consumption targets. An alternative approach to setting water targets will be explored and put forward in the next preferred options consultation. Acknowledge the comment re: adding flexibility around BREEAM, this is to be considered. Policy CE2 already includes a clause that allows for alternative approaches where it can be demonstrated that the approach is equivalent to or exceeds BREEAM excellent. Policy CE4 sets out the requirements for retrofit for existing/legacy buildings.

	MEPC Limited	Policy CE2 Sustainable Design and Construction	At a strategic level, MEPC is supportive of Policy CE2 but has some concerns - 1) Policy CE2.1 Water - Building Regulations provide a higher water efficiency standard which Local Authorities can use and efficiency requirements beyond this standard can be difficult to implement. Water efficiency is not currently included in the evidence base and if higher standards are pursued then they should undergo viability assessment, 2) RIBA 2030 Climate Change only sets targets for a small number of non-residential uses so we would recommend an alternative target is used which is not building specific, 3) BREEAM Wat01 - provides an alternative approach which could be placed on non-residential development so MEPC requests that the policy is amended to remove the RIBA Climate Change water efficiency target and states, ' For all non-residential development, it is required that, where practical and viable, at least two BREEAM water efficiency credits (war01) are obtained'. CE2.2 - supports principle of Circular Economy but in regard to Part D requirement, there is currently insufficient materials within the market with EDPs, so the requirement is not deliverable. The use of EDPs should be encouraged rather than required. CE2.3 - supportive but Building Regs and	Thank you for the comprehensive comments. We acknowledge the comment around water consumption targets. An alternative approach to setting water targets will be explored and put forward in the next preferred options consultation. We acknowledge the comment around the lack of availability of EPDs. This will be looked into and the potential of either removing the requirement or making it optional will be explored. The inclusion of overheating in CE2 will be revisited and reconsidered for the next preferred options document.

			other key design guidance already takes into account potential effects of Climate Change. Support provision of dynamic thermal modelling and future climate scenarios for new non-residential development. CE2.4 - supportive but recommend that this is applied, 'where feasible and practical' as on development that only just exceeds the threshold it may be difficult to achieve. It should also be noted in the Policy that here are some bespoke buildings, such as data centre, where an alternative approach would be more effective.	
	Bloor Homes	Policy CE2 Sustainable Design and Construction	No objection to principle of the policy but water and waste consumption measures as part of the policy is not necessary as this is picked up in the building regulations and the Future Homes Standard.	Our evidence base supports the inclusion of a water target, however what this is will be revisited for the next iteration of the preferred options document.

	Arup	Policy CE2 Sustainable Design and Construction	Welcome inclusion of water target, however having a water consumption target per person is difficult to quantify for non-residential buildings, alternative could be the Unified Green Euro Water labels for water fittings Reuse of existing buildings - could a GLA style of "predevelopment reviews" be requested. Policy CE2.3 Overheating - reference should read TM52 for non-residential buildings would recommend making reference to adopting the GLA overheating hierarchy. Would also recommend that all developments operational from 2030 should use the 2050 weather files.	We will consider whether overheating should be included in the next preferred options iteration. If overheating requirement is kept in, we can amend reference to TM52 for CIBSE. We acknowledge the comment around water consumption targets. An alternative approach to setting water targets will be explored and put forward in the next preferred options consultation.
	Picton Jones (Asset Management) Ltd	Policy CE2 Sustainable Design and Construction	Supportive of Policy CE2 but wording should support a flexible approach, as there are different sustainable design standards and site context or use type won't always allow standardised targets to be achieved (i.e. water consumption levels).	Comment is noted and support is welcomed. The policy (and evidence base) only encourages the use of certification standards for residential development. The Council considers that mandating this for all residential development would compromise viability.

	Home Builders Federation	Policy CE2 Sustainable Design and Construction	If the Council wishes to adopt the optional standard for water efficiency of 110 litres per person per day, then the Council should justify doing so by applying the criteria set out in the PPG. Therefore, the Council should provide evidence demonstrating a clear local need and if proven, the Council should not set a requirement beyond the optional standard of 110 litres per person per day. The HBF considers that whilst it might be appropriate to encourage the use of locally sourced and / or sustainable materials it is not appropriate for this to be required. There is potential for significant impacts from this policy in terms of design, in terms of timescale of delivery and in terms of costs, and the HBF does not consider that any of these have been properly taken into account by the Council. Futureproofing - the HBF has concerns around this policy requirement and how it will be implemented. As this policy is currently written it could be taken to unnecessary extremes. Again, the HBF considers that whilst the Council may want to encourage futureproofing, it should not be a requirement. The HBF also notes that there are no costs associated with this policy requirement in the Viability Assessment and as such the potential for significant costs that could be associated with this policy have not been considered.	Thank you for the comprehensive comments. We acknowledge the comment around water consumption targets. An alternative approach to setting water targets will be explored and put forward in the next preferred options consultation. The inclusion of overheating in CE2 will be revisited and reconsidered for the next preferred options document.

			CE2.5 - The HBF considers this part of the policy is unnecessary, it is not necessary or appropriate for planning policy to require a development to meet building regulations. Overheating is a building regulations consideration and should be left to be considered by that area of regulation.	

	Langley Sutton Coldfield Consortium	Policy CE2 Sustainable Design and Construction	Objects to the additional technical standards being sought through proposed Policy CE2 (Parts CE2.1 and CE2.4) on the basis that these are not considered to be appropriately justified. it is considered that BCC has not provided evidence of a clear local need for either the optional Building Regulation Standard of 110 litres / person / day or the even tighter RIBA-based target proposed within Policy CE2.1 of 95 litres / person / day. This proposed Policy CE2.1 approach is therefore currently considered to be unjustified. it is considered that insufficient justification has been provided for the requirement for BREEAM Excellent (or alternative equivalent) included within proposed Policy CE2.4. However should a requirement for BREEAM Excellent be ultimately justified for, and included as a Policy in, the adopted Local Plan, this should only apply to planning applications which have not been submitted and validated prior to the adoption of the Local Plan, to provide time to enable this requirement to be factored into the design, viability and land purchase processes.	Thank you for the comprehensive comments. Birmingham commissioned Jacobs to product a low carbon evidence base for the local plan. Within this, a variety of different construction standards were appraised, including LETI, UKGBC and LEED. The study concluded that BREEAM was the most appropriate measure "BREEAM Excellent is the most common level of performance referred to, both in planning policy and corporate strategies. According to BREs study, typical energy reduction of meeting this level of performance is approximately aligned to a 25% reduction over Building Regulations. Based on our review of BREEAM New Construction version 6, we did not identify any significant technical barriers that could prevent buildings with GIA less than 1000m2 from achieving BREEAM Excellent." We acknowledge the comment around water consumption targets. An alternative approach to setting water targets will be explored and put forward in the next preferred options consultation. The Written Ministerial Statement (WMS) represents a regression in achieving net-zero new development and poses risks related to the Future Homes Standard (FHS) reliance on grid decarbonization. The WMS unlawfully constrains powers conferred to Local Planning Authorities (LPAs) by statute. Specifically, Section 1 of the Planning and Energy Act 2008 permits LPAs to set energy efficiency requirements that surpass building regulations. Additionally, the WMS misdirects local authorities by contravening Section 19 of the Planning and Compulsory Purchase Act 2004 (PCPA), which mandates that local plans contribute to climate mitigation and adaptation. The most recent report to the government (2024) from the Committee on Climate Change identifies the WMS as a barrier to achieving net

				zero. The UK Green Building Council (UKGBC) is lobbying for the withdrawal of this statement. Moreover, the 2024 amendment to the National Planning Policy Framework (NPPF) Paragraph 161 (formerly Paragraph 157) explicitly refers to the transition to net zero by 2050; this is the first instance where the NPPF has done so, despite the net zero obligation having been mandated in Section 1 of the Climate Change Act 2008 since 2019. The amendment requires the planning system to support this transition and adds to the requirements that must be fully considered. The Council will continue to monitor this situation closely. We acknowledge the comment around water consumption targets. An alternative approach to setting water targets will be explored and put forward in the next preferred options consultation.
The Tyler Parkes Partnership Ltd	West Midlands Police	Policy CE2 Sustainable Design and Construction	Requests that the supporting text should also refer to the following; new construction should also be without compromise to the safety and security of the built environment (both internal and external) including integration of Secured by Design and Park Mark principles including liaison with West Midlands Polices Design Out Crime Officers.	This is covered under 'What does sustainable development mean for the Birmingham Local Plan?' under the 'Designing places where people can lead safe and healthy lives as part of a community' point. Safety is therefore in the overarching vision and objectives of the local plan.

	Birmingham City Council Housing Department	Policy CE2 Sustainable Design and Construction	Overall, CE2 is generally supported. Wording needs to adopt a flexible approach. Whilst it is recognised that there are different sustainable design standards and methods available, such as PassivHaus, this is not appropriate in all circumstances, and a flexible approach should be adopted to the wording of this policy.	Comment is noted and support is welcomed. We acknowledge the comment around water consumption targets. An alternative approach to setting water targets will be explored and put forward in the next preferred options consultation. The policy (and evidence base) only encourages the use of certification standards for residential development. The Council considers that mandating this for all residential development would compromise viability.
		Policy CE2 Sustainable Design and Construction	Generally supportive of the creation of well designed, low carbon homes but there are concerns with water consumption target, which should be aligned to Building Regulations instead and the resource efficiency element should acknowledge that there will be instances where locally sourced materials will not be available to use. EPDs are not widely available enough so this should be optional. Support BREEAM good.	We acknowledge the comment around water consumption targets. An alternative approach to setting water targets will be explored and put forward in the next preferred options consultation. We acknowledge the comment around the lack of availability of EPDs. This will be looked into and the potential of either removing the requirement or making it optional will be explored. Birmingham commissioned Jacobs to produce a low carbon evidence base for the local plan. Within this, a variety of different construction standards were appraised, including LETI, UKGBC and LEED. The study concluded that BREEAM was the most appropriate measure "BREEAM Excellent is the most common level of performance referred to, both in planning policy and corporate strategies. According to BREs study, typical energy reduction of meeting this level of performance is approximately aligned to a 25% reduction over Building Regulations. Based on our review of BREEAM New Construction version 6, we did not identify any significant technical barriers that could prevent buildings with GIA less than 1000m2 from achieving BREEAM Excellent."

		Policy CE2 Sustainable Design and Construction	Respondent questions the 95 litres per person per day requirement all major residential schemes, in that they are untested and are likely to be cause issues for residents. Stretch 2030 targets require more testing in order to become policy.	We acknowledge the comment around water consumption targets. An alternative approach to setting water targets will be explored and put forward in the next preferred options consultation.
	Worcestershire County Council	Policy CE2 Sustainable Design and Construction	WCC recommends a minor change to the wording of policy CE2.2(b), to ensure that mineral resources are also included: All development proposals should minimise use of materials and creation of waste and promote opportunities for a circular economy through b. Reuse and recycling of appropriate materials that arise through demolition and refurbishment, including the reuse of non-contaminated excavated soil, minerals, and hardcore within the site. Because policy CE2.2 applies to all development, we consider that this would complement, rather than duplicate, the proposed minerals policy CE18, which encourages prior extraction of minerals only on sites of over 5 hectares.	We agree with suggested change to CE2, will be amended to include mineral resources. This comment will be considered in the next iteration of the preferred options document.
		Policy CE2 Sustainable Design and Construction	The use of street trees and well-designed landscaping as well as dual aspect requirements for new flats and homes to ensure a through draft should be compulsory. Requirement for use of cooling hierarchy and provision of blue and green infrastructure should also be required for residential development.	We agree, this was intended to be cover both domestic and non-domestic but agree that it isn't clear. This will be amended for the next preferred options document.

	Lendlease	Policy CE3 Whole Life-Cycle Carbon	Lendlease are supportive of Policy in general but concerned there could be some unintended consequences that should be addressed - 1) Retention of Structures - this needs to be a balanced consideration alongside other objectives such as achieving higher densities in location well served by public transport, 2) Operational Emissions - it is unclear if the need for an on-site zero emissions strategy means the development to be Net Zero and if there are operational energy requirements that for part of WLCA then there should be a cross reference to them within this Policy, 3) Embodied Carbon Targets - RIBA 2030 Climate Challenge targets are only for residential development, schools and offices so there are other building uses that will have different embodied carbon reduction potential. Suggests that specific targets are removed and RIBA Climate Challenge and LETI targets are provided as guidance, 4) Upfront Carbon - separate objectives and policies should be included with upfront embodied carbon (A1-A5) and operational energy demand (B6-B7). Other WLCA elements associated to in-use embodied carbon and end of life emissions are likely to be outside the developer's control. It should be recognised that major development sites are often progressed via Outline or Hybrid applications where there will be insufficient information to carry out a	Thank you for the comprehensive comments. Comment is noted and support is welcomed. Note comment around change approach from RIBA to LETI, this will be explored. The policy as a whole will be reviewed, and this will then be considered through further viability testing. We agree that 'zero emissions' should be removed from the wording of the policy.

			meaningful WLCA at this stage. The WLCA requirement could be conditioned for future Reserved Matters applications. LETI have set out a range of low carbon design guidance, taking a staged approach to considering carbon and consider LETI upfront embodied carbon targets to be more suitable than RIBA carbon targets and the draft Policy should be updated in regard to this.	

	Calthorpe Estates	Policy CE3 Whole Life-Cycle Carbon	Calthorpe support in principle. There are unintended consequences of the draft policy. Whilst Calthorpe agree that the retention of existing structures can reduce the carbon impact of a development, there are cases where this needs to be weighed in the balance alongside the opportunity to deliver on other objectives the Council has set. This could lead to more development being pushed to less sustainable locations. Part C of the draft policy CE3 sets out the need to include an on-site zero emissions strategy, however it is not clear from the draft wording whether this in turn requires development to be Net Zero. Where Embodied Carbon Targets are set, these need to be considered as part of the evidence base and viability assessment. The soundness of the draft Policy would be improved if development targets a reduction in embodied carbon, but removes specific targets, rather providing the RIBA Climate Challenge and LETI targets as guidance. Separate objectives and policies should be included with regards to the upfront embodied carbon (A1-A5) and the operational energy demand (B6-B7) supports the use of carbon offsetting where this is part of a suitable and validated approach to net zero. However, it is not clear from the current draft policy wording what the exact requirement for offsetting is. It is not clear if this relates to the upfront	Thank you for the comprehensive comments. The comment around changing approach from RIBA to LETI is noted and, this will be explored. The policy as a whole will be reviewed, and this will then be considered through further viability testing. The role of offsetting will be explored for the next preferred options consultation.

			embodied carbon emissions, or full Whole Life Carbon emissions including the operational emissions. It is also not clear if the ultimate goal of this policy, when taken together with draft Policy CE6, is to deliver net zero carbon buildings. Given that the soundness and viability of draft Policy CE3 is entirely dependent on this guidance, Calthorpe are of the view that it must be made available now. Where requirements go beyond the Building Regulations this needs to be considered as part of the evidence base and viability assessment. Consider that at this stage Policy CE4, Part 1, of the policy is removed. Support the improvement of the building fabric and energy performance in line with the requirements of the Building Regulations. However, further enhancements to bring an existing building in line with the RIBA and LETI performance targets are likely to be unfeasible. These targets are suited to new development where the design of the development can accommodate the material and technology systems required to meet those targets. Existing buildings, and particularly heritage assets are likely to be unable to meet the standards.	

	Henley Investment Management Ltd	Policy CE3 Whole Life-Cycle Carbon	The policies are confusing and potentially unworkable. The full impacts of the policy demands don't appear to have been fully thought through and represent a significant shift in development dynamics for the Birmingham market. Much greater clarity of purpose and operation is required throughout policies CE1 and CE3. If the intent of CE1 and CE3 is to minimise carbon emissions, then that is one thing. If the intent is to require net zero carbon, then that is a different thing. Currently, it is not possible to construct property (embodied carbon) on a net zero basis without the use of offsetting. If WLC net zero is a policy requirement then off setting will have to be embraced as a necessary element. If carbon offsetting is to be embraced at all, it is necessary for there to be a clear structure for how it is to operate. 1) what is being assessed to be offset; 2) how is it calculated; 3) what is the cost per tonne; 4) who is setting the cost; 5) how is that regulated; 6) who is collecting the offset tariff; 7) how are the proceeds to be deployed; 8) how is it determined that offsetting meets Plan requirements.	Thank you for the comprehensive comments. We acknowledge the comments about the potential impacts CE3 may have on viability and this will be explored further. Offsetting will be re considered for the next consultation.

	Unite Group Plc	Policy CE3 Whole Life-Cycle Carbon	Unite object to Policy CE3. The policy currently refers to the RIBA (2030) target 625kg/CO2e/sqm (A-C). However, this does not cover PBSA as a separate category and therefore references to this can be limiting in this case. Notwithstanding, to set a blanket target would greatly impede development such as PBSA that tend to pack more material into a smaller amount of space thus leading to a greater carbon intensity per sq. Consequently, Unite argue that the Policy should acknowledge PBSA as a separate category following UKGBC guidelines for commercial residential and allowing for a carbon budget suited to the building type rather than a generic target. It should also be recognised that there are elements during the construction process that might impact on this which could lead to an increase in material application on grounds of structural safety etc. which needs a caveat in the process. The Policy should be amended to follow RICS guidance instead of RIBA, as it does not cater for PBSA. This would encourage carbon savings where possible, with an aspiration for achieving the target but allowing greater flexibility rather than rigidity.	The comments have been noted. The policy is to be reviewed, and further viability testing undertaken. RICS will be explored as an alternative to RIBA.

	Knighthead Capital Management	Policy CE3 Whole Life-Cycle Carbon	Knighthead welcomes the policy and its importance but sometimes retention of existing buildings is not always the most carbon efficient approach. Policy needs to be more flexible through additional wording to part b of the Policy to state: b. They minimise embodied emissions through: The retention of structures and materials on the site of the proposed development, where possible. Where this is not possible, the demolition or removal of structures and materials should be justified and mitigated through 2. below. The use of materials and construction methods that minimise emissions Similarly, additional wording is suggested at the beginning of CE3.1 Off-setting Off-setting will be accepted only in exceptional circumstances where the Whole Life Carbon Assessment indicates that the development will result in an increase in carbon emissions as a result of the development, and following agreement with the Council.	We acknowledge the concerns around flexibility, policy is to be reviewed, and further viability testing undertaken. Amendments will be considered for the next preferred options consultation.

	Zero Carbon House	Policy CE3 Whole Life-Cycle Carbon	Policy CE3 is a good step forwards but it could be added that a simplified high level WLCA is required for all buildings. It is important that all users of the BLP understand clearly that RICS WLCA contains no metric performance standards or targets.	Comment is noted and support is welcomed. We agree that reference to RICS could be clearer, this will be reviewed and amended for the next draft of the preferred options.
	Jaguar Land Rover	Policy CE3 Whole Life-Cycle Carbon	Policy CE3 Whole Life Cycle Carbon Assessment would be unreasonable burden on business wishing to update and redevelop sites. The policy should allow a transition period (as discussed in para 157 of NPPF) or reasonable alternatives to be used. The policy should be relaxed to encourage improved energy efficiency but not require an assessment.	We acknowledge the concerns, policy is to be reviewed, and further viability testing undertaken. The inclusion of a transitional phase will be explored further.

	MEPC Limited	Policy CE3 Whole Life-Cycle Carbon	Generally supportive of overarching approach of Policy but have concerns that the draft Policy could be unsound in its current form and may introduce a 'presumption against demolition' Suggested amendments are - 1) Retention of Structures - should be aligned to the Council's objectives for growth in locations well served by public transport, walking and cycling and 2) maximise densities to make efficient use of land. Care needs to be taken when using WLCA data in decision making and other factors such as location, design and alternatives must be part of the assessment, 3) Operational Emissions - clarity is needed on whether Part C require development to be net zero? If there are operational energy requirements to be considered as part of the WLCA this should be cross referenced here i.e. PE6. IT may be preferential to consider upfront carbon separately to the whole life carbon of development, 4) Embodied Carbon Targets - any set targets should undergo viability testing as part of the evidence base. The evidence base has noted the potential to use timber to meet targets (section 7.3) particularly for structural works but there are currently design and insurance implications for the use of timber on non-residential settings. So, it is unclear if meeting these targets is viable and suggest targets are removed and RIBA Climate	Thank you for the comprehensive comments. LETI will be considered in place of RIBA. We acknowledge comments about interactions with other policies, and this will be considered ahead of the next preferred options consultation.

			Change and LETI targets are provided as guidance, 5) Upfront Carbon - recommend that separate policies be included and operational energy demand. The other WLCA elements of in-use embodied carbon and end of life emissions are likely to be outside the developers' control and for Outline applications, insufficient information will be held at that stage to carry out a meaningful assessment. MEPC considers that LETI upfront embodied carbon targets may be more suitable than RIBA carbon targets. The policy should be amended to focus on upfront embodied carbon only, 6) CE3.1 Off Setting - clarity is needed in the Policy as to the exact requirements and if the ultimate goal is to deliver net zero carbon buildings? If offsetting is to include all WLC stages this needs to be made explicitly clear in the Policy so that the full impact of technical and commercial viability can be assessed. Also, clarity is needed on if both regulated and unregulated carbon emissions are to be included as this would impact the viability of the Policy. It would be unfair to include unregulated energy demand as this is dependent upon residents or building operators and would be an unsound requirement. Also noted that the draft Policy states that guidance on offsetting and WLCA will be prepared at a later stage but the soundness of Policy CE3 is entirely	

			dependent on this guidance and must be made available to stakeholders as part of the consultation process.	
	Arup	Policy CE3 Whole Life-Cycle Carbon	Embodied carbon targets are less onerous than GLA BAU and Aspirational targets. Risk of any intended targets and designs eroded away through design development.	Comments are noted and will be considered in next draft of preferred options.
	Picton Jones (Asset Management) Ltd	Policy CE3 Whole Life-Cycle Carbon	Policy CE3 should acknowledge that a whole life cycle approach will not be suitable for all development, and the requirement should be changed to 'if possible' or 'where possible'.	We acknowledge the comment re: adding flexibility around WLC, this is to be considered for the next preferred options consultation.

