BIRMINGHAM CITY COUNCIL

CABINET

**TUESDAY, 09 NOVEMBER 2021 AT 10:00 HOURS
IN BMI MAIN HALL, 9 MARGARET STREET, BIRMINGHAM, B3 3BS**

A G E N D A

1 **NOTICE OF RECORDING/WEBCAST**

The Chair to advise/meeting to note that this meeting will be webcast for live or subsequent broadcast via the Council's meeting You Tube site (www.youtube.com/channel/UCT2kT7ZRPFCXq6_5dnVnYlw) and that members of the press/public may record and take photographs except where there are confidential or exempt items.

2 **APOLOGIES**

To receive any apologies.

3 **DECLARATIONS OF INTERESTS**

Members are reminded that they must declare all relevant pecuniary and non pecuniary interests arising from any business to be discussed at this meeting. If a disclosable pecuniary interest is declared a Member must not speak or take part in that agenda item. Any declarations will be recorded in the minutes of the meeting.

4 **EXEMPT INFORMATION – POSSIBLE EXCLUSION OF THE PRESS AND PUBLIC**

a) To highlight reports or appendices which officers have identified as containing exempt information within the meaning of Section 100I of the Local Government Act 1972, and where officers consider that the public interest in maintaining the exemption outweighs the public interest in disclosing the information, for the reasons outlined in the report.
b) To formally pass the following resolution:-
RESOLVED – That, in accordance with Regulation 4 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012, the public be excluded from the meeting during consideration of those parts of the agenda designated as exempt on the grounds that it is likely, in view of the nature of the business to be transacted or the nature of the proceedings, that if members of the press

and public were present there would be disclosure to them of exempt information.

Birmingham City Council
Report to Cabinet
9TH NOVEMBER 2021

Subject:	FINANCIAL MONITORING REPORT 2021/22 QUARTER 2 (UP TO 30TH SEPTEMBER 2021)
Report of:	Director of Council Management – Rebecca Hellard
Relevant Cabinet Member:	Councillor Tristan Chatfield – Finance & Resources
Relevant O &S Chair(s):	Councillor Mohammed Aikhlaq - Resources
Report author:	Director of Council Management – Rebecca Hellard

Are specific wards affected? If yes, name(s) of ward(s):	☐ Yes	☒ No – All wards affected
Is this a key decision? If relevant, add Forward Plan Reference: 009034/2021	☒ Yes	☐ No
Is the decision eligible for call-in?	☒ Yes	☐ No
Does the report contain confidential or exempt information? ☐ Yes ☒ No If relevant, provide exempt information paragraph number or reason if confidential:		

1   Executive Summary

1.1   The quarterly finance report attached as Appendix A is part of the City Council's robust financial management arrangements.

2   Recommendations

That the Cabinet:-

2.1   Notes the City Council's 2021/22 forecast at 30th September 2021 of a net overspend of £10.2m, comprising of £32.9m direct covid related expenditure and

reduction in income, partially offset by revenue budget non-Covid underspends of £22.7m.

2.2   Notes that corrective action will take place to ensure the budget is balanced by March 2022.

2.3   Notes that Directorates are reporting that £19.8m of the £36.7m savings targets are either delivered or on track. This represents 54% of the total target with a further 38% (£14.1m) anticipated to be delivered. Directorates are continuing to work towards ensuring that these savings are brought on track and are delivered.

2.4   Notes that the forecast capital expenditure in 2021/2022 is £709.2m.

2.5   Notes that reporting is now in the new Council Directorate structure.

2.6   Notes the allocation of Specific Policy Contingency as set out in paragraph 4.14.

2.7   Approves the allocations of General Policy Contingency as set out in paragraph 4.15.

2.8   Notes the expected underspend on Specific Policy Contingency as set out in paragraph 4.17

2.9   Notes the Treasury Management and Investment Portfolio Reports that are included in Appendix A.

2.10   Approves the use of £10.0m of the Delivery Plan Reserve as set out in paragraph 4.19.

2.11   Approves the writing off of debts over £0.025m as described in paragraph 4.12.

2.12   Approves the allocation of £0.745m Corporate Capital Contingency for investment in CCTV as set out in paragraph 4.7.

3   Background

3.1   At the meeting on 23rd February 2021, the Council agreed a net revenue budget for 2021/2022 of £828.7m to be met by government grants, council tax and business rates. Appendix A sets out the full financial position at Quarter 2.

4   Key Issues

4.1   The Council is forecasting a net revenue overspend of **£10.2m** which represents 1.2% of the £828.7m budget. This represents an improvement of £17.2m since Quarter 1.

4.2   This is the second full financial forecast for the year. There is still sufficient time for corrective action to be taken over the course of the year which will bring the budget back into balance by March 2022. This includes looking to maximise the use of ring fenced Covid funding to mitigate the current Covid overspend. Progress will be monitored by the Director of Council Management and the Cabinet Member for Finance and Resources, and reported to Scrutiny via monthly exception reporting.

4.3 The direct covid related expenditure and reduction of income of **£32.9m** is after applying funding; **£17.5m** of un-ringfenced Covid-19 related grant funding from the government received in 2020/21 carried forward into 2021/22, release of **£3.0m** from specific grant funding, **£6.0m** of Public Health Grant to fund Covid related spending in 2021/22, an estimate of funding for income loss of **£3.2m** and **£12.5m** pressures funded in the 2021/22 budget from the application of Tranche 5 of Government Covid funding. It is also after applying an estimate of **£38.0m** cost from the redeployment of staff on a similar basis to that reported in the 2020-21 outturn. This is partially offset by a net revenue budget non-Covid underspend of **£22.7m**. This is shown in the table below:

Table 1 : High level position.	Covid Variation	Non-Covid Variation	Total Variation
	£m	£m	£m
Directorate Sub Total	25.7	10.5	36.2
Corporate Budgets	11.5	4.8	16.3
Application of Tranche 5 Funding Budget 2021/22	(12.5)	0.0	(12.5)
Covid Funding	(17.5)	0.0	(17.5)
Specific Grant Funding	(3.0)	0.0	(3.0)
Public Health Grant	(6.0)	0.0	(6.0)
Income Loss Scheme Funding	(3.2)	0.0	(3.2)
City Council General Fund Sub Total	**(5.1)**	**15.3**	**10.2**
Transfer of Indirect Covid Costs	38.0	(38.0)	0.0
General Fund after transferring indirect costs	**32.9**	**(22.7)**	**10.2**

4.4 There are also several ring-fenced grants for additional reliefs and support schemes which are being spent on the additional measures set out in government guidance.

Capital Programme

4.5 Capital expenditure for the year 2021/22 is forecast at £709.2m against the revised capital budget of £754.8m, representing a net variation of £45.6m.

4.6 This is a decrease in forecast spend of £56.9m from Quarter 1. This is largely due to slippage in relation to Transportation & Connectivity within the City & Municipal Development Directorate (£26.0m) and within the Education and Skills Directorate (£9.0m). The Corporate Contingency budget is being slipped by half (£12.5m) at this half year stage too. Further details for these variations are provided below.

4.7 Cabinet is asked to approve an allocation of £0.745m from the Corporate Capital Contingency budget to support the procurement of 20 new CCTV cameras and an upgrade to 30 existing cameras, as set out in Appendix A paragraph 2.25.

4.8 Details of the Capital Programme are set out in Appendix A in Section 2 and Annex 4.

Treasury Management and Investment Portfolio

4.9 The Covid-19 pandemic has had a significant impact on Treasury Management decision making in the quarter. Details are set out in the Appendix A Annex 3.

4.10 During the quarter, the Director of Council Management and the Council's Treasury Management Panel considered the following treasury related issues:

- Reviewed the Council's interest in the partnership between Arlingclose and UK Municipal Bond Agency (MBA) to provide a short-term loan solution to local authorities by issuing Commercial Paper. This would allow the Council to diversify its sources of short-term funding and manage refinancing and liquidity risks.

- Reviewed the industry wide removal of the London Interbank Offered Rate (LIBOR) as an interest rate benchmark for financial contracts and its replacement by the Bank of England administered Sterling Overnight Index Average (SONIA). The Council intends to use SONIA as the new reference rate for deposits held with the Council.

- The Panel assessed the impact of environmental, social and governance (ESG) issues on Treasury Management and agreed to include ESG considerations as part of the Council's future investment and borrowing strategies.

4.11 The Investment Portfolio is reported in Appendix A Annex 5.

Write-Offs

4.12 The schedule at Appendix A, Annex 2 part D summarises debts recommended for write off of over £0.025m.

Policy Contingency

4.13 The original policy contingency budget for 2021/22 was £44.6m, excluding savings that will be allocated to directorates in 2021/22. Following use of reserves and allocations approved by Quarter 1, the budget excluding savings was £38.3m.

4.14 Cabinet is asked to note as shown below the allocation of Specific Policy Contingency. Further details are provide in the relevant paragraph in Appendix A.

Use of	Reason	Value (£m)	Reference to Paragraph in Appendix A
Specific Policy Contingency	Inflation	0.055	3.52

4.15 Cabinet is asked to approve the following allocations of General Policy Contingency as shown below. Further details are provided in the relevant paragraph in Appendix A.

Use of	Reason	Value (£m)	Reference to Paragraph in Appendix A
General Policy Contingency	City Housing JNC Posts	0.362	3.54
General Policy Contingency	Communications-Commonwealth Games	0.593	3.54
General Policy Contingency	City Serve price freeze	0.494	3.54
General Policy Contingency	Digital mail and Bank charges	0.600	3.54

4.16   If these uses are approved, the Policy Contingency budget excluding savings will be £30.3m.

4.17   Cabinet is asked to note that following a review of Policy Contingency, there is a forecast underspend of £9.3m related to savings on redundancy and exit costs due to the number of redundancies being lower than forecasted, and any costs that do materialise will be funded using capital receipts flexibility. These savings will help to mitigate the cost of the pay award pressure.

Reserves

4.18   Cabinet in April 2021 and July 2021 approved the draw down of £10.0m in total from the Delivery Plan Reserve. After taking into account actual and forecast expenditure, there remains £0.3m uncommitted.

4.19   Given the success of the pump priming of transformation at pace to date, Cabinet is asked to approve a further £10.0m draw down from the Delivery Plan Reserve. Further requests are expected in the coming months and it is important to keep up the pace and scale of transformation enabling work, which is increasingly focussing on invest to save initiatives that will improve citizen outcomes whilst reducing net service delivery costs.

5   Options considered and Recommended Proposal

5.1   Directors, in striving to manage their budgets, have evaluated all the options available to them to maintain balance between service delivery and a balanced budget.

6   Consultation

6.1   The Leader, Deputy Leader, other Cabinet Members, Directors, the City Solicitor and Human Resources Director have been consulted in the preparation of this report.

6.2   There are no additional issues beyond consultations carried out as part of the budget setting process for 2021/22.

7   Risk Management

7.1   The monitoring of the Council's budget and the identification of actions to address issues arising, as set out in this report, are part of the Council's arrangements for the management of financial issues.

8   Compliance Issues:

8.1   How are the recommended decisions consistent with the City Council's priorities, plans and strategies?

8.1.1 The budget is integrated with the Council Financial Plan, and resource allocation is directed towards policy priorities.

8.2   Legal Implications

8.2.1 Section 151 of the 1972 Local Government Act requires the Chief Finance Officer (as the responsible officer) to ensure the proper administration of the City Council's financial affairs. Budget control, which includes the regular monitoring of and reporting on budgets, is an essential requirement placed on Directorates and members of the Corporate Management Team by the City Council in discharging the statutory responsibility. This report meets the City Council's requirements on budgetary control for the specified area of the City Council's Directorate activities.

8.3   Financial Implications

8.3.1 The Corporate Revenue and Capital Budget Monitoring documents attached give details of monitoring of service delivery within available resources.

8.4   Procurement Implications (if required)

8.4.1 N/A

8.5   Human Resources Implications (if required)

8.5.1 N/A

8.6   Public Sector Equality Duty

8.6.1 There are no additional Equality Duty or Equality Analysis issues beyond any already assessed in the year to date. Any specific assessments needed shall be made by Directorates in the management of their services.

9   Background Documents

9.1   City Council Financial Plan 2021-2025 approved at Council 23rd February 2021

9.2   Quarter 1 Financial Monitoring Report approved by Cabinet 27th July 2021

APPENDIX A

Quarter 2 Financial Monitoring Report 2021-22

1.   High Level Summary Financial Position

1.1.   At the end of Quarter 2, there is a forecast net revenue overspend on the Council's General Fund of **£10.2m** (Column E in table 2) which represents 1.2% of the £828.7m budget and a **£17.2m** improvement since Quarter 1. This is made up of a **£22.7m** (Column D in table 2) revenue budget non-Covid underspends and a **£32.9m** (Column C in table 2) overspend on direct covid related expenditure and reduction in income.

1.2.   Direct covid related expenditure and reduction in income of **£32.9m** (Column C in table 2) is after applying funding; **£17.5m** of un-ringfenced Covid-19 related grant funding from the government received in 2020/21 carried forward into 2021/22, release of **£3.0m** from specific grant funding, **£6.0m** of Public Health Grant to fund Covid related spending in 2021/22, an estimate of funding for income losses of **£3.2m** and **£12.5m** pressures funded in the 2021/22 budget from the application of Tranche 5 of Government Covid funding. It is also after applying an estimate of **£38.0m** cost from the redeployment of staff on a similar basis to that reported in the 2020-21 outturn. The covid overspend represents an improvement of **£3.5m** since Quarter 1. We will continue to look to maximise the use of other specific covid funding to reduce this estimated cost.

Table 1 : High level position.	Covid Variation	Non-Covid Variation	Total Variation
	£m	£m	£m
Directorate Sub Total	25.7	10.5	36.2
Corporate Budgets	11.5	4.8	16.3
Application of Tranche 5 Funding Budget 2021/22	(12.5)	0.0	(12.5)
Covid Funding	(17.5)	0.0	(17.5)
Specific Grant Funding	(3.0)	0.0	(3.0)
Public Health Grant	(6.0)	0.0	(6.0)
Income Loss Scheme Funding	(3.2)	0.0	(3.2)
City Council General Fund Sub Total	**(5.1)**	**15.3**	**10.2**
Transfer of Indirect Covid Costs	38.0	(38.0)	0.0
General Fund after transferring indirect costs	**32.9**	**(22.7)**	**10.2**

1.3.   In terms of savings, **£19.8m** of the **£36.7m** savings targets are either delivered or on track which represents 54% of the total savings target with a further 38% (£14.1m) anticipated to be delivered, as shown in table 6 of this report. The £20.1m establishment saving, currently shows £14.4m achieved and £5.7m is an amber risk. However, one off in year savings have been identified and ongoing savings now need to be identified and delivered. Following the improved delivery, £5.0m that was previously considered as unachievable has now been reassessed as at amber risk rather than red, given the recent improvement in delivering savings.

1.4.   The revenue budget non-Covid position is a net underspend of **£22.7m** (Column D in table 2). This is an improvement of **£7.7m**, which relates to the allocation of **£9.3m** of Policy Contingency funding, **£5.0m** reduced pressure from recognising workforce savings as an amber risk. This is offset by an overspend of **£4.8m** related to Birmingham Children's Trust.

1.5.   The direct covid related expenditure and reduction in income is £32.7m overspend, including indirect spending of £37.9m, and is shown in table 2 (column c) below.

1.6. For individual directorate positions please see table 2 below.

1.7. The corporate position is detailed below in table 2. The headlines are :- **£5.4m** shortfall in local tax support expected to be received compared to the forecast when the budget was set. The likely underachievement of **£0.4m** of transport savings. There is a forecast cost of **£8.3m** for potential costs of a pay award if this is agreed at 1.75% which has from Quarter 2 been offset by a **£9.3m** forecast underspend of Policy Contingency. At Quarter 2 it has been identified that **£6.0m** can be allocated from the Public Health Grant to fund Covid related expenditure.
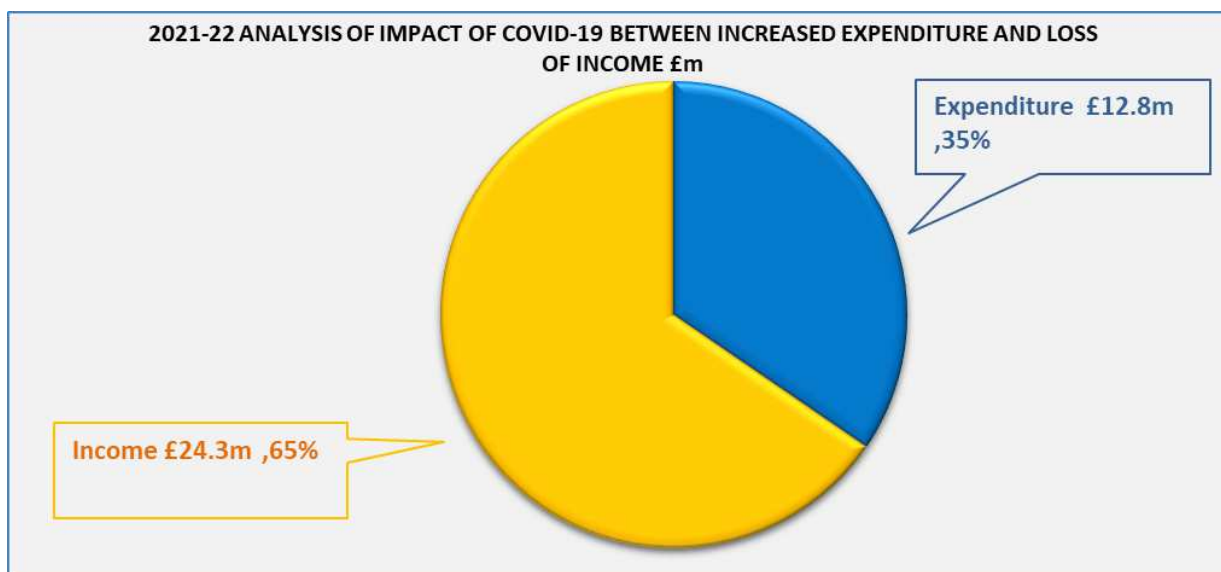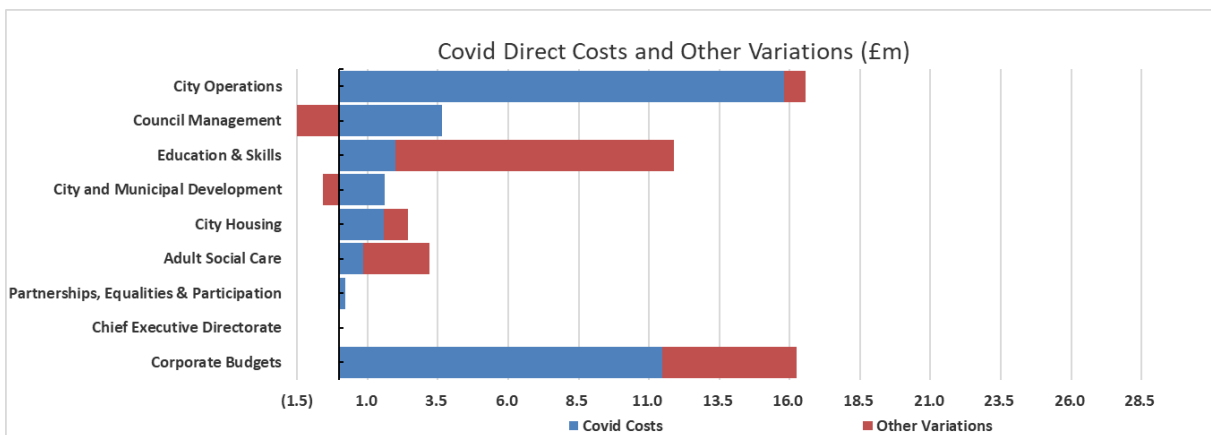
The Pie chart shows the direct covid related expenditure and reduction in income overspend split between income and expenditure.

Income loss forecast due to covid has decreased by £4.2m from Month 3. However, there is an increase of £3.4m across covid expenditure giving a directorates net decrease position of £1.3m. This is before an increase in £3.0m specific grant funding, £6.0m of Public Health Grant and a decrease of £1.7m in forecast funding for income loss, resulting in net decrease of £9.5m overall in the covid forecast.

Table 2

Table 2 :High Level Summary	A	B	C	D	E	F
Directorate *	Current Budget	Forecast Outturn	Covid 19 Financial Impact Included	Over/(Under) spend Non Covid costs	Total Over/(Under) Spend *	Movement since Month 3
	£m	£m	£m	£m	£m	£m
City Operations	185.204	201.762	15.810	0.748	**16.558**	(1.894)
Education & Skills	298.196	310.097	2.005	9.896	**11.901**	7.076
Adult Social Care	337.238	340.442	0.839	2.365	**3.204**	2.582
City Housing	12.869	15.315	1.568	0.878	**2.446**	(1.159)
City and Municipal Development	60.929	61.951	1.604	(0.582)	**1.022**	0.524
Council Management	54.117	54.931	3.638	(2.824)	**0.814**	(4.276)
Partnerships, Equalities & Participation	3.107	3.318	0.211	0.000	**0.211**	(0.124)
Chief Executive Directorate	0.623	0.623	0.000	0.000	**0.000**	0.000
Directorate Sub Total	**952.284**	**988.440**	**25.675**	**10.481**	**36.156**	**2.729**
Corporate Budgets	(123.613)	(107.355)	11.470	4.788	**16.258**	(12.581)
Application of Tranche 5 Funding Budget 2021/22	0.000	(12.515)	(12.515)	0.000	**(12.515)**	0.000
Covid Funding	0.000	(17.471)	(17.471)	0.000	**(17.471)**	0.000
Specific Grant Funding	0.000	(3.000)	(3.000)	0.000	**(3.000)**	(3.000)
Public Health Grant	0.000	(6.000)	(6.000)	0.000	**(6.000)**	(6.000)
Income Loss Scheme Funding	0.000	(3.234)	(3.234)	0.000	**(3.234)**	1.661
Corporate Subtotal	**(123.613)**	**(149.575)**	**(30.750)**	**4.788**	**(25.962)**	**(19.920)**
City Council General Fund	**828.671**	**838.865**	**(5.075)**	**15.269**	**10.194**	**(17.191)**
Indirect Covid Costs			37.998	(37.998)	**0.000**	0.000
General Fund after transferring indirect costs	**828.671**	**838.865**	**32.923**	**(22.729)**	**10.194**	**(17.191)**
Financial Position as at M3	828.671	856.055	42.374	(14.989)	**27.385**	
Movement from M3	**0.000**	**(17.191)**	**(9.451)**	**(7.740)**	**(17.191)**	
Movement from M3 %	**0.000%**	**(2.01)%**	**(22.30)%**	**51.64%**	**(62.77)%**	

The above table has been sorted according to the total over/under spend (largest to smallest)

**This excludes Covid-19 risk, see paragraph 3.44 below

Analysis of Non-covid pressure faced by Directorate

	Non delivery of savings £m	Expenditure variations £m	Income variations £m	One-off mitigations £m	Non Covid 19 Financial Impact Included £m
City Operation	1.508	3.302	1.068	(5.130)	0.748
Education & Skills	0.000	8.796	1.100	0.000	9.896
Council Management	0.200	(0.799)	(1.065)	(1.160)	(2.824)
City Housing	0.000	2.916	(2.038)	0.000	0.878
City and Municipal Development	0.329	(1.075)	0.164	0.000	(0.582)
Adult Social Care	0.000	2.070	0.295	0.000	2.365
Chief Executive	0.000	0.000	0.000	0.000	0.000
Partnerships, Equalities & Participation	0.000	0.000	0.000	0.000	0.000
Directorate Sub Total	**2.037**	**15.210**	**(0.476)**	**(6.290)**	**10.481**
Corporate *	0.400	8.300	5.369	(9.281)	4.788
Total	**2.437**	**23.510**	**4.893**	**(15.571)**	**15.269**

One off mitigation: actions taken by Directorates to deliver a balanced budget for 2021-22, which also includes mitigation for non-delivery of savings target (over £0.5m).

1.6 **City Operations:** The main mitigation is an underspend of £5.1m on borrowing costs due to delays in procurement of the new fleet. Out of a total of 74 new vehicles that have been ordered 31 vehicles were delivered and in use by the end of March 2021with the remaining 43 received in June.   In addition, further Garden and Bulky Waste income of £0.5m is anticipated. The Parks service has identified internal mitigations totalling £1m within Grounds Maintenance Service.

1.7 **Council Management**: There are one-off mitigations actions that have been identified including the use of Policy Contingency and the use of reserves carried forward from previous year that will be considered as part of Outturn. These mitigations now produce a significant underspend of £3.0m as a contribution towards balancing the Council's budget.

1.8 **Corporate:** £6.0m use of Public Health Grant to fund Covid related spend and £9.3m use of policy contingency, which is discussed in more details in section 3.57 below.

2. Capital Expenditure

2.1. Capital expenditure for the year 2021/22 is forecast at £709.2m against a revised capital budget of £754.8m, representing a net variation of £45.6m.

2.2. This is a decrease in forecast spend of £56.9m from Quarter 1. This is largely due to slippage in relation to Transportation & Connectivity within the City & Municipal Development Directorate (£26.0m) and within the Education and Skills Directorate (£9.0m). The Corporate Contingency budget is being slipped by half (£12.5m) at this half year stage too. Further details for these variations are provided below.

2.3. Expenditure to date is £222.6m which is 31% of the year-end total forecast. In comparison spend to date at Quarter 2 in 2019/20 (the year prior to Covid-19) was 26%. Traditionally capital spend increases during the second half of the financial year as more work is completed and contractor invoices are received.

2.4. Capital Receipts are a key element of the programme and at Quarter 2 in 2021/22 they amount to £44.9m, being £15.6m of the £65m Asset Review programme and £29.3m of the £35m Business as Usual programme. Further detail is provided in paragraph 2.24 below.

Table C1: Summary 2021/22 Capital Programme Financial Position

	Spend to date	Quarter 1 Budget	Budget Changes Period 4-6	Revised Quarter 2 Budget	Forecast net overspend/ (slippage)	Forecast Outturn
	£m	£m	£m	£m	£m	£m
General Fund	171.7	623.6	12.8	636.5	(51.1)	585.4
HRA	50.9	110.4	7.9	118.3	5.5	123.8
TOTAL	222.6	734.0	20.7	754.8	(45.6)	709.2

2.5. The revised budget is a £20.7m increase from the budget approved at Quarter 1.

Table C2: **Movements from the Original Budget:**

Directorate	Amount in 21/22	Capital Project	Funding	Cabinet Approval
City Operations: Private Sector Housing	£2.2m	Energy Efficiency – Green Homes Grant for Local Authority Delivery Phase 2	Green Homes Grant	07/09/21
City Housing: Housing Options	£2.0m	Temporary Accommodation Strategy	Prudential Borrowing	27/07/21
City Housing: HRA	£7.9m	Housing Improvement Programme – Green Homes Grant Phase 2	Grant & Direct Revenue Funding	07/09/21
City & Municipal Development: Planning & Development	£2.7m	Bromford Estate Flood Defence works.	Grant	June 2020
City & Municipal Development: Transportation	£1.0m	Adding new resources to various projects .as approved by Cabinet on 09/02/2021 within the Transportation & Highways Capital Programme Annual update report.	Various	09/02/21
City & Municipal Development: Property Services	£5.0m	Contribution towards the redevelopment of Perry Barr Train Station.	Community Infrastructure Levy (CIL)	June 2019
Total	20.7			

2.6 **Capital Planning & Allocations** City Operations – City Centre CCTV: an allocation of £0.745m is being requested in this report to be approved as an allocation from the Corporate Capital Contingency Budget, funded from corporate prudential borrowing. Further details are set out in paragraph 2.25 below.

Table C3: Year End forecast by Directorate.

Capital Forecast 2021/22 by Directorate						
Directorate	(a) 2021/22 Quarter 1 Budget £m	(b) 2021/22 Period 4-6 Budget Movements £m	(c) 2021/22 Quarter 2 Revised Budget (a+b) £m	(d) 2021/22 Spend to Date £m	(e) Forecast Variation Quarter 2 £m	(f) 2021/22 Forecast Outturn (c+e) £m
Commonwealth Games	**72.5**	**0.0**	**72.5**	**32.9**	**0.0**	**72.5**
Council Management						
Development & Commercial	1.1	0.0	1.1	1.7	0.0	**1.1**
Corporately Held Funds	88.4	0.0	88.4	2.4	(13.6)	**74.8**
ICT & Digital	9.3	0.0	9.3	0.8	(1.3)	**8.0**
Total Council Management	**98.8**	**0.0**	**98.8**	**4.9**	**(14.8)**	**83.9**
City Operations						
Control Centre Upgrade	0.3	0.0	0.3	0.0	0.0	**0.3**
Street Scene	39.3	0.0	39.3	14.5	0.0	**39.3**
Private Sector Housing	0.5	2.2	2.7	0.2	0.0	**2.7**
Neighbourhoods	3.2	0.0	3.2	0.0	(1.2)	**2.0**
Regulation & Enforcement	1.6	0.0	1.6	0.6	0.0	**1.6**
Highways Infrastucture	4.7	(0.0)	4.7	1.0	0.0	**4.7**
Total City Operations	**49.5**	**2.2**	**51.7**	**16.3**	**(1.2)**	**50.5**
City Housing						
Housing Options Service	0.1	2.0	2.1	0.0	0.0	**2.1**
HRA	110.4	7.9	118.3	50.9	5.5	**123.8**
Total City Housing	**110.5**	**9.9**	**120.4**	**50.9**	**5.5**	**125.9**
City & Municipal Development						
Planning & Development	50.6	2.7	53.3	20.8	0.0	**53.3**
Transport & Connectivity	81.7	1.0	82.6	9.6	(26.0)	**56.6**
Housing Development	1.6	0.0	1.6	0.0	0.0	**1.6**
Perry Barr Residential Scheme	151.8	5.0	156.8	70.4	0.0	**156.8**
Property Services	60.6	0.0	60.6	1.4	0.0	**60.6**
Total City & Municipal Development	**346.3**	**8.7**	**354.9**	**102.2**	**(26.0)**	**328.9**
Education & Skills	**46.9**	**0.0**	**46.9**	**10.9**	**(9.0)**	**37.9**
Adult Social Care	**9.6**	**0.0**	**9.6**	**4.5**	**0.0**	**9.6**
TOTAL	**734.0**	**20.7**	**754.8**	**222.6**	**(45.6)**	**709.2**

Forecast Variations at Quarter 2
Council Management – Slippage of £14.8m.

2.7 **ICT & Digital** – Slippage of £1.3m – this is mainly due to the Application Platform Modernisation (APM) scheme which was expected to spend £3.3m in this financial year. £0.5m relates to hardware purchases which are awaiting clarity on capacity requirements and £0.4m relates to the Document Management Solution which is now being delivered by IT Operations due to complete in 2022/23. The remainder of the slippage relates to the Field Work Project (funded from Flexible Use of Capital Receipts) which will now be delivered in 2022/23.

2.8 Corporate Capital Contingency – Slippage of £12.5m – as at Quarter 2 there have been very few applications for corporate capital contingency funding therefore it is prudent to slip 50% of the current budget (£12.5m) into future financial years. These resources can be brought forward again prior to the year-end if required.

City Operations – Slippage of £1.2m.

2.9 Community Sports & Events – National Indoor Arena (NIA) Replacement Track £1.2m. Following recommendations from World Athletics after the World Indoors 2018 event, a specification for Tender was sent out based on their feedback. The outcome detailed higher costs on materials and shipping. In addition to that a longer build time is required which would impact other events due at the venue. Alternative proposals are being discussed but any change in specifications would require re-tendering due to procurement guidelines.

City Housing – Net Overspend of £5.5m.

2.10 HRA - Housing Improvement Programme - £12.1m forecast overspend as reported at Quarter 1 – mainly due to fire protection works to High Rise Residential Blocks including replacement cladding and fire panels and urgent structural defect remediation works to ageing stock.

2.11 HRA – Redevelopment - £6.6m slippage. This is made up of net slippage of £5.3m (against a £32.9m programme) in relation to Birmingham Municipal Housing Trust (BMHT). Although the impact of Covid and reduced labour availability is decreasing it is still impacting supply chains. Brexit is also impacting on certain trades due to import restrictions, bureaucracy and labour returning to home countries. The schemes affected are Kings Norton 1, Monmouth Road and Bromford. Clearance - slippage of £1.4m. Clearance and rehousing activity has been significantly impacted as a result of Covid, including delays with possession proceedings and court hearings. The lack of available suitable rehousing options, particularly for larger households, has caused delays obtaining vacant possession of the schemes. In addition, the ability to acquire properties within clearance schemes due to the complexity of cases, including numbers of households shielding and representatives not being available for negotiations have led to previous forecasts not being achieved. In addition, unforeseeable environmental issues caused by the weather, led to seeking an alternative approach to remediation works required prior to development at Yardley Brook.

City & Municipal Development – Net Slippage of £26.0m.

2.12 Transport Connectivity – Tame Valley Phases 2 & 3 slippage of £3.7m - Testing Contract: Tenders were sought in November 2019 for commencement on site in early 2020. Due to no interest received, a retendering exercise took place which was awarded and works commenced on site August 2020 and finished December 2020.

2.13 Main Works Contract: Invitation to tender for the main works contract occurred in September 2020 following on from the Testing Contract but were delayed due to COVID resource requirements. Due to advice received on legal aspects of the tender, there were various extensions to the tender period and final tenders were submitted at end of April 2021 and have now been evaluated. Works are due on site in March 2022, approximately 1 year behind original schedule. Works are now programmed to be complete by December 2026.

2.14 Transport Connectivity – Snow Hill Public Realm slippage of £1.3m - due to the proximity of Commonwealth Games, a decision has been made not to commence some schemes until after the Games are completed. This means some of the projects will slip into future financial years.

2.15 Transport Connectivity – Brum Breathes & Route to Zero slippage of £10.6m – the slippage relates to spend against the original Mitigations Budget profile as a result of the delayed implementation of the Clean Air Zone (CAZ). This budget is also demand led with spend taking place after actions required are confirmed i.e. Taxi & HGV upgrades, Non-compliant car scrappage and support to encourage more use of Public Transport. As a result, spend may accelerate before year end or have further slippage into next financial year.

2.16 Transport Connectivity – Active Travel slippage of £5.9m – the majority of slippage into next year relates to the A45 Coventry Road Cycle Route. The funding for the scheme is subject to a drawdown procedure via the West Midlands Combined Authority (WMCA) / Transport for West Midlands (TfWM). The funding drawdown will be part of the full business case process and is only available once the scheme development has been completed.

2.17 Transport Connectivity – Public Transport Slippage of £3.8m – Slippage into future years across a number of schemes but mainly in relation to Sprint projects (Sutton to Birmingham via Langley, Birmingham to Airport & Birmingham to Walsall) pending approvals from Transport for West Midlands (TfWM), Section 278 and proposals being put on hold until post the Commonwealth Games.

Education & Skills – Slippage of £9.0m.

2.18 Schools Condition Allowance (SCA) – Slippage of £1.0m reflects the revised profile of costs provided by Education Infrastructure (EDI) due to current market conditions that includes an impact on the availability of resources and obtaining materials - therefore some projects have been reprofiled for delivery in 2022/23. It should be noted that will be no impact on service delivery, no loss of funding and resources will be re-profiled into future years.

2.19 Basic Need Additional Places – Slippage of £7.0m - due to the pandemic forecasted pupil numbers have reduced and therefore the requirement for additional places has reduced. There is a level of uncertainty around pupil numbers due to Covid, Elective Home Education and Brexit. Cohort numbers on roll in schools reduced between 2019/20 and 2020/21, leading to a reassessment of required permanent expansions. There is also less domestic movement than previous. EDI are currently assessing the forecasts before embarking on any further expansions. It should be noted that there is no loss of funding and resources will be re-profiled into future years.

2.20 Community Libraries – Slippage of £1.0m due to a delay in the completion of the Community Libraries report to allow further development and approval of the Community Library Strategy – timescales are yet to be confirmed.

Risks and Issues

2.21 The **impact of Brexit** on the construction industry is still ongoing and together with the continuing impact of Covid 19 and economic recovery casts greater uncertainty

particularly about the supply and import of materials and labour. This applies to most projects within the capital programme and the impact of this situation will continue to be monitored closely during the coming months.

2.22 **Dudley Road Scheme** – Funding to be identified:
Delivery of the revised main scheme has been estimated at £20.7m. Funding has been identified from the Levelling Up Fund in order for the scheme to progress to full implementation after the Commonwealth Games. A bid to the Levelling Up Fund of £19.9m was submitted in June 2021 with the anticipated outcome due in October 2021. There is a risk that the funding bid may not be successful, and other sources of external funding may be required if the project is to progress. A further update will be provided to Cabinet once the outcome of the Levelling Up Fund bid is known.

2.23 **Revenue Reform Projects** (Flexible Use of Capital Receipts) – Revenue expenditure which qualifies as being eligible for funding under the Flexible Use of Capital Receipts i.e. Transformational spend that results in revenue savings at Quarter 2 is £2.6m. Eligible spend is initially charged to revenue and subsequently moved to capital against the appropriate projects – as at Period 6 only £2.6m has been transferred to capital and therefore this figure may be understated. Positive action will be undertaken at Period 7 to identify further revenue spend that will need to be transferred to capital. However, as at period 6 all projects are forecast to spend to budget and more detailed monitoring of this spend is provided in Table C4 below:

Table C4 – **Flexible Use of Capital Receipts**

| Capital Monitoring Quarter 2 2021-22 | | | | | | |
| Flexible Use of Capital Receipts | | | | | | |
Directorate	(a) 2021/22 Quarter 1 Budget £m	(b) 2021/22 Period 4 - 6 Budget Movements £m	(c) 2021/22 Quarter 2 Revised Budget (a+b) £m	(d) 2021/22 Spend to Date £m	(e) Forecast Variation Quarter 2 £m	(f) 2021/22 Forecast Outturn (c+e) £m
Council Management Directorate:						
Corporately Held Funds:						
Redundancy & Pension Strain	0.0	0.0	0.0	0.2	0.0	0.0
Travel Assist	0.1	0.0	0.1	0.0	0.0	0.1
Tyseley ERF & Transfer Station	0.7	0.0	0.7	0.0	0.0	0.7
Business Improvement & Change	1.8	0.0	1.8	1.8	0.0	1.8
Finance Transformation Involvement	1.3	0.0	1.3	0.0	0.0	1.3
Service Innovation & SAP	0.0	0.0	0.0	0.0	0.0	0.0
Cyber Security	3.0	0.0	3.0	0.4	(0.3)	2.7
Insight Programme	1.1	0.0	1.1	0.0	(0.6)	0.5
Customer Programme	5.6	0.0	5.6	0.0	0.0	5.6
Eclipse IT Support	0.7	0.0	0.7	0.0	0.0	0.7
Early Interventions Transformation	0.5	0.0	0.5	0.0	0.0	0.5
Community Equipment	0.2	0.0	0.2	0.0	0.0	0.2
Life Courses Project	1.8	0.0	1.8	0.0	0.0	1.8
Flexible Use of Capital Receipts - Other	10.7	0.0	10.7	0.0	0.0	10.7
Inclusive Growth Delivery Plan	15.0	0.0	15.0	0.0	0.0	15.0
Birmingham Childrens Partnership	1.1	0.0	1.1	0.0	0.0	1.1
Total Corporately Held	**43.7**	**0.0**	**43.7**	**2.4**	**(0.9)**	**42.8**
ICT & Digital Services:						
ITD Transition Programme	0.2	0.0	0.2	0.0	0.0	0.2
Application Platform Modernisation	1.7	0.0	1.7	0.2	(0.6)	1.0
Networks & Security	0.0	0.0	0.0	0.0	0.0	0.0
Insight	0.1	0.0	0.1	0.0	0.0	0.1
Field Work Project	0.4	0.0	0.4	0.0	(0.4)	0.0
Total ICT & Digital Services	**2.4**	**0.0**	**2.4**	**0.2**	**(1.0)**	**1.4**
TOTAL	**46.1**	**0.0**	**46.1**	**2.6**	**(1.9)**	**44.2**

Capital Receipts & Disposals Programme:

2.24 Review of the Disposals Programme & Expected Capital Receipts – The 2021/22 budgeted target of capital receipts is £100.0m. At present £44.9m of receipts have been achieved in 2021/22, £15.6m against the £65m Asset Review programme and £29.3m against the Business as Usual programme. It should be noted that the disposals programme is back-end loaded meaning that majority of receipts are due to be received towards the end of the 2021/22 financial year and relate to a small number of high value cases.

Table C5 below sets out the position at Quarter 2 2021/22:

Capital Receipts & Disposals Programme 2021/22	2021/22 £m
Budget	100.0
Achieved at Quarter 2	44.9
Further Anticipated Receipts	55.1

Capital Planning and Allocations:

City Operations - City Centre CCTV

2.25 Cabinet are requested to approve an allocation of £0.745m from the Corporate Capital Contingency budget, funded from corporate prudential borrowing to support the procurement of 20 new CCTV cameras and an upgrade to 30 existing cameras removing gaps and improving quality, reliability across key Common Wealth Games and transit areas across the city centre, directly benefitting Birmingham City Council and multi-agency games operations. The upgrade will include enhanced coverage across the designated walking routes (e.g. between rail, shuttle and bus transport hubs and event venues) live and activation sites and all the elements required for compliance, satisfying the requirements of the Surveillance Camera Code 2013.

Financing the Quarter 2 Forecast Outturn

2.26 The Quarter 2 forecast outturn will be financed as shown in the pie chart (Table C6) and the Table C7 below.

Table C6 – Forecast Financing Chart - £709.2m

Quarter 2 Forecast Financing

- Grants & Contributions, £164.6m
- Earmarked Capital Receipts, £113.0m
- Direct Revenue Financing, £29.1m
- Revenue Contributions - HRA, £71.5m
- Corporate Resources, £17.4m
- Prudential Borrowing, £313.5m
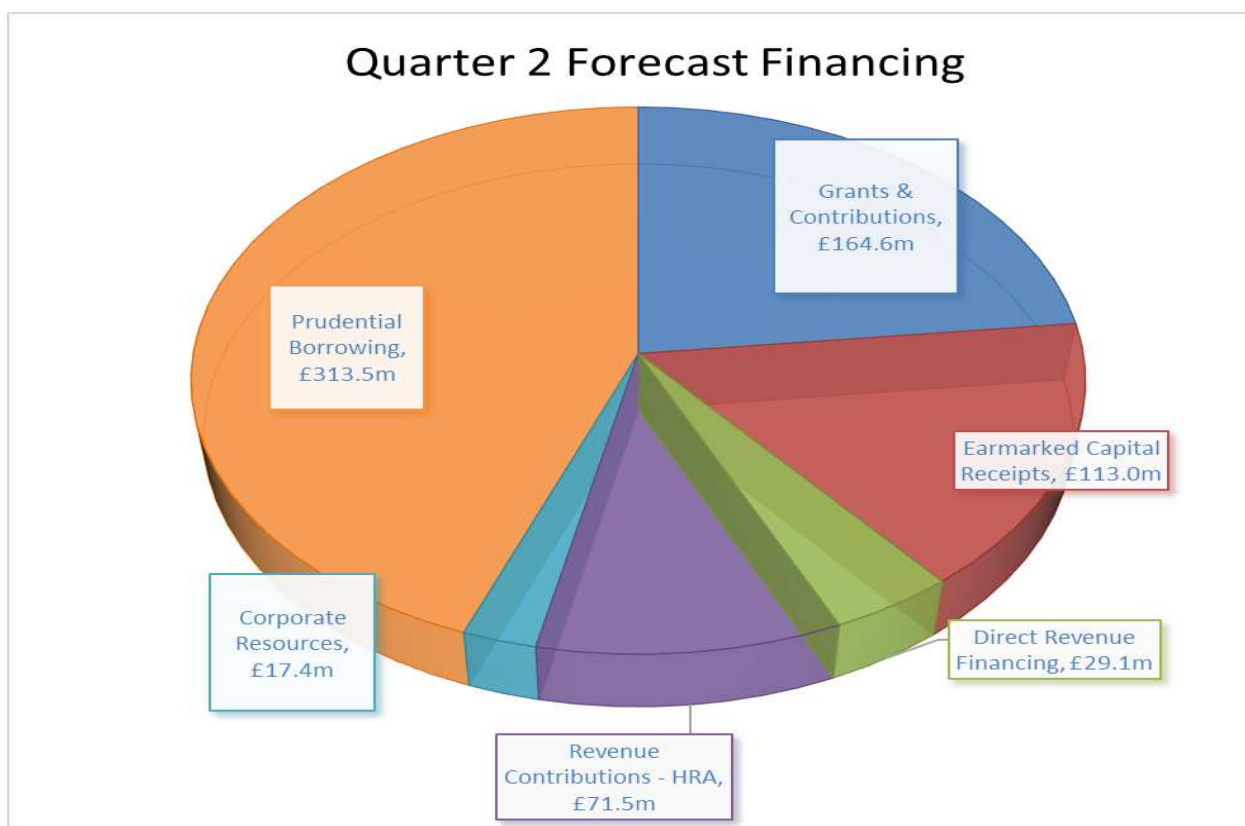
2.27 Table C7 – Capital Financing

Summary of Capital Funding Quarter 2 2021-22	General Fund £m	Housing Revenue Account £m	Total £m
Forecast Capital Expenditure	**585.4**	**123.8**	**709.2**
Forecast Funding:			
Grants & Contributions	(153.4)	(11.3)	(164.6)
Earmarked Receipts	(86.1)	(26.9)	(113.0)
Direct Revenue Funding	(29.1)	(71.5)	(100.6)
Corporate Resources	(17.4)	0.0	(17.4)
Prudential Borrowing	(299.4)	(14.1)	(313.5)
Total Funding	**(585.4)**	**(123.8)**	**(709.2)**

3. **Key Issues**

Non Covid-19 Related Issues (Significant variance above £0.5m)

3.1. **Afghan Refugees;** Three funding schemes are available for Local Authorities to support Afghan citizen resettlement. ARAP (Afghan Resettlement and Assistance Policy), under which BCC has already committed to welcoming 80 individuals, ACRS (Afghan Citizens Resettlement Scheme), and grant funding to top up housing costs. BCC has already started welcoming people under ARAP.

3.2. The resettlement schemes include funding of £20,520 per individual for welcome, integration and support, £4,500 per child for education provision for one year, and £850 per adult for English language provision. Housing is funded through the introduction amount, benefits, and additional grant funding to meet any gap between cost and benefits. Based on existing resettlement schemes, which attract the same funding offer, this is considered sufficient for the costs of administering and providing services required. The risk in this scheme is if families cannot fund their housing once the top up is removed, and present as homeless at that stage. The impact on wider BCC services over the longer term cannot be estimated without knowledge of the individuals and families and what skills and needs they bring, but without doubt are minimised by the successful implementation of resettlement.

Education and Skills

3.3. At the end of Quarter 2, there is a forecast **overspend of £9.9m** relating to revenue budget non-Covid expenditure for the Directorate**.** This is a deterioration of **£6.6m since Quarter 1.**

3.4. There is a forecast overspend for **Inclusion and SEND** of **£5.3m**. The forecast overspend is on Travel Assist made up of £3.9m transport costs and £1.4m on guides.   The basis for projection is 2021/22 actual expenditure to date extrapolated for the remainder of the year. Management information on activity and costs is required for this projection to be more accurately refined. The forecast on Travel Assist assumes a successful bid of £1.6m for transformation costs funded through the Flexible Use of Capital Receipts.

3.5. The council have terminated a contract with North Birmingham Travel, the additional cost of the alternative provider (procured at short notice and including set up costs) is estimated to be up to £3.3m (worst case). This additional cost of contract will be taken from the Financial Resilience Reserve. As costings become more certain they will be reported through the routine financial reporting updates to Cabinet.

3.6. In May 2021 Birmingham hosted Ofsted and CQC to conduct their Local Area SEND Revisit in order to establish if the partnership has made sufficient progress against the 13 areas of significant weakness identified in the 2018 inspection. The outcome of this revisit has now been published, with Birmingham making sufficient progress in 1 of the 13 areas of significant weakness. As a result of the revisit, there is a need for a SEND Improvement Programme for the city which will require significant one-off investment from the general fund, alongside ongoing investment from the HNB and General Fund to address capacity issues within the system. Cabinet has approved in July 2021 extra funds to address the capacity issues. A bid for one-off transformation costs has also been submitted to the S151 Officer.

3.7. There is a forecast overspend for **Birmingham Children's Trust** of **£4.8m** as follows:

The outturn position for 2020/21 highlighted a cost pressure of £3m against placements which would carry forward into 2021/22. The latest position for the Trust is now forecast to overspend by £4.8m and this entirely relates to placement costs which can be broken down as follows:

- £2.4m supported accommodation
- £1.3m disabled children
- £1.1m shortfall in contributions from partners

Whilst some of this can be attributed to an increase in the care population, the rate of increase in the number of children in care has actually reduced from around 6% to less than 3%. A key reason for the increase in placement costs is that children's needs are increasing in complexity, including mental health and trauma caused by domestic abuse and exploitation. The shortfall in income contributions is also a cause for concern, particularly health given the complexity of need.

The Trust continues to promote better outcomes for children and its Stronger Families initiative is intended to place more children with their families which in turn is expected to reduce costs by £2m this year. This benefit has already been factored into the forecast for the year.

3.8. The Director of Council Management and the Interim Director of Education and Skills have commissioned the Chartered Institute of Public Finance & Accountancy (CIPFA) to carry out a budget sufficiency review of the Education and Skills budget. The Local Government Association (LGA) will also support with work in this area. This work should conclude in November 2021.

City Housing

3.9. At the end of Quarter 2, there is a forecast **overspend of £0.9m** relating to revenue budget non-Covid expenditure for the Directorate, all related to the Homelessness Service**. This is an improvement of £1.6m since Quarter 1.**

3.10. **Housing General Fund (projected year end £1.1m overspend):**
- The forecast overspend is due to projected temporary accommodation demand levels over the course of the year reflecting significant increase following the lifting of the eviction ban at the end of May. We have seen an increase at the end of August which is earlier and higher than anticipated. Current modelling assumes continuation of current demand levels of 20 per week until the end of December reducing to 15 per week until the end of March. This continues to be monitored. Resulting cost pressure is **£3.1m**.