	Home Builders Federation	Policy CE3 Whole Life-Cycle Carbon	CE3.1 - The HBF considers that this policy does not serve a clear purpose, and it is not evident how a decision maker should react to development proposals. it is not clear from the policy how it will be determined what is an appropriate level of emissions or what would be an appropriate level of reductions. The HBF is also concerned that planning may be too early in the building process to fully assess the carbon impact of a design. It may be that further decisions are made post planning, which do not require further consent which would impact on the carbon emissions. Consider how it will be monitored and what the implications are for the preparation of any assessment, particularly in relation to how easily accessible any data is, and that it will have to take into consideration that much of the responsibility for emissions will lie in areas outside of the control of the homebuilding industry, including material extraction and transportation, occupation and maintenance, demolition and disposal. The Council will also have to consider how the policy will interact with other policies for example in relation to energy efficiency or resilience to heat, as well as the viability and delivery of development. If this policy were to be introduced then the Council should provide a transitional period to give the industry time to adjust to the	Offsetting will be considered further for the next consultation. The suggestion of a transitional period will be considered. The policy will be refined and considered through further viability testing.

			requirements, to upskill the workforce as needed and for the supply chain to be updated or amended as required. The HBF also notes that the Viability Assessment does not appear to have included a cost for undertaking this whole life-cycle carbon assessment, or any costs associated with addressing any issues raised by these assessments.	

	Langley Sutton Coldfield Consortium	Policy CE3 Whole Life-Cycle Carbon	Objects to the Whole Life Cycle Carbon Assessment approach set out within proposed Policy CE3 on the basis that this is not considered to be appropriately justified. Any local requirements for the sustainability of buildings are required to reflect Government policy and the requirements of the NPPF. There is however no single accepted national standard for assessing whole-life carbon as part of the planning process and it is not explicitly clear on the structure and methodology to be applied. Although this proposed Policy is seeking a laudable goal, it is not currently considered to be viable and deliverable based on the available evidence base.	Thank you for the comprehensive comments. We agree that viability and trade-offs with other policies needs to be considered further. The policy will be refined and considered through further viability testing. The Written Ministerial Statement (WMS) represents a regression in achieving net-zero new development and poses risks related to the Future Homes Standard (FHS) reliance on grid decarbonization. The WMS unlawfully constrains powers conferred to Local Planning Authorities (LPAs) by statute. Specifically, Section 1 of the Planning and Energy Act 2008 permits LPAs to set energy efficiency requirements that surpass building regulations. Additionally, the WMS misdirects local authorities by contravening Section 19 of the Planning and Compulsory Purchase Act 2004 (PCPA), which mandates that local plans contribute to climate mitigation and adaptation. The most recent report to the government (2024) from the Committee on Climate Change identifies the WMS as a barrier to achieving net zero. The UK Green Building Council (UKGBC) is lobbying for the withdrawal of this statement. Moreover, the 2024 amendment to the National Planning Policy Framework (NPPF) Paragraph 161 (formerly Paragraph 157) explicitly refers to the transition to net zero by 2050; this is the first instance where the NPPF has done so, despite the net zero obligation having been mandated in Section 1 of the Climate Change Act 2008 since 2019. The amendment requires the planning system to support this transition and adds to the requirements that must be fully considered. The Council will continue to monitor this situation closely.

	Birmingham City Council Housing Department	Policy CE3 Whole Life-Cycle Carbon	The policy should recognise that it will not be suitable in all circumstances and that the addition of if possible and where possible should be added.	We acknowledge the comment re: adding flexibility around WLC, this is to be considered for the next preferred options consultation.
		Policy CE3 Whole Life-Cycle Carbon	Generally, agree with Policy CE3 but it should acknowledge that this approach may not be commercially viable for small developments.	Comment is noted and support is welcomed. CE3 only applies to "all major development proposals, or any proposal involving more than one development phase."
		Policy CE3 Whole Life-Cycle Carbon	Support for Policy CE3. it is suitable for major applications and agree that it would not be practical to ask of all applications. Recommend reference the RICS version 2 which has now superseded version 1. Worth referencing the UK Net Zero Carbon Building Standard as this will be released later this year so should be ready when the Plan is submitted. This standard will set upfront carbon targets for all developments.	Comment is noted and support is welcomed. Reference will be updated to RICS v2 for next iteration.
	Acocks Green Focus Group	Policy CE3 Whole Life-Cycle Carbon	Support and consider that stronger and less flexible policy wording would be appropriate. See Bath's policy as an example.	Comment is noted and support is welcomed. We will review this policy and make any amendments for the next preferred options consultation.
	Save Smallbrook	Policy CE4 Retrofitting Existing Buildings	Mention inclusion of locally listed buildings to provide more protection to these buildings as per the new Historic Environment SPD.	Reference to locally listed buildings will be considered for the next stage of the preferred options.
POD Consultation Event - Handsworth		Policy CE4 Retrofitting Existing Buildings	The emphasis should be more on re-using existing housing rather than building new.	The City Council has an empty homes programme which seeks to bring empty homes back into use, however the standard methodology for housing need sets out how many new homes the Council needs to deliver.

	Lendlease	Policy CE4 Retrofitting Existing Buildings	Supportive of Policy CE4 but the requirement to 'maximise' elements of design must be subject to viability testing and there needs to be some flexibility in the Policy in relation to historic buildings.	Comment is noted and support is welcomed. This will be considered as part of the next preferred options document.
	Aegon UK Property Fund	Policy CE4 Retrofitting Existing Buildings	Supportive of retrofitting and reuse of existing buildings where appropriate and viable to do so but not all buildings are capable of retrofit and this should be recognised in Policy CE4. In locations such as the Gun Quarter there is a conflict between desire to retrofit and maximise densities. The Policy should be amended and aligned to NPPF, which advocates a 'Retrofit First' approach and not a 'Retrofit Only' approach.	Comment is noted and support is welcomed. Ensuring that the balance is clear and adequate flexibility is included will be considered as part of the next preferred options document.

	Calthorpe Estates	Policy CE4 Retrofitting Existing Buildings	Maximising elements of design must be subject to the feasibility and viability of including these elements. Consideration should also be given as to whether this aligns with other objectives, for example in the context of a historic building. Calthorpe are concerned that this requirement could place a significant burden on development where refurbishment may only impact a small part of a wider building. Where requirements go beyond the Building Regulations this needs to be considered as part of the evidence base and viability assessment. Calthorpe therefore consider that at this stage Policy CE4, Part 1, of the policy is removed. Consider that further enhancements to bring an existing building in line with the RIBA and LETI performance targets are likely to be unfeasible. propose that Policy CE4, Part 2 is amended to read use of the energy hierarchy and minimisation of on-site energy demand as much as possible, where feasible and viable. CE4.1 - Support but critical that this is considered alongside design implications and potential heritage characteristics of the building. CE4.2 - Certification schemes can add significant cost to development and may conflict with the design. Suggest that no requirements are set out in policy is on a voluntary basis only. The policy text should	This will be considered through further viability testing. This comment will be considered for the next preferred options consultation

			be updated to make clear that the weight be afforded will be significant.	
	Unite Group Plc	Policy CE4 Retrofitting Existing Buildings	Unite are in support of draft policy CE4.	Comment is noted and support is welcomed.
	BCC Lead Local Flood authority	Policy CE4 Retrofitting Existing Buildings	Birmingham LLFA support the fourth sub-bullet relating to maximising opportunities to install green and blue infrastructure improvements in line with preferred policy CE9.	Comment is noted and support is welcomed.
	Zero Carbon House	Policy CE4 Retrofitting Existing Buildings	Birmingham draft retrofit-first policy is welcome but should be strengthened. Central Lincolnshire policy includes a clear strong presumption against demolition. See Policy S11 of Central Lincolnshire Local Plan. Make it clear the CE4 applies to listed buildings.	Comment is noted and support is welcomed. The referenced policies will be considered, and any amendments will be considered for the next preferred options consultation.

	Commercial Estates Group (CEG)	Policy CE4 Retrofitting Existing Buildings	CEG supports in principle the emphasis placed on the potential for retrofit and reuse of existing buildings as a means of seeking to reduce carbon emissions resulting from demolition and redevelopment. However, the feasibility, practically, and viability of retrofitting existing buildings for re-use and re-occupation is the subject of a range of complex factors including those relating to whole life carbon impacts. Accordingly, draft Policy CE4 should maintain a balanced approach by not setting a default presumption of what is the most sustainable or most carbon efficient approach when considering the redevelopment of existing buildings versus retorting and adaptation proposals.	Thank you for the comprehensive comments. Ensuring balance is clear will be considered as part of the next preferred options document.

	MEPC Limited	Policy CE4 Retrofitting Existing Buildings	MEPC is supportive of retrofitting and reuse of existing buildings and structures but the 'maximising' of elements of design must be subject to viability of including these elements. Context of the development for example in a heritage area must be recognised and suggest that 'maximised' is replaced with 'optimisation'. Concerned that the Policy states that development should improve performance in line with Part L even when not triggered as a mandatory requirement. This could place a substantial burden on development where refurbishment may only impact a small part of a wider building. The provision for consequential improvements as set out in Building Regs is designed to minimise this issue. We recommend that Policy CE4 Part 1 is removed from the Plan. In regard to minimising on-site energy demand, alignment with requirements in Building Regs is supported but further enhancements are unfeasible. Existing buildings and heritage buildings are unlikely to be able to meet these higher standards. In addition, maximising renewable heat and electricity may conflict with the retention of the existing structure. The additional costs that higher standards would require has not been tested via the evidence base and recommend the following amended wording for CE4 Part 2, ' use of energy hierarchy and minimisation of on-site energy demand as	Thank you for the comprehensive comments. Ensuring balance is clear will be considered as part of the next preferred options document. This will be considered through further viability testing. Suggested amendments will be considered.

			much as possible, where feasible and viable'.CE4.1 Historic Buildings - the Policy needs to be considered alongside design implications and any heritage characteristics of a building.CE4.2 Certification - these can add significant costs to a development so suggest they are encouraged but not made a requirement. Policy could be amended to say, 'where these industry best practice standards are used this is given significant weight in the decision making process.'	
	Victorian Society	Policy CE4 Retrofitting Existing Buildings	Policy CE4.1 Historic Buildings should be reworded to make clear that the policy applies to locally listed buildings as well as to the other cases specified.	Reference to locally listed buildings will be considered for the next stage of the preferred options.

	Ardstone Capital	Policy CE4 Retrofitting Existing Buildings	Policy also notes that the Council will support the retention and reuse of historic buildings as opposed to their demolition and replacement as part of their approach to reducing the city's carbon emissions under CE3 Whole Life Cycle Carbon and CE4 Retrofitting Existing Buildings. However, there will be instances where the benefits of demolition outweigh perceived heritage or concerns around embodied carbon and must be assessed in the context of delivering the Local Plan objectives as a whole. This could be true for the partial/full demolition of the 1990s block to the rear of Victoria Square House to meet housing and/or economic needs and provide improvements close to New Street Station.	We agree that viability and trade-offs with other policies needs to be considered further. The policy will be refined and considered through further viability testing.
		Policy CE4 Retrofitting Existing Buildings	Insufficient weight is given to the advantages of retrofit. This should be the default approach and developers should be required to demonstrate why this is not viable in comparison to demolition.	Adding further weight will be considered through further viability testing.
The Tyler Parkes Partnership Ltd	West Midlands Police	Policy CE4 Retrofitting Existing Buildings	PCCWM requests that the supporting text should also refer to the following, retrofitting of existing buildings should also be without compromise to the safety and security including integration of Secured by Design and Park Mark principles including liaison with West Midlands Police Design Out Crime Officers.	This is covered under 'What does sustainable development mean for the Birmingham Local Plan? under the 'Designing places where people can lead safe and healthy lives as part of a community' point. Safety is therefore in the overarching vision and objectives of the local plan.

		Policy CE4 Retrofitting Existing Buildings	Generally supportive of Policy CE4 but clarification and more guidance should be provided on what it practically means to 'future proof and be compatible with future energy technologies?'. Developers could easily make the wrong energy choices.	This will be considered as part of the next preferred options document.
	Frampton Town Planning Ltd	Policy CE4 Retrofitting Existing Buildings	Agree	Comment is noted and support is welcomed.
POD Consultation Event - Central Birmingham Library		Policy CE5 Renewable Energy Networks and Shared Energy Schemes	Desire for Solar Panels and EV charging to be on all homes.	Policy CE6 states that "Proposals should maximise solar energy generation using the available roof space and parking area." The new homes solar generation bill at a national government level explores making solar power mandatory. EV charging does not sit within this policy and is addressed through building regulations and Birmingham's Parking SPD.

	Lendlease	Policy CE5 Renewable Energy Networks and Shared Energy Schemes	Lendlease support the use of heat networks where they can reduce operational carbon emissions and do not impact the affordability of heating or cooling for residents. It should be recognised that the Future Homes Standard 2025 will significantly reduce energy demand and energy emissions in new development and will set a high baseline for an alternative heat network scheme to compete with. Any requirement to connect or create a heat network must be subject to viability testing, for both new development within and outside of heat network zones. Clarity is required on what 'heat network ready' means in terms of technical and space requirements as they have cost implications for development.	Comments are noted. We agree that greater clarity should be provided on what heat network ready means outside of zones for next preferred options document. 'Heat network ready' within heat network zones will be defined by heat network zoning legislation.

	Calthorpe Estates	Policy CE5 Renewable Energy Networks and Shared Energy Schemes	Calthorpe supports the use of heat networks where they can help reduce operational carbon emissions, and do not impact on the affordability of heating or cooling for either residents or tenants. Any objective/requirement to connect or create a heat network must be subject to feasibility and viability. Greater clarity should be provided as part of the policy on the expectations of what heat network ready means in terms of technical and space requirements and potential cost implications.	Thank you for the comprehensive comments. We agree that greater clarity should be provided on what heat network ready means for next preferred options document. Secondary legislation on heat network zoning is not yet adopted but will bring more clarity on zones and HNZ. HNZ will become national legislation and will define the requirements for building connection within heat network zones. Heat network compatible solutions should be considered for development outside of zones.

	Henley Investment Management Ltd	Policy CE5 Renewable Energy Networks and Shared Energy Schemes	It is not clear whether the designated Heat Network Zones are fixed or whether they may change over time. The policy appears to require development to be designed and constructed with two systems for heating space and water. Such an approach is counterproductive in terms of cost efficiency, space efficiency, carbon minimisation and sustainability. The policy requirement should be deleted.	The policy does not require two heating sources to be installed. Legislation will define exemptions that existing or new developments will be able to utilise. More information on heat network zoning in Birmingham can be found here however these are not yet fixed: https://assets.publishing.service.gov.uk/media/671761349242eccc6c849bad/heat-network-zone-map-Birmingham__2_.pdf and here https://www.gov.uk/government/publications/heat-network-zoning-maps . Secondary legislation on heat network zoning is not yet adopted but will bring more clarity on zones and HNZ. HNZ will become national legislation and will define the requirements for building connection within heat network zones. Heat network compatible solutions should be considered for development outside of zones.

	Unite Group Plc	Policy CE5 Renewable Energy Networks and Shared Energy Schemes	Supportive of approach in CE5 as it will enable greater on-site resilience but asks that EV charging be considered as a separate provision of renewable energy, unless the energy is generated or operated by a third party.	Comment is noted and support is welcomed. This will be considered in the next preferred options consultation.
	Knighthood Capital Management	Policy CE5 Renewable Energy Networks and Shared Energy Schemes	Knighthood welcomes the flexibility provided in Draft Policy CE5 that the connection of these networks will be subject to technical feasibility or viability. Additional flexibility could be provided through recognition that the need to connect to a future heat network will be subject to progress of a plan by BCC, and discussion with relevant stakeholders to ensure connection is appropriate.	Work is underway to help inform when and how heat network zones are deployed across the city of Birmingham once zoning legislation comes into effect. The designation of heat network zones will be subject to a formal consultation process. More information on heat network zoning in Birmingham can be found here: https://assets.publishing.service.gov.uk/media/671761349242eccc6c849bad/heat-network-zone-map-Birmingham__2_.pdf and here https://www.gov.uk/government/publications/heat-network-zoning-maps . Comment noted and will be considered for next preferred options consultation.

	MEPC Limited	Policy CE5 Renewable Energy Networks and Shared Energy Schemes	MEPC are supportive of use of heat networks where they do not impact upon the affordability of heating or cooling for residents. Once implemented the FHS 2025 will significantly reduce energy demand and carbon emissions of new developments. These standards will set a high bar for alternative heat network schemes to compete with. Any requirement to create a heat network must be subject to feasibility and viability and it is recommended that this applies to both developments inside and outside of heat network zones. Careful consideration must be given to creating 'heat network ready' buildings in regards to the additional space required and the Policy needs to provide more details as to technical and space requirements and potential cost implications.CE5.2 Smart Grids and Micro Grids - support for minimum performance details but the use of building facades, roof space and curtilage should be subject to design viability.	Thank you for the comprehensive comments. Comment is noted and support is welcomed. We agree that greater clarity should be provided on what heat network ready means outside of zones for next preferred options document. 'Heat network ready' within heat network zones will be defined by heat network zoning legislation.
		Policy CE5 Renewable Energy Networks and Shared Energy Schemes	Support the approach for renewable energy and heat networks for new developments and the existing housing stock.	Comment is noted and support is welcomed

	Home Builders Federation	Policy CE5 Renewable Energy Networks and Shared Energy Schemes	The HBF considers that it is important that this policy is amended so that a heat network connection is not a requirement and is instead implemented on a flexible basis. The Council should be aware that for the foreseeable future it will remain uneconomic for most heat networks to install low- carbon technologies.	Work is underway to help inform when and how heat network zones are deployed across the city of Birmingham once zoning legislation comes into effect. The designation of heat network zones will be subject to a formal consultation process. More information on heat network zoning in Birmingham can be found here: https://assets.publishing.service.gov.uk/media/671761349242eccc6c849bad/heat-network-zone-map-Birmingham__2_.pdf and here https://www.gov.uk/government/publications/heat-network-zoning-maps . Comment noted and will be considered for next preferred options consultation. Legislation will define exemptions that existing or new developments will be able to utilise.
		Policy CE5 Renewable Energy Networks and Shared Energy Schemes	Generally supportive of Policy CE5 but further considerations are required, such as wider stakeholder engagement, investment and more guidance on what 'network ready' means? It is possible that electric heating could be the most cost-effective low carbon choice.	Thank you for the comprehensive comments. We agree that greater clarity should be provided on what heat network ready means for next preferred options document. Secondary legislation on heat network zoning is not yet adopted but will bring more clarity on zones and HNZ. HNZ will become national legislation and will define the requirements for building connection within heat network zones. Heat network compatible solutions should be considered for development outside of zones.
	Lendlease	Policy CE6 Reducing Operational Emissions	Lendlease are generally supportive of Policy CE6, but it is unclear as to its ultimate objective - are net zero buildings required? Clarity is also needed on the development targets and how they align with requirements in Policy CE3?	How carbon targets are presented, and what methodology they are aligned to will be explored further in the next preferred options consultation

	Calthorpe Estates	Policy CE6 Reducing Operational Emissions	The Policy is unclear on its ultimate objective and target and if it requires net zero buildings. Clarity is needed on the development targets and how this aligns with requirements set out in Policy CE3. A more sequential approach to dealing with emissions and setting policies is required to provide clarity on how to reduce emissions from development. Consideration should be given to the December 2023 Written Ministerial Statement which states that Local Authorities should not set policies which go beyond the requirements of the Building Regulations unless these are properly considered as part of an evidence base and viability assessment. Any targets which are set should be based on further improvements in carbon emissions, not energy performance. Any improvements beyond the Building Regulations should be based on carbon reduction and appropriately considered as part of the viability assessment. The provision of generation and storage systems needs to be considered as part of feasibility and viability assessments. These should be encouraged rather than required. The policy is not sufficiently clear on when the dynamic modelling requirement would apply. It should be encouraged where appropriate rather than required. The policy is not clear on how Post	Thank you for the comprehensive comments. How carbon targets are presented, and what methodology they are aligned to will be explored further for next preferred options consultation. Note the comment around dynamic modelling, which will be revisited. These aspects will be considered through further viability testing. The Written Ministerial Statement (WMS) represents a regression in achieving net-zero new development and poses risks related to the Future Homes Standard (FHS) reliance on grid decarbonization. The WMS unlawfully constrains powers conferred to Local Planning Authorities (LPAs) by statute. Specifically, Section 1 of the Planning and Energy Act 2008 permits LPAs to set energy efficiency requirements that surpass building regulations. Additionally, the WMS misdirects local authorities by contravening Section 19 of the Planning and Compulsory Purchase Act 2004 (PCPA), which mandates that local plans contribute to climate mitigation and adaptation. The most recent report to the government (2024) from the Committee on Climate Change identifies the WMS as a barrier to achieving net zero. The UK Green Building Council (UKGBC) is lobbying for the withdrawal of this statement. Moreover, the 2024 amendment to the National Planning Policy Framework (NPPF) Paragraph 161 (formerly Paragraph 157) explicitly refers to the transition to net zero by 2050; this is the first instance where the NPPF has done so, despite the net zero obligation having been mandated in Section 1 of the Climate Change Act 2008 since 2019. The amendment requires the planning system to support this transition and adds to the requirements that must be fully considered. The Council will continue to monitor this situation closely.