- Initial Additional Hostel accommodation at Oscott Gardens is planned to introduce a further 200 units phased in from December to March with an expected saving of **£0.7m** reducing the overspend to £2.4m. There are a number of risks associated with the delivery of this project which may delay the implementation date beyond December and have a detrimental impact the forecast position.

- Other mitigations have been explored generating a further £1.3m. This includes savings in procurement of commissioned services and alternative funding sources £0.4m, the implementation of a new contract for leased properties in February 2022 which will relieve the pressure on using night rate placements £0.3m and furniture and other underspends £0.6m.

3.11. **Shelforce (£0.2m underspend)**
- There are a number of minor variations across the service which net off to a breakeven position. The service is reliant on the HRA capital programme to deliver windows and doors via external contractors. A reduction in the HRA capital programme relating to Fire Doors means a loss of income of £0.9m which will be mitigated through cost savings in the lower use of materials of £0.9m. Shelforce have recently secured additional orders which will generate a surplus of £0.2m.

City Operations

3.12. At the end of Quarter 2, there is a forecast overspend of **£0.7m** relating to revenue budget non-Covid expenditure for the Directorate. This is a deterioration £0.4m since Quarter 1.

3.13. **Street Scene service** is reporting a forecast overspend of **£1.4m**, details of major variances are below:
- The Trade Waste Service forecast a shortfall of income of **£0.4m** as a result of losing a major contract. The service is working towards securing new clients to mitigate this pressure. The Waste Vehicle Garage service is forecasting an income shortfall of **£0.8m** due to reduced client base. This has been exacerbated by the procurement of new grounds maintenance fleet which will be covered by warranty arrangements in the first year of operation thereby reducing the reliance on the internal garage service. However, after the warranty period lapses, the Vehicle Garage service will be able to repair these vehicles where required
- **£1.2m** associated on maintenance and vehicle hire due to old and mechanically less reliable vehicles being past their natural life.
- The employee position has deteriorated and is forecast to be **£2.1m** overspent due to further delays in implementing the Street Scene Service re-design.
- **£0.4m** estimated costs of operating non-compliant vehicles in the CAZ.
- There are a number of other minor pressures which when aggregated together total **£1.6m.** This includes Non-delivery of savings relating to the disposal of parks land income and from commercial projects not been delivered in 2021/22 due to delays.
- The total overspends of **£6.5m** has been in part mitigated by **£5.1m** underspend:
  - £3.2m underspend on borrowing costs due to delays in procurement of the new fleet. Out of a total of 74 new vehicles that have been ordered 31 vehicles were delivered and in use by the end of March 2021with the remaining 43 received in June.
  - £1.0m – Underspend with the Grounds Maintenance Service.
  - £0.5m additional income from Garden and Bulky Waste is anticipated.

3.14. **Neighbourhoods Service (projected year end £1.3m underspend):**
- The main variance is lower than expected payments to Leisure Contracts of £0.8m and an underspend of £0.2m relating to net operational savings mainly within Alexander Stadium and other Leisure facilities, additional income of £0.2m within Neighbourhood Advice Service from the Adults Directorate, and £0.1m savings on prudential borrowing costs.

Adult Social Care

3.15. At the end of Quarter 2, the directorate has a **forecast an overspend of £2.4m** relating to revenue budget non-Covid for the Directorate. This a deterioration of £2.4m since Quarter 1 resulting from £2.4m of workforce underspends previously

mitigating budget pressures, now being taken as a contribution towards achieving the £20m establishment saving target.

3.16. **Packages of Care** Quarter 2 forecast is reporting a forecast overspend of **£3.5m** for Older Adults driven by increased activity within the Sevacare budget, reduced health income and increased residential and non-residential activity; and a forecast underspend of £0.01m for Younger Adults driven by reduced activity (predominantly Day Care within Adults with a Learning Disability) partially offset by a reduction in income. The Sevacare contract is partially funded by Better Care Funding (BCF) funding and discussions are needed as to whether this overspend can be too.

3.17. **Community & Social Work Ops – (forecast zero variance at year end**) - The Service is currently seeing high levels of vacancies leading to unspent budget for employees and agency. This is predominantly due to difficulties in recruitment and retention of social work staff and is partially offset with the use of agency. There is a recruitment campaign to fill these vacancies, but progress has been slow together with the difficulty in getting agency workers, so posts are currently unfilled. The unspent budget has been removed to contribute to the 2021/22 Establishment Savings.

3.18. **Commissioning – £0.7m underspend** – The Service is reporting an underspend against employees of £0.4m linked to vacancies across the team and recharge income against base budget funded posts. Recruitment plans are being discussed with relevant Head of Service and assumptions are currently that these will be filled within the next few months. There are also underspends of £0.3m against the overall third sector grant budget

3.19. **Director – £0.4m underspend** – The service forecast an underspend of £0.2m due to reduced Access to Work and Professional Fees expenditure, together with £0.2m lower than anticipated Pensions Increase Act and annual pension costs for early retirement.

City & Municipal Development Directorate

3.20. At the end of Quarter 2, there is a forecast **underspend of £0.6m** relating to revenue budget non-Covid expenditure for the Directorate. There has been no change since Quarter 1. The underspend largely relates to a £0.3m underspend on Integrated Transport Levy Payments (ITA Levy) to the West Midlands Combined Authority (WMCA) and £0.3m surplus in income from project officer recharges to Capital projects.

Council Management Directorate

3.21. At the end of Quarter 2, there is a forecast revenue budget non-Covid **underspend of £2.8m,** this is an improvement of £3.0m since Quarter 1 on non-Covid-19. This is largely relating to Housing Benefit Overpayment recovery which is performing better than last year. The ongoing review of supported exempt accommodation (SEA) is identifying Landlords where this status is not applicable resulting in clawback of overpaid Housing Benefit.
Overpayment recoveries from the Department of Work and Pensions are also performing better than last year. Improved collection of overpayments has contributed to an expected surplus on our benefit subsidy claim of £3 million for 2021/22. There are other £0.4m net pressures for the directorate.
This report seeks cabinet approval to use Policy Contingency for the council wide overspends on Digital Mail and Bank Charges.

Clean Air Zone (CAZ)

3.22. Poor air quality remains the single biggest environmental health risk and is recognised as a national crisis by the Government and the NHS, which is why Birmingham - and numerous other cities across the UK - are introducing Clean Air Zones.

3.23. Birmingham's Clean Air Zone became operational on 1 June 2021. The Clean Air Zone was introduced as one of most significant measures to help bring the current levels of nitrogen dioxide to within the legal limit in the shortest possible time. This is to reduce the risk of ongoing human exposure to this pollutant and to comply with a ministerial direction from the Secretary of State for the Environment, Food and Rural Affairs to the Council (March 2019).

3.24. Around 80% of roadside nitrogen dioxide is from road transport. Therefore, the Clean Air Zone will help the Council, and the city, to achieve the objective of improved air quality by applying a daily fee to motor vehicles that do not meet the emission standards for the Clean Air Zone.

3.25. Some temporary exemptions and financial support have been put in place for certain groups: including residents within the Clean Air Zone, city centre workers earning less than £30,000 a year, Birmingham-licensed taxi/private hire vehicles and businesses based or operating within the Clean Air Zone.

3.26. The operation and enforcement of the Clean Air Zone are set out in a 'Charging Order', which exercises powers conferred on the Council by Part III and Schedule 12 of the Transport Act 2000 and Parts 2 and 6 of The Road User Charging Schemes (Penalty Charges, Adjudication and Enforcement) (England) Regulations 2013.

3.27. In line with the application of these regulations the revenue generated by the scheme will, in the first place, be used to cover the cost of operation, including the maintenance of cameras, operational staff etc.

3.28. It is also government policy that the level of any charges should not be set as a revenue raising measure and the purpose of the scheme is not to generate revenue but to encourage improved air quality. This means that the more vehicles that are compliant with the scheme, the less revenue the scheme would generate.

3.29. In the event that net proceeds are generated from the scheme these proceeds would be applied, in such proportions as may be decided by the Council, to directly or indirectly facilitate the achievement of relevant local transport policies in accordance with the following high-level spending objectives:
- supporting the delivery of the ambitions of the scheme and promoting cleaner air;
- supporting active travel and incentivising public transport use;
- supporting zero emission and sustainable infrastructure and actions in and around the city to improve air quality.

3.30. Some of the programmes which have been identified as being suitable for support include the Hydrogen Bus Project, additional funding to support the Private Hire Vehicle Running Grant, the City Centre Public Realm (CCPR) project and contributions to West Midlands Combined Authority Transport schemes such as the University Station redevelopment, Camp Hill Stations scheme and the Cross-City Bus scheme.

3.31. The current estimate of the potential revenue is shown in the table below. It should be noted that the forecast is based on limited data. Therefore, the forecast will be

reviewed and updated on a monthly basis to reflect actual revenue received and to provide higher degree of accuracy around forecast revenue.

Table 4: 2021/22 Period 6 Summary & Full Year Forecast

	Actual & Estimate £m	Actual & Estimate £m	2021/22 Estimate Reported to Cabinet 09.01.2021 £m
CAZ D daily charge revenue			(21.047)
CAZ PCN revenue			(5.839)
CAZ revenue total (estimate)			**(26.886)**
CAZ D daily charge revenue to Period 5 (actual)	(5.741)		
CAZ D daily charge revenue - Periods 6 to 12 (estimate)	(11.900)		
CAZ D daily charge revenue Total (actual and estimate)		**(17.641)**	
CAZ PCN revenue to Period 5 (actual)	(2.721)		
CAZ PCN revenue period 6 to 12 (estimate)	(10.501)		
PCN revenue total (actual and estimate)		**(13.222)**	
CAZ revenue total (actual and estimate)			**(30.863)**
Variance from January 2021 estimate (Surplus) / Shortfall			**(3.977)**

3.32. The estimate at Quarter 2 indicates a surplus of £3.977m over the position reported to Cabinet in January 2021. This is dependent on the assumptions regarding the CAZ D daily charge and the generation of CAZ related PCN's. It should be noted that there is no precedent for either of these items.

Emerging Risks not included in Forecast

3.33. There are a number of risks that are not included in the forecast outturn of this report.

3.34. The Trade Unions have been offered a pay award of 1.75% by the Employer's side, although this has not been accepted. A potential pay award of 1.75% that could cost £8.3m has been built into the forecast. There is a risk that a higher pay award is agreed. Each extra 0.5% increase would cost £2.3m per annum.

3.35. There is a risk that savings that are rated as amber are not achieved in full.

Other Risks that cannot be quantified

3.36. There are a number of risks that have not yet be quantified. These include the following:

- Recovery from Covid
- Economic impact of Covid

- Brexit
- Housing and homelessness
- Highways Re-procurement
- Clean Air Zone impact on Parking Income

Savings Programme

3.37. The savings programme for 2021/22 of £36.7m of which £16.5m of savings is either at risk or undeliverable. £19.8m of the saving is either achieved or on target, which is 54% of the target with a further 38% (£14.1m) anticipated to be delivered.

Directorate	Non-Delivery of Saving		Saving at Risk	Saving Delivered and on Track	Total Saving
	Delayed Because of Covid-19	High Risk & Undeliverable			
	£m	£m	£m	£m	£m
Adult Social Care	0.000	0.000	7.500	1.293	8.793
City Operations	0.000	1.508	0.000	0.673	2.181
Council Management	0.116	0.200	0.000	3.069	3.385
Education & Skills	0.000	0.000	0.000	0.050	0.050
City & Municipal Development	0.322	0.329	0.156	0.238	1.045
Corporate	0.000	0.400	6.421	14.458	21.279
Directorate Sub Total	**0.438**	**2.437**	**14.077**	**19.781**	**36.733**

3.38. The £36.7m savings programme for 2021-22 (shown in the following charts) is now showing £19.8m as delivered or on track.
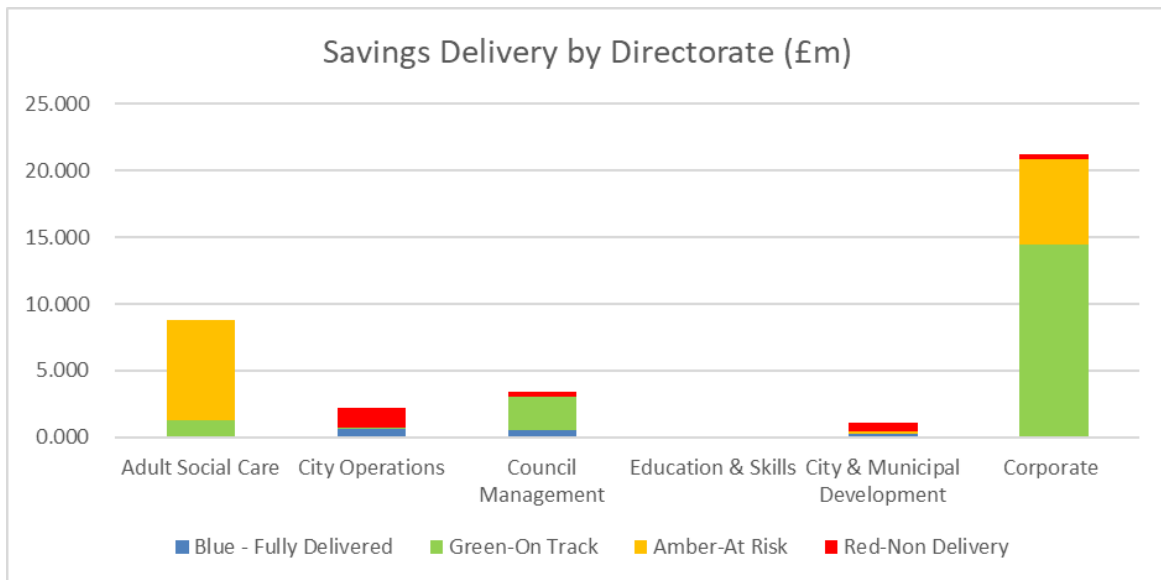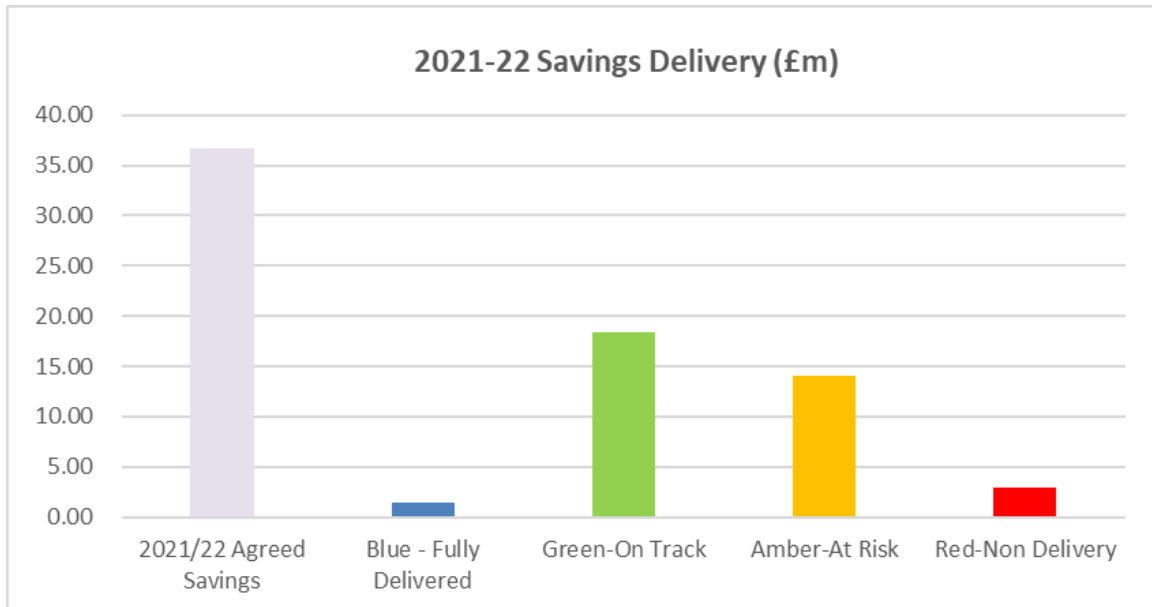
- **Corporate** has the largest saving target of £21.2m, of which 68% has been achieved, £14.5m is from the £20.1m establishment saving. The remainder of the saving is assessed as an amber risk in the current financial year. This is an improvement of £4.5m since quarter 1.

- **Adult Social Care** has a saving target of £8.8m of which 15% of the saving has been achieved. The £7.5m of saving is currently being assessed as being at risk due to uncertainty around demand in community and hospital settings. The increased demand from hospital discharges is currently being analysed.

- **City & Municipal Development** has £1.0m savings target of which £0.2m has been achieved and the rest has been assessed as at risk or undeliverable.
    - **£0.3m** non-delivery of the commercial property rental growth saving due to Covid delay.
    - **£0.3m** non-delivery of Public Hub Programme; property related savings have been delayed due to Covid. Proposals now to be considered as part of programme of New Ways of Working however this is not anticipated to be deliverable in 2021/22.
    - **£0.2m** is at risk of non-delivery Capital receipts from disposals of ring-fenced commercial portfolio properties to mitigate future Central Admin Buildings (CAB) savings are being monitored for deliverability.

- **City Operations** has £2.2m savings target. The current assessment is that £1.5m of those savings are considered unlikely to be delivered. The key highlights of which are:

- £0.6m Street Services - this saving will not be achieved in 2021/22. The redesign work requires additional HR capacity, which will need to be sourced. It is hoped that the redesign can be in place by 1st April next year. Investment of £0.1m is required to implement this and is being funded by the service.
- £0.2m of land sales saving will not be achieved in 2021/22. Discussions involving Parks and Housing colleagues are ongoing with the Allotment Association and Birmingham & District Allotment Confederation whose agreement is required to apply for consent from Secretary of State for disposal of statutory allotment land.
- £0.2m implementation of commercialisation programme relating to car parks .The delays in sourcing the business rates valuation information from the Valuation Office Agency has resulted in the implementation being delayed to 2022/23.
- £0.5m hire of vehicles and associated repairs and maintenance cost reduction for the Waste Management Replacement Strategy will not be achieved in 2021/22. Due to the delay in the procurement of waste vehicles, the associated hire and repair costs of existing vehicles which are beyond their useful life will continue until new vehicles are procured (currently planned for 2022/23).
- **Council Management** has £3.4m saving target of which £3.1m has been achieved.
  - Workforce related savings totalling £0.2m will not be achieved in 21/22 due to delayed restructure of the IT&D Service, however the service expects to mitigate this non-delivery of savings via efficiency gains on other budget lines.
  - Savings of £0.1m are considered unlikely to be achieved due to the impact of Covid on the events market and closure of the Council House.

Table 6: Achievement of Establishment Savings
- £14.5m of establishment saving have been delivered and it is anticipated that the remaining £5.7m will be delivered.

Table 6: Establishment Saving Summary by Directorate	Savings achieved at M3	Further Savings estimated at M6	Total
	£m	£m	£m
Adult Social Care	2.353	3.342	**5.695**
Education & Skills	0.455		**0.455**
City & Municipal Development	1.052	0.100	**1.152**
City Operations	0.820		**0.820**
City Housing	0.682	0.500	**1.182**
Council Management	1.100	0.551	**1.651**
Partnerships, Equalities & Prevention	0.503		**0.503**
Total Directorates	**6.965**	**4.493**	**11.458**
Unallocated Increment Budget remaining	3.000		**3.000**
Total	**9.965**	**4.493**	**14.458**

2021-22 Savings Delivery (£m)

Savings Delivery by Directorate (£m)

Analysis of Saving Type 2021-22
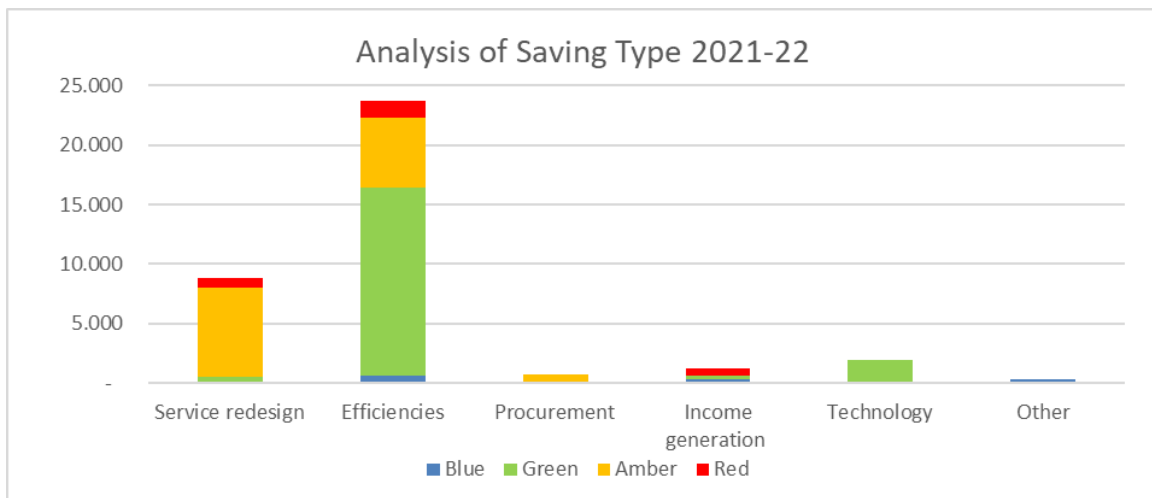
Covid-19 Major Incident Financial Impact

3.39. Council has carried forward £17.5m of un-ringfenced Covid-19 related grant funding from the government, there is an estimated £3.2m of income that can be reclaimed from the Governments Income loss scheme up to the scheme end on the 30th of June.

3.40. The Council funded £12.5m of covid pressures in the 2021/22 budget through the use of Tranche 5 of Government un-ringfenced grant funding.

3.41. £6.0m of Public Health Grant will be released to fund Covid related spending in 2021/22.

3.42. Ring-fenced grants for additional reliefs and support schemes are being spent on the additional measures set out in government guidance.

3.43. The summary below sets out the forecast Covid-19 financial position at Quarter 2.

Table 7: Forecast Covid-19 financial position	Covid cost £m
Directorate covid overspend	25.675
Corporate budgets overspend	11.470
Indirect Covid costs	37.998
Total Covid-19 overspend	**75.143**
Application of Tranche 5 Funding Budget 2021	(12.515)
Covid grants carried forwards	(17.471)
Specific Grant Funding	(3.000)
Public Health Grant	(6.000)
Income compensation	(3.234)
Total Covid income	**(42.220)**
Net deficit	**32.923**

3.44. There are further Covid-19 financial risks which have been quantified at £5.0m which are around Adult Social Care.

Delivery Plan

3.45. The Transformation Programme structure has been defined and the associated architecture to support delivery has been established. Reporting mechanisms and assurance processes are being developed and will be embedded over the next two quarters. Outline business cases and discovery/ feasibility work is continuing across the programme.

3.46. A further £5.0m was approved by Cabinet in July from the Delivery Plan Reserve, therefore a total of £10.0m has now been approved for draw down, from the Delivery Plan Reserve. The second approval was to enable and expedite programme management support across the Portfolios within the Transformation Programme and specialist capacity to lead and drive forward key areas of activity.

3.47. Initial sourcing of appropriate support for the organisation was funded primarily by the Transformation Fund (£5.25m).

3.48. With regards to the Transformation Fund, the total spend to date including 2021-22 Q2 is £1,841,283 with a remaining £1,219,068. Of this amount, £1,205,087 is committed leaving a remainder of £13,981 uncommitted funds.

3.49. With regards to the Delivery Plan Reserve, the total amount approved for spend to date is £9,150,251. The forecast for spend is £105,000 and the pipeline forecast is £447,618.This would leave a remainder of £297,132.

3.50. Given the success of the pump priming of transformation at pace to date, it is prudent at this time to request a further £10.0m draw down from the Delivery Plan Reserve. Further requests are expected in the coming months and it is important to keep up the pace and scale of transformation enabling work which is increasingly focussing on invest to save initiatives that will improve citizen outcomes whilst reducing net service delivery costs.

CEO Transformation Fund - £5.25m		
2020-2021 allocation £4m		
2021-2022 Allocation £1.25m		
Quarter 2 2021-22		
Actual spend 20/21	£	2,189,649
Total Allocation 20/21	£	4,000,000
Remaining funds carried forward to 21/22	£	1,810,351
Allocation 2021-2022	£	1,250,000
Remaining funds carried forward from 20/21	£	1,810,351
Total Allocation for 21/22	£	3,060,351
Spend Q2 21/22	£	1,841,283
Remaining	£	1,219,068
Committed funds	£	1,205,087
Remainder	£	13,981

Delivery Plan Reserve- Draw Down £10m		
Quarter 2		
Total Spend Approved	£	9,150,251
Request Forecast	£	105,000
Pipeline Forecast	£	447,618
Total	£	9,702,869
Remaining	£	297,132

Transfer of Service Areas

3.51. The Quarter 2 Report reflects the transfer of services from the previous Directorates to the new Directorates as part of the Chief Executive's Delivery Plan as approved in

principle by Cabinet on 19 January 2021. The new hierarchy is reflected in this report.

Policy Contingency

3.52. The Council Financial Plan and Budget 2021-2025 approved by Council on 23rd February 2021 reflected £44.0m for Specific Policy contingency budget in 2021/22 and £0.6m for General Policy Contingency budget. This is excluding savings that will be allocated to directorates in 2021/22. Until they are allocated, these will be held within the Policy Contingency budget.

3.53. It was approved by Cabinet on 29th June 2021 to carry forward £5.5m into a General Policy Contingency Reserve and use this in 2021/22 to increase the General Policy Contingency budget to £6.1m. This is reflected in the budget set out below.

Table 8: Policy Contingency

Policy Contingency	Budget £m	Committed by Qtr 1 £m	Qtr 2 Committed £m	Not yet committed £m	Forecast underspend £m
Inflation Contingency	17.324	(8.630)	(0.055)	8.639	0.000
Redundancy and Exit Costs	9.281			9.281	(9.281)
Modernisation Fund - Social Care	8.955		(5.800)	3.155	0.000
Workforce Equalities & Streetscene	4.000	(2.205)		1.795	0.000
Apprenticeship Levy	1.259			1.259	0.000
Delivery Plan Programme Management	1.250			1.250	0.000
Highways Maintenance	0.750			0.750	0.000
Short-term Improvement in the Council House	0.500			0.500	0.000
HR Additional Temporary Resources	0.300	(0.300)		0.000	0.000
Loss of Income from Car Park Closures	0.252			0.252	0.000
Corporate Funding for Owning & Driving Performance (ODP)Culture Change Programme	0.129			0.129	0.000
General Contingency	6.086	(0.651)	(2.149)	3.286	0.000
Total Policy Contingency excluding savings	**50.086**	**(11.786)**	**(8.004)**	**30.296**	**(9.281)**
Capitalisation Transformation Projects to be allocated to services in 2021/22	(21.349)			(21.349)	
Delivery Plan Workforce saving - to be allocated to services in 2021/22	(20.132)	9.965	4.493	(5.674)	
DRF Revenue Switching to be allocated to servcies in 2021/22	(9.304)			(9.304)	
Procurement Savings	(0.747)			(0.747)	
Transport Work Stream	(0.400)			(0.400)	
Total Savings to be allocated	**(51.932)**	**9.965**	**4.493**	**(37.474)**	**0.000**
Total Policy Contingency	**(1.846)**	**(1.821)**	**(3.511)**	**(7.179)**	**(9.281)**

Specific Policy Contingency

3.54. As shown above the Section 151 Officer has approved the release of the following:

• £0.1m of Specific Policy contingency to fund inflationary pressures,

3.55. The release of £5.8m funding for Modernisation Fund-Social Care was approved by Cabinet on 16th March 2021.

General Policy Contingency

3.56. Cabinet is asked to approve the release of the following from General Policy Contingency:

- £0.4m to fund JNC positions within City Operations as part of the new Council structure.
- £0.6m to fund communications costs to support the Commonwealth Games.
- £0.5m to fund a price freeze for City Serve.
- £0.1m to fund the 3 cities initiatives
- £0.6m to fund Digital mail and Bank charges

Balance Remaining

3.57. Assuming the releases of budget shown above are approved, the balance on Policy Contingency excluding Savings would be £30.3m.

3.58. The Council will closely monitor expenditure on Policy Contingency and will seek to identify savings during the remainder of the financial year.

Forecast Underspend

3.59. Following a review of Policy Contingency, there is a forecast underspend of £9.3m related to savings on redundancy and exit costs due to the number of redundancies being lower than forecasted, and any costs that do materialise will be funded using capital receipts flexibility. These savings will help to mitigate the cost of the pay award pressure.

3.60. The Council will continue to closely monitor expenditure on Policy Contingency and will seek to identify further savings during the remainder of the financial year.

Collection Fund

3.61. The monitoring arrangements for the Collection Fund include reporting on the in-year position for Council Tax and Business Rates. The impact of any surplus or deficit is taken into account as part of the setting of the following years budget.

Council Tax

3.62. The overall net budget for Council Tax income including Parish and Town Council Precepts is £384.8m in 2021/22. In addition, the Council collects the precepts on behalf of the Fire and Police Authorities.

3.63. There is a deficit forecast for the year of which the Council's share is **£2.7m**. This is made up of a cumulative deficit brought forward from 2020/21 of £5.9m, a 2021/22 deficit of £12.3m, largely driven by increased Council Tax Support, offset by the £15.5m Hardship Fund.

3.64. The position for Council Tax is set out in the table below:

Council Tax Summary Table (BCC Share)

	Budget	Forecast Outturn	Forecast Surplus/(Deficit)
	£m	£m	£m
Gross Debit	569.373	569.853	0.480
Non Collection	(13.545)	(14.823)	(1.278)
Net Budget	**555.828**	**555.030**	**(0.798)**
Council Tax Support	(96.390)	(111.335)	(14.945)
Other Reliefs and Discount	(72.685)	(69.356)	3.329
Total in year Debit	**386.754**	**374.340**	**(12.414)**
Prior Year Adjustment	(1.965)	(1.849)	0.116
Total In Year Surplus/(Deficit)	**384.789**	**372.491**	**(12.298)**
Total Deficit Brought Forward	0.000	(5.905)	(5.905)
Grand Total Surplus/(Deficit)	**384.789**	**366.586**	**(18.203)**
Hardship Fund	0.000	15.526	15.526
Grand Total Net Surplus/(Deficit)	**384.789**	**382.112**	**(2.676)**

Business Rates

3.63. Under the 100% Business Rates Pilot that came into effect on 1st April 2017 the Council continues to retain 99% of all Business Rates collected under the Business Rates Retention Scheme with 1% being paid over to the West Midlands Fire Authority. The overall budgeted level of Business Rates in 2021/22 is £422.4m (excluding the Enterprise Zone), of which the Council's retained share is £418.2m.

3.64. There is a deficit anticipated, in year, of which the Council's share is £115.8m. This is mainly due to reliefs of £107.7m which primarily relate to Retail and Small Business Reliefs that the Council has granted to businesses in the leisure, hospitality, retail and nursery sectors which have been affected by Covid-19. The forecast gross rate yield is £3.1m lower than the budget due to lower growth in businesses and longer processing times at the Valuation Office impacting on when growth is added to the schedule. To be prudent only a small amount of growth from missing and undervalued assessments has been included in the forecast, and original growth from planning applications which was assumed when the budget was set has not been factored in the forecast due to economic uncertainties. In addition, an increase in bad debt provision of £2.6m is forecast as a result of COVID-19 and an increase in the appeals provision of £2.5m is forecast to cover outstanding appeals.

3.65. The Government has announced plans to provide an extra, targeted business rates support package for businesses which have been unable to benefit from the existing £16 billion business rates relief for retail, hospitality and leisure businesses. The £1.5 billion funding pot which is to be distributed amongst all local authorities will provide businesses within Birmingham access to an additional £25m in rate relief. The Council is currently waiting for the relief legislation to be passed by central government and the subsequent scheme guidance to be released to local authorities. The extra relief and the funding for it has not been included in the forecast above. Once the Council is in receipt of this guidance a further update will be provided.

3.66. As with Council Tax, the Council budgeted for lower than usual collection rates in 2021/22. There may be further worsening of non-collection rate due to the continuing effects of Covid-19 on the economy. An allowance has been made for this in the forecast for the bad debt provision.

3.67. The total additional grants, compared to budget, that are anticipated to offset this deficit is £100.7m. However, this will be received into the General Fund in 2021/22 and so will be required to be set aside as a contribution to reserves in the current year to be used to offset the £115.8m forecast deficit in the Collection Fund.

3.68. As a result of the above a total in year deficit of £15.1m is assumed to be carried forward and taken into account in setting the budget for 2022/23 made up of £115.8m deficit relating to the Council's share offset by £100.7m compensatory grants.

3.69. In addition to the in-year position and as previously reported in the 2020/21 Outturn report, a cumulative deficit was brought forward from 2020/21 of £2.5m. Therefore, an overall forecast Deficit of £17.6m relating to the Council's share of Business Rates (£15.1m in year Deficit plus £2.5m Deficit brought forward) is anticipated.

3.70. The position for Business Rates is shown in the table below:

Business Rates Summary Table (BCC Share)

	Net Budget £m	Forecast Outturn £m	Forecast Surplus/(Deficit) £m
Gross Rate Yield	556.321	553.265	(3.056)
Total Reliefs	(100.665)	(208.323)	(107.658)
Gross rate yield after reliefs	**455.656**	**344.942**	**(110.714)**
Increase in Bad Debts Provision	(18.226)	(20.791)	(2.565)
Other	(19.274)	(21.819)	(2.546)
Total Net Rate Yield	**418.156**	**302.332**	**(115.824)**
Compensatory Section 31 Grant (BCC Share)	54.079	154.796	100.716
Grand Total In Year Surplus/(Deficit)			**(15.108)**
BR Deficit Brought Forward		(2.477)	(2.477)
Grand Total Surplus/(Deficit)			**(17.585)**

Overall

3.71. Taken together, the anticipated position for the Collection Fund and related income streams is a deficit of £20.3m to be carried forward and taken into account in setting the budget for 2022/23 (a £2.7m deficit for Council Tax and a £17.6m deficit for Business Rates).

3.72. The Council is planning to use £2.5m of the Business Rates Volatility Contingency Reserve in 2022/23 to fund the increase in Appeals Provision that is forecast to be required.

3.73. It should be noted that the Government stated that local authorities would be compensated in 2021/22 for 75% of the 2020/21 loss in Collection Fund Income. The Council estimated that it would receive in the region of £39.6m when setting its 2021/22 budget based on the guidance issued by the Government, however it now only expects to receive £23.4m. This shortfall of £16.2m will be spread over the three years from 2021/22 to 2023/24 at £5.4m per year.

Housing Revenue Account (HRA)

	Current Budget	Forecast Outturn	Over/ (Under-spend)	Movement since Pd 3 Over/(Under) spend
	£m	£m	£m	£m
Rent Income	(254.737)	(254.687)	0.050	0.050
Service Charges	(15.158)	(15.158)	0.000	0.000
Other Income	(11.638)	(11.712)	(0.074)	(0.074)
Total Income	**(281.533)**	**(281.557)**	**(0.024)**	**(0.024)**
Repairs	65.767	65.992	0.225	0.225
Estate Services	20.072	19.241	(0.831)	(0.831)
General Management	69.081	65.005	(4.076)	(3.657)
Bad Debt Provision	8.120	6.040	(2.080)	(0.235)
Capital Financing	55.870	52.870	(3.000)	0.000
Capital Programme Funding	62.623	70.144	7.521	4.521
Total Expenditure	**281.533**	**279.293**	**(2.240)**	**0.024**
Net Surplus	**0.000**	**(2.264)**	**(2.264)**	**0.000**

Overall Position

3.74. At the end of Quarter 2 the forecast for the HRA is a net surplus of (£2.3m), which is no change to what was reported at Period 3. The surplus is available to be added to the current revenue reserve of £11.3m increasing it to £13.6m.

Expenditure Variances

3.75. The forecast variance on Repairs is an overspend of £0.2m, an increase on the nil variance reported at Period 3. The net overspend is due to a combination of factors, including additional revenue costs resulting from capital fire panel works.

- This forecast variance on Estate Services is an underspend of (£0.8m), which is an increase on the nil variance reported at Period 3. The main reason for the forecast underspend is turnover on employees.

- The forecast variance on General Management is an underspend of (£4.1m) which is an increased underspend of (£3.7m) from what was reported at Period 3. The increase is due to an underspend on employees (£1.6m) due to turnover, a transformation review of the service and pension savings; an underspend on the recruitment of the new building safety posts due to delays in building safety legislation (£1.5m); and other variances (£0.6m).

- The forecast variance on the Bad Debt Provision is an underspend of (£2.1m) which is an increased underspend of (£0.2m) from what was reported at Period 3. The underspend is on the Housing Benefit provision and is due to lower levels of arrears on Housing Benefit because of the impact of Covid on former tenant arrears and the continued move to universal credit.

- This forecast variance on Capital Financing is an underspend of (£3.0m) which is no change from what was reported at Period 3. The anticipated savings on Capital Financing are largely due to the estimated interest rate being lower than the budgeted rate.

- The forecast overspend on Capital Programme Funding is £7.5m, an increase of £4.5m on what was reported at Period 3. The overspend is due to the increased investment planned on the Capital Programme, including match funding of £3.2m on the LAD2 programme. The overspend is funded from the savings on the Capital Financing, Estate Services and General Management budgets.

HRA Current Arrears

3.76. HRA current arrears at the end of August were £20.0m, an increase of £3.4m since the beginning of April. The latest forecast position provided by the Rent Team shows an increase in arrears of £2.2m, after taking into account the payment holidays in December and March. Year-end forecast is £18.9m. The position does not include any impact of changes in furlough or the additional £20 per week to tenants in receipt of universal credit. Both policies are currently due to finish at the end of September.

Housing Rents - Covid-19 Forecast for 2021/22
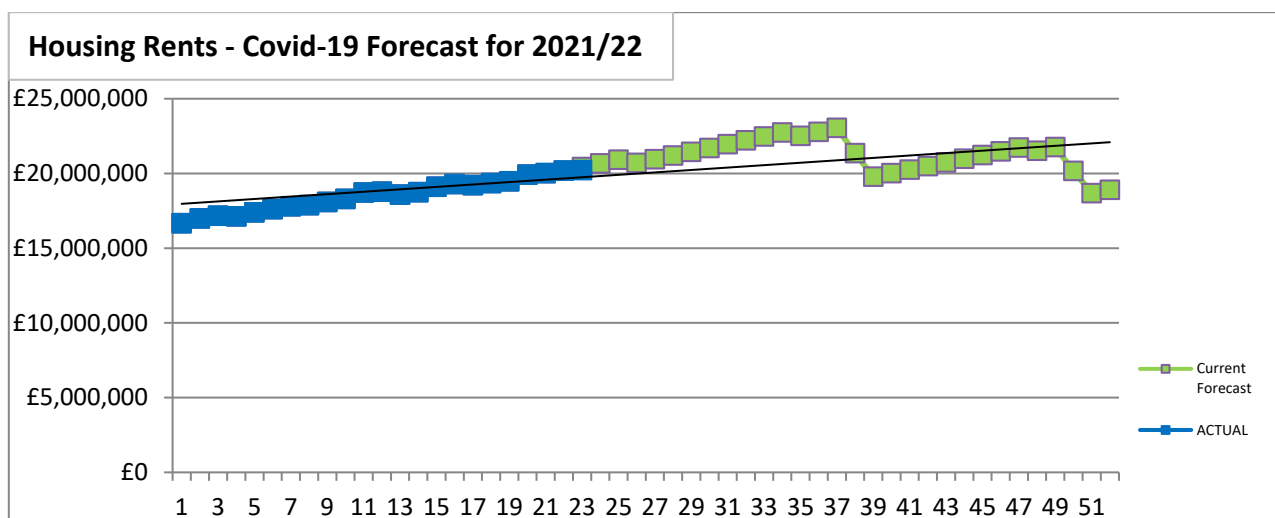
3.77. The HRA Current Arrears Bad Debt Provision would increase by £1.9m based on the forecast increase in arrears. This results in an underspend of £2.1m against the HRA Current Arrears Bad Debt Provision Budget. Work is ongoing to assess if the arrears increase will be in line with the above forecast or closer to last year's outturn of £3.2m. Currently the variation to budget forecast on this part of the Bad Debt Provision is nil.

Covid_19 pressures

Currently, the only Covid-19 specific pressure identified is an additional cost of £0.2m for targeted cleaning of high-rise and low-rise blocks of flats post Covid-19 lockdown, and provision of PPE. This will be funded from savings within the general management budget.

Dedicated Schools Grant (DSG)

Summary

3.78. The July 2021 notification from the Department for Education (DfE) shows total Dedicated Schools Grant (DSG) funding for Birmingham in 2021/22 of £1,324.2m, which comes through four blocks of funding. The Education & Skills Funding Agency (ESFA) currently recoups £646.0m of the DSG allocation to directly passport to academies and free schools.

3.79. The Council is responsible for the remaining budget of £678.2m, in conjunction with the local Schools' Forum. In addition, schools and academies receive direct funding allocations from the Department for Education (DfE) relating to Pupil Premium, Education Funding Agency (EFA) Post 16 Funding and Universal Infant Free School Meals. Birmingham's maintained schools allocation is estimated at £58.4m.

3.80. The budget will move during the course of the year as schools convert to academy status and Department for Education updates funding for updated pupil counts (particularly in early years).

3.81. At Quarter 2 the high-level forecast for the Dedicated Schools Grant (DSG) is as follows:

	Budget £m	Forecast Outturn £m	Variance £m
Schools Delegated	387.326	387.326	-
Central Schools Services	18.284	18.284	-
High Needs	181.231	181.231	-
Early Years	91.313	91.313	-
Sub Total – City Council	**678.154**	**678.154**	**-**
Academies & Other recoupment	646.017	646.017	-
Total	**1,324.171**	**1,324.171**	**-**

Key Service Highlights

3.82. DSG is a highly prescribed and ring-fenced grant and is the primary source of funding that is delegated or allocated to schools and other educational providers for their revenue costs as well as funding certain prescribed centrally managed provision. The Directorate have not reported any variations on the DSG at Period 6. This is primarily because the majority of the budget is delegated to schools and early years providers and variations tend only to appear during the start of the new academic year (in September). A more substantial update will be provided at period 9 when the new academic year placement of pupils and the associated financial implications have been evaluated.

3.83. Demand led pressures in the High Needs Block have in the past led to overspends with a £14m High Needs Block deficit reported at the end of 2019/20. As agreed by Schools Forum at their meeting in January 2020, £5m was repaid during 2020/21 with the remaining £9m due to be repaid at a rate of £5m in 2021/22 and the remaining £4m balance in 2022/23.

3.84. In May 2021 Birmingham hosted Ofsted and CQC to conduct their Local Area SEND Revisit in order to establish if the partnership has made sufficient progress against the 13 areas of significant weakness identified in the 2018 inspection. The outcome of this revisit has now been published, with Birmingham making sufficient progress in 1 of the 13 areas of significant weakness. As a result, the Secretary of State has issued a statutory direction to Birmingham to improve SEND services and has appointed a Commissioner. There is therefore a need for a SEND Improvement programme for the city which will require significant one-off investment from the general fund, alongside ongoing investment from the HNB and General Fund to address capacity issues within the system.

3.85. The Interim Director of Council Management and the Interim Director of Education and Skills have commissioned the Chartered Institute of Public Finance & Accountancy (CIPFA) to carry out a budget sufficiency review of the Education and

Skills budget which includes a review of spending against the DSG. The Local Government Association (LGA) will also support with work in this area. This work should conclude by November 2021 and further updates as to the impact of their assessment on the DSG position will be provided in due course.

3.86. The financial risk to the Council arising from any negative variance is low, as it is a condition of the grant from the Department for Education that any overspends are carried forward and plans submitted for bringing the DSG account back into balance. Nonetheless, potential risks and mitigations are detailed below.

Key Risks (not reflected in the financial forecast)

3.87. The number of LA maintained schools in deficit has decreased and is now 28 (11.9% of the total number of LA maintained schools). The cumulative value of deficits has decreased by £2.4m to £6.3m; the Local Authority is working with Governing Bodies on deficit recovery plans to reduce this further. For 2021/22 there is a proposal to use £3m of the High Needs Block to support special schools in financial difficulties and so reduce the liability that falls on the Council when special schools convert or close.

3.88. It should be recognised that 2020/21 has been a difficult year with the COVID-19 pandemic and whilst there have been reported cost increases and income losses, there have also been some savings associated with premises and utilities costs as a result of buildings being closed and staff working from home as well as additional funding being received to support schools during the pandemic. It is envisaged the true financial position will probably evolve over the next few years.

Future Years Impact

3.89. Future years impacts will be influenced most substantively by the Government's review of school funding and, in particular, ongoing guarantees of increased high needs funding. The current High Needs proposals should ensure that the deficit on the High Needs block is paid off by the end of 2022/23.

Savings Tracker:

3.90. There is no specific savings tracker for the Dedicated Schools Grant, but as highlighted above, the plan to repay the High Needs block cumulative deficit is on track.

4. Balance Sheet Section

Borrowing

4.1. Gross loan debt is currently £3,190m, with the year-end projection likely to be below the planned level of £3,722m. Some government grants have been received early and there has been a reduced borrowing requirement for the capital programme. The annual cost of servicing debt represents approximately 27% of the budget.

4.2. Positive cashflows within the local government sector mean that the Council's treasury investments remain temporarily higher at £199m against a planned level of £40m. This has meant the Council has been able to delay some of its short term and long-term borrowing needs. Uncertainty remains about the continued impact of Covid on the Council's cashflow.

Level of Debt and Provision

4.3. The Council's sundry debt at end of September 21 stood at £81.7m. This was a decrease of £1.9m compared to end of September 20 when total debt was £83.6m.
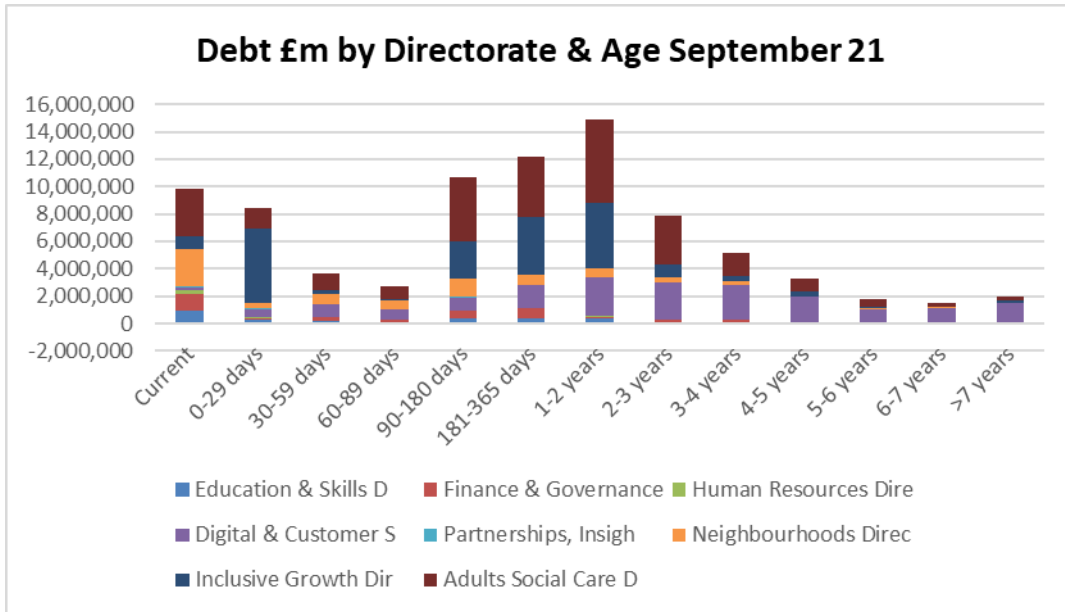
4.4. The table below show there are year on year decreases in all age bands up to 89 days due. This is a positive position and the efforts to continue to drive down the city's sundry debt are ongoing.
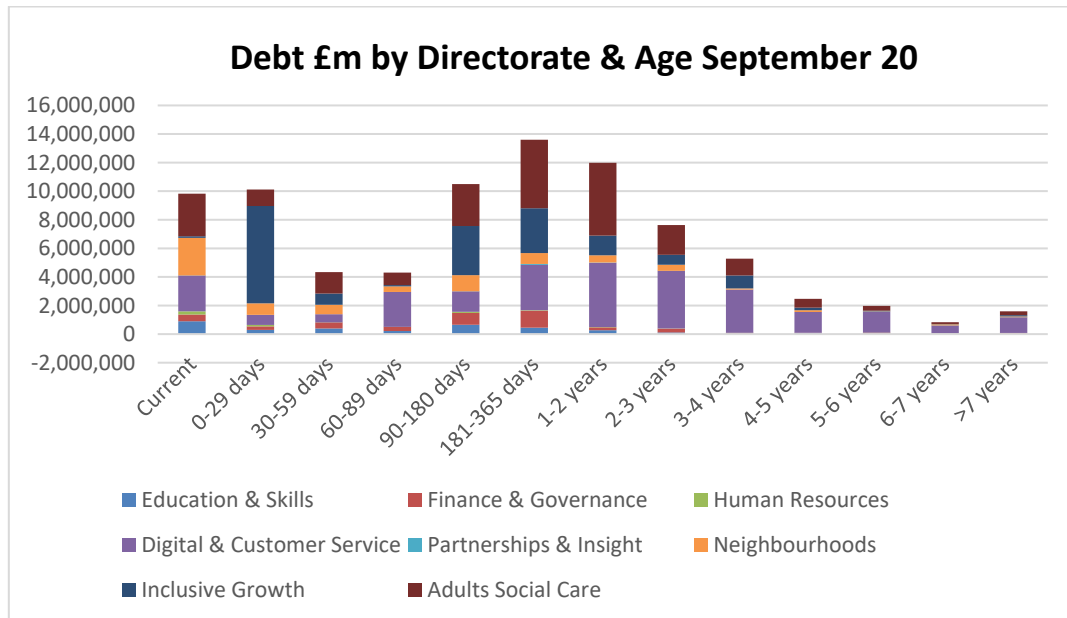
4.5. The older debts show a different position with a year on year increase of £2.8m in the age band 1 – 2 years so a more concerted effort and focus will continue to be placed on these. There are factors which have contributed to this increase which include local decisions in place to not take proceedings on any commercial rent debt. This situation is to be reviewed again in March 22.