			Occupancy Evaluation requirement would be applied, whether it applies to all development or a proportion of a site. Greater clarity is required.	

	Walter Smith Farms Ltd, L N Mitchell Ltd and Emmanuel College, University of Cambridge	Policy CE6 Reducing Operational Emissions	Considered that not all developments should be required to submit an Energy and Carbon statement, particularly when considering minor and/or householder applications or proposals that do not relate to new builds. The wording should be clarified accordingly, i.e. by use of a threshold relating to scale and/or proposed use (residential, commercial, etc) or type of development (new build or building redevelopment). When setting thresholds relating to emissions, these should mirror Building Regulations standards. Otherwise, there is a realistic risk that the increased requirements will lead to viability issues and consequentially risk site deliverability, which would have a direct impact on housing land supply. Any requirements above those set nationally should be robustly justified and relevant evidence provided.	In line with our evidence base, we feel we have appropriate evidence to require energy statements for all developments. However, we acknowledge the comment around submission of information for householder applications, and this will be considered further. The Written Ministerial Statement (WMS) represents a regression in achieving net-zero new development and poses risks related to the Future Homes Standard (FHS) reliance on grid decarbonization. The WMS unlawfully constrains powers conferred to Local Planning Authorities (LPAs) by statute. Specifically, Section 1 of the Planning and Energy Act 2008 permits LPAs to set energy efficiency requirements that surpass building regulations. Additionally, the WMS misdirects local authorities by contravening Section 19 of the Planning and Compulsory Purchase Act 2004 (PCPA), which mandates that local plans contribute to climate mitigation and adaptation. The most recent report to the government (2024) from the Committee on Climate Change identifies the WMS as a barrier to achieving net zero. The UK Green Building Council (UKGBC) is lobbying for the withdrawal of this statement. Moreover, the 2024 amendment to the National Planning Policy Framework (NPPF) Paragraph 161 (formerly Paragraph 157) explicitly refers to the transition to net zero by 2050; this is the first instance where the NPPF has done so, despite the net zero obligation having been mandated in Section 1 of the Climate Change Act 2008 since 2019. The amendment requires the planning system to support this transition and adds to the requirements that must be fully considered. The Council will continue to monitor this situation closely.

	Henley Investment Management Ltd	Policy CE6 Reducing Operational Emissions	The requirements of the policy are unclear, the policy is long, complex and confusing. A simpler, clearer policy would be more effective. Part 3 refers to offsetting, but as with CE3 it is not clear when offsetting is required. It appears that every assessment tool possible has been included in the policy without clear purpose or rationale. The policy should also differentiate between requirements for outline applications and those for full planning permission or reserved matters.	We agree, there is an error in the referenced policy here which will be corrected for the next preferred options consultation. We agree that it needs to be clearer what is required at each planning stage, we will be exploring making a checklist to make this clearer.
	Unite Group Plc	Policy CE6 Reducing Operational Emissions	Objection to Policy CE6 - in the case of PBSA, the UKGBC Net Zero standard approach should be followed, allowing a split for Landlord and Tenant areas. This will allow greater clarity on the building performance.	The UKGBC approach will be reviewed and considered to replace current RIBA standard. Comment noted and will be considered for the next preferred options consultation.
	Knighthead Capital Management	Policy CE6 Reducing Operational Emissions	Knighthead strongly supports the need to reduce operational carbon emissions within development. Exceptional circumstances can arise for a particular development, in which flexibility is required to align with Policy CE5 providing flexibility for applicants to connect to heat networks. to ensure delivery of the sustainable places and healthy communities Birmingham needs. Suggested section 6 of the Policy be amended to 6. Alternatively for site heat demands, connection to a low or zero-emission heat network where available, technically feasible and financially viable.	We acknowledge the concerns around flexibility, policy is to be reviewed, and further viability testing undertaken.

	Zero Carbon House	Policy CE6 Reducing Operational Emissions	BLP rightly refers to building monitoring data and performance in use but there is no policy requirement or incentive for this. Nor is there any requirement for as built energy calculations. A clause such as Central Lincolnshire policies S7 and S8 (pp.30-33) should be added.	Policy CE6 already includes provision for monitoring "Data Transparency and Measurement - measure and share actual (as-built) carbon and energy data after practical completion. This must include reporting of as-built whole life cycle carbon emissions at practical completion and one-year post-occupancy. This should be completed using the provided template."

	Jaguar Land Rover	Policy CE6 Reducing Operational Emissions	JLR support for major developments to reduce operational emissions but the requirement for an Energy and Carbon Statement and provision of energy modelling data is too onerous, particularly for legacy industrial sites. It is recognised that design should aim to reduce operational energy, but each development should be determined on a case-by-case basis particularly as residential and commercial proposals will have different design requirements. Operational requirements should be managed via Building Regulations and not Policy. Supportive of CE6.2 related to renewable energy generation and storage but should include reference to development proposals for alterations of existing industrial areas for the promotion of low-carbon industries such as electric vehicle manufacturing.	Energy and carbon statements are already required for all major development proposals - so this is not a change from our adopted policies. However, we will further explore which building types of the requirements should apply to and will consider breaking the requirements down further. We do not wish to leave all carbon reduction targets to building regs. The Written Ministerial Statement (WMS) represents a regression in achieving net-zero new development and poses risks related to the Future Homes Standard (FHS) reliance on grid decarbonization. The WMS unlawfully constrains powers conferred to Local Planning Authorities (LPAs) by statute. Specifically, Section 1 of the Planning and Energy Act 2008 permits LPAs to set energy efficiency requirements that surpass building regulations. Additionally, the WMS misdirects local authorities by contravening Section 19 of the Planning and Compulsory Purchase Act 2004 (PCPA), which mandates that local plans contribute to climate mitigation and adaptation. The most recent report to the government (2024) from the Committee on Climate Change identifies the WMS as a barrier to achieving net zero. The UK Green Building Council (UKGBC) is lobbying for the withdrawal of this statement. Moreover, the 2024 amendment to the National Planning Policy Framework (NPPF) Paragraph 161 (formerly Paragraph 157) explicitly refers to the transition to net zero by 2050; this is the first instance where the NPPF has done so, despite the net zero obligation having been mandated in Section 1 of the Climate Change Act 2008 since 2019. The amendment requires the planning system to support this transition and adds to the requirements that must be fully

				considered. The Council will continue to monitor this situation closely.

	Hanehouse Ltd	Policy CE6 Reducing Operational Emissions	Recommend that Criterion 5 in Policy CE6.1 is amended to - 'Maximisation of on site or building integrated renewable heat and electricity generation and storage, including solar energy, where possible'. There may be circumstances where a heritage building will have limited options for incorporating renewable energy. There are other spaces for solar energy generation apart from rooftops, such as being integrated into building facades.	This is a welcome suggestion. We agree that this would rewording to this effect would be beneficial, this will be explored for the next preferred options stage.

	MEPC Limited	Policy CE6 Reducing Operational Emissions	MEPC are generally supportive of the energy hierarchy and responding to local opportunities for energy generation or provision, but the current Policy is unclear on its ultimate objective - does it require net zero buildings? Clarification is also required on how this policy aligns to Policy CE3 and some of the Policy is repetitive. Concerns are held on 1) Energy Performance - the RIBA 2030 targets only set targets for a small number of building types and is not comprehensive enough. The Ministerial Statement December 2023 states that the LAs should not set policies which go beyond Building Regs unless assessed as part of the evidence base. It is recommended this Policy be revised to note the forthcoming FHS 2025 and future Building Regs and any improvements beyond Building Regs should be based on carbon reduction, 2) WLCA - the Policy aligns with PAS2080:2023 which is a contradiction to the RICS guidance and repeats requirements of Policy CE3. Suggest that compliance with Policy CE3 is provided here to reduce complexity for applicants, 3) Maximising renewable generation and storage - this should be subject to viability, and it should be recognised that maximising these systems may conflict with design and not be feasible. The requirement for Solar PV on car park areas need to be considered via a viability assessment and its recommended	Thank you for the comprehensive comments. We agree that links back to CE3 need to be clearer - action for next preferred options stage. We acknowledge comments about RIBA; alternatives will be explored. Reflecting flexibility of energy storage will be explored. We agree with the comments around modelling, further clarity to be provided on dynamic modelling. Additional viability testing will be completed on these changes.

			these measures are encouraged rather than required, 4) Low or Zero Emissions Heat Network - this requirement needs to be subject to viability testing and to confirm it will not adversely impact upon occupants, 5) Dynamic Modelling - clarification is needed on when this requirement would apply as it is not considered suitable for low density developments and consideration given to cost implications for modelling and reporting as part of the design process. It is recommended that dynamic modelling is encouraged rather than required 6) Post Occupancy Evaluation - clarity is needed on how this requirement will be applied and if it applies to all developments or a proportion of a site? POE has cost implications, and we recommend this requirement is removed until further research is carried out.	
	Picton Jones (Asset Management) Ltd	Policy CE6 Reducing Operational Emissions	Policy CE6 Reducing Operational Emissions is quite restrictive, as Energy and Carbon Statements should not be required for every development. Some flexibility should be allowed depending on circumstance.	Our evidence base supports requiring an energy and carbon statement for all developments. We also already require this as a part of our current validation requirements. However, we acknowledge the comment around submission of information for householder applications, and this will be considered further.

	Langley Sutton Coldfield Consortium	Policy CE6 Reducing Operational Emissions	The Consortium objects to Policy CE6.1 relating to Energy and Carbon Statements on the basis that this introduces a whole series of reporting requirements, which have not been explicitly assessed within the viability reporting. Such proposals, whilst delivering laudable aims which are explained in more detail within the BCC Net Zero Plan, go over and above the minimum national requirements recommended by the conclusions of the Viability Report	Thank you for the comprehensive comments. The Written Ministerial Statement (WMS) represents a regression in achieving net-zero new development and poses risks related to the Future Homes Standard (FHS) reliance on grid decarbonization. The WMS unlawfully constrains powers conferred to Local Planning Authorities (LPAs) by statute. Specifically, Section 1 of the Planning and Energy Act 2008 permits LPAs to set energy efficiency requirements that surpass building regulations. Additionally, the WMS misdirects local authorities by contravening Section 19 of the Planning and Compulsory Purchase Act 2004 (PCPA), which mandates that local plans contribute to climate mitigation and adaptation. The most recent report to the government (2024) from the Committee on Climate Change identifies the WMS as a barrier to achieving net zero. The UK Green Building Council (UKGBC) is lobbying for the withdrawal of this statement. Moreover, the 2024 amendment to the National Planning Policy Framework (NPPF) Paragraph 161 (formerly Paragraph 157) explicitly refers to the transition to net zero by 2050; this is the first instance where the NPPF has done so, despite the net zero obligation having been mandated in Section 1 of the Climate Change Act 2008 since 2019. The amendment requires the planning system to support this transition and adds to the requirements that must be fully considered. The Council will continue to monitor this situation closely. Note the comment around viability, once policies are redrafted, further viability testing will be completed.

	Birmingham City Council Housing Department	Policy CE6 Reducing Operational Emissions	It is considered that the current wording of this policy is quite restrictive and that Energy and Carbon Statements should not be required in all circumstances. Instead, a flexible approach should be adopted to this policy requirement.	Our evidence base supports requiring an energy and carbon statement for all developments. We also already require this as a part of our current validation requirements. However, we acknowledge the comment around submission of information for householder applications, and this will be considered further.
		Policy CE6 Reducing Operational Emissions	Generally supportive of Policy CE6, as it will drive the Construction Industry towards more sustainable practices, but the FHS will be introduced shortly, meaning they will not be aligned, and this raises issues for scope and enforceability. Further guidance is required in terms of the deliverability of the Policy.	Comment is noted and support is welcomed
	Acocks Green Focus Group	Policy CE6 Reducing Operational Emissions	The policy seems excessive if applied to smaller scale proposals, e.g. householders and listed buildings.	Our evidence base supports requiring an energy and carbon statement for all developments. We also already require this as a part of our current validation requirements. However, we acknowledge the comment around submission of information for householder applications, and this will be considered further.

	BCC Lead Local Flood authority	Policy CE7 Flood Risk Management	Birmingham LLFA supports Policy CE7 but suggest that the policy text should be amended to include; reference to 20 metres easements from the top of the bank or flood defence for watercourses, developers often overlook these statutory minimum requirements if they are not referred to in local policy. that there should never be an increase in surface water discharges post development for all development sites. the need to safeguard land for the creation of flood storage areas along the River Rea, River Cole and River Tame catchments as part of a co-ordinated approach to managing current and future flood risk. Suggested revised wording for Policy CE7: At the end of the 'Sustainable Drainage Assessment and Operation and Maintenance Plan' section, insert the following new wording; "Surface water discharge rates should never exceed predevelopment discharge rates". In the 'Enhancements of Water Resources' section, between the first and second paragraphs, insert the following new wording; "There should be a 20-metre easement from the top of bank for all rivers from built development / infrastructure. Development adjacent to rivers should seek	Overall support for the proposed policy is noted. We will consider the suggested amendments to the policy wording and will liaise with the LLFA as we refine our approach for the next stage of plan preparation.

			to naturalise the channel and provide access for maintenance. Land required for future flood risk management should be safeguarded from future development that could compromise the ability of Birmingham to manage future flood risk"	
	Natural England	Policy CE7 Flood Risk Management	This is a significant policy which will affect your residents as well as those downstream within the River Humber basin. We await the outcome of the HRA and its assessments before we can comment definitively on the impacts of your hydrology policies on the likely significant effects on sites. Requirements for Sustainable Urban Drainage (SuDs) are welcomed, biodiversity, flood risk and other factors are likely to benefit. We would be pleased to input into your SuDS strategy in order to maximise the benefits provided by future developments.	General support for the proposed policy approach, and particularly the SUDs requirements, is noted. We will engage further with Natural England as work on the Local Plan progresses, particularly when we have the findings of the HRA.
	Picton Jones (Asset Management) Ltd	Policy CE7 Flood Risk Management	Sustainable drainage assessment, operation and maintenance plans are most appropriately secured via planning conditions. The policy on SUDS, enhanced water resources and trees and woodlands is all supported.	Support for the SUDS, enhanced water resources and trees and woodlands aspects of the policy is noted. The suggestion to secure Sustainable Drainage Assessment and Operation and Maintenance Plans through planning conditions is noted and will be considered further as part of the next stage of plan preparation.

	Canal and Rivers Trust (Planning Manager)	Policy CE7 Flood Risk Management	Supportive of references to flood risk arising from all sources including canals, the role that canals play in managing flood risk, the need for SUDs to protect and enhance water quality, and the value of canals to amenity and wildlife. The requirement for details of construction and groundworks within 20 metres of a raised reservoir to be assessed by a statutory undertaker is noted. We are concerned about development that affects the structural integrity of the dam and associated infrastructure.	Comments and general support for the proposed policy are noted.

		Policy CE7 Flood Risk Management	The policy is strong in regard to surface water flood risk, but there is a significant gap in regard to fluvial flood risk. Some of the justification text regarding fluvial flood risk should be in the policy itself. Policy CE7 doesn't appear to have been informed by the Level 1 SFRA findings and recommendations on Fluvial flood risk, meaning the policy is not in accordance with para 166 of NPPF. Section 5.4 of the L1 SFRA indicates that primary Fluvial risk is from the River Tame, River Rea, River Cole and their main tributaries. Section 6 also identifies flood alleviation schemes, defences and assets such as Stonehouse and Upper Bourn Brook project and Lower Rea scheme to reduce flood risk. These and other schemes will require the support of developer contributions. Section 7 of the L1 SFRA summarises cumulative impacts of development and identifies five High Risk catchments. It also recommends that BCC works closely with neighbouring authorities to develop complementary Local Plans and minimise cross boundary issues. The 'Flood Risk Management' section of the policy should be amended as follows, 'All new developments should ensure that flood risk from all sources can be managed for future occupants, and that they do not contribute to increasing flooding risk to third	Thank you for your comprehensive comments. We have noted your concerns and suggested amendments to the policy, particularly regarding fluvial flood risk, the sequential and exception tests, cumulative impacts of development and increases to flood risk elsewhere, the use of developer contributions, easements, naturalisation of water courses and making space for water. We will seek to refine the proposed policy approach as part of the next stage of plan preparation, and we will fully review the findings of the Level 1 and Level 2 SFRA and Water Cycle Study as part of this. We will also proactively engage with the EA and LLFA to ensure that the revised policy approach presents a sound position.

			party land and access and can demonstrate an overall flood risk reduction'. The policy should also include a section on fluvial flood risk which reflects section 10.1 of the L1 SFRA. This should for example include developer contributions for the delivery/maintenance of a relevant flood defence scheme, flood risk infrastructure and the EAs flood warning service, making space for water (e.g. through oversized SUDs, green/blue corridors), applying the sequential and exception tests, safeguard functional floodplain and mitigation for flood risk elsewhere. Reasoned justification should signpost developers to section 8 of the L1 SFRA and the L2 SFRA when it has been published. Reasoned justification wording regarding easements and restoring or de-culverting watercourses should be in the policy instead. As recommended by paragraph 54.14 of the L1 SFRA, an easement standard of at least 20 metres from the top of river channels should be aimed for to make space for green corridors, biodiversity and habitats, naturalisation of watercourses, new flood risk infrastructure and footpaths. Developers will need to fully justify and discuss variance from this standard with the LLFA and EA. The regulation of activities within 8 or 16 metres of a main river by EA is often viewed as the maximum easement required but is	

			insufficient across many BCC watercourses where improvements are needed. Easements are essential to enable access to the watercourse and for inspections and emergency works, meaning there should be no built development within the watercourse easement. Further suggested additional policy wording: 'Developments should seek to naturalise watercourses by reinstating a natural, sinuous river channel, restoring the functional floodplain and open up culverts, to provide biodiversity as well as amenity and flood risk improvements'. Justification for this is provided by the 'moderate status' identified in the Humber River Basin Management Plan. Supportive of the policy section on trees and woodland but propose amendment from 'encouraging to expecting' and that trees should be native species of local provenance.	
	Birmingham City Council Housing Department	Policy CE7 Flood Risk Management	Sustainable Drainage Assessment and Operation and Maintenance Plans are most appropriately sourced through planning conditions. The policy requirements for SuDs, Enhancements of Water Resources and Trees and Woodlands parts are all supported.	Support for the SUDS, enhanced water resources and trees and woodlands aspects of the policy is noted. The suggestion to secure Sustainable Drainage Assessment and Operation and Maintenance Plans through planning conditions is noted and will be considered further as part of the next stage of plan preparation.

POD Consultation Event - Central Birmingham Library		Policy CE8 Sustainable Resource Management	Respondent unhappy about littering and rubbish.	Policy CE8 does not apply directly to littering but sets out the strategic approach to how waste is managed across the city and the infrastructure that is needed to process it. Policy CE8 will be reviewed as part of the next stage of the Plan-making process and consideration will be given to the management of waste at the operational level.
POD Consultation Event - Handsworth		Policy CE8 Sustainable Resource Management	More litter bins need around shops	Policy CE8 does not apply directly to litter bins but sets out the strategic approach to how waste is managed across the city and the infrastructure that is needed to process it. Policy CE8 will be reviewed as part of the next stage of the Plan-making process and consideration will be given to the management of waste at the operational level.
POD Consultation Event - Erdington		Policy CE8 Sustainable Resource Management	Litter bins not fit for purpose, separation of recycling	Policy CE8 does not apply directly to litter bins but sets out a strategic approach to how waste is managed across the city and the infrastructure that is needed to process it. Policy CE8 will be reviewed as part of the next stage of the Plan-making process and consideration will be given to the management of waste at the operational level.
	Unite Group Plc	Policy CE8 Sustainable Resource Management	Supportive of Policy CE8.	Support for Policy CE8 is welcomed. Specific support for the principles of re-use and re-cycle, in terms of the use of Secondary and Recycled Aggregates and salvaging of building materials for use by new developments is noted.

	WMRTAB	Policy CE8 Sustainable Resource Management	Conclusions of the 2024 Waste Capacity Study appear to contradict the Preferred Options Document which states there is a shortfall in its capacity to handle specialist hazardous waste and is a net exporter of construction and demolition and inert waste. it is not clear how the need for capacity has been identified, in particular there is no commitment to planning for waste on the basis of net self-sufficiency and targets for recycling, composting, other recovery and landfill are not set out. The exact extent for the requirement for "recycling and disposal capacity" needs to be clearly identified in order that the Plan can detail how this capacity will be accommodated within the Plan area. There appears to be a contradiction between increasing disposal capacity and minimising waste sent directly to landfill as landfill constitutes disposal capacity. The Plan could more clearly state that this need will likely be met by continued export to non-hazardous landfills beyond its area. Welcome an opportunity to comment on the conclusions of the Waste Needs and Capacity Assessment as well as draft updates to policy approaches. Detail regarding net self-sufficiency and targets needs to be included. It is also recommended that a definition of "circular economy" be included in the glossary.	This issue will be reviewed in conjunction with WMRTAB and addressed during the next stage of Plan-making. A second Preferred Option will be consulted upon during Autumn 2025 meaning Stakeholders will have further opportunities for engagement in the new Local Plan.