4.6. The targeted approach adopted will continue and this includes understanding the Council's top 50 debtors, analysis of which is given below.

Top 50 Debtors Profile

4.7. As of September 21 the value of the top 50 aged debtors (+ 90 days) was £8.7m which is 10.6% of total sundry debt. Analysis of this debt shows that £2.10m is highly likely to be or has been recovered, £4.80m is in the balance and £1.80m is high risk and unlikely to be or will not be recovered. Example being insolvent companies with no assets.

RAG Summary	£m	No. debts
Highly likely to be or has been recovered	2.10	10
In the balance	4.80	25
Unlikely to be or will not be recovered	1.80	15
TOTALS	**8.70**	**50**

4.8. The profile of the £8.7m is spread across directorates as shown in table below

Directorate	Value £m	Nature of debts
Adult Social Care	4.20	Residential care provision & NHS contributions
Finance & Governance	0.65	Suppliers to schools for meals & Schools
Inclusive Growth	3.50	Commercial property rents
Neighbourhoods	0.35	Market rents
TOTAL	**8.70**	

4.9. Action plans have been recorded for all these debts which are subject to monthly reviews. Reports for the top 20 debtors for each directorate continue to be produced with associated action plans for each of these.

Reserves

4.10. The Council operates a policy of not using reserves unless they have been set aside for specific purposes; they will not be used to mitigate the requirement to make savings or meet on-going budget pressures, except in exceptional circumstances. The main use of reserves relates to grant reserves where funding has been received prior to the requirement to spend the resource. The Council also has earmarked reserves where it has made a decision to set money aside to fund specific costs when they occur in later years.

4.11. The Council anticipated the net use of £155.9m of reserves in setting the 2021/22 budget. This is summarised in Table 6 together with the current forecast outturn balance. At Quarter 2, £37.4m of uses of reserves that were approved by Cabinet as part of the Outturn Report on June 29th have been reflected. There is a forecast of a further £55.6m net uses of reserves and a contribution to reserves of £100.7m.

4.12. This includes assuming that the forecast overspend of £10.2m is funded by use of the Financial Resilience Reserve (FRR).

4.13. Given the significant financial pressures that are still facing the Council due to the Covid-19 emergency it may become necessary to utilise reserves in 2021/22 to support the budget, but only as a last resort. In-year requests to use reserves will be considered on an exception basis.

Table 9: Reserves	Balance as at 31st March 2021 *	Original Budgeted (Use) / Contribution	Change to budget approved at Outturn	Further changes forecast	Forecast Outturn Balance at 31st March 2022
	£m	£m	£m	£m	£m
Corporate General Fund Balance	38.382	0.000	0.000	0.000	38.382
Delivery Plan Reserve (formerly Invest to Save)	70.097	3.296	0.000	(24.750)	48.643
Financial Resilience Reserve Gross	*101.119*	*42.964*	*0.000*	*(15.544)*	*128.539*
Net Borrowing from Financial Resilience Reserve	*(11.863)*	*(9.017)*	*0.000*	*(0.600)*	*(21.480)*
Financial Resilience Reserve Net	89.257	33.947	0.000	(16.144)	107.059
General Reserves and Balances	**197.735**	**37.243**	**0.000**	**(40.894)**	**194.083**
Other Corporate Reserves **	407.378	(205.454)	(21.954)	92.049	272.019
Grant	318.094	(7.419)	(15.480)	(6.000)	289.195
Earmarked	57.007	19.717	0.000	0.000	76.724
Schools	69.389	0.000	0.000	0.000	69.389
Non Schools DSG	12.660	0.000	0.000	0.000	12.660
Subtotal Other Reserves	**864.529**	**(193.156)**	**(37.434)**	**86.049**	**719.987**
Grand total	**1,062.264**	**(155.914)**	**(37.434)**	**45.155**	**914.070**

*The Opening Reserves Balances is subject to confirmation when the Accounts have been finalised. The figures are based on the draft accounts as published.

** Please note that the further changes forecast for Other Corporate Reserves includes the £100.7m as described in paragraph 4.16 below.

4.14. There are forecast further uses of reserves as follows:
- The forecast overspend of **£10.2m** is assumed to be funded from the FRR as mentioned above.
- The **£17.5m** of Covid Reserves carried forward from 2020/21 will be required in 2021/22 as referred to in paragraph 1.2.
- In order to facilitate the further improvement to the SEND service Cabinet approved the drawdown of **£5.1m** from the Financial Resilience Reserve (FRR) in July 2021.
- It is also expected that the **£2.0m** SEND Reserve created at the end of 2020/21 will be fully utilised in 2021/22.
- There will be a use of **£10.0m** of the Delivery Plan Reserve to fund the Delivery Plan as approved by Cabinet in April and July 2021 plus a further **£10.0m** requested in this report, and as described in paragraph 3.46 .
- There will be a use of **£6.0m** of carried forward Public Health Grant Reserve to mitigate eligible spending in 21/22.
- There will be a further use of **£4.8m** of the Delivery Plan Reserve to fund New Ways of Working (NWOW) as approved by Cabinet in July 2021.
- Cabinet approved the drawdown of **£0.7m** for two years for the Digital Inclusion Strategy and Action Plan from the £10.0m Community Recovery Reserve in September 2021, leaving a balance on that reserve of £9.3m.
- Cabinet approved the use of **£0.3m** of the FRR to fund costs of the Route to Zero (R20) team in October 2021.
- There is expected to be a reduction of **£0.6m** to a budgeted repayment of borrowing from the FRR as the repayment was made at the end of 2020/21, so is no longer required.

4.15. This is partially offset by a forecast reduction in uses of reserves of the following:
- The Council is using **£5.4m** less of the Tax Income Compensation Reserve than planned as there is less available to use, as referred to in paragraph 1.5.

- The Council is using **£6.2m** less of the Capital Receipts Flexibility Reserve than planned. This is a timing issue and does not affect the bottom line.

4.16. There is also a forecast contribution to reserves as follows:

- As set out in paragraph 3.67 in the Collection Fund section, the Council will receive from the Government additional grants of **£100.7m** to offset the Collection Fund deficit caused by the granting of reliefs to businesses. This will be received into the General Fund in 2021/22 and will be required to be set aside as a contribution to reserves in the current year, to be used in to offset the forecast deficit in the Collection Fund related to 2021/22 that will be charged to the General Fund in 2022/23.

List of Annexes

1. **Covid Costs details**

2. **Write off details**

3. **Treasury Management**

4. **Capital Programme tables**

5. **Investment Property Portfolio Monitoring Dashboard**

Annex 1 Covid Cost Details

Detail of Covid Forecast Costs by Directorate

Directorate	Service	Description	Sum of Covid Cost (£m)
Adult Social Care	Packages of Care	Loss of day centre income due to closure	0.212
Adult Social Care	Packages of care	Support to care market not covered by grant or specific ASC provision	0.070
Adult Social Care	Assessment & Support Planning	Additional Adults staffing costs	0.445
Adult Social Care	Other Minor		0.112
Adult Social Care			**0.839**
Education & Skills	BCC Early Years, BCT	additional Covid expenditure approved by Coordination Response Group	0.300
Education & Skills	Birmingham Children's Trust - other	Increased costs in BCT Children's Social Care - Other - estimate only at this stage to be refined	1.120
Education & Skills	EWS	reduction in income from fixed penalty notices for school absences	0.105
Education & Skills	Libraries	Strategic and Community Libraries. Loss of income from sales, fees and room hire. Also potential loss of rental income at Sutton library.	0.070
Education & Skills	SENDIASS	SENDIASS - additional expenditure to cover work that would have been undertaken by social work placements	0.339
Education & Skills	Other Minor		0.071
Education & Skills			**2.005**
Council Management	IT&D	IT equipment and support to respond to immediate Business Continuity requets including project work and staff time	2.046
Council Management	Development & Commercial	City Catering – loss of income from functions	0.170
Council Management	Development & Commercial	City Catering –saving CC104 19+ Commercialism	0.116
Council Management	Development & Commercial	Loss of commercial advertising income from outdoor digital advertising, lamp posts, roundabouts etc	0.148
Council Management	Development & Commercial	Shortfall in overhead reccovery due to reduced photcopying volumes in CAB and BCC Building	0.075
Council Management	CityServe	Increase in cost of laundering uniforms due to increased frequency of washing - CityServe	0.060
Council Management	Commercial Hub - Cityserve	Cityserve –loss of income from the schools	0.414
Council Management	Procurement	CRG Decision - Pandemic Response and Recovery Procurement Support	0.150
Council Management	Legal and Governance	CRG Decision - Pandemic Response and Recovery Legal and Governance Support	0.217
Council Management	Service Finance	CRG Decision - Pandemic Response and Recovery Service Finance Support	0.135
Council Management	Other Minor		0.107
Council Management			**3.638**
City & Municipal	Property Services	Commercial Rent Property Strategy Growth (Inclusive Growth only): non-achievement of savings proposal in Council Financial Plan 2020+	1.065
City & Municipal	Property Services	Operational Hub Programme - non achievement of savings targets in Council Financial Plan 2020+	0.322
City & Municipal	Director Inclusive Growth	Facilities - Miscellaneous	0.142
City & Municipal	Other Minor		0.075
City & Municipal			**1.604**
City Operations	Street Scene	Additional costs primarily agency as a result of responding to Covid related requirements (Lateral flow tests collection and disposal, cleaning of vehicles,supporting the reopening of hospitality venues, covering for staff who are being vaccinated or taking annual leave owed from2020/21. (updated20/06/20)	2.183
City Operations	Street Scene	Loss of income due to loss of customers as business have shut and delayed reopening loss of trade waste income	1.115
City Operations	Street Scene	Cost of buying back unused 2020/21 Annual Leave as a result of the demands of being part of City Council's response to Covid (nil in 2021/22)	-
City Operations	Neighbourhoods	Loss of income due to closure of Lesiure Centres	1.433
City Operations	Neighbourhoods	Estimated Claims from External contractors	1.844
City Operations	Neighbourhoods	Loss of income Community Centres and delay in tranfer of Oddingley (updated 29/05/20)	0.231
City Operations	Regulation & Enforcement	Additional cost of gate security at cemeteries and cremetoria - costs arranged through Security Services (Inclusive Growth) using Extra Personnel resources	0.141
City Operations	Regulation & Enforcement	Register Office additional contracted hours for officers continued initially in 2021/22	0.090
City Operations	Regulation & Enforcement	Markets - Open Market St Martins 2021/22 Impact of traders continuing to leave and giving up stalls and storage units directly attributed to COVID-19 closure and reduced demand	0.108
City Operations	Regulation & Enforcement	Markets - Rag Market 2021/22 impact of traders giving up stalls and storage units directly attributed to COVID-19 closure and reduced demand. Vacancies unlikely to be re-filled	0.262
City Operations	Regulation & Enforcement	Trading Standards - Reduction in court costs expected to continue to affect 2021/22 due to closure of courts over COVID response period and prioritisation of serious criminal hearings only.	0.150
City Operations	Regulation & Enforcement	Coroner - cost in 2021/22 of additional coroner over and above holiday cover plus additional assistant coroners above BAU plans to deal with COVID workload.	0.074
City Operations	Regulation & Enforcement	Temp Mortuary facilities BCC / West Midlands Regional incl Registration with HTA £200k is expected BCC contribution to decommissioning - parts in Oct21, Dec21 and final decommissioning February 2022	0.200
City Operations	Car Parking	Car Parking On Street F&C - V3B0	1.010
City Operations	Car Parking	Car Parking On Street-Bay Suspensions - V350	0.905
City Operations	Car Parking	Car Parking Off Street F&C - V3B0	2.840
City Operations	Car Parking	Car Parking Off Street Season Tickets V220	0.670
City Operations	Car Parking	Civil Parking enforcement V4Q0	0.576
City Operations	Car Parking	Local Car Parks - V3B0	0.473
City Operations	Street Scene - Parks	Parks Loss of income from Bowls/Cricket/Car Parks/Shop Sales/catering income,plus other expenditure items relating to loss of tree assets	0.116
City Operations	Other Minor		1.389
City Operations			**15.810**
City Housing	Housing Options	Additional NRPF costs incurrd in 2021/22 (third pary and bed&breakfast)	0.148
City Housing	Housing Options	Reduced Capacity Hostels during 2021/22 resulting in additional bed & breakfast costs	0.825
City Housing	Other Minor		0.595
City Housing			**1.568**
Partnerships, Equalities & Participation	Community Safety	Improviing standards of Supported Accomodation (Exempt)	0.100
Partnerships, Equalities & Participation Total	Community Safety	Improviing standards of Supported Accomodation (Exempt)	0.105
Corporate	Other Minor		0.006
Corporate			**0.211**
Corporate Total	Council Tax	Council Tax Support	4.000
Corporate Total	Corporately Managed Budgets	Dividends	7.470
Corporate Total			**11.470**
Covid Grand total			37.145

Annex 2 Write-offs
Write-off of Irrecoverable Housing Benefit, Council Tax and Business Rates

a.   **Irrecoverable Housing Benefit**

1)   In circumstances where Housing Benefit overpayments are identified as not being recoverable, or where recovery is deemed uneconomic, the City Council's Financial Regulations and delegated powers allow for these overpayments and income to be written off. All possible avenues must be exhausted before such write offs are considered. Amounts already written off will still be pursued should those owing the Council money eventually be located or return to the city.

2)   The cost to the council of writing off these irrecoverable sums will be charged to the City Council's provision set up for this purpose, which includes sums set aside in previous years to meet this need. It is, therefore, the appropriate account to be charged. There is no effect on the revenue account.

3)   In 2021/22, from 1st July up to 30th Sept 2021, further items falling under this description in relation to Benefit overpayments have been written off under delegated authority. The Table below details the gross value of amounts written off, which members are asked to note.

Age analysis	Over 6 years	3 to 6 years	Under 3 years	Total
	£m	£m	£m	£m
Benefit Overpayments	0.009	0.030	0.043	0.082
Total	**0.009**	**0.030**	**0.043**	**0.082**

Appendix 6b to this report gives a more detailed age analysis of overpayments and income written off.

b.   **Irrecoverable Council Tax & Business Rates**

There has been no write-offs submitted for Quarter 2. There has been no resource at either officer or management level to process write offs in the last quarter due to the continuation of business grants and the movement of cases to the correct enforcement stage.

c. **Age analysis of overpayments and debts written off under delegated authority by Revenues and Benefits Division (Housing Benefit)**

Summary 01.06.21 – 30.09.21.

Detail	Pre 2011	2011/12	2012/13	2013/14	20014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	Total	No of Debtors
Housing Benefit debts written off under delegated authority	£156.11	£394.50	£41.35	£228.60	£3,459.95	£5,166.74	£7,075.48	£4,705.73	£17,881.78	£9,004.19	£22,467.09	£11,799.27	£82,380.79	261
TOTAL	£156.11	£394.50	£41.35	£228.60	£3,459.95	£5,166.74	£7,075.48	£4,705.73	£17,881.78	£9,004.19	£22,467.09	£11,799.27	£82,380.79	261
No of debts in Age band	5	5	3	3	15	30	54	38	43	61	129	119	505	

Debt Size	Small		Medium		Large
Cases	>£1,000	Cases	£1,001-£5,000	Cases	£5,000-£25,000
246	£32,038.86	13	£32,283.88	2	£18,058.05

d. **Schedule of Sundry debts recommended for write off.**
Cabinet is requested to approve the writing off of debts greater than £0.025m due to the Council, totalling £1.0m. Table 1 details the nature of the debt.

Directorate/ Service Area	Invoice Date(s) or Liability period	Amount (£)	Comments
Adult Social Care / Client Financial Services (CFS)	Feb 2018 to April 2020	£31,127.70	**Nature and duration of service**: Social Care charges for residential & non-residential care supplied - from February 2018 - to April 2020
Inclusive Growth / Birmingham Property Services (BPS)	Apr 2003-Mar 2018	£637,356.00	**Nature and duration of service:** Commercial Rent charges for land for the period April 2003 to March 2018.
Inclusive Growth / Birmingham Property Services (BPS)	Mar 2016 – Jun 2020	£256,437.25	**Nature and duration of service**: Commercial Rent charges for the period March 2016 to June 2020
Neighborhoods /Markets	Feb 2018 to March 2020	£30,254.70	**Nature and duration of service:** Market Rent of Unit from 18th February 2018 – 31st March 2020.

TREASURY MANAGEMENT MONITORING DASHBOARD: 30 SEPTEMBER 2021

		value	comparator	difference
1	**Gross loan debt**	**£m**	**£m**	**£m**
	at month end	**3,190**		
	year end Forecast (vs Plan)	3,568	3,722	-154
	year end Forecast (vs Pru Limit for loan debt)	3,568	4,103	-535

Forecast year end debt is below the year end plan and prudential limit due to the impact of Covid and reduced borrowing required for the capital programme. Some uncertainty remains about the continued impact of Covid on the Council's cashflow.

		value	comparator	difference
2	**short term borrowing**			
	at month end (vs Guideline)	214	588	-374
	interest rate year to date on outstanding deals (vs assumption)	0.25%	0.50%	-0.25%

Short term borrowing is currently lower than forecast. Covid grants received in advance has allowed the Council to temporarily use internal borrowing to meet its borrowing needs. As these grants are utilised, the Council expects to resume short term borrowing later in the year.

		value	comparator	difference
3	**Treasury investments**			
	at month end (vs Guideline)	199	40	159
	interest rate year to date on outstanding deals (vs assumption)	0.01%	0.20%	-0.19%

Treasury investments remain temporarily higher than the guideline, before commitments made to expenditure of Covid grants are actually spent.

		value	comparator	difference
4	**Long term loans taken**			
	year to date (vs Plan)	-	130	-130
	ave. interest rate obtained (vs assumption)	-	2.40%	-2.40%

No long term borrowing has been taken in the year to date, due to favourable cashflows deferring the need for long term borrowing.

5	**Assurance**	
	were Credit criteria complied with?	**yes**
	were investment defaults avoided?	**yes**
	was the TM Code complied with?	**yes**
	were prudential limits complied with?	**yes**

These are key performance indicators for treasury management which in normal circumstances should all be yes. Investment quality is kept under continual review with support from the Council's treasury advisers.

Treasury Management: portfolio overview				
This appendix summarises the Council's loan debt and treasury management investments				
		this quarter		last quarter
		30/09/2021		30/06/2021
		£m		£m
PWLB		**2,484.2**		**2,484.2**
Bonds		**373.0**		**373.0**
LOBOs		**71.1**		**71.1**
Other long term		**47.4**		**49.8**
Salix		**0.4**		**0.5**
Short term		**214.3**		**232.9**
Gross loan debt		**3,190.4**		**3,211.5**
less treasury investments		**(198.9)**		**(172.0)**
Net loan debt		**2,991.5**		**3,039.5**
Budgeted year end net debt		**3,681.8**		**3,681.8**
Prudential limit (gross loan debt)		**4,102.7**		**4,102.7**

Short term borrowing was lower at the end of the quarter as the use of internal borrowing has allowed the Council to repay maturing loans without refinancing.

Treasury investments by source	
	£m
UK Government	**0**
Money Market Funds	**189**
Banks and Building Societies	**10**
	199

Treasury investments by credit quality			
			£m
AAA			**0**
AAAmmf			**189**
AA			**10**
A			**0**
			199

In line with the Strategy, the Council holds its treasury investments in diversified liquid funds of high credit quality. The Covid grants received in advance have been retained in liquid funds until their distribution.

Investments as Accountable Body

These are investments made as Accountable Body on behalf of on behalf of others, and are not the Council's own money.

	Growing Places Fund	AMSCI	Regional Growth Fund	Local Growth Fund	LGF3	LOGRO	NMCL	Total
	£m	£m	£m	£m	£m	£m	£m	£m
UK Government	0.0	15.0	10.0	0.0	0.0	0.0	0.0	25.0
Birmingham City Council[1]	0.0	0.0	0.0	4.2	0.0	0.0	0.0	4.2
Money Market Funds	12.1	24.7	1.8	0.0	0.4	3.2	1.8	44.0
	12.1	39.7	11.8	4.2	0.4	3.2	1.8	73.2

[1] *These funds have been lent to the Council by agreement at a commercial rate*

Treasury management: summary of delegated decisions in the quarter

This appendix summarises decisions taken under treasury management delegations to the Chief Finance Officer during the quarter.

1. Short term (less than 1 year)	borrowing		investments
	£m		£m
opening balance	233		-172
new loans/investments	82		-760
loans/investments repaid	-101		733
closing balance	214		-199

These loans and investments are for short periods from one day up to 365 days.
Short term loans have decreased as loans have been repaid upon maturity.

2. Long term borrowing:				
date	lender	£m	rate	maturity

No long term borrowing has been taken to date

3. Long term loans prematurely repaid:				
date	lender	£m	rate	maturity

No long term loans were prematurely repaid.
In line with treasury management practices, the Council will repay long term loans prematurely if this provides a financial saving to the Council.

4. Long term treasury investments made:				
date	borrower	£m	rate	maturity

No long term investments were made. The Council is a substantial net borrower and usually has cash to invest for relatively short periods.

DEBT AND PRUDENTIAL INDICATORS

	WHOLE COUNCIL	21/22 Indicators £m	21/22 Forecast £m	22/23 Indicators £m	22/23 Forecast £m	23/24 Indicators £m	23/24 Forecast £m	24/25 Indicators £m	24/25 Forecast £m
	Capital Finance								
1	Capital Expenditure - Capital Programme	639.7	709.2	461.6	494.5	261.1	339.5	204.2	251.4
2	Capital Expenditure - other long term liabilities	37.8	37.6	33.2	33.0	33.4	33.2	34.3	34.1
3	Capital expenditure	677.5	746.8	494.8	527.5	294.5	372.7	238.5	285.5
4	Capital Financing Requirement (CFR)	4,797.1	4,733.3	4,891.5	4,723.4	4,723.3	4,686.5	4,663.3	4,670.3
	Planned Debt								
5	Peak loan debt in year	3,740.0	3,585.2	3,717.7	3,661.9	3,659.7	3,609.8	3,493.6	3,548.9
6	+ Other long term liabilities (peak in year)	397.3	397.8	373.7	374.0	348.4	348.5	322.1	322.1
7	= Peak debt in year	4,137.3	3,983.0	4,091.4	4,035.9	4,008.1	3,958.3	3,815.7	3,871.0
8	does peak debt exceed year 3 CFR?	no	no	no	no	no	no	no	no
	Prudential limit for debt								
9	Gross loan debt	4,102.7	3,585.2	4,226.3	3,661.9	4,151.6	3,609.8	4,077.9	3,548.9
10	+ other long term liabilities	397.3	397.8	373.7	374.0	348.4	348.5	322.1	322.1
11	= Total debt	4,500.0	3,983.0	4,600.0	4,035.9	4,500.0	3,958.3	4,400.0	3,871.0

Notes

1   There is a net increase in forecast capital expenditure due mainly to slippage from previous years.

4   The Capital Financing Requirement represents the underlying level of borrowing needed to finance historic capital expenditure (after deducting debt repayment charges).This includes all elements of CFR including Transferred Debt.

5-7   These figures represent the forecast peak debt (which may not occur at the year end). The Prudential Code calls these indicators the Operational Boundary.

8   It would be a cause for concern if the Council's loan debt exceeded the CFR, but this is not the case due to positive cashflows, reserves and balances.

11   The Authorised limit for debt is the statutory debt limit. The City Council may not breach the limit it has set, so it includes allowance for uncertain cashflow movements and potential borrowing in advance for future needs.

HOUSING REVENUE ACCOUNT	21/22 Indicators £m	21/22 Forecast £m	22/23 Indicators £m	22/23 Forecast £m	23/24 Indicators £m	23/24 Forecast £m	24/25 Indicators £m	24/25 Forecast £m
Capital Finance								
1 Capital expenditure	126.0	123.8	165.0	126.5	144.4	154.7	120.1	150.7
HRA Debt								
2 Capital Financing Requirement (CFR)	1,113.4	1,081.4	1,144.0	1,112.0	1,156.4	1,124.4	1,161.7	1,129.7
Affordability								
3 HRA financing costs	102.9	102.5	103.8	103.6	104.4	104.1	105.8	105.5
4 HRA revenues	281.5	279.3	288.1	288.1	296.2	296.2	304.2	304.2
5 HRA financing costs as % of revenues	36.6%	36.7%	36.0%	36.0%	35.2%	35.2%	34.8%	34.7%
6 HRA debt : revenues	4.0	3.9	4.0	3.9	3.9	3.8	3.8	3.7
7 Forecast Housing debt per dwelling	£18,782	£18,241	£19,271	£18,731	£19,513	£18,973	£19,764	£19,219

Notes

3 Financing costs include interest and depreciation rather than Minimum Revenue Provision (MRP) in the HRA.

6 This indicator is not in the Prudential Code but is a key measure of long term sustainability.

7 This indicator is not in the Prudential Code but is a key measure of affordability: the HRA debt per dwelling should not rise significantly over time.

DEBT AND PRUDENTIAL INDICATORS   **Annex 3.4c**

	GENERAL FUND	21/22 Indicators £m	21/22 Forecast £m	22/23 Indicators £m	22/23 Forecast £m	23/24 Indicators £m	23/24 Forecast £m	24/25 Indicators £m	24/25 Forecast £m
	Capital Finance								
1	Capital expenditure (including other long term liabilities)	551.6	623.0	329.8	401.0	150.1	218.0	118.4	134.8
2	Capital Financing Requirement (CFR)	3,683.7	3,651.9	3,747.5	3,611.4	3,566.9	3,562.1	3,501.6	3,540.7
	General Fund debt								
3	Peak loan debt in year	2,626.6	2,503.8	2,573.7	2,549.9	2,503.3	2,485.4	2,331.9	2,419.2
4	+ Other long term liabilities (peak in year)	397.3	397.8	373.7	374.0	348.4	348.5	322.1	322.1
5	= Peak General Fund debt in year	3,023.9	2,901.6	2,947.4	2,923.9	2,851.7	2,833.9	2,654.0	2,741.3
	General Fund Affordability								
6	Total General Fund financing costs	222.4	219.2	218.3	231.6	241.6	247.8	241.7	247.0
7	General Fund net revenues	828.7	828.7	852.2	852.2	872.4	872.4	909.7	909.7
8	General Fund financing costs (% of net revenues)	26.8%	26.4%	25.6%	27.2%	27.7%	28.4%	26.6%	27.1%

Note

4   Other long term liabilities include PFI, finance lease liabilities, and transferred debt liabilities.

6   Financing costs include interest and MRP (in the General Fund), for loan debt, transferred debt, PFI and finance leases.

8   This indicator includes the revenue cost of borrowing and other finance, including borrowing for the Enterprise Zone and other self-supported borrowing.

TREASURY MANAGEMENT	**21/22 Indicators**	**21/22 Forecast**	**22/23 Indicators**	**22/23 Forecast**	**23/24 Indicators**	**23/24 Forecast**	**24/25 Indicators**	**24/25 Forecast**
1 General Fund impact of an unbudgeted 1% rise in interest rates	£4.1m	£3.9m	£3.7m	£4.5m	£2.3m	£3.8m	£2.2m	£4.3m
2 Variable rate exposures vs upper limit 30%	19%	19%	18%	20%	18%	21%	17%	21%
Maturity structure of borrowing	**Indicators**	**Forecast**	**Indicators**	**Forecast**	**Indicators**	**Forecast**	**Indicators**	**Forecast**
(lower limit and upper limit)	**Year End**	**Year End**	**Year End**	**Year End**	**Year End**	**Year End**	**Year End**	**Year End**
3 under 12 months	18%	17%	18%	19%	16%	19%	16%	21%
4 12 months to within 24 months	1%	1%	2%	2%	2%	2%	2%	2%
5 24 months to within 5 years	5%	6%	7%	7%	8%	8%	9%	9%
6 5 years to within 10 years	16%	17%	14%	14%	15%	15%	14%	14%
7 10 years to within 20 years	23%	21%	24%	21%	22%	20%	23%	20%
8 20 years to within 40 years	35%	36%	33%	34%	35%	35%	34%	33%
9 40 years and above	2%	2%	2%	2%	2%	2%	2%	1%
Investments longer than 364 days								
upper limit on amounts maturing in:								
	Limit	**Forecast**	**Limit**	**Forecast**	**Limit**	**Forecast**	**Limit**	**Forecast**
10 1-2 years	400	0	400	0	400	0	400	0
11 2-3 years	100	0	100	0	100	0	100	0
12 3-5 years	100	0	100	0	100	0	100	0
13 later	0	0	0	0	0	0	0	0

Note

1 Based on year end debt borrowing less investments, with less than one year to maturity.

2-9 These indicators assume that LOBO loan options are exercised at the earliest possibility, and are calculated as a % of net loan debt.

2 The limit on variable rate exposures is a local indicator.

Capital Monitoring Summary - Quarter 2 2021/22

Annex 4a

Expenditure

	2021/22 £m	2022/23 £m	2023/24 £m	Later Years £m	Total Plan £m
Quarter 1 Budget 2021/22	734.028	473.563	337.241	1,605.798	3,150.630
New Resources Periods 4-6	20.742	0.000	0.000	0.000	20.742
Revised Budget Quarter 2	**754.770**	**473.563**	**337.241**	**1,605.798**	**3,171.372**
Forecast Slippage	(56.742)	21.485	2.312	32.945	0.000
Forecast Overspend / (Underspend)	11.159	(0.568)	(0.025)	0.553	11.119
Forecast Outturn at Quarter 2	**709.187**	**494.480**	**339.528**	**1,639.296**	**3,182.491**

Resources

	2021/22 £m	2022/23 £m	2023/24 £m	Later Years £m	Total Plan £m
Use of Specific Resources:					
Grants & Contributions	164.618	108.638	86.725	69.598	429.579
Earmarked Capital Receipts - RTB & Revenue Reform	113.019	46.699	46.328	145.672	351.718
Revenue Contributions - Departmental	29.145	13.595	13.781	3.119	59.640
Revenue Contributions - HRA	71.467	73.582	75.128	600.236	820.413
Use of Corporate or General Resources:					
Corporate Resources	17.394	0.319	16.850	0.000	34.563
Prudential Borrowing	313.544	251.647	100.716	820.671	1,486.578
Forecast Use of Resources at Quarter 2	**709.187**	**494.480**	**339.528**	**1,639.296**	**3,182.491**

Capital Forecast 2021/22 by Directorate

Directorate	(a) 2021/22 Quarter 1 Budget £m	(b) 2021/22 Period 4-6 Budget Movements £m	(c) 2021/22 Quarter 2 Revised Budget (a+b) £m	(d) 2021/22 Spend to Date £m	(e) Forecast Variation Quarter 2 £m	(f) 2021/22 Forecast Outturn (c+e) £m
Commonwealth Games	**72.5**	**0.0**	**72.5**	**32.9**	**0.0**	**72.5**
Council Management						
Development & Commercial	1.1	0.0	1.1	1.7	0.0	**1.1**
Corporately Held Funds	88.4	0.0	88.4	2.4	(13.6)	**74.8**
ICT & Digital	9.3	0.0	9.3	0.8	(1.3)	**8.0**
Total Council Management	**98.8**	**0.0**	**98.8**	**4.9**	**(14.8)**	**83.9**
City Operations						
Control Centre Upgrade	0.3	0.0	0.3	0.0	0.0	**0.3**
Street Scene	39.3	0.0	39.3	14.5	0.0	**39.3**
Private Sector Housing	0.5	2.2	2.7	0.2	0.0	**2.7**
Neighbourhoods	3.2	0.0	3.2	0.0	(1.2)	**2.0**
Regulation & Enforcement	1.6	0.0	1.6	0.6	0.0	**1.6**
Highways Infrastucture	4.7	(0.0)	4.7	1.0	0.0	**4.7**
Total City Operations	**49.5**	**2.2**	**51.7**	**16.3**	**(1.2)**	**50.5**
City Housing						
Housing Options Service	0.1	2.0	2.1	0.0	0.0	**2.1**
HRA	110.4	7.9	118.3	50.9	5.5	**123.8**
Total City Housing	**110.5**	**9.9**	**120.4**	**50.9**	**5.5**	**125.9**
City & Municipal Development						
Planning & Development	50.6	2.7	53.3	20.8	0.0	**53.3**
Transport & Connectivity	81.7	1.0	82.6	9.6	(26.0)	**56.6**
Housing Development	1.6	0.0	1.6	0.0	0.0	**1.6**
Perry Barr Residential Scheme	151.8	5.0	156.8	70.4	0.0	**156.8**
Property Services	60.6	0.0	60.6	1.4	0.0	**60.6**
Total City & Municipal Development	**346.3**	**8.7**	**354.9**	**102.2**	**(26.0)**	**328.9**
Education & Skills	**46.9**	**0.0**	**46.9**	**10.9**	**(9.0)**	**37.9**
Adult Social Care	**9.6**	**0.0**	**9.6**	**4.5**	**0.0**	**9.6**
TOTAL	**734.0**	**20.7**	**754.8**	**222.6**	**(45.6)**	**709.2**

		Budget Movements					
		Current Year			All Years		
	Ref.	Quarter 1 Budget £m	Quarter 2 Budget £m	Change £m	Quarter 1 Budget £m	Quarter 2 Budget £m	Change £m
COMMONWEALTH GAMES 2022							
CWG Alexander Stadium		44.282	44.282	0.000	49.639	49.639	0.000
CWG Organising Cttee		28.263	28.263	0.000	34.791	34.791	0.000
TOTAL COMMONWEALTH GAMES		72.545	72.545	0.000	84.430	84.430	0.000
COUNCIL MANAGEMENT							
Development & Commercial							
Gateway/Grand Central Residual Costs		0.600	0.600	0.000	18.291	18.291	0.000
Capital Loans & Equity		0.500	0.500	0.000	3.032	3.032	0.000
Total Development & Commercial		1.100	1.100	0.000	21.323	21.323	0.000
Corporately Held Funds							
Revenue Reform Projects		43.704	43.704	0.000	43.704	43.704	0.000
Corporate Capital Contingency		27.600	27.600	0.000	119.360	119.360	0.000
ERP Implementation		17.060	17.060	0.000	20.000	20.000	0.000
Total Corporately Held Funds		88.364	88.364	0.000	183.064	183.064	0.000
SAP Investments		0.000	0.000	0.000	3.733	3.733	0.000
ICT & Digitial Services							
ICT & Digital		9.313	9.313	0.000	13.184	13.184	0.000
Total Digital & Customer Services Directorate		9.313	9.313	0.000	13.184	13.184	0.000
TOTAL COUNCIL MANAGEMENT		98.777	98.777	0.000	221.304	221.304	0.000
CITY OPERATIONS							
Control Centre Upgrade							
Control Centre Upgrade - CCTV Cameras		0.250	0.250	0.000	0.250	0.250	0.000
Total Control Centre Upgrade		0.250	0.250	0.000	0.250	0.250	0.000
Street Scene							
Waste Management Services		27.388	27.388	0.000	74.628	74.628	0.000
Parks & Nature Conservation		11.920	11.921	0.001	15.575	15.576	0.001
Total Street Scene		39.308	39.310	0.001	90.203	90.204	0.001
Private Sector Housing	CO1 ●	0.530	2.710	2.180	1.598	3.778	2.180
Neighbourhoods							
Community, Sport & Events		2.225	2.225	0.000	4.830	4.830	0.000
Neighbourhoods		0.013	0.013	0.000	0.013	0.013	0.000
Cultural Development		0.924	0.924	0.000	3.124	3.124	0.000
Total Neighbourhoods		3.162	3.162	0.000	7.967	7.967	0.000
Regulation & Enforcement							
Bereavement		0.252	0.252	0.000	0.252	0.252	0.000
Markets Services		0.000	0.000	0.000	0.759	0.759	0.000
Environmental Health		0.000	0.000	0.000	0.000	0.000	0.000
Mortuary/Coroners		1.273	1.273	0.000	1.330	1.330	0.000
Illegal Money Lending		0.028	0.028	0.000	0.028	0.028	0.000
Total Regulation & Enforcement		1.553	1.553	0.000	2.369	2.369	0.000
Highways Infrastructure		4.682	4.675	(0.007)	17.043	17.036	(0.007)
TOTAL CITY OPERATIONS		49.485	51.660	2.174	119.430	121.604	2.174
CITY HOUSING							
Housing Options Service	CH1 ●	0.057	2.057	2.000	2.377	4.377	2.000
Housing Revenue Account							
Housing Improvement Programme	CH2 ●	66.180	74.076	7.896	679.929	687.825	7.896
Redevelopment		42.362	42.363	0.001	490.118	490.119	0.001
Other Programmes		1.904	1.904	0.000	19.292	19.292	0.000
Total Housing Revenue Account		110.446	118.343	7.897	1,189.339	1,197.236	7.897
TOTAL CITY HOUSING		110.503	120.400	9.897	1,191.716	1,201.613	9.897
CITY & MUNICIPAL DEVELOPMENT							
Planning & Development							
Major Projects							
Enterprise Zone - Paradise Circus		21.885	21.885	0.000	28.776	28.776	0.000
Enterprise Zone - Other		15.511	15.511	0.000	806.027	806.027	0.000
Other Major Projects	CMD1 ●	12.331	15.031	2.700	16.600	19.300	2.700
Total Major Projects		49.727	52.427	2.700	851.403	854.103	2.700
Public Realm		0.873	0.873	0.000	0.873	0.873	0.000
Infrastructure		0.000	0.000	0.000	0.234	0.234	0.000
Total Planning & Development		50.600	53.300	2.700	852.510	855.210	2.700

		Budget Movements					
		Current Year			All Years		
	Ref.	Quarter 1 Budget £m	Quarter 2 Budget £m	Change £m	Quarter 1 Budget £m	Quarter 2 Budget £m	Change £m
Transport Connectivity							
Major Schemes							
Tame Valley Phase 2 & 3		5.104	5.104	0.000	86.032	86.032	0.000
A457 Dudley Road		4.803	4.803	0.000	23.441	23.441	0.000
Birmingham City Centre Retail Core Public Realm		8.676	8.676	0.000	11.236	11.236	0.000
Snowhill Public Realm		4.074	4.074	0.000	5.714	5.714	0.000
Other (Major Schemes)		5.609	6.083	0.474	14.796	15.270	0.474
Total Major Schemes		**28.266**	**28.740**	**0.474**	**141.219**	**141.693**	**0.474**
Brum Breathes & Route To Zero		23.142	23.142	0.000	40.409	40.409	0.000
Active Travel		17.263	17.498	0.235	23.031	23.266	0.235
Public Transport		9.532	9.532	0.000	10.882	10.882	0.000
Infrastructure Development		1.557	1.804	0.247	8.762	9.009	0.247
Places for People (Local Neighbourhoods)		1.836	1.859	0.023	4.479	4.502	0.023
Section 278/106		0.063	0.063	0.000	0.063	0.063	0.000
Local Measure		0.006	0.000	(0.006)	0.006	0.000	(0.006)
Total Transport Connectivity		**81.665**	**82.638**	**0.973**	**228.851**	**229.824**	**0.973**
Housing Development							
In Reach		1.563	1.563	0.000	7.900	7.900	0.000
Total Housing Development		**1.563**	**1.563**	**0.000**	**7.900**	**7.900**	**0.000**
Perry Barr Residential Scheme	CMD2 ●	**151.815**	**156.815**	**5.000**	**244.382**	**249.382**	**5.000**
Property Services							
Property Strategy		47.000	47.000	0.000	64.458	64.458	0.000
Other Schemes		13.629	13.629	0.000	28.629	28.629	0.000
Total Property Services		**60.629**	**60.629**	**0.000**	**93.087**	**93.087**	**0.000**
TOTAL CITY & MUNICIPAL DEVELOPMENT		**346.272**	**354.945**	**8.673**	**1,426.729**	**1,435.402**	**8.673**
EDUCATION AND SKILLS DIRECTORATE							
Education & Early Years							
Devolved Capital Allocation to Schools		3.075	3.075	0.000	3.075	3.075	0.000
School Condition Allocations		14.364	14.364	0.000	24.887	24.887	0.000
Basic Need - Additional School Places		24.080	24.080	0.000	59.821	59.821	0.000
Other Minor Schemes - Schools		0.013	0.013	0.000	0.013	0.013	0.000
IT Investment		1.083	1.083	0.000	1.683	1.683	0.000
Other Major Projects (Children's Trust Accom)		1.854	1.854	0.000	1.854	1.854	0.000
Total Education & Early Years		**44.469**	**44.469**	**0.000**	**91.333**	**91.333**	**0.000**
Skills & Employability							
Adult Ed & Youth		1.270	1.270	0.000	1.983	1.983	0.000
Birmingham Libraries		1.132	1.132	0.000	4.132	4.132	0.000
Total Skills & Employability		**2.402**	**2.402**	**0.000**	**6.115**	**6.115**	**0.000**
TOTAL EDUCATION & SKILLS		**46.871**	**46.871**	**0.000**	**97.448**	**97.448**	**0.000**
ADULT SOCIAL CARE DIRECTORATE							
Adult Care & Health							
Property Schemes		0.276	0.276	0.000	0.276	0.276	0.000
Adults IT		0.733	0.733	0.000	0.733	0.733	0.000
Independent Living		8.565	8.565	0.000	8.565	8.565	0.000
TOTAL ADULT SOCIAL CARE		**9.573**	**9.573**	**0.000**	**9.573**	**9.573**	**0.000**
TOTAL CAPITAL PROGRAMME		**734.027**	**754.771**	**20.744**	**3,150.631**	**3,171.375**	**20.744**

CITY OPERATIONS

Ref.	Project/Programme	Comments	2021/22 Increase (Decrease) £m	All Years Increase /(Decrease) £m
CO1	Private Sector Housing - Energy Efficiency	Green Homes Grant Local Authority Delivery Phase 2. Report to Cabinet 7th September 2021. Funded by Grant	2.180	2.180

CITY HOUSING

Ref.	Project/Programme	Comments	2021/22 Increase (Decrease) £m	All Years Increase /(Decrease) £m
CH1	Housing Options - Temporary Accommodation Strategy	Acceleration of City Housing Transformation to enable reduction in Temporary Accommodation. Report to Cabinet 27th July 2021. Funded by Departmental Prudential Borrowing.	2.000	2.000
CH2	HRA - Housing Improvement Programme	As approved by Cabinet 7th September 2021 - Green Homes Grant – Local Authority Delivery Phase 2 report. £4.676m funded by grant; £3.220m funded by DRF.	7.896	7.896

CITY & MUNICIPAL DEVELOPMENT

Ref.	Project/Programme	Comments	2020/21 Increase (Decrease) £m	All Years Increase /(Decrease) £m
CMD1	Bromford Estate Flood Defence Works	Grant funded from the Homes England's Public Asset Accelerator Fund to make a payment of up to £2.7m to the Environment Agency to facilitate the Bromford Estate section of the Flood Defence proposals for the River Tame.	2.700	2.700
CMD2	Perry Barr Residential Scheme	Contribution ffrom the Community Infrastructure Levy fund towards the redevelopment of Parry Barr train Station as approved by Cabinet in June 2019.	5.000	5.000

Capital Forecast 2021/22 - Quarter 2

		Forecast Variations										
		Current Year						All Years				
	Ref.	Quarter 2 Budget £m	Current Actuals £m	Quarter 2 Forecast £m	Variation £m	Quarter 1 Variation £m	Change £m	Quarter 2 Budget £m	Quarter 2 Forecast £m	Variation £m	Quarter 1 Variation £m	Change £m
COMMONWEALTH GAMES 2022												
CWG Alexander Stadium		44.282	20.141	44.282	0.000	0.000	0.000	49.639	49.639	0.000	0.000	0.000
CWG Organising Cttee		28.263	12.721	28.263	0.000	0.000	0.000	34.791	34.791	0.000	0.000	0.000
TOTAL COMMONWEALTH GAMES DIRECTORATE		72.545	32.862	72.545	0.000	0.000	0.000	84.430	84.430	0.000	0.000	0.000
COUNCIL MANAGEMENT												
Development & Commercial												
Gateway/Grand Central Residual Costs		0.600	1.682	0.600	0.000	0.000	0.000	18.291	18.291	0.000	0.000	0.000
Capital Loans & Equity		0.500	0.000	0.500	0.000	0.000	0.000	3.032	3.032	0.000	0.000	0.000
Total Development & Commercial		1.100	1.682	1.100	0.000	0.000	0.000	21.323	21.323	0.000	0.000	0.000
Corporately Held Funds												
Revenue Reform Projects		43.704	2.442	43.404	(0.300)	0.000	(0.300)	43.704	43.404	(0.300)	0.000	(0.300)
Corporate Capital Contingency	CM1 ●	27.600	0.000	15.100	(12.500)	0.000	(12.500)	119.360	119.360	0.000	0.000	0.000
ERP Implementation		17.060	0.000	16.303	(0.757)	0.000	(0.757)	20.000	20.000	0.000	0.000	0.000
Total Corporately Held Funds		88.364	2.442	74.807	(13.557)	0.000	(13.557)	183.064	182.764	(0.300)	0.000	(0.300)
SAP Investments		0.000	0.000	0.000	0.000	0.000	0.000	3.733	3.733	0.000	0.000	0.000
ICT & Digital Services												
ICT & Digital	CM2 ●	9.313	0.785	8.039	(1.274)	0.000	(1.274)	13.184	13.184	0.000	0.000	0.000
Total Digital & Customer Services		9.313	0.785	8.039	(1.274)	0.000	(1.274)	13.184	13.184	0.000	0.000	0.000
TOTAL COUNCIL MANAGEMENT DIRECTORATE		98.777	4.909	83.946	(14.831)	0.000	(14.831)	221.304	221.004	(0.300)	0.000	(0.300)
CITY OPERATIONS												
Cotrol Centre Upgrade												
Control Centre Upgrade - CCTV Cameras		0.250	0.000	0.250	0.000	0.000	0.000	0.250	0.250	0.000	0.000	0.000
Total Control Centre Upgrade		0.250	0.000	0.250	0.000	0.000	0.000	0.250	0.250	0.000	0.000	0.000
Street Scene												
Waste Management Services		27.388	11.733	27.388	(0.000)	0.000	(0.000)	74.628	74.628	0.000	0.000	0.000
Parks & Nature Conservation		11.921	2.731	11.921	(0.000)	0.001	(0.001)	15.576	15.576	0.000	0.000	0.000
Total Street Scene		39.310	14.464	39.309	(0.001)	0.001	(0.002)	90.204	90.204	0.000	0.000	0.000
Private Sector Housing		2.710	0.150	2.710	0.000	0.000	0.000	3.778	3.778	0.000	0.000	0.000
Neighbourhoods												
Community, Sport & Events	CO1 ●	2.225	0.027	1.025	(1.200)	0.000	(1.200)	4.830	4.830	0.000	0.000	0.000
Neighbourhoods		0.013	0.015	0.013	0.000	0.000	0.000	0.013	0.013	0.000	0.000	0.000
Cultural Development		0.924	0.030	0.924	0.000	0.000	0.000	3.124	3.124	0.000	0.000	0.000
Total Neighbourhoods		3.162	0.072	1.962	(1.200)	0.000	(1.200)	7.967	7.967	0.000	0.000	0.000
Regulation & Enforcement												
Bereavement		0.252	0.000	0.252	(0.000)	0.000	(0.000)	0.252	0.252	0.000	0.000	0.000
Markets Services		0.000	0.014	0.000	0.000	0.000	0.000	0.759	0.759	0.000	0.000	0.000
Mortuary/Coroners		1.273	0.605	1.273	0.000	0.000	0.000	1.330	1.330	0.000	0.000	0.000
Illegal Money Lending		0.028	0.000	0.028	(0.000)	0.000	(0.000)	0.028	0.028	0.000	0.000	0.000
Total Regulation & Enforcement		1.553	0.619	1.553	(0.000)	0.000	(0.000)	2.369	2.369	0.000	0.000	0.000
Highways Infrastructure		4.675	1.019	5.426	0.751	0.000	0.751	17.036	20.412	3.376	0.000	3.376
TOTAL CITY OPERATIONS DIRECTORATE		51.660	16.324	51.210	(0.450)	0.001	(0.451)	121.604	124.980	3.376	0.000	3.376
CITY HOUSING												
Housing Options Service		2.057	0.000	2.057	0.000	0.000	0.000	4.377	4.377	0.000	0.000	0.000
Housing Revenue Account												
Housing Improvement Programme	CH1	74.076	36.362	86.174	12.098	12.098	0.000	687.825	699.923	12.098	12.098	0.000
Redevelopment	CH2 ●	42.363	14.667	35.731	(6.632)	0.000	(6.632)	490.119	490.119	0.000	0.000	0.000
Other Programmes		1.904	(0.118)	1.904	0.000	0.000	0.000	19.292	19.292	0.000	0.000	0.000
Total Housing Revenue Account		118.343	50.911	123.809	5.466	12.098	(6.632)	1,197.236	1,209.334	12.098	12.098	0.000
TOTAL CITY HOUSING DIRECTORATE		120.400	50.911	125.866	5.466	12.098	(6.632)	1,201.613	1,213.711	12.098	12.098	0.000