			Confirmation that shortfalls can be met by deliverable development of land identified in the Plan is required to provide certainty. Strongly recommend that a policy is included which will ensure that existing waste management capacity is safeguarded except in exceptional circumstances. Existing capacity needs to be relied upon to provide the waste management capacity.	
	Sandwell Metropolitan Borough Council	Policy CE8 Sustainable Resource Management	Sandwell MBC supports policy CE8, and the approach taken regarding waste management across Birmingham.	Support for Policy CE8 is welcomed.
	Wolverhampton City Council	Policy CE8 Sustainable Resource Management	Support policy CE8 and the approach taken regarding waste management across Birmingham.	Support for Policy CE8 is welcomed.

		Policy CE8 Sustainable Resource Management	Supportive of Policy CE8 principle to move waste up the waste hierarchy and is positive that there is a distance threshold specified of 250m, where proposals for anaerobic digestion will not be approved where there is existing housing. This threshold should also be applied to new waste facilities. Please see our response to Strategic Planning Climate Change Guidance (West Midlands Area) version 1 June 2024 for additional issues for consideration in policy e.g. support for Circular Economy, expansion of existing waste facilities, adoption of Whole Life Passports for all buildings and inclusion of a Derelict Building Strategy. In regard to new developments, all waste infrastructure should be designed to be easily accessible by the elderly, infirm and disabled residents.	General support for Policy CE8 is welcomed and specific support for the adoption of a 'waste hierarchy' and for a minimum 250m threshold for anaerobic digestion from existing homes is noted (with suggestion to extend threshold to homes located near new waste facilities). The Policy will be reviewed as part of the next stage of the Plan-making process, when consideration will be given to the management of waste at the operational level (i.e., functionality of wheelie bins for elderly and disabled users).
	Birmingham City Council Housing Department	Policy CE8 Sustainable Resource Management	Support is given to this policy, in particular the Druids Heath redevelopment site protects and enhances the green infrastructure network, contributing to its enhancement and therefore increasing benefits to the local community. In respect of blue infrastructure this part of the policy is supported. The City Council are encouraged to support proposals that will provide enhancements to blue infrastructure and the surrounding green networks.	General support for Policy welcomed, specifically in relation to the beneficial impacts it will have on the Druids Heath redevelopment site.

	Dudley Metropolitan Borough Council	Policy CE8 Sustainable Resource Management	Recognise the cross-boundary waste relationships that exist for Birmingham and the wider West Midlands. Dudley MBC and BCC have undertaken discussions as part of the Duty to Cooperate on this matter and will continue to keep any specific cross boundary issues arising under review.	General support for Policy is welcomed and specific need for cross-boundary waste partnership working to manage waste in Birmingham and wider West Midlands is noted.

	Worcestershire County Council	Policy CE8 Sustainable Resource Management	Would welcome the opportunity to review the final waste policy before regulation 19 stage. Supports the approach of equivalent self-sufficiency in planning for waste management capacity whereby authorities aim to meet their own overall waste needs wherever possible, whilst allowing for localised constraints. This approach also recognises that the movement of all types of wastes across administrative boundaries is a normal part of the operation of the market, and some specialist wastes may need to travel further, to regional or national facilities. The preferred options identifies that Birmingham's waste capacity is likely to be exceeded by 2036. It is not clear whether the policy approach is to seek to increase the available waste management capacity over the plan period in order to achieve and maintain net self-sufficiency, or whether there is evidence to suggest that Birmingham will not be able to achieve and maintain net self-sufficiency over the plan period. Waste Management assessment should be discussed with DtC partner authorities through WMRTAB. Data from the WDI and HWI demonstrate that the levels of waste movements between each authority remain comfortably below the thresholds suggested by the	Policy CE8 will be reviewed as part of the next stage of the Plan-making process. A range of issues will be re-assessed, including Birmingham's self-sufficiency in planning for waste management. A second Preferred Option is to be prepared, which will be informed by liaison with DTC Authorities and there will be further opportunities for engagement during 2025.

			WMRTAB and, as such, WCC considers that these waste movements do not constitute a strategic issue. We are not aware of any reason why these limited movements should not continue.	

	Woodland Trust	Policy CE9 Green Infrastructure and Nature Recovery	Local Plan should encourage recording of Ancient and Veteran trees on the Ancient Tree Inventory and consider where it may be appropriate to place a Tree Preservation Order. A 50-metre buffer between new developments and ancient woodland should be preserved, 15-metres is insufficient. Ensure for AVTs a Root Protection Area, either 15 times the trunk's diameter or extends five metres beyond the canopy, whichever is greater. For non-AVTs adopt Bristol Tree Replacement Standard with respect to felling replacement trees be planted no more than 12 times the distance of the original tree's trunk diameter, to correspond with root extent area Site allocations should take into account sensitive natural assets. Assess nitrogen impact of ammonia-emitting developments on ancient woodland less than five kilometres distant Major developments should provide five UKISG-compliant trees per dwelling or 1,000m² of non-residential floorspace. No one should be more than 300 metres from the nearest natural green space, including safe and accessible routes. Consideration also given to Woodland Trust's Access to Woodland Standard (everyone should have a small wood of at least two hectares in size within 500 metres of their home or larger	Policy CE9 is associated to a wider Environmental Policy framework, which includes the Urban Forest Masterplan 2021, City of Nature Plan 2022 and the West Midlands Combined Authority Local Nature Recovery Strategy (LNRS). Within this framework, Birmingham's tree network and woodlands will be conserved and enhanced, with additional protection for ancient woodlands, veteran trees and irreplaceable habitats. A policy requirement is for all development to consider green infrastructure early in the process, in terms of both any impacts posed for existing green infrastructure and also the wide range of benefits that new green infrastructure could deliver, particularly the planting of new trees.

			wood of at least 20 hectares in size within four kilometres of where they live) Strong tree retention standard for responsible development must also be embraced, meaning that a thorough tree survey is required, categorising trees by their health and quality (A, B, C or U) and submitting clear Tree Retention Plan. Mandate a creation of a tree Protection Plan, safeguarding tree root systems and establishing construction exclusion zones (CEZs).	
POD Consultation Event - Central Birmingham Library		Policy CE9 Green Infrastructure and Nature Recovery	lack of support from rangers at Lickey Hills due to constraints to budgets.	Policy CE9 does not cover operational Park Ranger services but Ranger Services has announced a prioritisation of work from 2025, where it will focus resources on 11 priority wards, which have the least amount of green space in the City. Alongside these priority wards, the City of Nature Programme is actively supporting a network of volunteers across all wards, such as 'Friends of Parks' groups to engage local residents in the care and long-term future of their local parks and green spaces.
	Knighthood Capital Management	Policy CE9 Green Infrastructure and Nature Recovery	Knighthood strongly support the aims of Draft Policy CE9 and is committed to enhancing the quality and connectivity of Birmingham's blue and green infrastructure networks to improve air quality, such as the canal running on the western boundary of the Site.	Strong support for Policy CE9 is welcomed and the identification of the positive impacts posed by green infrastructure for quality placemaking, wellbeing and air quality in particular.

	BCC Lead Local Flood authority	Policy CE9 Green Infrastructure and Nature Recovery	Management and maintenance considerations must be included early in the design process in order to positively manage green and blue infrastructure. Major developments must incorporate a Green-Blue Infrastructure Plan as part of their planning applications.	Support for Policy CE9, in relation to blue infrastructure requirements is welcomed. The Policy clearly states that management and maintenance considerations must be considered early during the design process for development and that Major developments must submit a Green/Blue Infrastructure Plan as part of the application documents.
	Soho Road Business Improvement District	Policy CE9 Green Infrastructure and Nature Recovery	Implement green infrastructure, such as rain gardens and bioswales, to manage stormwater runoff.	Suggestions for green infrastructure to respond to water management issues is welcomed. Policy CE7: Flood Risk Management outlines a range of measures for implementation into new development and retrofit on existing sites.
	Natural England	Policy CE9 Green Infrastructure and Nature Recovery	This policy is amongst the most important within the plan. Welcome the City of Nature Plan, commitment to protect most green and open spaces within the city and enhance others and recognition of Birmingham's significant tree cover in places with your Urban Forest Master Plan.	Strong support for Policy CE9 is welcomed. The Policy is part of a wider Environmental Policy framework, which includes the Urban Forest Masterplan 2021, the City for Nature Plan 2022 and the West Midlands Combined Authority Local Nature Recovery Strategy, which aim to protect and enhance green and open spaces and extend the existing tree canopy across Birmingham.

	Birmingham City Council Conservative Group	Policy CE9 Green Infrastructure and Nature Recovery	Over the life of the plan, we should see an increase in both the area and quality of green open space. Stronger protection should be included for the green belt, including no loss that does not have the support of local residents.	Policy CE9 is part of a wider Environmental Policy framework, which includes the Urban Forest Masterplan 2021, the City for Nature Plan 2022 and the West Midlands Combined Authority Local Nature Recovery Strategy, which aim to protect and enhance green and open spaces and extend the existing tree canopy across Birmingham. A Green Belt review was not included in the Preferred Option document consulted on during Summer 2024 but due to the updated NPPF published in December 2024, Local Planning Authorities which are unable to meet their housing need target will be required to undertake a Green Belt review. To support this process, Birmingham will commission a full assessment of existing Green Belt land and the resulting evidence will be analysed, to inform any future approach to these locations. Whilst the NPPF requires a review of Green Belt land, it should be noted that the 5 Principles of Green Belt land remain in place and any proposals for Green Belt alterations would be subject to full community consultation.
	Sandwell Metropolitan Borough Council	Policy CE9 Green Infrastructure and Nature Recovery	Sandwell MBC supports policy CE9 which seeks to maintain and expand Birmingham's green infrastructure network and will continue to work with Birmingham, and the other constituent members of the West Midlands Combined Authority, to prepare and implement a Local Nature Recovery Strategy for the region.	Support for Policy CE9 is welcomed. An intention to collaborate in the development of a West Midlands Combined Authority Local Nature Recovery Strategy is also welcomed.

	University Hospitals Birmingham NHS Trust	Policy CE9 Green Infrastructure and Nature Recovery	Any physical development should be supplemented by a minimum level of green space for active and more informal recreation.	Policy CE13: Open Space recognises the importance that open spaces in Birmingham plays in regard to recreational, health and wellbeing benefits for residents. The policy protects existing open spaces from loss, with developers being required to meet set criteria for re-provision or to provide evidence that its loss will not impact public recreational or amenity. The Policy also requires all new Major development to provide public open space on-site or make financial contributions for off-site provision or for improvements.
	Canal and Rivers Trust (Planning Manager)	Policy CE9 Green Infrastructure and Nature Recovery	Request that plan text identifies opportunities to enhance GI projects.	General support for Policy CE9 is welcomed. As noted in your comment, Policy CE9 is associated to a wider Environmental policy framework, which includes the Urban Forest Masterplan 2021, City of Nature Plan 2022 and the West Midlands Combined Authority Local Nature Recovery Strategy. Policy CE9 requires developers to consider the benefits that green infrastructure can contribute to wider place making, beyond the site boundaries, to address issues such as social inequality, air quality and provide opportunities for recreation and food growing.

		Policy CE9 Green Infrastructure and Nature Recovery	Supportive of Blue Infrastructure policy and it has contribution to make to achieving the objectives in the Humber River Basin Management Plan. The presence of invasive species and dominant species can constrain biodiversity and many weirs no longer serve a purpose and restrict fish movement. Policy CE9 could bolster Blue infrastructure initiatives to eradicate invasive species and move obsolete weirs. Is the reference to 'applicants taking into account the BNG requirements set in Policy CE12 and CE7 a mistake? Should the policy signpost to Policy CE11 BNG instead?	General support for Policy CE9 is welcomed and particular support for the inclusion of the Humber River Basin Management Plan is noted.
The Tyler Parkes Partnership Ltd	West Midlands Police	Policy CE9 Green Infrastructure and Nature Recovery	Supports the approach but requests an addition to the policy to reflect the importance of public safety, security and the reduction of crime and fear of crime. This could be on the following lines: New developments must fully consider the multifunctional benefits that green infrastructure can deliver as part of site design and to contribute to wider place making. These benefits do not have to be mutually exclusive and include nature recovery and resilience; climate change mitigation; water management; addressing social inequalities; improving air quality, health and mental wellbeing, public safety, security and the reduction of crime and fear of crime and providing opportunities for recreation and community food growing."	General support for Policy CE9 is welcomed. Potential for green infrastructure to contribute to increased levels of public safety, improved security and the reduction/fear of crime is noted. A second Preferred Option will be consulted upon during Autumn 2025, meaning Stakeholders will have further opportunities for engagement in the new Local Plan.

	Birmingham City Council Housing Department	Policy CE9 Green Infrastructure and Nature Recovery	Support is given to this policy, in particular the Druids Heath redevelopment site protects and enhances the green infrastructure network, contributing to its enhancement and therefore increasing benefits to the local community. In respect of blue infrastructure this part of the policy is supported. The City Council are encouraged to support proposals that will provide enhancements to blue infrastructure and the surrounding green networks.	Support for Policy CE9 is welcomed and particular reference, to the positive impacts the Policy will have on green and blue spaces within Druids Heath is noted.

		Policy CE9 Green Infrastructure and Nature Recovery	The National Trust welcome the proposed approach to green infrastructure and consider that the proposed regional park would make a significant contribution towards the achievement of the GI objectives for the city. In respect of the regional park proposals, whilst we thoroughly support the measures to maintain and enhance the green infrastructure network, we would recommend that the 8 Hills Regional Park is referenced in this policy and designated on the Policies Map as land to the south of Hawkesley, Frankley Reservoir and Bartley Reservoir. We consider that this would both strengthen Birmingham's green infrastructure network and present an opportunity to enter into a partnership with a governance structure for 8 Hills Regional Park and engage in a cross-boundary relationship when it comes to truly integrated green infrastructure for the benefit of people and nature across the West Midlands conurbation and beyond. With Birmingham's open spaces and existing green infrastructure under such considerable pressure in delivering housing need for the borough and potentially beyond in future, it seems that by creating a designation for the 8 Hills Regional Park in this area of Green Belt, this could potentially comprise a mechanism to demand more from development proposals	General support for Policy CE9 is welcomed. Suggestion for the formal designation of 8 Hills Regional Park (land south of Hawkesley, Frankley Reservoir and Bartley Reservoir) due to the benefits it could bring for local residents and those in wider areas and the achievement of strategic GI ambitions for Birmingham, is noted. A second Preferred Option will be consulted upon during Autumn 2025, meaning Stakeholders will have further opportunities for engagement in the new Local Plan.

			and hold developers to account when they seek to develop in the area, whilst also promoting the other benefits that it could deliver such as increasing peoples access to green space on their doorstep, with the value of the regional park being felt outside of its boundary and the people living in these areas becoming significant beneficiaries	
	Dudley Metropolitan Borough Council	Policy CE9 Green Infrastructure and Nature Recovery	Welcome increased green linkages, which enable Dudley residents to explore and enjoy the local environment, particularly allowing for movement across the two areas at the shared boundary with Dudley borough. Ties in with DMBCs aspiration to create a cycling link between Halesowen and Woodgate Valley, creating sustainable transport and wildlife links between the two areas.	Support for Policy CE9 is welcomed, particularly the requirement for increased connectivity between green open spaces on Birmingham and Dudley MBC boundaries, which will improve local residents' options for active travel and benefit wildlife.
	Arup	50.10 Paragraph	We need to be more ambitious with energy efficiency targets.	Comment is noted and support is welcomed
	Arup	50.2 Paragraph	Positive to see the focus is on Whole Life Carbon, this should also apply to refurbishments.	Support is welcomed. Note that planning permission is unlikely to be required for most refurbishments/fit outs unless more comprehensive retrofit is proposed.
		51.3 Paragraph	many of the HMOs will fall well below the energy efficiency required and should not be considered fit for habitation.	National government set the EPC requirements for private rent, including HMOs.
	BCC Lead Local Flood authority	54.27 Paragraph	Birmingham LLFA supports the Preferred Options Document but recommends that a water cycle study is undertaken which they would also like to review and comment on.	Support for the Preferred Options Document noted. We will continue to engage with the LLFA as work on the Local Plan progresses, particularly in regard to the preparation of a Water Cycle Study.

	Frampton Town Planning Ltd	57.1 Paragraph	Agree	Agreement noted.
	Frampton Town Planning Ltd	57.8 Paragraph	Add at the end of the paragraph 57.8: It is acknowledged that some forms of development, for which planning permission is required, will not involve the loss of any habitat, for example, a change of use of an existing building. In such circumstances it would not be appropriate to seek a BNG from such forms of development.	Comment noted.
		59.1 Paragraph	CE12's supporting paragraph could be enhanced. Birmingham needs to step away from Natural England's National Standard Urban Green Factor Scoring Table - unsuitable and could frustrate compliance with the overarching Govt 25 Year Environment Plan. Scoring Table can be adjusted by reference to London Wildlife Trust: Urban Greening for BNG (a design guide) to include an entry for wildlife value for walls used for nesting of birds and roosting of bats.	Comments noted.
POD Consultation Event - Central Birmingham Library		66.1 Paragraph	Business rates are too high.	Business rates cannot be addressed through the Local Plan.

	IM Properties	67.2 Paragraph	The proposed new NPPF contains a greater focus on economic growth, with freight and logistics identified as key sectors. The WMCA also identify logistics and distribution as a sector with high growth prospects. The 295.6 hectare need figure is not split into local and strategic needs. Vacancy rates are very low in the city and rental rates have been increasing more than inflation. It is also more appropriate to apply a 40% or even 35% plot ratio rather than 50%. The above factors mean that the employment land need figure should be 369 hectares and not 295.6 hectares. This is uplifted further to 422 hectares when a 35% plot ratio is applied. 90% of the city's industrial and logistics inventory is poor or average quality, and many older and lower quality sites are being redeveloped for housing and are not being replaced. A review of the HEDNA is required to take account of the findings of the Stage 3 West Midlands Strategic Employment Sites Assessment and to focus on the delivery of strategic employment sites. Further work will also be required via the duty to cooperate to ensure that strategic sites can be delivered to address unmet needs across the FEMA. Policies PG1 and EC1 will require revision to	As part of the next stage of plan production we will give further consideration to the key economic sectors with potential for growth and also review the proposed approach in light of changes to national planning policy. Proposed policy EC1 contains a breakdown of the recommended industrial land by site size, with larger sites intended to meet strategic needs and smaller sites intended to meet more localised needs. An additional margin has been applied to the industrial land requirement in the HEDNA to take account of the low vacancy rates in the city. A 50% plot ratio has been applied in the HEDNA rather than a lower figure because this reflects the more urban, built-up nature of the city compared with elsewhere. It also reflects the national and local objectives to make more efficient use of land and increase densities and reflects shifting changes in working with increased use of technology and greater hybrid working. Given the reasons above, the City Council disagrees with your assessment that the industrial land requirement should be uplifted. Nonetheless, the evidence contained within the HEDNA will be kept under review and will be updated if it becomes clear that it is based on out-of-date evidence or that it no longer accords with national planning policy. Future stages of plan production will reflect any updates to the HEDNA.

			reflect the uplifted employment land requirement.	
	Nurton Developments	67.2 Paragraph	The HEDNA identifies a need of 268.7 hectares using a plot ratio of 50%, which is high by industry standards, 40% is an industry norm that has been used in similar studies, using this percentage would result in a need of 335.9ha of developable land which should be considered the minimum figure.	A 50% plot ratio has been applied to the industrial land requirement in the HEDNA rather than a lower figure because this reflects the more urban, built-up nature of the city compared with elsewhere. It also reflects the national and local objectives to make more efficient use of land and increase densities and reflects shifting changes in working with increased use of technology and greater hybrid working. Given the above, the City Council disagrees with your assessment that the industrial land requirement should be uplifted.
	MEPC Limited	67.4 Paragraph	It is noted that offices are excluded from consideration in reference to employment land and that despite the need identified in the HEDNA, the Plan has not pursued a detailed Policy in relation to office development. There is a need for a long-term vision for office floorspace requirements, with the identification of appropriate locations which will be supported.	Unfortunately changes at the national level, which mean that offices are now considered in the same use class as many other commercial uses, mean that local policy can no longer prescribe any specific rules or requirements for the amount office floorspace to be planned for and in which locations.

	Birmingham Hippodrome	71.12 Paragraph	Policy is overly prescriptive which could be damaging to areas such as Southside which have a variety of night-time economy roles. Important that all aspects of an area's identity are protected.	Comments noted.
	Birmingham Hippodrome	71.15 Paragraph	Include City Centre in this policy as there are several night-time economy venues in Southside - such as Old Rep and Electric Cinema - with heritage and cultural value which require protection.	The policy refers to public houses.
	Birmingham Hippodrome	71.9 Paragraph	Comments regarding value of clustering night-time economy uses echoed.	Comments noted.
	Birmingham Hippodrome	72.14 Paragraph	Specific reference requested to be made to Southside as part of City Heart. Linkages to Central Birmingham Framework with regards to NTE and Destination Brum allocation, represents a real opportunity for growth.	Comments noted.