Capital Forecast 2021/22 - Quarter 2

	Ref.	Quarter 2 Budget £m	Current Actuals £m	Quarter 2 Forecast £m	Variation £m	Quarter 1 Variation £m	Change £m	Quarter 2 Budget £m	Quarter 2 Forecast £m	Variation £m	Quarter 1 Variation £m	Change £m
Forecast Variations												
				Current Year					All Years			
CITY & MUNICIPAL DEVELOPMENT												
Planning & Development												
Major Projects												
Enterprise Zone - Paradise Circus		21.885	17.987	21.885	0.000	0.000	0.000	28.776	28.776	0.000	0.000	0.000
Enterprise Zone - Other		15.511	0.913	15.511	0.000	0.000	0.000	806.027	806.027	0.000	0.000	0.000
Other Major Projects		15.031	1.589	15.031	0.000	0.000	0.000	19.300	19.300	0.000	0.000	0.000
Total Major Projects		**52.427**	**20.489**	**52.427**	**0.000**	**0.000**	**0.000**	**854.103**	**854.103**	**0.000**	**0.000**	**0.000**
Public Realm		**0.873**	**0.222**	**0.873**	**0.000**	**0.000**	**0.000**	**0.873**	**0.873**	**0.000**	**0.000**	**0.000**
Infrastructure/Site Enabling Programme		**0.000**	**0.076**	**0.000**	**0.000**	**0.000**	**0.000**	**0.234**	**0.234**	**0.000**	**0.000**	**0.000**
Grants/Loans Programme		**0.000**	**0.000**	**0.000**	**0.000**	**0.000**	**0.000**	**0.000**	**0.000**	**0.000**	**0.000**	**0.000**
Total Planning & Development		**53.300**	**20.787**	**53.300**	**0.000**	**0.000**	**0.000**	**855.210**	**855.210**	**0.000**	**0.000**	**0.000**
Transport Connectivity												
Major Schemes												
Tame Valley Phase 2 & 3	CMD1 🔴	5.104	0.166	1.368	(3.736)	0.000	(3.736)	86.032	86.032	0.000	0.000	0.000
A457 Dudley Road		4.803	1.928	4.803	0.000	0.000	0.000	23.441	23.441	0.000	0.000	0.000
Birmingham City Centre Retail Core Public Realm		8.676	0.189	8.676	0.000	0.000	0.000	11.236	11.236	0.000	0.000	0.000
Snowhil Public Realm	CMD2 🔴	4.074	1.716	2.800	(1.274)	0.000	(1.274)	5.714	5.714	0.000	0.000	0.000
Other (Major Schemes)		6.083	1.072	4.609	(1.474)	0.000	(1.474)	15.270	11.214	(4.056)	0.000	(4.056)
Total Major Schemes		**28.740**	**5.071**	**22.256**	**(6.484)**	**0.000**	**(6.484)**	**141.693**	**137.637**	**(4.056)**	**0.000**	**(4.056)**
Brum Breathes & Route To Zero	CMD3 🔴	23.142	2.452	12.542	(10.600)	0.000	(10.600)	40.409	40.409	0.000	0.000	0.000
Active Travel	CMD4 🔴	17.498	0.892	11.635	(5.863)	0.000	(5.863)	23.266	23.266	0.000	0.000	0.000
Public Transport	CMD5 🔴	9.532	0.728	5.709	(3.823)	(0.785)	(3.038)	10.882	10.882	0.000	(0.785)	0.785
Infrastructure Development		1.804	0.207	1.804	0.000	0.000	0.000	9.009	9.009	0.000	0.000	0.000
Places for People (Local Neighbourhoods)		1.859	0.030	1.859	0.000	0.000	0.000	4.502	4.502	0.000	0.000	0.000
Section 278/106		0.063	0.145	0.063	0.000	0.000	0.000	0.063	0.063	0.000	0.000	0.000
Local Measure		0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Total Transport Connectivity		**82.638**	**9.525**	**55.868**	**(26.770)**	**(0.785)**	**(25.985)**	**229.824**	**225.768**	**(4.056)**	**(0.785)**	**(3.271)**
Housing Development												
In Reach		1.563	0.000	1.563	0.000	0.000	0.000	7.900	7.900	0.000	0.000	0.000
Total Housing Development		**1.563**	**0.000**	**1.563**	**0.000**	**0.000**	**0.000**	**7.900**	**7.900**	**0.000**	**0.000**	**0.000**
Perry Barr Residential Scheme		**156.815**	**70.442**	**156.815**	**0.000**	**0.000**	**0.000**	**249.382**	**249.382**	**0.000**	**0.000**	**0.000**
Property Services												
Property Strategy		47.000	0.000	47.000	0.000	0.000	0.000	64.458	64.458	(0.000)	0.000	(0.000)
Other Schemes		13.629	1.384	13.629	0.000	0.000	0.000	28.629	28.629	0.000	0.000	0.000
Total Property Services		**60.629**	**1.384**	**60.629**	**0.000**	**0.000**	**0.000**	**93.087**	**93.087**	**(0.000)**	**0.000**	**(0.000)**
TOTAL CITY & MUNICIPAL DEVELOPMENT DIRECTORATE		**354.945**	**102.138**	**328.175**	**(26.770)**	**(0.785)**	**(25.985)**	**1,435.402**	**1,431.347**	**(4.056)**	**(0.785)**	**(3.271)**
EDUCATION AND SKILLS DIRECTORATE												
Education & Early Years												
Devolved Capital Allocation to Schools		3.075	0.198	3.075	0.000	0.000	0.000	3.075	3.075	0.000	0.000	0.000
School Condition Allocations	ES1 🔴	14.364	1.720	13.364	(1.000)	0.000	(1.000)	24.887	24.887	0.000	0.000	0.000
Basic Need - Additional School Places	ES2 🔴	24.080	8.832	17.080	(7.000)	0.000	(7.000)	59.821	59.821	0.000	0.000	0.000
Other Minor Schemes - Schools		0.013	0.007	0.013	0.000	0.000	0.000	0.013	0.013	(0.000)	0.000	(0.000)
IT Investment		1.083	0.146	1.083	0.000	0.000	0.000	1.683	1.683	0.000	0.000	0.000
Other Major Projects (Children's Trust Accom)		1.854	0.000	1.854	0.000	0.000	0.000	1.854	1.854	0.000	0.000	0.000
Total Education & Early Years		**44.469**	**10.903**	**36.469**	**(8.000)**	**0.000**	**(8.000)**	**91.333**	**91.333**	**(0.000)**	**0.000**	**(0.000)**
Skills & Employability												
Adult Ed & Youth		1.270	0.000	1.270	0.000	0.000	0.000	1.983	1.983	0.000	0.000	0.000
Birmingham Libraries	ES3 🔴	1.132	0.000	0.132	(1.000)	0.000	(1.000)	4.132	4.132	0.000	0.000	0.000
Total Skills & Employability		**2.402**	**0.000**	**1.402**	**(1.000)**	**0.000**	**(1.000)**	**6.115**	**6.115**	**0.000**	**0.000**	**0.000**
TOTAL EDUCATION & SKILLS DIRECTORATE		**46.871**	**10.903**	**37.871**	**(9.000)**	**0.000**	**(9.000)**	**97.448**	**97.448**	**(0.000)**	**0.000**	**(0.000)**

Capital Forecast 2021/22 - Quarter 2

			Forecast Variations									
			Current Year						All Years			
	Ref.	Quarter 2 Budget £m	Current Actuals £m	Quarter 2 Forecast £m	Variation £m	Quarter 1 Variation £m	Change £m	Quarter 2 Budget £m	Quarter 2 Forecast £m	Variation £m	Quarter 1 Variation £m	Change £m
ADULT SOCIAL CARE DIRECTORATE												
Adult Care & Health												
Property Schemes		0.276	0.000	0.276	0.000	0.000	0.000	0.276	0.276	0.000	0.000	0.000
Adults IT		0.733	0.000	0.733	0.000	0.000	0.000	0.733	0.733	0.000	0.000	0.000
Independent Living		8.565	4.533	8.565	0.000	0.000	0.000	8.565	8.565	0.000	0.000	0.000
TOTAL ADULT SOCIAL CARE DIRECTORATE		9.573	4.533	9.573	(0.000)	0.000	(0.000)	9.573	9.574	(0.000)	0.000	0.001
TOTAL CAPITAL PROGRAMME		754.771	222.580	709.187	(45.585)	11.314	(56.899)	3,171.375	3,182.494	11.117	11.313	(0.195)

COUNCIL MANAGEMENT DIRECTORATE				
Ref	Project/Programme	Comments	Current Year (£m)	All Years (£m)
CM1	Corporately Held Funds - Capital Contingency	Slippage of £12.5m – as at Quarter 2 there have been very few applications for corporate capital contingency funding therefore it is prudent to slip 50% of the current budget (£12.5m) into future financial years. These resources can be brought forward again prior to the year-end if required.	(12.500)	0.000
CM2	ICT & Digital	Slippage of £1.3m – this is mainly due to the Application Platform Modernisation (APM) scheme which was expected to spend £3.3m in this financial year. £0.5m relates to hardware purchases which are awaiting clarity on capacity requirements and £0.4m relates to the Document Management Solution which is now being delivered by IT Operations due to complete in 2022/23. The remainder of the slippage relates to the Field Work Project (funded from Flexible Use of Capital Receipts) which will now be delivered in 2022/23.	(1.274)	0.000

CITY OPERATIONS DIRECTORATE				
Ref	Project/Programme	Comments	Current Year (£m)	All Years (£m)
C01	Community, Sport & Events	NIA Replacement Track - Following recommendations from World Athletics after World Indoors 2018 event, a specification for Tender was sent out based on their feedback. The outcome detailed higher costs on materials and shipping. In addition to that a longer build time is required which would impact have other events due at the venue. Alternative proposal are being discussed but any change in specifications would require re-tendering due to procurement guidelines.	(1.200)	0.000

CITY HOUSING DIRECTORATE				
Ref	Project/Programme	Comments	Current Year (£m)	All Years (£m)
CH1	Housing Improvement	Housing Improvement Programme - £12.1m forecast overspend as reported at Quarter 1 – mainly due to fire protection works to High Rise Residential Blocks including replacement cladding and fire panels and urgent structural defect remediation works to ageing stock.	12.098	12.098
CH2	Redevelopment	Redevelopment - £6.6m slippage. This is made up of net slippage of £5.3m (against a £32.9m programme) in relation to Birmingham Municipal Housing Trust (BMHT). Although the impact of Covid and reduced labour availability is decreasing it is still impacting supply chains. Brexit is also impacting on certain trades due to import restrictions, bureaucracy and labour returning to home countries. The schemes affected are Kings Norton 1, Monmouth Road and Bromford. **Clearance - slippage of £1.4m**. Clearance and rehousing activity has been significantly impacted as a result of Covid, including delays with possession proceedings and court hearings. The lack of available suitable rehousing options, particularly for larger households, has caused delays obtaining vacant possession of the schemes. In addition, the ability to acquire properties within clearance schemes due to the complexity of cases, including numbers of households shielding and representatives not being available for negotiations have led to previous forecasts not being achieved. In addition, unforeseeable environmental issues caused by the weather, led to seeking an alternative approach to remediation works required prior to development at Yardley Brook.	(6.632)	0.000

CITY & MUNICIPAL DEVELOPMENT DIRECTORATE

Ref	Project/Programme	Comments	Current Year (£m)	All Years (£m)
CMD1	Transport & Connectivity - Tame Valley Phase 2 & 3	Testing Contract: Tenders sought in November 2019 for commencement on site in early 2020. Due to no interest received, retendering exercise happened which was awarded and commenced on site in August 2020 and finished in December 2020. Main Works Contract: Invitation to tender in Sept 2020 following on from Testing Contract and delayed due to Covid resource requirements. Due to advice received on legal aspects of the tender, there were various extensions to the tender period and final tenders were submitted at the end of April 2021 and have been evaluated. Works dues on site in March 2022, approximately 1 year behind schedule. Works are programmed to be completed in December 2026.	(3.736)	0.000
CMD2	Transport & Connectivity - Snow Hill Public Realm	Due to proximity of Commonwealth Games, a decision has been made not to commence some schemes until after the Games are completed. This means some of the finances will slip into future financial years.	(1.274)	0.000
CMD3	Transport & Connectivity - Brum Breathes & Route to Zero	Slippage relates to spend against the original Mitigations Budget profile as a result of the delayed implementation of the CAZ. This budget is also demand led with spend taking place after actions required are confirmed i.e. Taxi & HGV upgrades, Non-compliant Car Scrappage and support to encourage more use of Public Transport. As a result spend may accelerate before year end or have further slippage into next financial year.	(10.600)	0.000
CMD4	Transport & Connectivity - Active Travel	the majority of slippage into next year relates to the A45 Coventry Road Cycle Route. The funding for the scheme is subject to a drawdown procedure via the West Midlands Combined Authority (WMCA) / Transport for West Midlands (TfWM). The funding drawdown will be part of the full business case process and is only available once the scheme development has been completed.	(5.863)	0.000
CMD5	Transport & Connectivity - Public Transport	Slippage into future years across a number of schemes but mainly in relation to Sprint projects (Sutton to Birmingham via Lanlgely, Birmingham to Airport & Birmingham to Walsall) pending approvals from TfWM, Section 278 and proposals being out on hold until post the Commonwealth Games.	(3.823)	0.000

EDUCATION & SKILLS DIRECTORATE

Ref	Project/Programme	Comments	Current Year (£m)	All Years (£m)
ES1	Schools Condition Allowance	Slippage of £1.0m reflects the revised profile of costs provided by Education Infrastructure (EDI) due to current market conditions that includes an impact on the availability of resources and obtaining materials - therefore some projects have been reprofiled for delivery in 2022/23. It should be noted that will be no impact on service delivery, no loss of funding and resources will be re-profiled into future years.	(1.000)	0.000
ES2	Basic Need Additional Places	Slippage of £8.0m - due to the pandemic forecasted pupil numbers have reduced and therefore the requirement for additional places has reduced-. There is a level of uncertainty around pupil numbers due to Covid, Elective Home Education and Brexit. Cohort numbers on roll in schools reduced between 2019/20 and 2020/21, leading to a reassessment of required permanent expansions. There is also less domestic movement than previous. EDI are currently assessing the forecasts before embarking on any further expansions. It should be noted that there is no loss of funding and resources will be re-profiled into future years.	(7.000)	0.000
ES3	Community Libraries	Slippage of £1.0m due to a delay in the completion of the Community Libraries report to allow further development and approval of the Community Library Strategy – timescales are yet to be confirmed.	(1.000)	0.000

Prudential Borrowing - Additions or Reductions Quarter 2 (July to Sept) 2021

This Appendix reviews changes in the Council's proposed borrowing to finance capital expenditure to show whether the Council's underlying indebtedness increases or decreases. The Council needs to consider carefully the affordability and sustainability of any increase in debt.

Description	#	2021/22 £'000	2022/23 £'000	Later Years £'000	Total £'000
Borrowing Needing Budget Support:					
TOTAL BORROWING NEEDING BUDGET SUPPORT		0	0	0	0
Self Supported Borrowing:					
Council Management					
Corporate Capital Contingncy	A	(12,500)	0	12,500	0
ERP Implementation	A	(157)	157	0	0
ICT Infrastructure	A	(278)	278	0	0
City Operations					
Sport	A	(1,200)	1,200	0	0
City Housing					
Housing Options	N	2,000	0	0	2,000
City Municipal Development					
Enterprise Zone Investment Plan Phases 1 & 2	A	67	(67)	0	0
Education & Skills:					
Basic Need	A	(7,000)	7,000	0	0
Skills & Employability	A	(1,000)	1,000	0	0
TOTAL SELF SUPPORTED BORROWING		(20,068)	9,568	12,500	2,000
TOTAL ADDITIONS / (REDUCTION) IN PRUDENTIAL BORROWING		(20,068)	9,568	12,500	2,000

Note: This includes some re-phasing between years.

A - Amendment to existing project spend or resources.

  N - New projects or programmes added in the quarter.

This appendix shows capital plans over the ten year Long Term Financial Plan period, for those projects where longer term plans have been developed. Long term plans will be subject to ongoing review to ensure that any expenditure plans are within a prudent forecast of resources. Please note that many projects do not have such long term planning horizons, and the absence of forecasts does not mean that no spend is anticipated, just that it cannot yet be reasonably quantified.

	2021/22 Forecast	2022/23 Forecast	2023/24 Forecast	2024/25 Forecast	2025/26 Forecast	2026/27 Forecast	2027/28 Forecast	2028/29 Forecast	2029/30 Forecast	2030/31+ Forecast	Total Forecast
DIRECTORATE:	£m	£m	£m	£m	£m	£m	£m	£m	£m	£m	£m
COMMONWEALTH GAMES 2022	72.546	11.885	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	84.431
COUNCIL MANAGEMENT	83.945	51.742	45.608	39.708	0.000	0.000	0.000	0.000	0.000	0.000	221.003
CITY OPERATIONS	51.211	33.227	20.422	14.212	4.882	1.025	0.000	0.000	0.000	0.000	124.979
CITY HOUSING											
Housing Options	2.057	0.000	0.298	0.000	0.000	0.000	0.000	0.329	0.000	1.693	4.377
HRA	123.809	126.502	154.686	150.721	131.587	99.238	91.804	100.089	122.805	108.092	1,209.333
TOTAL CITY HOUSING	125.866	126.502	154.984	150.721	131.587	99.238	91.804	100.418	122.805	109.785	1,213.710
CITY & MUNICIPAL DEVELOPMENT											
Planning & Development	53.300	28.282	12.728	26.608	8.855	2.270	0.952	0.000	0.000	722.217	855.212
Transport & Connectivity	55.868	71.731	85.959	3.520	4.370	4.320	0.000	0.000	0.000	0.000	225.768
Housing Development	1.563	3.817	2.520	0.000	0.000	0.000	0.000	0.000	0.000	0.000	7.900
Perry Barr Residential Scheme	156.815	92.567	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	249.382
Property Services	60.629	27.357	5.100	0.000	0.000	0.000	0.000	0.000	0.000	0.000	93.086
TOTAL CITY & MUNICIPAL DEVELOPMENT	328.175	223.754	106.307	30.128	13.225	6.590	0.952	0.000	0.000	722.217	1,431.348
EDUCATION & SKILLS DIRECTORATE	37.871	47.369	12.208	0.000	0.000	0.000	0.000	0.000	0.000	0.000	97.448
ADULT SOCIAL CARE DIRECTORATE	9.573	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	9.573
TOTAL FORECAST CAPITAL PROGRAMME Q2	709.187	494.479	339.529	234.769	149.694	106.853	92.756	100.418	122.805	832.002	3,182.492
RESOURCES:											
USE OF SPECIFIC RESOURCES:											
Grants & Contributions	164.618	108.638	86.725	22.024	30.160	12.230	4.434	0.250	0.250	0.250	429.579
Use of earmarked Capital Receipts	113.019	46.699	46.328	31.385	30.713	11.890	6.662	11.909	32.376	20.737	351.718
Revenue Contributions - Departmental	29.145	13.595	13.781	1.097	0.000	0.000	0.000	0.329	0.000	1.693	59.640
- HRA (incl reserves & S106)	71.467	73.582	75.128	95.474	79.966	80.463	80.708	86.341	90.179	87.105	820.413
TOTAL SPECIFIC RESOURCES	378.249	242.514	221.962	149.980	140.839	104.583	91.804	98.829	122.805	109.785	1,661.350
USE OF CORPORATE OR GENERAL RESOURCES:											
Corporate Resources	17.394	0.319	16.850	0.000	0.000	0.000	0.000	0.000	0.000	0.000	34.563
Unsupported Prudential Borrowing - Corporate	75.539	96.558	64.500	39.908	0.000	0.000	0.000	0.000	0.000	0.000	276.505
Unsupported Prudential Borrowing - Directorate	238.005	155.088	36.217	44.880	8.855	2.270	0.952	1.589	0.000	722.217	1,210.073
TOTAL CORPORATE RESOURCES	330.938	251.965	117.567	84.788	8.855	2.270	0.952	1.589	0.000	722.217	1,521.141
TOTAL FORECAST USE OF RESOURCES Q2	709.187	494.479	339.529	234.768	149.694	106.853	92.756	100.418	122.805	832.002	3,182.492

INVESTMENT PROPERTY PORTFOLIO MONITORING DASHBOARD: QUARTER 2 2021/22

1	Portfolio objectives

The Portfolio is comprised of non-operational service properties which were historically held to earn a financial return.

2	Portfolio summary

	budget £m	forecast £m	variance
Direct property	-23.98	-22.92	1.06
Loans on property			
less portfolio prudential borrowing	3.39	3.39	0.00
less management costs	2.39	2.39	0.00
net total	-18.21	-17.15	1.06

3	Limit on borrowing for Investment property portfolio	value £m	limit £m	variance £m
	prudential borrowing from 1 April 2019	7.91	50.00	42.09
	borrowing repaid from sale proceeds	-17.38	0.00	17.38
		-9.47	50.00	59.47

4	Portfolio completions in the quarter (acquisitions and disposals)

		£m
Sales completed in quarter 1 & 2	Sales	5.81
	Purchase	0.00

Commentary:

Sales to date in 2021/22 include £2.450m Upper Gough Street car park, £0.710m John Bright St, £1.292m Northside Business Centre, £0.583m Princip & Lancaster St

5	Planned activity in the coming quarter

Receipts from Small Heath Business Park £0.837m (balance), 405-407 Dudley Road £0.380m and Brickfield Road £0.250m are expected. A further 6.048m is expected for the balance of Chamberlain Buildings in Quarter 4.

6	Assurance

was the CIPFA Treasury Code complied with?	yes
was the Council's Service and Commercial investment Strategy complied with?	yes
(the Strategy implements the requirements of the Government Investment Guidance)	
was the Council's Investment Property Strategy complied with?	yes

commentary:
All properties fully evaluated and disposed with in the appropriate manner.

Birmingham City Council
Report to Cabinet (ADDENDUM)

9th November 2021

Subject:	<u>ADDENDUM</u> TO FINANCIAL MONITORING REPORT 2021/22 QUARTER 2 (UP TO 30TH SEPTEMBER 2021)
Report of:	Director of Council Management – Rebecca Hellard
Relevant Cabinet Member:	Councillor Tristan Chatfield – Finance & Resources
Relevant O &S Chair(s):	Councillor Mohammed Aikhlaq - Resources
Report author:	Director of Council Management – Rebecca Hellard

Are specific wards affected? If yes, name(s) of ward(s):	☐ Yes	☒ No – All wards affected
Is this a key decision? If relevant, add Forward Plan Reference:	☐ Yes	☒ No
Is the decision eligible for call-in?	☐ Yes	☒ No
Does the report contain confidential or exempt information?	☐ Yes	☒ No

1 Executive Summary

1.1 This addendum report sets out an emerging financial risk in relation to daily cost variations for the Travel Assist Service.

2 Recommendation

2.1 That Cabinet note the financial risk, with further information to follow in future financial reporting. A further report specific to Travel Assist will also be scheduled into the Forward Plan for Cabinet.

Page 1 of 3

3   Key Issues

3.1   As per the Quarter 2 2021/22 Financial Monitoring Report there is ***a forecast overspend for Inclusion and SEND of £5.3m. The forecast overspend is on Travel Assist made up of £3.9m transport costs and £1.4m on guides. The basis for projection is 2021/22 actual expenditure to date extrapolated for the remainder of the year. Management information on activity and costs is required for this projection to be more accurately refined.***

3.2   Since this report was written a new issue has emerged whereby the Travel Assist Team have been recording daily variations throughout August and September, which over an academic year would cause a significant additional financial pressure. The reasons for these variations need to be investigated, but include re-routing to reduce journey times, salary and fuel inflation, driver shortages and increases in demand.

3.3   An officer operational project group is being established by the Director of Education & Skills bringing together all required expertise, including procurement, commissioning, data and finance. This group will work to secure the management information required to produce accurate financial projections; and take action to ensure value for money is being achieved across all contracts and journeys. They will take actions that are child focussed and will consider issues relating to carbon emissions. A further report specific to Travel Assist will also be written by the group and scheduled into the Forward Plan for Cabinet.

4   Engagement

4.1   The Leader, Deputy Leader, other Cabinet Members, Director of Education & Skills, Director of Finance and Legal Services have been engaged in the preparation of this report.

5   Risk Management

5.1   The monitoring of the Council's budget and the identification of actions to address issues arising, as set out in this report, are part of the Council's arrangements for the management of financial issues.

5.2   If no action is taken the continuation of the daily variations captured during August and September would cause a significant additional financial pressure over the period of the remainder of financial year 2021/22.

6   Compliance Issues:

6.1   **How are the recommended decisions consistent with the City Council's priorities, plans and strategies?**

6.1.1   The budget is integrated with the Council Financial Plan, and resource allocation is directed towards policy priorities.

6.2   **Legal Implications**

6.2.1 Section 151 of the 1972 Local Government Act requires the Chief Finance Officer (as the responsible officer) to ensure the proper administration of the City Council's financial affairs. Budget control, which includes the regular monitoring of and reporting on budgets, is an essential requirement placed on Directorates and members of the Corporate Management Team by the City Council in discharging the statutory responsibility. This report meets the City Council's requirements on budgetary control for the specified area of the City Council's Directorate activities.

6.3 **Financial Implications**

6.3.1 As outlined in the body of the report.

6.4 **Procurement Implications (if required)**

6.4.1 N/A

6.5 **Human Resources Implications (if required)**

6.5.1 N/A

6.6 **Public Sector Equality Duty**

6.6.1 There are no additional Equality Duty or Equality Analysis issues beyond any already assessed in the year to date. Any specific assessments needed shall be made by Directorates in the management of their services.