	Birmingham Hippodrome	72.4 Paragraph	Hippodrome aspirations for growth are in line with Objective 4, and need to "support business growth, job creation, and inward investment by providing a range of employment and economic growth opportunities" as well as Objective 5, and the need to "build on Birmingham's competitive economic advantages and retain and attract the best talent".	Comments noted.
	Knighthead Capital Management	Policy EC1 Industrial Land Provision	Knighthead acknowledges the identified need for industrial land set out within Draft Policy EC1 but wishes the Plan to recognise that the former Wheels site which forms part of the Sports Quarter should now be removed as a key industrial site as it now presents the opportunity to deliver socio-economic benefits on a more significant scale than would be realised.	Your site-specific comment is noted. This will be considered further as part of the next stage of plan making.
	Walsall Council	Policy EC1 Industrial Land Provision	The policy could be clarified to confirm if the target of 296 hectare refers to new build on land not previously used for industry, or whether it includes churn comprising the redevelopment of existing industrial land.	The 296 hectare figure does include the redevelopment, or churn, of existing industrial uses. This is explained in paragraph 67.2 which supports policy EC1.
	South Worcestershire Councils	Policy EC1 Industrial Land Provision	It is suggested that consideration be given to including specific types of employment land for research and development, which is a strength of the city economy and would be more in line with the draft NPPF.	The new NPPF was published while the Preferred Options Document was being subject to consultation. The City Council will ensure that future iterations of the Local Plan will be in accordance with this amended policy framework. This will include further consideration to the key economic sectors with potential for growth.

	Sandwell Metropolitan Borough Council	Policy EC1 Industrial Land Provision	Sandwell MBC supports policy EC1	Support for proposed policy EC1 is noted.
	University Hospitals Birmingham NHS Trust	Policy EC1 Industrial Land Provision	Allow flexibility for surplus land on sites so that new build can be integrated onto already developed locations. Prioritise vacant brownfield sites on former industrial sites for development.	Support for prioritising development on vacant industrial sites is noted. This will be explored further as part of the next stage of plan preparations, along with your suggestion for new build on surplus land to be integrated onto already developed locations.

	Wolverhampton City Council	Policy EC1 Industrial Land Provision	Support Policy EC1 but should clarify if the target refers to new build on land not previously used for industry, or whether it includes churn comprising the redevelopment of existing industrial land (i.e. development not resulting in a net increase in employment land). There is a dependency on bringing forward land identified in the urban capacity study for which there is no evidence of landowners intending to release for development. Reference to 53 hectares of land available in South Staffordshire is consistent with evidence published by South Staffordshire in the Stantec SRFI apportionment study. Potentially, additional land could be apportioned to Birmingham if other areas within the market area of the SRFI do not need this land to meet needs arising in their area. This could help to address the potential shortfall of employment land in Birmingham outlined above.	Support noted. Paragraph 67.2, which supports policy EC1, explains that the 296 hectare figure does include the redevelopment (i.e. churn) of existing industrial uses. It is recognised that a large amount of the potential industrial land supply is from sites where there is no confirmation of development aspirations from landowners, however the main intention of proposed policy EC1 is to deliver a rolling 5-year reservoir of readily available industrial land. The City Council will continue to enhance its evidence of the developability of the longer-term land supply as work on the Local Plan progresses. Comments relating to the SFRI apportionment are noted. The City Council will continue to engage with other authorities in the FEMA to finalise the actual amount of land from this facility that can be apportioned to meet the city's future industrial land needs.

	Nurton Developments	Policy EC1 Industrial Land Provision	The respondent asserts that the Preferred Options document and evidence base, provides no qualitative assessment of the need and supply of strategic employment sites to meet the sectors referenced by paragraph 84(b) of the new NPPF, which is an omission. NDL argues that this issue should be addressed after the next update of the West Midlands Employment Sites Study and as it's a sub-regional issue, the council should work with other authorities to develop a strategy for providing these strategic employment sites to serve Birmingham.	The new NPPF was published while the Preferred Options Document was being subject to consultation. The City Council will ensure that future iterations of the Local Plan will be in accordance with this amended policy framework. The City Council will continue to engage with other authorities in the FEMA in order to coordinate the delivery of strategic industrial land.
		Policy EC1 Industrial Land Provision	Supportive of Policy EC1 as it states the Council will support new industrial development in the B2 and B8 use classes, and this will involve the redevelopment of existing industrial land.	Support noted.
		Policy EC1 Industrial Land Provision	Supportive of Policy EC1 as it will support new industrial developments in B2 and B8 use classes and involve the redevelopment of existing industrial land.	Support noted.

	Logicor	Policy EC2 Core Industrial Areas	Strongly support the proposed Core Industrial Areas designation, particularly the retention of these areas for B2 and B8 uses and resisting the development of other land uses. Support the identification of the Travis Perkins site within the proposed Tyseley Growth Zone and Core Industrial Area. Also support the expansion of Tyseley Growth Zone and the potential greater networking and clustering of similar industries. Transport and connectivity should be improved to enable greater clustering and networking. The next version of the Local Plan should reflect the proposed changes to national planning policy.	Support noted. Further consideration will be given to the implications of the changes to national planning policy and the potential to improve transport and connectivity in this area at the next stage of plan production.

	Knighthead Capital Management	Policy EC2 Core Industrial Areas	Supports the aim of Draft Policy EC2 in concentrating industrial uses within designated areas and the recognition that flexible Use Class E uses will be appropriate where they are industrial in nature. Wheels Site (Sports Quarter) is allocated within the Draft Local Plan as a CIA (HELAA 2023 Site Reference 2748) with potential to contribute 16 ha of land for industrial uses to the total supply. The sites industrial designation should be removed to allow for the full Sports Quarter vision to come forward. Prepared to work with BCC to develop a masterplan for the site and surrounding area. Requires the allocation and Growth Zone to be more flexible to allow for the proposed hotel, leisure, retail, residential, cultural, community and other employment generating uses.	Support for the overall aim of proposed policy EC2 is noted. The allocation of the Wheels site for industrial uses is made within the Bordesley Park Area Action Plan, which is not proposed to be replaced by the Birmingham Local Plan. Further consideration will be given as part of the next stage of plan production as to whether there is any potential to increase the flexibility for proposed uses in this location.
	Jaguar Land Rover	Policy EC2 Core Industrial Areas	Supportive of Policy EC2 and its identification of the Castle Bromwich site as a Core Employment Area and recognition that uses outside of B2 and B8 can be considered appropriate. Any developer contributions and mitigation measures should be proportionate in scale and context of the particular development scheme.	Support noted. Further consideration will be given to the levels and appropriateness of any developer contributions and mitigation measures as work on the new Local Plan progresses.

	Mondelēz International	Policy EC2 Core Industrial Areas	Support the new Core Industrial Areas and them being refocused on B2 and B8 uses. Explicit reference to the retention and expansion of ancillary uses as being acceptable in these areas should be included in the policy, for example offices and leisure attractions/facilities where they will help to support the main B2/B8 use.	Overall support for the proposed policy is noted. As you have noted, the first requirement of the policy does make provision for new ancillary uses that support the wider B2 or B8 uses. It is recognised that this could be made clearer that this also covers the expansion of existing non B class uses where they are also ancillary. This will be addressed at the next stage of plan production.

	Brookes and Adams Ltd	Policy EC2 Core Industrial Areas	The addition of the Brookes and Adams Ltd site to the adjoining existing Core Industrial Area designation is not supported in any form. Draft Policy EC2 is not supported and should be amended to reflect the site being excluded from the designation. The recommendation of the HEDNA was to review the boundary of the existing Core Employment Area to remove the large gym and medical centre facilities, and to include the Brookes and Adams unit. It also noted the further potential to expand west to include unit on Aldridge Road. The Preferred Options Policies Map incorporates the former suggestions but has not explored the potential of expanding west, and results in an approximate reduction in area of the CEA from 19.3ha to 14.95ha, despite the inclusion of our client's land. It is the intention of the landowner to seek alternative uses for the site, and information about the unsuitability of the premises for continued employment uses. It has been demonstrated that the premises is no longer able to meet the operational needs of Brookes and Adams Ltd, and in general is in an increasingly unfit state to meet the requirements of other, potential occupiers seeking B2 units,	Comment noted. If the landowner has proposals to develop the Brookes and Adams site for an alternative use, then we will reconsider its potential designation as a Core Industrial Area. Land to the west towards Aldridge Road has not been included because there is no concentration of B class uses in this area.
	Sandwell Metropolitan Borough Council	Policy EC2 Core Industrial Areas	Sandwell MBC supports policy EC2 and the intention to resist losses of B2 and B8 uses within the Core Industrial Areas.	Support noted.

	Planning Prospects on behalf of @ Indurent	Policy EC2 Core Industrial Areas	The approach to Policy EC2 and the range of uses to be acceptable within Core Industrial Areas is supported. The removal of Regional Investments Sites from the Plan is also supported.	Support noted.
	Friends of Birmingham Wheels Park including motorsport related clubs, community groups, organisations and businesses formerly operating at the site	Policy EC2 Core Industrial Areas	Object to the declassification of existing Core Employment Areas because this puts undue pressure on sites such as Birmingham Wheels Park. We also object to restricting uses in the remaining Core Industrial Areas to B2 and B8 activities. In other parts of the country facilities such as Birmingham Wheels Park take place in employment areas. There are many examples of non-industrial uses in the proposed Core Industrial Areas in Birmingham.	The proposed Core Industrial Areas have been refocused on the locations where there are concentrations of existing and proposed (allocated, committed or promoted) B2 and B8 uses in the city. As shown in the Preferred Options Document, there is sufficient land supply in these locations to help towards meeting the city's employment land needs up to 2042, but further work is needed to confirm the intentions of landowners on some of the longer-term sites. The existing Core Employment Areas were identified prior to the changes in the Use Classes Order in 2020 and so they encompass a wider range of land uses than is now possible. There have also been some changes to the mixture of land uses in some areas which mean that they are no longer predominantly industrial, which is why these areas are not proposed to be designated in the future. The allocation of the Wheels site for industrial uses is made within the Bordesley Park Area Action Plan, which is not proposed to be replaced by the Birmingham Local Plan. As the existing Core Employment Areas and proposed Core Industrial Areas are specific to Birmingham, they are not directly comparable with policy approaches taken elsewhere in the country.
	Wolverhampt on City Council	Policy EC2 Core Industrial Areas	Support Policy EC2 as well as the intention that losses of B2 and B8 uses within the Core Industrial Areas will be resisted.	Support noted.

		Policy EC2 Core Industrial Areas	Whilst it is recognised that these areas should be protected for industrial uses, the policy should adopt a flexible approach to the provision of employment generating uses in these areas. A site at 17 Langley Drive will become available during the Plan period for industrial and storage use, as well as other uses such Sui Generis and E(g) (ii) and E(g) (iii).	Proposed policy EC2 includes flexibility for ancillary uses and uses of an industrial nature to take place within the Core Industrial Areas. Adding further flexibility to the policy risks undermining the intention of the policy to concentrate industrial uses within these areas. We will consider the suitability of the land at 17 Langley Drive to accommodate industrial development over the plan period to 2042 as part of the next stage of plan preparation.
		Policy EC2 Core Industrial Areas	Whilst it is recognised that these areas should be protected for industrial uses, the policy should adopt a flexible approach to the provision of employment generating uses in these areas. Land to the west and east of Bromford Vent will become available over the plan period for industrial and storage development.	Proposed policy EC2 does specifically make provision for other uses of an industrial nature such as E(g)(ii), E(g)(iii) and Sui Generis uses. We will consider whether this needs to be made more explicit at the next stage of plan production. We will also consider the suitability of land to the west and east of Bromford Vent to accommodate industrial over the plan period to 2042 as part of the next stage of work on the plan.
	Property Link	Policy EC3 Protection of Other Industrial Land	The character of the Gun Quarter is changing to such an extent that it has become more of a mix of residential, commercial and light industrial uses. Supportive of proposed approach to redevelop small-scale isolated industrial sites to high-density residential and mixed-use development. Remaining protections through EC3 and EC2 will continue to be important for economic, social and environmental benefits.	Comments regarding the Gun Quarter and general support for policies EC2 and EC3 are noted.

	Knighthead Capital Management	Policy EC3 Protection of Other Industrial Land	Support Policy EC3 and the clarification of exceptional circumstances. Also support an absence of prescriptive criteria for a site to be considered for release (e.g. size thresholds and predominantly residential areas) that are present in the BDP. The reduction in time for marketing evidence from two years to one year is also supported.	Support noted.
	Hanehouse Ltd	Policy EC3 Protection of Other Industrial Land	Request for additional site allocations to be identified to support residential and other forms of development. This should include Growth Zones in current B2 and B8 uses, where there retention for employment is not part of the Growth Zone policy. The following amendments should also be made: 1) 'or' to be added to end of the second criterion 2) a third criterion be added to state that, 'the existing B2 and B8 uses are located within a Growth Zone and the retention of these existing uses is not specifically required under the associated Growth Zone Policy'.	Further consideration will be given to your suggested wording and the relationship between proposed policy EC3 and the Growth Zone policies as part of the next stage of plan preparation. Further allocations will be made where landowners or site promoters can confirm their availability, and they have been assessed as being suitable and achievable over the plan period to 2042.

	Woodbourne Group	Policy EC3 Protection of Other Industrial Land	Request for additional site allocations to be identified to support residential and other forms of development. This should include Growth Zones in current B2 and B8 uses, where their retention for employment is not part of the Growth Zone policy. The following amendments should also be made: 1) 'or' to be added to end of the second criterion 2) a third criterion be added to state that, 'the existing B2 and B8 uses are located within a Growth Zone and the retention of these existing uses is not specifically required under the associated Growth Zone Policy'.	Further consideration will be given to your suggested wording and the relationship between proposed policy EC3 and the Growth Zone policies as part of the next stage of plan preparation. Further allocations will be made where landowners or site promoters can confirm their availability, and they have been assessed as being suitable and achievable over the plan period to 2042.
	Walsall Council	Policy EC3 Protection of Other Industrial Land	Policies EC2 and EC3 to protect existing industrial land are welcome. The policies could be clarified that this protection does not include existing industrial land that is allocated for housing.	Comments relating to policies EC2 and EC3 are noted. Land is allocated for a specific use, which therefore establishes the principle of that proposed use. If any of the housing allocations are on existing industrial land, then no further justification would be required under proposed policy EC3. Policy EC2 relates to Core Industrial Areas where it would not be appropriate to allocate housing sites.

	Brookes and Adams Ltd	Policy EC3 Protection of Other Industrial Land	There is concern with the policy in its current form, specifically the use of predominantly industrial area as a policy test, as what may constitute this type of area is not strictly defined. The justification for reusing the wording from a Supplementary Planning Document (Loss of industrial land to alternative uses SPD) dated February 2006, to inform a planning policy that sets a vision to 2042, is also questioned when considering the soundness tests in planning law and the NPPF. Considering the above, the LPA is invited to reconsider their approach to Policy EC3.	Despite the dated nature of the Loss of Industrial Land to Alternative Uses SPD, the approach that it sets out in regard to non-conforming land and its definition of predominant land uses in the city has continued to be implemented through planning decisions made against current BDP policy TP20. The proposed new policy will formalise this established approach and provide greater clarity and certainty for developers and decision makers on how proposals involving the loss of industrial land should be assessed. Further revisions to the proposed policy approach will be checked for conformity with the most up to date national planning policy as work on the new Local Plan progresses.
	CPRE Worcestershire	Policy EC3 Protection of Other Industrial Land	Supportive of use of redundant employment land where this does not impede other policy objectives.	Support noted.
	Sandwell Metropolitan Borough Council	Policy EC3 Protection of Other Industrial Land	Sandwell MBC supports policy EC3	Support noted.

	Rainer and Wigley	Policy EC3 Protection of Other Industrial Land	If the Core Industrial Area designation for the Gun Quarter is removed, then the land south of Pritchett Street will be affected by this proposed new policy. Support the increased flexibility but it is recommended that the marketing period is reduced from 12 months to 6 months, as that is sufficient time to identify demand for a site. Also suggest an additional criterion is added to Policy, to allow redevelopment of industrial sites for non-industrial uses, if existing occupiers agree to relocate (and provide evidence of an agreement).	The suggested additional criterion will be considered as part of the next stage of plan production. Reducing the marketing period from the current two years to six months is likely to undermine the objective of this policy to safeguard against the loss of important industrial land in the city. The preferred approach to reduce the marketing period to 12 months is intended to introduce some flexibility to the existing BDP policy approach, whilst still retaining some safeguards for development proposals to meet.
	Aegon UK Property Fund	Policy EC4 Urban Centres	Suggest that Policy PG3 should recognise the purpose that existing retail locations serve, including out of centre sites such as Matalan at Dartmouth Middleway, particularly if located in a Growth Zone. This location could serve emerging communities such as those in the Gun Quarter and additional retail at Dartmouth Middleway should be supported in the Policy.	Support for policy on appropriately scaled retail development where it complements the City Centre Retail Core as part of mixed-use redevelopments. Support is noted for existing retail locations, including out of centre sites, such as Matalan on Dartmouth Middleway, particularly those in a Growth Zone. Point made about additional retail in this location serving growing need is welcomed.
	Calthorpe Estates	Policy EC4 Urban Centres	Categorise centres across Calthorpe Estates into three groups: Community Hub Centres; Convenience Centres and Lifestyle Centres. Consider that a more nuanced approach to centres would allow for a policy framework to be set which would guide their growth. Consider that a further tier of centres could be added to capture these smaller shopping and leisure opportunities.	The point about flexibility of local centres is supported so that new proposals can suit the needs of ever-changing high streets and different ways in which people use them. Any addition of another tier of local centres would have to be supported by evidence that there is a need for such a designation and that this will be useful in guiding future developments in the area. It is anticipated that the niche role that areas in the Calthorpe Estate play will be covered in the Growth Zone policy.

	Henley Investment Management Ltd	Policy EC4 Urban Centres	No reference in the policy to the definition of the primary shopping area of the City Centre, neither is the boundary shown on the proposals map. should be shown clearly on a plan and referenced in the policy.	The role of the City Centre in terms of its PSA designation will be further explored to maximise and protect retail opportunities.

	Knighthead Capital Management	Policy EC4 Urban Centres	Support Policy EC4 and the recognition that the provision of commercial offer outside of designated centres will be supported where located within an identified Growth Zone. Sports Quarter proposal will complement the businesses and enterprise within the Bordesley Green designated Local Centre and would be subject to a robust sequential test and retail impact assessment. Supports that the Policy supports City Centre as location for shops, offices, leisure, cultural and tourism development but suggests that policy goes further to acknowledge the important role of leisure destinations in out-of-centre locations, as key venues contributing to the city's tourism offer especially in identified Growth Zones or where they could not be accommodated in the City Centre. Sports Quarter will be key as its complementary leisure, retail, cultural, community and employment uses would complement and support the growth of retail and cultural uses in the city centre. Policy should recognise role that of public transport in realising growth potential and acknowledge that office uses are supported outside of the city centre where they are specifically identified in a site allocation and complementary to the primary use in those locations.	Support welcomed for EC4 to maintain and enhance viability and feasibility of identified urban centres in context of improved commercial opportunities in the proposed Sports Quarter and its benefits on the existing Bordesley Green Local Centre. It is noted the recommendation to acknowledge importance of leisure destinations and sporting venues in out-of-centre locations, and the role sustainable transport options have on reaching its growth potential. Development of offices in out of city centre locations will be considered where viability allows.

	Soho Road Business Improvement District	Policy EC4 Urban Centres	Provide spaces to facilitate community events and gatherings including community markets. Provide spaces for incubator spaces for local entrepreneurs and start-ups. Improve store fronts with a facade improvement programme.	Collaboration with Business Improvement Districts will be vital in providing spaces for community events and to provide spaces for small businesses to start-up.
	Bruntwood Sci Tech	Policy EC4 Urban Centres	Pleased to see the support that the policy gives to the role of the City Centre as a major hub for financial, professional and business services. Agree that the primary focus as set out in the policy for additional office development should be within and around the City Centre Core including the Snow Hill District, Park Birmingham and Western Gateway Growth Zones. It is useful to reaffirm the importance of the key economic role of the heart of the city centre and to ensure that policies support the delivery of a sufficient quantum of high-quality office accommodation which will be a key part of the city's offer to inward investors. Council should consider what means might be open to it to restrict residential conversions from office accommodation where the resulting accommodation can be of sub-optimal quality and use the Plans review to provide policy support for such an approach.	Support for Policy EC.4 is welcomed. The Policy is to be reviewed and streamlined to reflect the latest evidence and national planning policy at Regulation 19 stage in Spring 2026.

	MEPC Limited	Policy EC4 Urban Centres	Supportive of the locations listed in the Policy. The Policy must not be unduly prescriptive to the ability to adapt and respond to changing market conditions. It is important that the Plan fully acknowledges the importance of supporting the office market in the City and the provision of office floorspace should be acknowledged as presenting significant public benefit.	Support for overall locations for offices is welcomed. A general policy for office development where this is appropriate outside of these designated areas will be explored.
	Schroders Capital	Policy EC4 Urban Centres	Welcome the City Centre designation as a Tier 1 centre in the context of the retail core and the diversification of the City's offer to maintain its vitality and viability. Support the prevention of over-concentration of non-retail uses and the promotion of residential above ground floor level only in the Primary Shopping area in which CCH sits at the junction of New Street and High Street.	Support for Tier 1 designation with regard to Birmingham City Centre to factor in diversified offer as a result of changing consumer habits is welcomed, as is retaining active frontages, avoiding over-concentration of non-retail uses and residential uses above ground floors.
		Policy EC4 Urban Centres	Coventry Road should read Coventry Road (Small Heath) or Small Heath (Coventry Road), and Soho Road should read Soho Road (Handsworth) or Handsworth (Soho Road)	Coventry Road should read Coventry Road (Small Heath) or Small Heath (Coventry Road) and Soho Road should read Soho Road (Handsworth) or Handsworth (Soho Road). This change will be actioned.
	G.C. No 26 Ltd	Policy EC4 Urban Centres	Objects to Policy EC4 referencing 'taking into account any local regeneration strategies' as these may not be up-to-date or have been subject to viability appraisal or public consultation.	Any new policy referring to up-to-date regeneration strategies will support revisions to any such strategy.
	Glenbrook Property Limited	Policy EC4 Urban Centres	The respondent supports this policy.	Support is welcomed.

	Sandwell Metropolitan Borough Council	Policy EC4 Urban Centres	Sandwell MBC supports policy EC4 and that the evidence base is robust and up to date. Also supports the locally set thresholds for Impact Tests and the boundary changes and additional centres proposed within the hierarchy. Sandwell is proposing to remove Hagley Road Local Centre (diagonally opposite the proposed Hagley Road West centre in Birmingham) in our emerging Local Plan as it no longer performs the function of a centre within Sandwell. Support for living in the centres (over the ground floor) in the Policy.	Support for local centre boundaries and evidence base is welcomed. It is noted that Sandwell MBC intends to remove its end of the Hagley Road from Local Centres designation.
	University Hospitals Birmingham NHS Trust	Policy EC4 Urban Centres	Need to encourage development in the outer areas of the city to generate a healthier community and support any levelling up. Special consideration should be given for the integration of Health-related facilities and services with other uses such as large retail spaces and supermarkets. Occupation of Perry Barr development has been slow.	This point is supported through the different Growth Zones which encompass areas in the City Centre as well as areas outside this area. Moreover, the City Centre now encompasses more areas through the alignment of the Central Birmingham Framework which aims to include more areas beyond the Middleway. UHB exploration of shared assets including One Public Estate is welcomed. Completed developments are unlikely to be mentioned in the Document but focus on future stages of development.
	Hammerson	Policy EC4 Urban Centres	Supportive of Policy EC4 Urban Centres, identifying Birmingham City Centre as focus for offices, leisure, residential, cultural and tourism development.	Support for Policy EC4 Urban Centres, identifying Birmingham City Centre as focus for offices, leisure, residential, cultural and tourism development is welcomed.

The Tyler Parkes Partnership Ltd	West Midlands Police	Policy EC4 Urban Centres	Under the subheading New Development the PCCWM requests the addition of a further paragraph after existing point 11 on the following lines: New development in all centres, including neighbourhood centres and parades of shops should maximise the extent, safety and security of the built environment (both internal and external) including integration of Secured by Design and Park Mark principles including liaison with West Midlands Polices Design Out Crime Officers.	These measures outlined in point 11 have the aim of contributing to a safer environment with improved public realm improvements. Further wording about Secured by Design and other principles may labour the point here and are most likely dealt with more explicitly in a design policy.
	Perry Barr Sarl	Policy EC4 Urban Centres	Support the city councils view that Perry Barr should be identified within Tier 3 of the hierarchy of centres and the inclusion of One Stop Shopping Centre and adjoining land within the Centre.	This request to not include land to the west of the One Stop Shopping Centre within the designation is noted. This will be decided in the context other representations and evidence within the next plan making stage.

		Policy EC4 Urban Centres	Welcome the protection of the Network of Centres and reference to the City Centre being the focus for shops, offices, leisure, residential, culture and tourism. The mixed-use approach is also supported, as it will be integral to the regeneration of existing Estates, where the lack of services and complementary uses impact viability and vitality of these areas. Recommend the expansion of Policy EC4 to include specific reference to, 'appropriate scale leisure, offices, cultural and tourism as part of mixed-use redevelopments throughout the city Centre. As part of major regeneration schemes involving existing Estates, the creation of a new Local Centre or Neighbourhood Centre will be promoted where the scale is appropriate to the needs of the new neighbourhood'.	General support for EC4 Urban Centres is welcomed in particular to support a mix of use in the City Centre Retail Core. Expansion of Policy EC4 Urban Centres to include specific reference to the aforementioned wording will be explored as part of the next plan-making stage.

		Policy EC4 Urban Centres	We are supportive that (9) and (11) however we consider that this should not be at the cost of the loss of heritage assets whereby a viability assessment is submitted to justify any proposed loss, there would be merit to include reference to new development respecting the historic environment in (11). We are of the view that Birmingham's built heritage is at significant risk and this presents a further opportunity for the Local Plan to clearly articulate the importance of the historic environment and an appreciation that if lost, it cannot be replaced.	Support for Policy EC4 is welcomed. The National Trusts views in relation to the risks to built heritage are noted and agreed.
	Frampton Town Planning Ltd	Policy EC4 Urban Centres	NPPF states that LPAs should support opportunities to use the airspace above existing residential and commercial premises for new homes. BLP should therefore include policy to include this or add similar wording to Policy HN4 Residential Densities. It is suggested that the following words are added to paragraph 5: The use of airspace above existing residential and commercial premises for new homes will be supported where consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well designed and can maintain safe access and egress for occupiers.	National Planning Policy would apply to all decisions and where the Local Plan does not specifically deal with a particular matter then the NPPF would apply. However, it will be considered further at the next plan making stage how best to ensure that spaces above shops and other commercial units are being used for residential use in order to densify local centres and provide more housing, not exclusively in the city centre.

		Policy EC4 Urban Centres	The respondent requests that the policy specifies that delivery vehicle parking should not rely on public highway spaces being available and that active travel modes be prioritised for food deliveries.	This is an important consideration with regard to sustainable forms of delivery transport and will be considered at the next stage of plan making.
	Acocks Green Focus Group	Policy EC4 Urban Centres	Consider whether hot food takeaways are reclassifying themselves as cafes to avoid the 10% threshold. Larger convenience retail should be restricted to avoid negative impacts on local shops. Provision for local affordable shops should be required as part of new retail developments. Local centres should have a greater mix of uses and focus on delivering more localised facilities, in contrast to the trend for larger and more centralised facilities.	Point is noted about ensuring that the 10% takeaway threshold policy is as robust as possible taking into account the fact that a broader range of establishments provide takeaway functions as a result of changes to planning policy in light of COVID. Point is also noted relating to convenience shopping making more local shops unprofitable, policy options such as that with affordable workspace/housing will be explored where there is considerable amount of retail at the next plan making stage.
	Dudley Metropolitan Borough Council	Policy EC4 Urban Centres	No further comments to make.	Noted.

	Stoford	Policy EC5 Evening and Night-time Economy	The proposed preferable locations for the Evening and Night-time Economy should be clearly shown on the Policy Map and a specific NTE map should be included in the Plan. The current wording is too restrictive and will constrain wider growth ambitions for new residential development also in these areas. Part 3 refers to proposals outside of Westside, Southside and Digbeth may being resisted if it would lead to an overconcentration or harm to residential amenity and recommend that this should also apply to Westside, Southside and Digbeth. Due to the anticipated growth of 10,000 new homes in Digbeth Growth Zone, concentrating NTE venues in Digbeth may lead to conflicts between the two uses. To address this issue, it is recommended that the Policy extend locations for NTE venues beyond the current designations, to better balance the night-time economy with new and growing residential communities.	The need to make the policy wording clearer within the policy wording about the area covered by the Evening and Night-time Economy (NTE) zones, (which are the areas in the Digbeth and Western Gateway Growth Zones marked in pink hatched lines) is noted. Other Growth Zones are also subject to having NTE zones within them. In terms of achieving the balance between proposed residential growth in the area and new and existing NTE uses, the 'agent of change' principle as outlined in point 71.4 of the supporting text of the EC5 policy, and as set out in DMB Policy DM6 'Noise and vibration', will be essential. This may need to be included within the policy itself to give it more weighting.
	Knighthead Capital Management	Policy EC5 Evening and Night-time Economy	Support Policy EC5 and the protection of night-time economy uses. Any NTE uses within the Sports Quarter would serve to activate the Site at all hours, enhancing safety and diversifying the economy of Bordesley Green.	Support for Draft Policy EC5 is welcomed. Suggestion about NTE uses outside these areas being similarly protected is noted.

	Commercial Estates Group (CEG)	Policy EC5 Evening and Night-time Economy	CEG acknowledges the value of the Evening and Night-time Economy (NTE) but raises concerns about concentrating high-capacity NTE venues in Westside, Southside and Digbeth, especially given planned residential growth in these areas. They argue that this could deter development investment due to potential conflicts, such as noise issues, which may be difficult to resolve due to viability constraints. To support both residential and NTE needs, CEG suggests expanding the designated areas for NTE venues or adopting a more nuanced policy that balances housing needs with the principles of sustainable, mixed-use development.	Point relating to balancing NTE uses with proposed residential growth in these areas is noted and the agent of change principle will be applied with appropriate S106 funding designated for noise mitigation measures. Expanding the NTE and having a general criterion for NTE uses will be looked at in the next plan making stage.
	Oval Real Estate	Policy EC5 Evening and Night-time Economy	Need highlighted to balance concentrated night-time uses with aspirations to provide residential growth in Digbeth. Detailed assessments of noise and vibration have supported the Framework in support of each development plot, with the possibility of mitigation including specific glazing and sealed units to support a satisfactory living environment and maintain existing uses in the area.	Mitigation measures will be vital in supporting growth aspirations in Night-time economy areas such as Digbeth while maintaining the vibrant night-time and evening uses.

		Policy EC5 Evening and Night-time Economy	Paragraph 4 of Policy EC5 appears to suggest that, if an asset of cultural value was replaced with a venue of equivalent value to the community. Respondent questions whether this is what is intended.	In the case of any electric cinema redevelopment, the proposal would be subject to other aspects of planning policy, and with the significance of the building it would potentially be difficult to replace it with a venue of equivalent value. That being said, more work would be required to properly be able to quantify a facility's cultural value to see what a replacement would look like.
	Birmingham Hippodrome	Policy EC5 Evening and Night-time Economy	Supportive, mentioning protection of night-time economy venues in City Heart, especially Southside.	Support for protection of night-time economy uses in City Heart, especially Southside, is welcomed.
	Glenbrook Property Limited	Policy EC5 Evening and Night-time Economy	The respondent requests clarification regarding the assets covered by criteria 4, they question the definition of other arts venues and are concerned this policy could capture a wide range of uses that could be most appropriately dealt with by Policy EC6. The respondent objects to the policy wording including the term "local community" in criterion a). They argue that cultural value should be assessed using established and evidential based methods, rather than relying on local community perspectives, which may not always be representative. They request that Criterion c) be updated to replace equivalent value with an alternative metric that can be clearly defined or measured.	Other arts venues in this case refers to those venues which operate into the evening and night and as such as separate from museums and art galleries. Further clarification will be considered in relation to this. The local community is an important consideration when measuring the impact of loss on the city as well as other factors which will also be taken into account. An appropriate metric will be explored to properly quantify suitable value attributed to the NTE asset.

The Tyler Parkes Partnership Ltd	West Midlands Police	Policy EC5 Evening and Night-time Economy	Under the subheading New Development the PCCWM requests the addition of a further paragraph after existing point 11 on the following lines: New development in all centres, including neighbourhood centres and parades of shops should maximise the extent, safety and security of the built environment (both internal and external) including integration of Secured by Design and Park Mark principles including liaison with West Midlands Polices Design Out Crime Officers and where appropriate anti-terrorism officers.	Consideration of how public realm safety strategies are dealt with will be explored as part of the next plan making stage.
	Aegon UK Property Fund	Policy EC6 Tourism and Cultural Facilities	Supportive of ambitions for Cultural and Arts Sectors but further details are required on the requirements of a Cultural Needs Assessment. It is currently unclear how Cultural needs will be quantified or to justify a financial contribution by developers.	Further work is needed to develop the remit of Cultural Needs Assessments, specifically how culture can be quantified and the contributions expected from developers in the context of other viability pressures. This will be clarified in a future round of Local Plan consultation.
	Aston Villa Football Club	Policy EC6 Tourism and Cultural Facilities	Supportive of policy overall. Need for reference to stadia to be included into the policy. Supportive of inclusion of use of underutilised space but should not be limited to this. Also supportive of provision of supporting facilities such as hotels.	Support for EC6 is welcomed. The inclusion of wording to include stadia and further strengthening policy wording to stretch beyond meanwhile uses to longer-term tourism/cultural uses will be considered. Support for supportive facilities including hotels is welcomed.
	Warwickshire County Cricket Club Limited	Policy EC6 Tourism and Cultural Facilities	Increased flexibility should be applied to Part 2 of the Policy so that a Cultural Needs assessment is not needed for expansion of existing facilities such as Edgbaston Stadium.	Consideration will be given to inclusion of wording relating to the expanded role of sporting venues in terms of their cultural and tourist function.

	Interested Parties of Digbeth High Street Major Development Site	Policy EC6 Tourism and Cultural Facilities	Supportive of continued importance of Birmingham's role as an international centre for tourism, arts, culture and major events within the BLP, with Digbeth playing a key role in this.	The assertion of Digbeth as a place for supporting facilities to cultural and tourism uses such as hotels is supported.
	Henley Investment Management Ltd	Policy EC6 Tourism and Cultural Facilities	Not justified or in accordance with the requirements for planning obligations set out at CIL Regulation 122.	A contribution can be justified in the event of the contribution being related to the development.
	Knighthead Capital Management	Policy EC6 Tourism and Cultural Facilities	Support aim of Policy EC6 and acknowledge that provision of supporting facilities such as hotels are important. However, hotels are explicitly mentioned as appropriate supporting uses in the Growth Zones within which Villa Park and Edgbaston stadium are located and therefore should be included in any revision to Draft Policy GZ13 in support of the proposed Sports Quarter.	It is noted the importance of hotels as a supporting facilities to tourism and cultural facilities in the context of sporting venues and stadia. This will be considered in revision to Draft Policy GZ13.
	MEPC Limited	Policy EC6 Tourism and Cultural Facilities	Supportive of Policy but further details are required regarding the requirement for a Cultural Needs Assessment and clarification if development contributions will be sought. It is not currently clear how Cultural need will be quantified to justify a financial contribution?	Further work on the Cultural Needs Assessment is underway which will clarify further the exact parameters and expectations that would come out of a Cultural Needs Assessment.
	Schroders Capital	Policy EC6 Tourism and Cultural Facilities	This Policy is welcomed, as the development of further hotels and repurposing of offices for hotels within the City Centre will help sustain and enhance Birmingham's role as an international centre for tourism and events.	Support for hotel developments and re-purposing of existing buildings into hotels in the city centre is welcomed.

	Birmingham Hippodrome	Policy EC6 Tourism and Cultural Facilities	Point of new and expanded cultural facilities is especially important. For a city the size of Birmingham, the city is underserved in terms of theatre capacity. This is linked to Objective 1 "To ensure physical, social and digital infrastructure meets the needs of all existing and future citizens".	The need for new and expanded cultural facilities in Birmingham is recognised. Any new proposals will be supported by the Council, the viability of which will be supported by an increased city centre population and improved transport links. The proposed Cultural Quarter Growth Zone which incorporates Hippodrome will aim to strengthen cultural venues including theatres particularly in this area.
	Glenbrook Property Limited	Policy EC6 Tourism and Cultural Facilities	The respondent supports the objectives of the policy but objects to the policy wording including the term "local community" in criterion a). They argue that cultural value should be assessed using established and evidential based methods, such as the statutory listing process. Rather than relying on Local community perspectives, which may be the most vocal but may not always be representative. Criterion c) is supported.	Rewording suggestions are noted with regard to the inclusion of "local community"; however, this is an important consideration to ensure this value is not being lost for the local community. Support for criterion c) regarding replacement facilities is welcomed.
	Friends of Birmingham Wheels Park including motorsport related clubs, community groups, organisations and businesses formerly operating at the site	Policy EC6 Tourism and Cultural Facilities	it is very important that the policy or reasoned justification should clearly state that sports and recreation facilities (including Villa Park, St Andrews, Edgbaston Cricket Ground, Alexandra Stadium and Perry Barr Greyhound and Speedway as well as Birmingham Wheels Park) are all protected by Policy CE14.	Point noted in relation to widening list of sporting and recreation facilities. CE14 will apply to these facilities as well.

The Tyler Parkes Partnership Ltd	West Midlands Police	Policy EC6 Tourism and Cultural Facilities	Requests the addition of a further paragraph under this policy on the following lines: New development to support the tourism economy should maximise the extent, safety and security of the built environment (both internal and external) including integration of Secured by Design and Park Mark principles including liaison with West Midlands Polices Design Out Crime Officers and, where appropriate, anti-terrorism officers. An assessment should be undertaken (as part of the design of new developments likely to attract large numbers of people) to demonstrate and document how potential security and crime-related vulnerabilities have been identified, assessed and where necessary, addressed in a manner that is appropriate and proportionate.	Suggestion for re-wording will be considered, taking into account the best way in which to reference current and future crime prevention strategies where this relates to tourism and cultural facilities matters.
	Birmingham City Council Housing Department	Policy EC6 Tourism and Cultural Facilities	Concern is raised in respect of the current wording of this policy. It is considered that the requirement to submit a Cultural Needs Assessment is onerous and this should be secured through planning condition on a site-by-site basis rather than a blanket approach being applied across developments over a defined threshold.	Further requirements of a Cultural Needs Assessment will be decided at a future plan making stage to ensure that it is robust and can deliver benefits to local cultural and arts organisations.

		Policy EC6 Tourism and Cultural Facilities	We are supportive of policy EC6 and consider that heritage has been appropriately referenced. We welcome the introduction of a Cultural Needs Assessment for new development and appreciate that this is an effort to ensure that there is no further loss of cultural institutions in Birmingham.	Support for heritage being appropriately referenced and in the introduction of a Cultural Needs Assessment to protect cultural institutions is welcomed.
POD Consultation Event - Small Heath		Policy EC7 Social Value	Small Heath requires youth, training centre, sports quarter for young people. Cleaner environment and resources.	Improvements to public realm is crucial in creating more liveable environments. This is supported and will be addressed in the relevant policies.
	MODA	Policy EC7 Social Value	Suggest the following minor amendment to Policy EC7: "In order to ensure that new development contributes effectively to the levelling up of local communities, the City Council will seek to ensure that applicants of major development schemes submit a Social Value Action Plan which is aligned to the Birmingham Business Charter of Social Responsibility. Where such action plans are submitted, they should seek to deliver social value at between 5-20% of the total construction costs." Also add in "Should financial viability allow" in penultimate paragraph.	New wording suggestion noted "In order to ensure that new development contributes effectively to the levelling up of local communities".
	Calthorpe Estates	Policy EC7 Social Value	Supports the principles. Vital that it doesn't become a box ticking exercise. The policy should allow social value to not only be calculated on a monetary basis but also on the level of impact that initiatives will have.	This is supported as the policy would need to have impact and not just become a formality. Measuring the impact through the initiatives rather than just monetary value is supported.

	Henley Investment Management Ltd	Policy EC7 Social Value	No justification for the social value capture requirement of 20% of development cost. The City Councils obligations under the Public Service (Social Value) Act 2012 do not extend to private sector development projects which the City Council has neither commissioned nor delivered. The provision of social value benefits should remain voluntary and subject to viability and feasibility on a project-by-project basis. Provision of social value at 20% of development cost is too high a requirement which will unreasonably burden the delivery of development which would otherwise provide benefits.	Policies will be subject to stringent examination to ensure that they are legally sound and pass the tests of deliverability.
	Knighthead Capital Management	Policy EC7 Social Value	Highly supportive of Policy EC7 as the aim is to ensure that the Sports Quarter will place the local community at the core of the proposals and ensure that proposals for providing social value are shaped by and for the community.	Support for Policy EC7 is welcomed as well as the respondent's willingness to work with local stakeholders to ensure social value is enshrined within any Sports Quarter proposals.

	Hanehouse Ltd	Policy EC7 Social Value	General support for Policy EC7 as pilot schemes have secured local skills and employment and training that the City needs. The financial contribution should be subject to the viability of the scheme and suggest the following amend to the policy: 'Where such action plans are submitted they should seek to deliver social value at between 5-20% of the total construction costs...'Where it is not possible to deliver the full 20% social value costs upon the delivery of the development scheme, developers will be required to provide a financial contribution through S106 which equates to 10% of the measure value in lieu of any undelivered social value as detailed in the action plan, should financial viability allow'.	This policy will be subject to further viability studies and whether a range of 5-20% of total construction value would be better will be explored, in light of pilot schemes that have taken place. Provisions are set out in policy where a lower contribution than 20% would be permitted.
	MEPC Limited	Policy EC7 Social Value	Supportive of intent of Policy but financial viability will be key to providing contributions for Social Value. Recognition in Policy that requirements may need to be amended is welcomed.	Further viability work in relation to the Social Value policy will be undertaken.
	Woodbourne Group	Policy EC7 Social Value	Removal of "development", to be replaced with "construction" costs. "As detailed in the action plan, should financial viability allow"	Removal of the word development will be considered.

	Birmingham City Council Conservative Group	Policy EC7 Social Value	Focus on levelling up the whole city and returning employment opportunities to brownfield land in outer areas, such as Northfield. Whilst relocation of some industries may make sense and even be desirable (provided jobs are kept within the city) there are some historic industries that should be protected where they are as they form an important part of the story of Birmingham. This includes the Jewellery Quarter where manufacturers and retailers are already feeling under threat from residential development and the leisure industry. There should be a clear strategy to keep jewellery in the jewellery quarter	Point is noted about retaining industry in areas where this is an important part of the identity and heritage such as in the Jewellery Quarter.
	Picton Jones (Asset Management) Ltd	Policy EC7 Social Value	Policy EC7 - concerned on current wording of policy as the requirement to submit a Social Value Action Plan is onerous and a blanket approach does not recognise the different types of sites that come forward for development.	The requirement of a submission of a Social Value Action Plan would mean that the policy is more robust and can have more far-reaching results, as opposed to negotiating this on a case-by-case basis through conditions.
	Hammerson	Policy EC7 Social Value	Supportive of intention of Policy EC7 but consider it to be overly prescriptive and will place an additional burden on development proposals.	Point is noted about the policy being overly prescriptive. The policy will be subject to further viability work to ensure that the requirements are achievable. Provisions are also set out in policy where 20% would have to be proved to be undeliverable.
	Birmingham City Council Housing Department	Policy EC7 Social Value	It is considered that the requirement to submit a Social Value Action Plan is onerous and this should be secured through planning condition on a site-by-site basis rather than a blanket approach to all major developments.	Further detailed requirements of a Social Value Action Plan will be decided at a future plan making stage to ensure that it is robust, deliverable and can deliver benefits to local residents in providing opportunities.

		Policy EC7 Social Value	Generally supportive of Policy EC7, the Berkeley Group runs a Group Graduate scheme and Apprenticeship scheme each year. The need to deliver wider social value should be balanced with the financial realities of development in the current market conditions. The proposed 20% contribution should be reviewed, if it is in addition to CIL and S106. We recommend that contributions are negotiated on a case-by-case basis, to ensure targets are achievable and can be reported against. There should also be a mechanism for review over the lifetime of long-term projects.	Point is noted with regard to achieving 20% of Gross Development Value for Social Value. This will be subject to further viability testing at the next stage of plan making. Provisions are also set out in the policy currently where it is proved that 20% of GDV would be undeliverable.
		Policy EC7 Social Value	The National Trust are supportive of the inclusion of policy EC7 and consider that this presents the opportunity for ensuring that development results in cohesive communities that benefit from all of the many opportunities and assets that Birmingham has.	Support is welcomed for the Social Value policy to ensure residents are benefitting from the opportunities Birmingham has.
		Policy EC7 Social Value	Respondent questions whether this policy is justified by available evidence base and national planning policy. Particular attention is focused on the 20% of total development costs proposal which in their view is not grounded in evidence. While there is an obligation to deliver Social Value under the Public Services Act of 2012, it is not believed this applies to private development.	More work may be needed to ensure that this policy is compliant with national planning policy and legislation.

	Acocks Green Focus Group	Policy EC7 Social Value	Support but need clarity on how much of the social value requirement will be for local spend.	Further work to ascertain specific contributions will be clarified at the next plan making stage.
POD Consultation Event - Central Birmingham Library		Policy CY1 Sustainable Transport	Clean Air Zone restricting movement for those travelling by car. Lack of signing for CAZ.	Comments noted.
	Stoford	Policy CY1 Sustainable Transport	Supportive of Policy CY1 but should be recognised that the creation of a sustainable transport network takes time and that there will be a transitional period, as being witnessed in Digbeth currently. Please note that there is still an operational requirement for parking for Typhoo Tea Factory including the provision of inclusive spaces for those with disabilities.	Welcome the support of policy CY1. Comments noted re: requirement for parking at the Typhoo Tea Factory.
	Calthorpe Estates	Policy CY1 Sustainable Transport	Support but important to acknowledge that car usage will continue so provision must continue to be made for this mode. Opportunity to introduce mobility hubs where cars can be accommodated alongside new sustainable transport options to open greater access for over 6000 residents of Edgbaston.	Support for approach welcomed. It is acknowledged that car usage will not be completely eliminated and that people may still need to use their private vehicles. This will be factored in whilst making active travel options as accessible and readily available as possible.
	Aston Villa Football Club	Policy CY1 Sustainable Transport	Aston Villa are supportive of investing in sustainable forms of transport to complement aims for new residential and economic investment in the area. Supportive of redevelopment of Witton Station.	Support noted

	Transport for West Midlands	Policy CY1 Sustainable Transport	This will help to deliver against the LTPs vision for a 45-minute region of well-connected neighbourhoods. The approach around supporting Behaviour Change through information, support and resources is supported and welcome. Important to note that there is a need to promote changing travel behaviours in response to unplanned travel disruptions as well as in response to planned events and in particular where disruption could be prolonged. The city will need to secure its further improvements in connectivity with surrounding areas, to the rest of the country and internationally in order to attract investment and support access to jobs. The Plan should refer to the requirements of ATE for providing or contributing to walking and cycling infrastructure, rather than Healthy Streets Principles and Toolkits (several references), which are less detailed. References the Birmingham Cycle Revolution, however, this has subsequently been superseded by both the Birmingham Walking and Cycling Strategy / Local Cycling Walking Infrastructure Plan (NPPF Para 108) and the Birmingham Transport Plan. Delivery Plan. Reference should also be made to Birmingham's Local Cycling and Walking Infrastructure Plan (NPPF Para 108) and Birmingham's Walking and Cycling	Comments noted.

			Strategy which contains the City's network plan for Active Travel and can be used to justify contributions to walking and cycling infrastructure The Birmingham LCWIP has superseded the Birmingham Cycle Revolution proposals (P339). Reference to walking and cycling being encouraged (P336 and 339) should be changed to enabled, which is the function of improved infrastructure. Would like to see more specific reference to the transport system and consideration of transport infrastructure related adaptation/decarbonisation including materials selection, fleet/plant/equipment energy sources, LED lighting, grass verges including biodiversity or the use of cuttings to produce Biochar and links into the Centre of Excellence for Decarbonising Roads (CEDR). Transport accounts for 34% of the City's carbon. Given this it would be useful if there was a requirement for Transport Assessments to quantify the carbon emissions associated with the travel generated by new developments. The plan also includes limited reference to electric vehicles/zero emission vehicles. The Plan should be clearer on how new development in Birmingham will help to support this shift alongside measures needed to improve or provide the energy infrastructure which may also be required.	

			The importance of CAV, the installation of 5G networks and the region being a global centre for testbeds in new mobility technologies could come across more within the local plan and be considered in all new development	
	Knighthood Capital Management	Policy CY1 Sustainable Transport	Knighthood strongly supports commitment to improving connectivity through Policy CY1 as well as the following initiatives, as they will complement and enhance the regeneration of the 'Sports Quarter' as a major sporting venue: Extension of Sprint and Metro; Improved accessibility and services at Adderley Park and Small Heath railway stations; Implementation of Bordesley Chords; Introduction of EV charging points; Improvements to and enhancement of opportunities for walking and cycling network throughout the area including links to and along the canal network and across the Middleway; and Potential works to the Middleway to enhance pedestrian linkages across the proposed Garrison Park Quarter.	Suggestions for improvements to active travel and public transport connecting the proposed Sports Quarter is welcomed. Collaboration with transport providers will be essential in delivering these improvements.

	Bruntwood Sci Tech	Policy CY1 Sustainable Transport	We support the proposals to further extend the Midland Metro and to link this better to some of the major growth zones, including Curzon Gateway We also support the proposals in Policy CY3 to introduce further bus priority on more of the key routes in the city. With the cancellation of the northern leg of HS2, there remain significant capacity constraints on the West Coast main line between Birmingham, Manchester, Liverpool and the rest of the North West. it would be helpful for the document to reference the problem and to commit to working with the government and other cities to seek solutions to one of the major infrastructure pressures which the country currently faces. Pleased to see that the draft document gives emphasis to the need to improve digital connectivity and we support the thrust of policy CY6. The quality of digital connectivity and services will be increasingly important to existing Birmingham-based businesses and potential inward investors. The current document, while rightly emphasising the role of new development in helping to improve connectivity, currently says little about the roles of infrastructure providers and the local authority in enabling the necessary improvements. We believe that, where relevant, the policies and recommendations from the BCC Digital	Support noted

			Partnership Board should be embedded within the Preferred Options document.	
	MEPC Limited	Policy CY1 Sustainable Transport	Supportive of Policy measures to improve sustainable transport across the City and welcome Policy CY1 to re-allocate existing road space wherever possible to provide sustainable transport modes. This is of particular relevance to Paradise, Great Charles Street and Sand Pits as the city is still dominated by car users.	Support for the policy is welcomed.
Colin Teasdale	Birmingham City Council Conservative Group	Policy CY1 Sustainable Transport	The Local plan should facilitate the reopening of rail lines including the Sutton Park line, Tamworth line, and extension of the Bordesley chords, including new stations. Development areas need to consider possible future uses so that it does not prevent the reopening or extending of rail lines or other public transport options. Pursue and enforce developer commitments to investment in public realm and open space, ensuring this is delivered in full as part of the development and not left to be negotiated away at a later date	Comments noted

The Tyler Parkes Partnership Ltd	West Midlands Police	Policy CY1 Sustainable Transport	Requests the addition of a further paragraph under this policy on the following lines: New investment and improvement of transport infrastructure should take full account of public safety, security issues and the reduction of crime and fear of crime for users of all modes of travel. All proposals affecting parking should adhere to Park Mark' principles including liaison with West Midlands Polices Design Out Crime Officers.	Comments noted.
	Birmingham City Council Housing Department	Policy CY1 Sustainable Transport	Overall, this policy is supported. In particular the need for new development to deliver new and improved public transport, cycling and walking networks.	Support noted.
	National Highways	Policy CY1 Sustainable Transport	Welcome the range of policies (CE1 and 18 Climate and Environment) aimed at tackling climate change, reduce carbon emissions, improve sustainable modes of transport and develop energy efficient buildings as well as Policies CY1-CY5 on transport and active travel and Policy EC4 on Urban centres. We consider them to be aligned with the expectations set out in the National Planning Policy Framework and National Highways Net Zero Strategy.	Support noted.

	Acocks Green Focus Group	Policy CY1 Sustainable Transport	Public transport, walking and cycling need to be made more attractive to encourage people out of their cars, rather than simply discouraging car use. Decentralised and more localised provision of facilities will discourage car use. Consider use of libraries to provide accessible service provision. Also need to target the use of cars for school pick up and drop offs.	Comments noted.
	Dudley Metropolitan Borough Council	Policy CY1 Sustainable Transport	Initiatives to promote sustainable transport are supported, in line with national planning policy.	Support noted

	Worcestershire County Council	Policy CY1 Sustainable Transport	The transport strategy to support the BLP will need to be based on a robust evidence base. As a minimum, for the transport evidence base to satisfy the requirements of NPPF, it is necessary to establish: The transport impacts of the development allocations. The improvements necessary to ensure that the impacts are not severe or unacceptable. Any land required for the delivery of the necessary improvements. The cost of the necessary improvements. Any other deliverability constraints. Supports the sustainable transport system but would like to understand how CY1 relates to the BTP delivery plan, decarbonising freight and network management. WCC requested further information regarding developing the transport evidence base and the potential cross boundary impacts. To date this has not been undertaken. The Pell Frishmann report notes traffic congestion on sections of arterial routes including the A38, A441, A435 and A456. These aforementioned routes adjoin Worcestershire's highway network. We are concerned with proposals that have the potential to impact on the safe and efficient operation of WCC roads (in this case, the A38, A441, A491, A456 and to a lesser extent the A448 and A435). We support	

			proposed public transport schemes (Section 2.6.1) that provide the opportunity to increase connectivity both within Birmingham and cross-boundary. We would seek to understand how and when these would be funded and their financial viability when developer contributions end. The County Council requests that as the BLP is progressed, we are engaged by the City Council to help determine any potential impacts on Worcestershire's transport network and identify any necessary transport infrastructure improvements to be included within the BTP Delivery Plan (currently under development) and associated development management policy to be incorporated into the plan. In particular, we would welcome an early opportunity to review the PRISM transport model, Local Model Validation Report and any forecasting reports that may be available as the transport evidence base and transport strategy supporting the BLP is progressed.	
		Policy CY1 Sustainable Transport	Respondent underlines importance of such scheme to support walking and cycling and use of public transport.	Active travel and public transport schemes are key for delivery of the Local Plan for getting around safely and sustainably. The explicit reference and timings of certain schemes may not be included within the Preferred Options Document as they are outside the remit of the planning system

POD Consultation Event - Selly Oak		Policy CY2 Active Travel	Parking is a difficulty in Selly which affects the environment. There should be traffic calming on Langleys Road, as speeding and safety is a real problem. There should be more of an emphasis on community cohesion. Not enough being done to persuade people to use public transport or active travel.	Traffic calming needed on Langleys Road, Selly Oak.
	Aston Villa Football Club	Policy CY2 Active Travel	The Club supports the Councils proposals to encourage city-wide cycling improvements. The Witton area would benefit from better access to and from the City Centre on bicycle. This would encourage more fans to cycle to games, reducing pressure on highways and public transport, and provide access for local residents to sustainable and safe transport which will also facilitate physical activity improve health and wellbeing. The proposed approach would align with paragraph 108 of the NPPF.	Support for the proposed policy approach is noted, particularly the wider benefits that can be brought about by better access to cycling infrastructure.
	Interested Parties of Digbeth High Street Major Development Site	Policy CY2 Active Travel	High-quality improvements of Digbeth High Street should be continued to surrounding streets of Digbeth and Rea Valley with focus on safety and wellbeing whilst link up new developments in a coherent manner. Emphasis on safety in public realm improvements particularly in relation to Digbeth High Street is supported.	Comments noted.

	Knighthead Capital Management	Policy CY2 Active Travel	Objectives and priorities for transport in relation to the Sports Quarter fully align to the active travel principles set out in Draft Policy CY2 particularly walking and cycling connectivity particularly in relation to the Middleway and proposed Garrison Park Quarter.	Support for active travel aligned with Sports Quarter is welcomed.
	Soho Road Business Improvement District	Policy CY2 Active Travel	Support for pedestrianising specific zones to create safe, walkable areas for shoppers and residents. Widen sidewalks and install more pedestrian crossings to improve safety and accessibility. Improve cycling infrastructure by adding dedicated bike lanes and secure bike parking facilities. Enhance wayfinding signage to help visitors navigate the area more easily.	Pedestrian friendly measures designed to encourage active travel is supported.

	MEPC Limited	Policy CY2 Active Travel	Supportive of Policy CY2 Active Travel - new developments should commit to a high-quality standard for public realm, as exemplified in recent works around Victoria Square and Colmore Row. As the Council holds a substantial property portfolio and land holdings, when disposing of assets, it should require a commitment to the associated public realm and long-term placemaking rather than piecemeal development. The Council could also support temporary or showpiece improvements as well as interim solutions, such as closing streets and spaces to traffic and then following up with permanent infrastructure changes.	Suggestion of utilising the council's property portfolio for enhancements of public realm is supported.
	University Hospitals Birmingham NHS Trust	Policy CY2 Active Travel	Physical developments should look to have cycling and walking in mind and be less dependent on the use of motorised transport.	Support for developments to have cycling and walking at the fore front is welcomed.
		Policy CY2 Active Travel	Ensure pavements and walking routes are accessible for those with mobility impairments.	Support for public realm such as pavements and walking routes to be accessible for individuals with disabilities and older people is welcomed.
		Policy CY2 Active Travel	Agreement with statement	Supportive

	Calthorpe Estates	Policy CY3 Public Transport	More investment is required. There are opportunities along Hagley Road, Pershore Road and co-ordination with the Council's Transport Strategy will be essential. There is the potential to enhance Five Ways Station through partnership working with Network Rail and TfWM. It would be beneficial for Policy C3 to include a category of rail stations to be upgraded.	These comments are noted particularly with regards to the proposal to include a category of rail stations to be upgraded. This will be discussed further with transport colleagues to inform the Preferred Options consultation due in autumn 2025.
	Aston Villa Football Club	Policy CY3 Public Transport	Importance of public transport in terms of providing easier access to homes, employment opportunities and cultural venues. Specific reference should be made to Witton station with regard to redevelopment of the station to facilitate more trips.	These comments are noted and particularly the proposal to include specific reference to Witton Station. This will be discussed further with transport colleagues to inform the Preferred Options consultation due in autumn 2025.
	Henley Investment Management Ltd	Policy CY3 Public Transport	As with all commuted sum obligations required of planning proposals, such requirements can only be made in accordance with the rules set down by CIL Regulation 122 and reflected in Policy IM1.	Comments are noted.

	Transport for West Midlands	Policy CY3 Public Transport	The document could, however, at Policy CY3, also include information on planned core bus network improvements, including cross-city bus, i.e. Cross City Bus Programme (Packages 1-6) and the Dudley Road Major Scheme. We would be grateful if the Local Plan could make it clear which proposals align with previously agreed priorities as now set out in the draft LTP and those which are additional local aspirations which are not included in the draft LTP. We would ask that proposals in the Local Plan align to previously agreed regional priorities as set out in the West Midlands Rail Investment Strategy and the draft LTP Public Transport and Shared Mobility Big Move. In particular key issues we wish to highlight are: Midlands Rail Hub and New Sutton Park line Stations (Page 177) All development proposals should take into account the need to accommodate the MRH proposals for additional platforms on both sides of Moor St. Station and the potential need for widening of the existing railway viaduct through Digbeth and Bordesley. Includes details of a number of rail related schemes for support and amendments within the policy/cross referencing. We would welcome a stronger reference to the role and approach for encouraging shared mobility in the Connectivity Chapter.	These comments are noted and will be fully considered and discussed with transport colleagues to inform the Preferred Options consultation due in autumn 2025. A schedule of schemes will need to be included within the Plan and cross referenced in the Infrastructure Delivery Plan.

	Knighthead Capital Management	Policy CY3 Public Transport	Fully aligns to the public transport principles set out in Draft Policy CY3 in delivering new and improved public transport which support sustainable journeys to the stadium, particularly Extension of Sprint and Metro; Improved accessibility and services at Adderley Park and Small Heath railway stations; and Implementation of Bordesley Chords.	Support for Policy CY3 is welcomed.
	Network Rail	Policy CY3 Public Transport	Welcome the references here and elsewhere in the document to supporting the delivery of the Bordesley Chords and to the commitment to continue collaborative working with stakeholders on this project. The stations referred to on the Water Orton and Sutton Park lines are not part of Network Rail's remit in the Midlands Rail Hub.	Comments are noted and support is welcomed.
	Soho Road Business Improvement District	Policy CY3 Public Transport	Reinstate Soho Road Station, utilising existing live rail line from Walsall to New Street. Enhance bus lanes and introduce dedicated bus lanes where feasible.	Comments are noted and suggestions for reinstating Soho Road Station.
	South Warwickshire Councils	Policy CY3 Public Transport	Supportive of priority of electrifying lines serving Snow Hill and Moor Street which are key rail connections to South Warwickshire and beyond.	Support for Policy CY.3 is welcomed, and the cross-boundary implications are acknowledged.

		Policy CY3 Public Transport	Proposed new railway station at Ladywood Middleway/Monument Road not referred to in Policy CY3.	Comments are noted and the reference to the proposed new railway station will be further discussed with transport colleagues to inform the Preferred Options consultation scheduled for autumn 2025.
	Birmingham Hippodrome	Policy CY3 Public Transport	Critical that public transport supports NTE, with poor frequency especially after shows stopping people from using public transport.	Comments are noted.
	Sandwell Metropolitan Borough Council	Policy CY3 Public Transport	Sandwell MBC supports policy CY3 including additional rail projects and bus rapid transit routes which would serve communities in Sandwell.	Support for CY3 is welcomed and the cross-boundary implications and benefits are agreed.
	University Hospitals Birmingham NHS Trust	Policy CY3 Public Transport	Developments should make life more viable for public transport provision and enable the smooth flow of modes which encourage high volume shifts e.g. adjacent to hospital sites	Comments are noted and agreed.

	Midlands Connect	Policy CY3 Public Transport	Midlands Rail Hub (MRH) is one of the cornerstones of our Regional Transport Strategy providing capacity for additional trains into and out of Birmingham, using two new chords, just east of Birmingham City Centre, to provide new connections from the Southwest and East Midlands to Birmingham Moor Street. Local Plan in outlines support for MRH and its central role in accommodating the growth in the City's rail network and contributing to the ambition to deliver an integrated, high quality public transport system as well as supporting access to HS2. Midlands Connect are currently working towards delivery of the scheme between 2030 and 2035. Alongside this Network Rail have signalled an intent to begin the procurement process, to design and deliver a substantial part of the MRH scheme.	Comments are noted and agreed. Support for the policy approach is welcomed, and we will continue to work with Midlands Connect to finalise the Preferred Options Consultation scheduled for autumn 2025.
		Policy CY3 Public Transport	The railway capacity needs to be mentioned which can only be achieved through construction of grade separated junctions at Northfield and Barnt Green.	Comments are noted and agreed.

	Worcestershire County Council	Policy CY3 Public Transport	Supports and notes the inclusions of working towards an integrated transport system and WCC would welcome collaboration as part of this analysis. The aims of the policies align with Worcestershire's and national planning aims and WCC agree that where appropriate the City should attempt to secure S106 contributions towards transport infrastructure. Supports proposed public transport schemes which increase connectivity - would seek to understand how they will be funded and their viability once developer contributions end.	Support for Policy CY3 is welcomed. We note the comments relating to funding and viability for the deliverability of public transport schemes.
	Mills & Reeve LLP	Policy CY3 Public Transport	Trains into City Centre are unreliable with delays being very frequent and are expensive.	Comments are noted and agreed.
		Policy CY3 Public Transport	In agreement	Support is welcomed.

	Transport for West Midlands	Policy CY4 Freight	Welcome the strong focus on supporting freight and logistics including an emphasis to encourage freight decarbonisation but would like work collaboratively with Birmingham on more specific solutions and ways of encouraging freight operators to transition to sustainable modes. A key consideration for the plan needs to be how potential sites could be identified and protected to allow for last mile urban consolidation, enabling and supporting changes in operator behaviours. Mention should also be made somewhere of options to expand delivery of parcels/small consignments by rail.	Support is welcomed and comments are noted.
	Network Rail	Policy CY4 Freight	Rail freight has significant potential for growth in the future and can take an increasing market share of all freight movements. There is also government support for a modal shift towards rail freight, as reflected in the latest King's Speech. Birmingham has a crucial role as a key hub in the national rail freight network. Key sites for this include Freightliner's Lawley Street terminal which has seen significant investment in recent years, and bulk freight terminals for aggregates at Lawley Street, Handsworth, Saltley and Small Heath. These facilities in a central urban location and close to construction sites helps to reduce HGV road freight.	Comments are noted and agreed. The reference to Freightliner's Lawley Street terminal is noted.

	Freightliner	Policy CY4 Freight	Local Plan would benefit from greater ambition concerning long-term opportunities for rail freight in the city, including a more positive approach to the integration of inner-city freight facilities in the plan. Opposes assumption that in the long-term inner-city freight should be relocated outside the city limits.	Comments are noted and will be further considered with transport colleagues in the finalisation of the Preferred Options Consultation scheduled for autumn 2025.
	Midlands Connect	Policy CY4 Freight	This policy acknowledges the role Midlands Rail Hub will play in providing for more strategic freight movements by releasing valuable network capacity. We also note that the local plan sets out clear policies for reducing the negative impact of freight movements in the city (for both road and rail freight), and the importance of balancing environmental considerations with economic growth. Important that future development proposals are based on an understanding of both current and future rail freight needs and Midlands Connect will need to work with BCC to ensure this happens.	Support for Policy CY3 is welcomed and comments are noted and agreed.
	Rail Freight Group	Policy CY4 Freight	Mention of both planning strategic rail freight interchanges, as described in the Planning Act, and other rail freight terminals need to be included. Industrial developments ought to be adjacent to a rail terminal.	Comments are noted and agreed.

		Policy CY4 Freight	Location of freightliner terminal should be reconsidered. City centre is not suitable location, outskirts of city location preferred.	Agree, this is in alignment with the policy to relocated freight facilities from inner city to the outskirts of city.
POD Consultation Event - Central Birmingham Library		Policy CY5 Network Management	Respondent wishes to halt perceived agenda against car users.	The Local Plan aims to boost active travel and public transport offer and make it safer for pedestrians and cyclists.
POD Consultation Event - Selly Oak		Policy CY5 Network Management	Raising issue of police enforcement for cars parked on pavements and double yellow lines.	Comments are noted. This does fall outside of the remit of the Local Plan.

	Transport for West Midlands	Policy CY5 Network Management	The Key Route Network (KRN) is not referenced at all in the draft Local Plan. Given the importance of the KRN for connectivity across Birmingham and the wider region and the implications of new development on it we would appreciate if it was acknowledged and referred to in the document as appropriate. TfWM is supportive of measures to use the regions transport network more efficiently. As such TfWM and our local authorities are developing policy and principles to guide roadspace reallocation decisions across the region and in particular on the KRN, we would ask that references to the re-allocation of existing roadspace should ensure that they align with the findings and approach emerging from this roadspace allocation policy work. More information will be needed on how a limit of 20mph on all local roads will be applied, and what roads are classified as 'local' roads as per this policy. Suggest a number of amendments to policy CY5 within their detailed response.	Comments are noted. We will further consider including reference to the Key Route Network in the Preferred Options Consultation scheduled for autumn 2025, as will the alignment with the findings and approach emerging from the roadspace allocation policy work. The detailed amendments will also be further considered with transport colleagues.
	Knighthead Capital Management	Policy CY5 Network Management	Support the prioritisation of public transport and active transport infrastructure in tackling car dependency but recommend that Draft Policy CY5 recognise some level of car parking will be needed for the viability developments such as large out-of-centre stadia.	Support is welcomed and comments will be fully considered to inform the Preferred Options consultation scheduled for autumn 2025.

	Soho Road Business Improvement District	Policy CY5 Network Management	Support for downgrading of A41 to B41 route, diverting large haulage vehicles away from shopping district to create a cleaner, calmer environment Install speed cameras at Soho Hill to reduce vehicle speeds and improve pedestrian safety Synchronise traffic control systems to optimize traffic flow. Introduce pay-and-display parking meters to manage parking more effectively. Provide clear signage to car parking areas to assist drivers in finding available spaces easily.	Comments are welcomed and noted.
	Birmingham City Council Conservative Group	Policy CY5 Network Management	Development should avoid creating pinch points for traffic. Developer contributions should be required for larger developments to put in place measures to improve safety around nearby schools. Adequate off-street parking should be provided so that on street parking does not compromise safety. The idea that not providing car spaces will reduce car ownership is misguided and counterproductive. Improvements to the canal network should be made to provide segregated cycle routes.	Comments are noted and agreed.
	University Hospitals Birmingham NHS Trust	Policy CY5 Network Management	Look at access at all times of the day as there are often missed appointments as a result of the lack of accessible bus services for appointment times.	Comments are noted.

	Boldmere Neighbourhood Forum	Policy CY5 Network Management	No mention of car parking in Policy CY5. Lack of car parking can be a barrier to people shopping in some areas due to the need to carry bags. Boldmere lacks both parking and adequate public transport.	Comments are noted. car parking must be considered as an overall package of sustainable transport measures to manage demand and ensure a safe environment for sustainable modes of travel such as walking and cycling and to improve overall public health through promoting active travel opportunities and reducing reliance on the private motor car.
		Policy CY5 Network Management	Respondent agrees with point	Support is welcomed.
	Home Builders Federation	Policy CY6 Digital Connectivity	Any requirements on developers should not go beyond the provision of infrastructure as set out in the statutory Building Regulations. The HBF does not consider that it is necessary to provide a policy to incentivise the development industry, the industry is already well aware of the benefits of infrastructure and the requirements of those looking to purchase a new homes and can self-police the cost/benefit of this provision with regards to site viability.	Comments noted.
	Soho Road Business Improvement District	74.1 Paragraph	Respondent supports electric vehicle charging points along Soho Road. They are also a support a localised Clean Air Zone for the area.	The Local Plan is supportive of installing EV charging points. At this time there are no plans to introduce additional Clean Air Zones in other parts of the city.
		77.1 Paragraph	Respondent wishes for paragraph to be removed as transport usage has returned to pre-Covid levels.	Comments are noted.

	Network Rail	77.12 Paragraph	Outside of reopening Platform 4, Network Rail are not proposing to increase passenger capacity at Snow Hill Station as part of the Midlands Rail Hub.	Comments are noted.
	Network Rail	77.13 Paragraph	No additional services on the Sutton Park Line are proposed by Network Rail as part of the Midlands Rail Hub.	Comments noted.
		77.6 Paragraph	Raises concern about the increasing cost of bus fares, need to work towards no further bus fare prices rises.	Comments are noted. The Local Plan cannot set policy on bus fares.
	Rail Freight Group	78.1 Paragraph	Rail freight must be safeguarded in order to keep HGVs off the road network and boost rail freight, to support decarbonisation.	Comments are noted and agreed.
	Heidelberg Materials	78.4 Paragraph	Oddly phrased and vague. Heidelberg Materials' Landor St aggregate distribution depot is centrally located, to move it away from the city centre defeats the object of reducing lorry movements by importing by rail. Moving freight facilities outward would increase lorry movements into the centre does not reduce them. For aggregates it would likely mean a reduction in the use of rail depots because it is the cost and time of the modal change that is a key economic driver.	These comments are noted.

	Rail Freight Group	78.4 Paragraph	Oppose desire to close inner-city rail freight facilities, as there is a shortage of rail connected land and finding replacement sites is small.	Comments are noted and will be fully considered with transport colleagues in the Preferred Options Consultation scheduled for autumn 2025.
	Rail Freight Group	78.5 Paragraph	Essential that rail freight terminals be served by HGV for last mile movements.	Comments are noted.
	Rail Freight Group	78.7 Paragraph	Supportive of Hams Hill rail freight terminal and emerging i54 development, however, more need to be supported.	Support is welcomed.
	Rail Freight Group	78.8 Paragraph	Comment supported as capacity needs to be aligned across rail network to key origins and destinations.	Support is welcomed.
	NHS Property Services	Policy IM1 Developer Contributions and Community Infrastructure Levy	Reference to provision of healthcare infrastructure should be referenced in Draft Policy IM1 and more specific requirements in Growth Zone policies. These need to be forecasted and delivered alongside growth and development. NHSPS suggest a separate section for setting out the process to determine the appropriate form of developer contributions to health infrastructure. Flexibility should be afforded to healthcare providers to deliver this.	Request for Policy IM1 and Growth Zone Policies to make explicit reference to healthcare infrastructure is noted. All Policies will be reviewed as part of the next stage of Plan making.

	Homes England	Policy IM1 Developer Contributions and Community Infrastructure Levy	As the City, its local and national stakeholders and others engage with the new local plan, flexibility will be required in relation to the adoption of the policies enclosed within the plan to ensure that high quality regeneration and development is delivered. A wider obligation on those engaged within the development space to share their learning and best practice to meet the future would be advantageous for all.	Whilst the Plan sets out the framework for development, proposals are assessed on a case-by-case base as they come forward, which allows for some flexibility on the application of Policy. The Council is always keen to learn and share Best Practice in enhancing and improving the built environment of the city and welcomes opportunities to engage with Homes England on projects, programmes and regeneration interventions.
	Knighthead Capital Management	Policy IM1 Developer Contributions and Community Infrastructure Levy	Introductory paragraph to section within Chapter 12: Implementation and Monitoring and Policy DM1 should make specific reference that planning obligations will be sought, where viable in-keeping with Planning Practice Guidance paragraphs 009 and 010 which note that planning obligations are negotiable on the basis of viability and references guidance on what viability assessments should include. Welcome that the City Council will continue to keep the CIL charges under review and would encourage an early review in the context of the proposed development strategy and inclusion of a large number of new growth zones, particularly to take account of the costs of on-site infrastructure and other associated works that CIL may not support.	Policy IM1 states that developer contributions will be sought in direct relation to the development and are fairly and reasonably related to scale and type of development proposed. The Plan sets out an ambition for growth across Birmingham and viability issues will be reviewed as part of the next stage of Plan making. Support welcomed for the intention to keep CIL charges under review.

	Commercial Estates Group (CEG)	Policy IM1 Developer Contributions and Community Infrastructure Levy	It is important that Birmingham City Council continues to consult and refine the policy requirements as to what is viable and deliverable. CEG propose that this is considered further when reviewing representations as part of this Preferred Options consultation, and in updating the Local Plan ahead of the Pre-submission (Reg 19) consultation, to ensure the requirements of the Local Plan to not adversely impact on the regeneration and development growth within Birmingham.	The use of viability assessments is part of the negotiation process, to determine the contribution on a case-by-case basis, as development proposals come forward. The Plan sets out an ambition to promote growth across Birmingham and viability issues will be reviewed as part of the next stage of Plan making.
	Home Builders Federation	Policy IM1 Developer Contributions and Community Infrastructure Levy	It is essential for the Infrastructure Development Plan (IDP) to clearly show the existing and known deficiencies in the current infrastructure, before reaching any conclusion on the cumulative effects of new development, and any contribution that is needed from new development to mitigate any additional individual and/or cumulative impacts.	Request for Policy IM1 to recognise and identify deficiencies in existing infrastructure and for these to be reflected in negotiations on contributions is noted. Where major development is proposed, negotiations will reflect the impacts posed for the area, which may include the remodelling or demolition of existing infrastructure. An Infrastructure Delivery Plan will accompany the new Plan.
	Planning Prospects on behalf of @ Indurent	Policy IM1 Developer Contributions and Community Infrastructure Levy	The respondent is concerned that future changes to CIL charges could have significant implications for the delivery of development and economic regeneration in the city, in particular with brownfield sites which are sensitive to additional costs. Any suggestion of CIL increases should be fully understood through a viability assessment of the Plan.	Policy IM1 states that CIL charges will be kept under review during the lifetime of the Plan. The Plan sets out an ambition to promote growth across Birmingham and viability issues will be reviewed as part of the next stage of Plan making.

The Tyler Parkes Partnership Ltd	West Midlands Police	Policy IM1 Developer Contributions and Community Infrastructure Levy	The PCCWM is concerned that: Alongside the rest of the consultation document this section fails to identify what infrastructure is covered. To be clear the PCCWM expects that support for the emergency services including the WMP would be included on any list for the reasons set out above, explicitly cover support for the emergency services. The consultation document only includes a commitment to keep (existing) CIL charges up to date. The experience of WMP on the Langley Sustainable Urban Extension is that the Council resisted requests for support for WMP. These points should be addressed by amendments to the plan. A further point is that the paragraph on Planning Obligations refers to Biodiversity Net Gain (BNG). Surely this is incorrect as BNG is a mandatory requirement on new development.	Policy IM1 states that developer contributions and CIL funding will be used to support a wide range of infrastructure and whilst a list of potential uses is given, it is caveated with, 'this includes but is not limited to'. The Growth Zone Policies all identify key infrastructure requirements to support the redevelopment of those areas, but policies are to be reviewed as part of the next stage of Plan making.
	Birmingham City Council Housing Department	Policy IM1 Developer Contributions and Community Infrastructure Levy	This policy should adopt a more flexible approach with the addition of where required to be incorporated into the text.	Policy IM1 does allow for flexibility, as it confirms that contributions will only be sought that are directly related to the development and are fairly and reasonably related in scale and kind to the proposal. Negotiation is part of the process; to determine the contribution to be made and proposals are considered on a case-by-case basis, as proposals come forward. Issues of viability will be reviewed as part of the next stage of Plan making.
		Policy IM1 Developer Contributions and Community Infrastructure Levy		Welcome support for intention to keep CIL charges under review during the lifetime of the Plan period. The Plan sets out an ambition to promote growth across Birmingham and viability issues will be reviewed as part of the next stage of Plan making.

		Policy IM1 Developer Contributions and Community Infrastructure Levy	The National Trust are keen to ensure that any development that does have an impact on our interests is appropriately mitigated and are therefore supportive of the inclusion of this policy. As set out in our comments in response to policy CE13, where on site amenity green space cannot be delivered, we are supportive that a financial contribution will be required towards new or improving nearby off-site public open space areas or play equipment which are well linked by means of cycling and walking. We consider that the Regional Park would be able to deliver such requirements and as set out above would recommend that the 8 Hills Regional Park is identified in any Infrastructure Funding Statement.	Policy IM1 states that developer contributions and CIL funding will be used to support a wide range of infrastructure and whilst a list of potential uses is given, it is caveated with, 'this includes but is not limited to'. All Policies will be reviewed as part of the next stage of Plan making.
	National Highways	Policy IM1 Developer Contributions and Community Infrastructure Levy	Recommend that National Highways is consulted on any infrastructure improvements identified for the SRN in the area	Welcome opportunities for further engagement by National Highways on the Plan, specifically implications posed by the Transport Infrastructure Plan.

	Sport England	Policy IM1 Developer Contributions and Community Infrastructure Levy	Sport England supports the policy of seeking planning obligations to make development acceptable in planning terms. New / improved social infrastructure such as provision for playing fields and other sports facilities should ensure phasing to be on a just in time basis to ensure such new infrastructure is available for use by occupants of the proposed development when it is needed.	Welcome support for Policy IM1.
	Worcestershire County Council	Policy IM1 Developer Contributions and Community Infrastructure Levy	Given the proximity of the plan to North Worcestershire and the potential to export unmet need, as well as the location of Longbridge Growth Zone on the Worcestershire border, there are potential additional cross boundary transport movements which would utilise Worcestershire's infrastructure. WCC suggest a monitor and manage approach to ensure that development does not have an unacceptable impact and that the cumulative impacts on Worcestershire's network would not be severe.	Agree with representation. It is recognised that the revised NPPF published in December 2024 refers to a Vision-led approach to assessing transport impacts and the delivery of subsequent mitigation through a monitor-and-manage approach, for significant development.

	Henley Investment Management Ltd	Policy IM2 Monitoring and Review	The monitoring policy appears to be worthless. It is a commitment to review the Plan within 5 years of adoption only. However, each measure requires three consecutive years of failure to achieve plan requirements. The trigger for review should be measured over a much shorter period of one or two years maximum, with assessment made at fixed dates during the 5-year period.	National policy requires plans to be reviewed five years after adoption and then updated if they are found to be out of date. The proposed policy approach accords with this. It is proposed that monitoring will be undertaken each year through the AMR and that this will help to identify when the plan is becoming out of date. The City Council typically publish the AMR within the same year as the end of each monitoring period, so it is not considered that that there is a significant lag in the reporting of key monitoring information. The key indicators listed that would trigger an early review are proposed to be measured on a three yearly basis because this period would allow the identification of longer-term trends, such as a downturn in house building which may be becoming entrenched. Such trends are not possible to measure on a single or two yearly basis. We will however consider the proposed monitoring approach further as part of the work to prepare the draft local plan, to ensure that it provides as robust a mechanism as possible to identify when the plan might need to be reviewed.
	Bloor Homes	Policy IM2 Monitoring and Review	Legislation changes by new government may supersede the policy wording about frequency of reviews of the Local Plan.	Comment noted.

	University Hospitals Birmingham NHS Trust	Policy IM2 Monitoring and Review	There does not appear to be a large volume of health-related information in the evidence bank used to develop the plan. Are there any intentions to use wider health information to enhance the plan? How are proposals funded in light of current financial position of the Council	There are large amounts of health-related evidence base produced by the Council's public health departments. Strategies such as the Health and Wellbeing Strategy and the Joint Strategic Needs Assessment (JSNA) will be essential to this. Collaboration with public health teams will continue to inform health policy. These proposals will be mainly funded by private and central government sources. Despite the Council's financial situation, it can nonetheless generate a revenue stream and draw upon other funding streams to deliver projects.

	Home Builders Federation	Policy IM2 Monitoring and Review	The HBF recommends that the Council include an appropriate monitoring framework which sets out the monitoring indicators along with the relevant policies, the data source and where they will be reported, this should also include the targets that the Plan is hoping to achieve and actions to be taken if the targets are not met. The HBF recommends that the Council provide details as to how the plan will actually be monitored, and identifies when, why and how actions will be taken to address any issues identified. It is important that Birmingham City Council continues to consult and refine the policy requirements as to what is viable and deliverable. Considers that this is a significant warning from the Councils own consultants, and should be taken seriously	Comments noted.
	Birmingham City Council Housing Department	Policy IM2 Monitoring and Review	Recognition is required in this policy of the impact of Annual Monitoring Reports on phased development with long-term lifespans.	Comments noted.
	Aston University	81.15 Paragraph	Refers us to comments made in relation to Policy SA1.	Comments noted
	Birmingham City University	81.15 Paragraph	Refers to comments made in relation to Site Allocations (SA.1)	Comments noted

	Save Station Street	81.15 Paragraph	The lapsed Bloc Hotels site and NCP carpark / Suffolk St area would be exceptional places for a music themed Hotel / Residential along with a Midlands Music and Performing Arts Museum adjacent to The Crown, The Electric Cinema and The Old Rep.	Comments Noted

The Tyler Parkes Partnership Ltd	West Midlands Police	84.1 Paragraph	The glossary fails to mention the emergency services, and this should be rectified, as follows: Infrastructure: Generic term to describe structures or buildings, services and facilities which support residents, animals and nature residing in certain areas. This could be in terms of transport, for example walking, cycling paths and public transport infrastructure, in social infrastructure in the form of community or health facilities, measures to improve the emergency services or measures to improve and encourage nature and climate change adaptation and mitigation in the form of green and blue infrastructure. The PCCWM would request two new additions to the glossary as follows: Secured by Design Secured by Design (SBD) is the official police security initiative that is owned by the UK Police Service with the specific aim to reduce crime and help people live more safely. The Police seeks to improve the physical security of buildings using products, such as doors, windows, locks and walling systems that meet SBD security requirements. In addition, the Police include proven crime prevention techniques and measures into the layout and landscaping of new developments, such as maximising natural surveillance and limiting excessive through movement. Through SBD, the Police work closely with	This issue will be considered at the next consultation stage of the Local Plan

			builders, developers, local authorities and registered housing associations to incorporate police crime prevention standards from initial concept and design through to construction and completion. West Midlands Police have specially trained Designing Out Crime Officers (DOCOs) who offer police designing out crime and Secured by Design advice free of charge. (See About SBD) Park Mark: The Safer Parking Scheme is a national standard for UK car parks that have low crime and measures in place to ensure the safety of people and vehicles. Each car park undergoes a rigorous assessment by specially trained police assessors, and a Park Mark is awarded to each car park that achieves the challenging standards. A Park Mark is awarded to parking facilities that have met the requirements of a risk assessment conducted by the Police, meaning the operator has put in place measures that deter criminal activity and anti-social behaviour (See About the Scheme)	