7 Background Documents

7.1.1 City Council Financial Plan 2021-2025 approved at Council 23rd February 2021.

Birmingham City Council
Report to Cabinet

9th November 2021

Subject:	**ADOPTION OF THE PARKING SUPPLEMENTARY PLANNING DOCUMENT**
Report of:	**ACTING DIRECTOR, INCLUSIVE GROWTH**
Relevant Cabinet Member:	**Councillor Ian Ward, Leader of the Council**
	Councillor Waseem Zafar – Transport and Environment
Relevant O &S Chair:	**Councillor Saima Suleman, Economy and Skills**
	Councillor Liz Clements, Sustainability and Transport
Report author:	Uyen-Phan Han, Planning Policy Manager Telephone No: 0121 303 2765 Email Address: uyen-phan.han@birmingham.gov.uk

Are specific wards affected?	☐ Yes	☒ No – All wards affected
If yes, name(s) of ward(s):		
Is this a key decision?	☒ Yes	☐ No
If relevant, add Forward Plan Reference: 008314/2021		
Is the decision eligible for call-in?	☒ Yes	☐ No
Does the report contain confidential or exempt information?	☐ Yes	☒ No
If relevant, provide exempt information paragraph number or reason if confidential :		

1   Executive Summary

1.1   To inform Cabinet of the outcome of the public consultation on the draft Parking Supplementary Planning Document (SPD) carried out during January and February 2020 and to seek authority from Cabinet to adopt the Parking Supplementary Planning Document (SPD) attached in Appendix 1.

1.2   To provide information in respect of the SPD screening assessments (Appendix 5) under the Environmental Assessment of Plans and Programmes Regulations 2004

Page 1 of 9

and seek approval to the conclusion that a Strategic Environmental Assessment is not required for the reasons set out in section 7.2.3.

2   Recommendations

2.1   Approves adoption of the Parking SPD, attached in Appendix 1 as part of the City's planning framework against which planning applications will be assessed. This will revoke and replace the Car Parking Guidelines SPD, February 2012.

2.2   Determines that a full Strategic Environmental Assessment is not required for the Parking SPD.

3   Background

3.1   The Parking SPD, when adopted, will replace the existing Car Parking Guidelines SPD for Birmingham which was adopted by Cabinet in May 2012. The 2012 standards were derived from Planning Policy Guidance Note 13 (PPG13) and Planning Policy Statement 4 (PPS4) published in 2001 and 2009 respectively. This guidance has since been superseded by the National Planning Policy Framework which itself was last revised in 2021. Revised standards are required to reflect new national guidance and delivery of the Birmingham Development Plan (BDP) 2031 and the draft Birmingham Transport Plan.

3.2   Robust evidence has been gathered to provide clear justification for the proposed parking standards and guidance within the SPD. This has included national and local policy alignment, site surveys, benchmarking with other cities and best practice research. Improving management of parking within the city centre is a necessary pre-requisite measure to support delivery of the key objectives of the Birmingham Clean Air Zone (CAZ). The effective management of parking will also contribute to the Council's climate change objectives by encouraging a transition to sustainable transport modes.

3.3   The SPD provides supplementary guidance and detail to support policies TP38-44 in the Birmingham Development Plan 2031 and policy DM15 in the Development Management in Birmingham Document. It will also be supported by the Birmingham Design Guide which provides detailed guidance on parking design.

3.4   The SPD was subject to 6-week consultation which commenced on 9 January 2020. The consultation sought views from the public and a broad range of stakeholders on the guidance contained in the document. Consultation was also undertaken on the evidence base which supports the proposed parking standards in the draft SPD.

3.5   Approximately 230 organisations and individuals responded to the consultation. The Consultation Statement (Appendix 2) contains further details on the engagement that was carried out, the main issues raised and how they have been addressed in the final SPD. In summary, the following key issues were raised:

- Concerns about impact of parking removal on the city centre economy, particularly leisure and the night-time economy as there is a lack of alternative provision to private car at off peak times.

- Some felt that motorists were being targeted too much. Parking levels should be increased.

- Public transport is not good, safe or reliable enough to offer a viable alternative to car travel. Public transport should be improved first before reducing car travel.

- Proposed measures will put more pressure on edge of city where already congested.

- New developments provide too little parking which has led to on-street and pavement parking.

- Objection to maximums set on residential car parking provision in Zone C.

- General support for management of residential parking and preventing commuter parking blocking residential streets.

- Some felt that the city should remove the option of car use entirely to end car culture.

- Parking in the city centre (particularly on street) should be substantially reduced/banned.

- Support high density housing with zero parking to meet housing need. Developments close to rail stations should be zero parking and high density.

- Strong support for additional park and ride provision, although some felt it encouraged short car journeys and is not appropriate.

- Some responses did not recognise station car parks as park and ride provision and feel the city requires dedicated bus park and ride provision close to the city centre.

- Concerns regarding the management of commuter on-street parking in residential streets around stations. Requests for additional enforcement of this and some requests for expansion of station car parks.

- Concern regarding parking levels outside schools and strong support for encouraging walking. Requests for parking to be completely banned/ strongly restricted in the vicinity of schools.

- There should be more consideration of disabled drivers/ Blue Badge Holders and those with mobility issues. Concern regarding any removal of blue badge parking bays. A number of people raised concerns about those who have mobility difficulties, but do not necessarily have a blue badge.

- Parking provision for powered two wheelers (motorcycles) should be better quality, more secure and close to/visible from key destinations.

- Pavement parking should be addressed/ banned.

- Kerbside waiting and idling vehicles should be addressed/ banned. Particular concerns raised regarding taxis idling near stations.

- Better parking enforcement is required.

- More provision is needed for rapid Electric Vehicle charging on street.

- A number of responses feel that provision for cyclists is too low/unambitious and should match Birmingham Cycle Revolution aspirations for future levels of cycling.

- Changing and shower facilities for cyclists should be provided in developments with a large number of staff.

- More provision for residential visitor parking should be made.

- Car parking for educational uses should be increased.

- Places of worship in Zone A and retail uses in Zone B have not got high enough parking provision.

- Concern about the viability implications for development and the lack of evidence to justify EV charging requirements.

- Controlled parking is generally supported as a way to manage high demand for on street parking, but some comments said additional charges should not be made for this, whilst others questioned whether further controlled parking would be rolled out extensively.

- Flexibility should be built into the SPD so that applicants can justify an alternative level of parking, where there are legitimate reasons for doing so.

- Clarity needed on how the zone boundaries and parking standards are set.

3.6 A detailed response to all comments including how the issues raised have been addressed in the SPD has been set out in the Consultation Statement (Appendix 2). All responses received have been analysed and considered in the preparation of the final SPD. This has led to some changes to the initial draft documents. In summary the key changes include:

- Zone A (city centre) will remain disabled user parking only. However, it is acknowledged that in some instances parking may be required e.g. where developments are predominantly used at off-peak times when public transport availability is lower. A 10% maximum (of site/staff/visitor capacity) will be set, where clear justification can be evidenced.

- Maximum car parking standards will remain for Zones A (city centre) and B (urban centres). Zone C (suburban/ residential) car parking standards for residential developments will be a 'typical level of provision' to comply with national planning policy. Accordingly, the values for the 'typical' residential parking in this zone have been lowered from previous maximums.

- A simpler approach has been taken to allocated and unallocated parking with worked examples provided. The approach to residential parking provides for visitor parking.

- Unallocated parking requirements will not be applied to smaller developments and have been adjusted where parking maximums would result in fewer than 1 bay per dwelling.

- Adjustment of the car parking standard for large retail development to ensure adequate provision in Zones B and C. Zone A will remain disabled user parking only.

- Cycle standard for educational uses has been increased to 1 space per 10 staff plus 1 per 10 pupils (from 1 per 20 in the draft).

- A requirement has been added for all developments of 40 or more staff to provide adequate shower and changing facilities.

- Staff car parking provision for Primary and Secondary schools in Zone C (suburban) to increase from 1 per 2 staff to 1 per 1.5 staff acknowledging the need for staff to travel with books/ equipment etc. in less accessible areas of the city. Similarly, the parking maximum for nurseries in Zone C has been increased from one space per 8 children, to one space per 4 children, with additional provision for visitors.

- Further guidance and consideration have been given to motorcycle parking in the SPD.

- Additional text relating to how the standards will be flexibly applied has been incorporated.

- Further detail on how the zones have been determined has been included.

- Further guidance on requirements for provision of on-street parking for HMO developments has been added.

- Alongside this, recent changes to the Town and Country (Use Class) Order 1987 which now consolidates the former uses Classes A1, A2, A3, B1 and elements D1 and D2 into a single use Class E, has meant that the parking standards table has required updating to reflect the new use classes.

3.7 The final SPD therefore seeks to take a balanced approach to managing the provision of parking in order to support the delivery of a sustainable transport system and the sustainable growth and regeneration of the city. The objectives of the SPD are to:

- Manage the provision of parking in a balanced way; supporting an efficient transport network whilst delivering sustainable growth.

- Encourage more journeys based on walking, cycling, public transport and low emission vehicles.

- Provide an appropriate quantity, quality and type of parking to balance the needs of different users, protect amenity and ensure highway safety.

4 Options Considered and Recommended Proposal

4.1 **Option 1- Do not adopt the SPD**: The purpose of the SPD is to support the delivery of the adopted Birmingham Development Plan 2031, Development Management in Birmingham DPD, Birmingham's transport strategy and the Council's commitment

to climate change action. Without the adoption of the new SPD, the Council will be relying on out-dated parking standards to determine planning applications, thereby putting at risk the delivery of key objectives contained in the above strategic documents. The SPD is necessary to provide clarity and detail on the requirements and expectations of the City Council for new developments.

4.2 **Option 2 – Adopt the SPD:** Based on the evidence assembled, it is considered that the approach contained in the final Parking SPD is the most appropriate and aligns with local and national planning policy and best practice.

4.3 The recommendation is therefore to adopt the Parking SPD.

5   Consultation

5.1 Extensive external consultation has taken place. The consultation statement is attached as Appendix 2. The statutory consultees for the Strategic Environmental Assessment purposes were also consulted (see section 7.2.3).

6   Risk Management

6.1 The programme for completion and adoption of the SPD has allowed for flexibility to account of any potential issues which may arise. This has allowed time for discussion with stakeholders and for issues to be addressed including issues arising from the progress of the Development Management in Birmingham DPD, as well as the processing of a large number of comments.

6.2 Other risks are addressed elsewhere in this report, including section 4 on the risks of not adopting the SPD and section 7.3 on the financial implications.

7   Compliance Issues:

7.1 **How are the recommended decisions consistent with the City Council's priorities, plans and strategies?**

7.1.1 The Parking SPD is consistent with the Birmingham Development Plan, the Birmingham Transport Plan, the Development Management in Birmingham DPD and the City's Council Plan and Budget 2019 to 2023. It will support delivery of the primary goals of an entrepreneurial city, an aspirational city, a fulfilling city to age well in and a great city to live in. It supports the most recent Council priority to tackle climate change and work towards a carbon neutral city. It will provide up to date policies against which planning applications for development will be assessed and will support provision of a sustainable integrated transport system for the city.

7.1.2 In particular the SPD will support Outcome 1, Priority 4: We will develop our transport infrastructure, keep the city moving through walking, cycling and improved public transport; and Outcome 4, Priority 4: We will improve the environment and tackle air pollution. Management of parking is a vital tool in providing an effective, efficient and sustainable transport network.

7.2 **Legal Implications**

7.2.1 The relevant legal powers for adopting the SPD are set out in Part 2 of the Planning and Compulsory Purchase Act 2004 (as amended), with detailed requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). This includes a requirement for a Consultation Statement (Appendix 2) and an Adoption Statement (Appendix 3). The SPD also needs to be consistent with the National Planning Policy Framework, the Birmingham Development Plan 2031 and prepared in accordance with Birmingham's Statement of Community Involvement (2020).

7.2.2 Under the requirements of the European Union Directive 2001/42/EC (Strategic Environmental Assessment (SEA) Directive) (which is "retained EU Law" following the exit of the United Kingdom from the European Union on 31 December 2020 as the directive was given effect to by domestic legislation) and Environmental Assessment of Plans and Programmes Regulations (2004), specific types of plan that set the framework for the future development consent of projects must be subject to an environmental assessment, unless thy fall within one of the exception to this requirement. Regulation 9 requires that the authority should make a formal determination as to whether or not the plan is likely to have significant environmental effects and therefore requires an SEA.

7.2.3 The City Council carried out a screening assessment of the SPD (Appendix 5), under these Regulations, and concluded that a SEA is not required as:

  o The documents do not set the framework for future consents under the Environmental Impact Assessment Directive;

  o and Appropriate Assessment under the Habitats Directive is not required; and

  o There is no pathway or mechanism for significant environmental effects to arise as the SPD is for guidance purposes, being an elaboration of existing policies in the BDP.

7.2.4 Comments received from the relevant statutory consultees for this process (Natural England, the Environment Agency and Historic England) supported the City Council's opinion.

7.3 **Financial Implications**

7.3.1 The Parking SPD has been prepared using existing Inclusive Growth Directorate (Planning and Development, and Transport and Connectivity) staff resources and specialist external consultants funded from existing Planning and Development revenue budgets to prepare specific evidence in support of the SPD.

7.3.2 Following adoption, up to date accessibility mapping will be completed at least every 3 years to ensure that the accessibility zoning remains accurate.

Page 7 of 9

This will cost approximately £8,000 on each occasion and will be funded from the Planning and Development revenue budget.

7.3.3 All future programmes/projects/schemes resulting from the adoption of the Parking SPD will be progressed in accordance with the Council's Gateway and Related Financial Approval Framework, which will include the identification of financial implications and associated resources.

7.3.4 Where required to support public realm improvements and sustainable transport modes, removal of on street parking may be required, and would therefore have financial implications regarding parking revenue. Parking loss figures cannot be quantified accurately at this time as they would be subject to individual scheme proposals. The precise implications will need to be determined as individual schemes are developed and future decision reports will be prepared to address this. However, it should also be acknowledged that roll out of further parking control schemes (Controlled Parking Zones or resident parking schemes) has the potential to compensate in whole or part for the loss of revenue elsewhere in the city.

7.3.5 Redevelopment of land currently used for off street parking may have varying financial implications. Removal of City Council car parks would result in loss of ticket revenue and potentially advertising income. Likewise closure of private car parks could result in loss of business rates revenue. Conversely, efficient redevelopment of land currently used as off-street parking offers opportunities for increased business rates income as well as wider benefits for the city economy through job creation, dependant on the subsequent land use. A surplus of private non-residential parking spaces in the city centre has been identified, providing scope for repurposing of valuable land currently utilised for parking. Detailed financial implications of any subsequent development proposal would need to be considered on a case by case basis.

7.4 Procurement Implications (if required)

7.4.1 No implications.

7.5 Human Resources Implications (if required)

7.5.1 No implications

7.6 Public Sector Equality Duty

7.6.1 The Parking SPD has been prepared in line with Section 149 of the Equality Act 2010 in ensuring that public bodies consider the needs of all individuals in shaping policy. An Equalities Analysis has been carried out and updated following public consultation. The Equalities Analysis has not identified any specific impacts the SPD will have on the protected characteristics. The SPD aims to ensure development provides for a wide range of need in terms of parking provision at the same time as encouraging sustainable travel.

8 Appendices

- Appendix 1 – Parking Supplementary Planning Document (April 2021)
- Appendix 2 – Consultation Statement for the Parking SPD
- Appendix 3 – Adoption Statement
- Appendix 4 – Risk Assessment
- Appendix 5 – Strategic Environmental Assessment Screening for the Parking SPD
- Appendix 6 – Equalities Analysis

9 Background Documents

9.1 Cabinet Report 29th October 2019 - Public consultation on the Parking Supplementary Planning Document

9.2 Draft Parking Supplementary Planning Document (November 2019)

Birmingham City Council

Birmingham Parking
Supplementary Planning Document

November 2021

1

008314/2021

Foreword

The Parking Supplementary Planning Document (SPD) will help deliver the objectives of the Birmingham Development Plan in creating a sustainable, inclusive and connected city and the principles set out in the Birmingham Transport Plan.

Managing parking in the right way can play a crucial role in creating a balanced, efficient and sustainable transport network. While the right amount of parking provision can help support local businesses, cater for those with mobility needs and prevent inconsiderate and unsafe parking, we must also ensure that our valuable street space is not dominated by parked cars.

On average, cars remain parked for about 96% of the time[1]. When they are moving on the roads, they contribute to congestion and release emissions which not only contribute towards climate change but also pollute the air we breathe.

Birmingham City Council has declared a climate emergency in June 2019 and a key part of this work will involve tackling the main causes of climate change in our city, including managing demand on our transport network.

We are also working to clean up our city's air through measures such as the Clean Air Zone and promoting a shift towards greener, cleaner forms of transport, with a clear focus on the movement of people rather than vehicles.

Birmingham is making bold moves to deliver an integrated public transport system and environments conducive to walking and cycling fit for a global city and fundamentally change the way goods and people move around our city.

As all car journeys begin and end with parking, managing parking is a key tool for managing the demand for private car travel. However, we acknowledge that this must be done in a balanced way and in tandem with moves to improve accessibility by more sustainable transport modes.

This document supports the delivery of a sustainable transport system and the sustainable growth and regeneration of the city whilst seeking to manage the provision of parking in a balanced way.

Councillor Ian Ward   **Leader, Birmingham City Council**
Councillor Waseem Zaffar   **Cabinet Member for Transport and Environment, Birmingham City Council**

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[1] https://www.racfoundation.org/research/mobility/spaced-out-perspectives-on-parking

Introduction

A bold approach to parking in Birmingham has been set out as a key principle in the Birmingham Transport Plan, using parking as a means to manage demand for travel by car through availability, pricing and restrictions.

Major changes are taking place on our transport network including new Metro and Sprint routes, improvements to cycling and walking infrastructure and the Clean Air Zone.

Parking is a key component of this change. It can influence the way people travel, the efficient use of land, highway safety and the quality of the built environment.

It is estimated that the growth in the city's population, as set out in the Birmingham Development Plan[1], will result in 1.2million additional daily trips across the network by 2031. It is not possible or indeed desirable to accommodate all these additional trips by private car due to existing constraints on our highway capacity and because of the significant detrimental impact of traffic on our environment and air quality.

Careful and appropriate management of parking is a key element of the Birmingham Transport Plan. An oversupply of parking can stimulate demand for car travel. This generates traffic on the network that increases congestion and delay, contributes to poor air quality and makes walking and cycling less safe and convenient. It also commandeers land which could be used for better purposes.

However, in certain circumstances, where parking supply is too low, this can act to inhibit economic activity, growth and social functions, particularly in locations with limited access to public transport. Lack of parking can exacerbate localised network inefficiency and lead to inconsiderate parking causing obstruction and hazards for cyclists and pedestrians. Many residential areas are reliant upon the availability of on-street parking to provide for household parking needs.

Implementing appropriate management of on and off-street parking, and the adoption of well-defined parking standards will contribute to sustainable development. This is consistent with the council's goals to make Birmingham an entrepreneurial city, an aspirational city, a fulfilling city to age well in and a great city to live in.

Purpose

The objectives of this Supplementary Planning Document (SPD) are as follows:

- Manage the provision of parking in a balanced way, supporting an efficient transport network whilst delivering sustainable growth.
- Encourage more journeys based on walking, cycling, public transport and low emission vehicles.
- Provide an appropriate quantity, quality and type of parking to balance the needs of different users, protect amenity and ensure highway safety.

This document will replace the existing Car Parking Guidelines Supplementary Planning Document (2012)[2] and elements of the Birmingham Parking Policy (2010)[3]. It provides

revised parking standards for all new developments in the city to reflect the National Planning Policy Framework[4].

The SPD forms part of the Council's planning framework and acts as a material consideration in the determination of planning applications. This SPD adds detail to policies in the Birmingham Development Plan and the Development Management in Birmingham Development Plan Document.

The emerging Birmingham Design Guide covers aspects of design and layout for parking provision, including cycle storage. Parking management guidance/technical notes will be produced by Birmingham City Council to support the implementation and management of parking infrastructure and activities, fully replacing the Birmingham Parking Policy 2010.

Context

This SPD has been informed by national and local planning policy, as well as local transport strategies.

The National Planning Policy Framework (NPPF)[4] provides the policy context governing land use planning within the UK at a national level, with a key objective of achieving sustainable development. It encourages transport systems to be balanced in favour of sustainable transport modes. When setting local parking standards for residential and non-residential development, the NPPF states that local authorities should take into account:

- The accessibility of the development.
- The type, mix and use of development.
- The availability of, and opportunities for, public transport.
- Local car ownership levels.
- The need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.

Maximum parking standards should only be set where there is a clear and compelling justification for them. However, the NPPF acknowledges that maximum parking standards can be a necessary tool for management of the local road network and for optimising the density of development in city and town centres and other locations that are well served by public transport.

Locally, this SPD supports the Birmingham Development Plan (BDP)[1] which promotes transition to sustainable modes of transport with high quality transport links to support sustainable growth.

It also supports the Development Management in Birmingham Development Plan Document which requires parking and servicing to contribute to the delivery of an efficient, comprehensive and sustainable transport system.

Local and regional transport strategies Birmingham Transport Plan'[6] and 'Movement for Growth'[7] both acknowledge the role of parking as a key part of an integrated transport network. Parking pricing and provision can support the objectives of the city and region's

4

transport strategy forming a key element together with the delivery of improvements to public transport, cycling and walking.

The Movement for Growth 10 year delivery plan identifies significant investment of over £1.4 billion for walking, cycling and public transport schemes within Birmingham before 2026. This level of improvement to accessibility by non-car modes allows a more stringent approach to be taken towards parking provision in the most accessible areas of Birmingham.

The transport vision in the Birmingham Transport Plan has provided a clear steer for this Parking SPD; creating an efficient, attractive, sustainable, healthy and equitable transport system by seeking a reduction in over-reliance of private cars and developing a go-anywhere integrated public transport system supported by walking and cycling.

The parking standards in this SPD are informed and supported by evidence from surveys, best practice reviews and data analysis. An in-depth study of parking in Birmingham city centre was completed in 2016 and this has formed the basis for city centre approach and guidance within this SPD.

The city's transport network can have a major impact on the city's air quality and, in consequence, on health and wellbeing. The whole of Birmingham is designated as an Air Quality Management Area (AQMA) for nitrogen dioxide (NO2) and the Council maintains an Air Quality Action Plan (AQAP). In order to deliver compliance with national objectives, Government has determined the need for Birmingham to introduce a Clean Air Zone (CAZ) to control road transport related emissions particularly NO2. A Birmingham City Centre Clean Air Zone[8] was introduced in June 2021.

In July 2019 Birmingham City Council declared a climate emergency[9]. Tackling climate change is one of the authority's six main priorities; a cross-party and multi-agency taskforce has been set up and a Route to Zero Action Plan has been developed and approved by the Council. This SPD supports these objectives through reducing demand for private car journeys and improving the Ultra-Low Emission Vehicle infrastructure to support a more sustainable transport network.

Vision and Principles

As we meet the challenges of a growing population, plan for new housing, jobs and infrastructure and seek to reduce our impact on climate change - managing parking in the right way will be crucial in creating an inclusive, sustainable and connected city.

This vision will be secured through the delivery of the parking strategy set out in this document, which is underpinned by the key principles below:

- An evidence-based and location-specific approach will be applied to decisions concerning parking provision.

- Where space is required for improvements for sustainable modes of transport or where traffic flow is impeded, parking provision may be removed, restricted, or parking control measures may be introduced.

- Parking should be safe, suitable and accessible for all potential users, without compromising highway safety.

5

- Efficient use of parking will be encouraged where different types of parking can be accommodated harmoniously. For example, where it is possible to allocate resident and short stay visitor parking within the same spaces, or where new developments provide customer parking, it may be expected to serve a wider purpose for local communities.

- Parking serves a multiplicity of users creating competing demands for the same limited space. Multiple considerations for different types of parking provision, as set out in Table 1 below, should be addressed, reflecting location specific circumstances. In general, provision should be given priority as set out in Table 1, unless clear justification is provided to the contrary. Whilst residential parking will be given high priority in predominantly residential areas, this may not be justifiable in the city centre and urban centres.

Table 1: Parking Considerations

Road User Parking	Vehicle Type Parking
• Disabled parking (residential) • Disabled parking (non-residential) • Resident parking • Essential worker in the delivery of public service • Registered carers • Doctor parking • Local business essential parking/service need • Short stay shopper/visitor parking • Long stay shopper/visitor parking • Long stay commuter parking	• Emergency vehicle • Bicycle • Bus/coach • Public service vehicle • Shared/pool car (Car Club) • Delivery vehicle/lorries and vans • Electric Vehicle • Powered two wheelers (motorcycles) • Taxi/ private hire vehicle • Conventional private car (internal combustion engine)

6

Parking Strategy

This section describes Birmingham's strategy for parking in support of the growth and regeneration of the city as well as dealing with local parking issues. A tailored approach is taken for different areas of the city taking into account connectivity, public transport availability and land use.

City Centre

Introduction

Birmingham city centre has undergone major transformation in recent years and further key developments are planned to take place, including the arrival of HS2, Smithfield and the introduction of a Clean Air Zone (CAZ). The increase in economic activity over the next 15 years is expected to generate an additional 140,000 daily trips to and within the city centre. Moving more people and goods to and within the city centre on the existing road network is a significant challenge.

For the purpose of this policy, the city centre is defined as the area within the A4540 Ring Road. The CAZ was launched on the 1 June 2021. All on street parking within the CAZ area is subject to parking controls (generally through controlled parking zones).

Figure 1   **Birmingham City Centre**

7
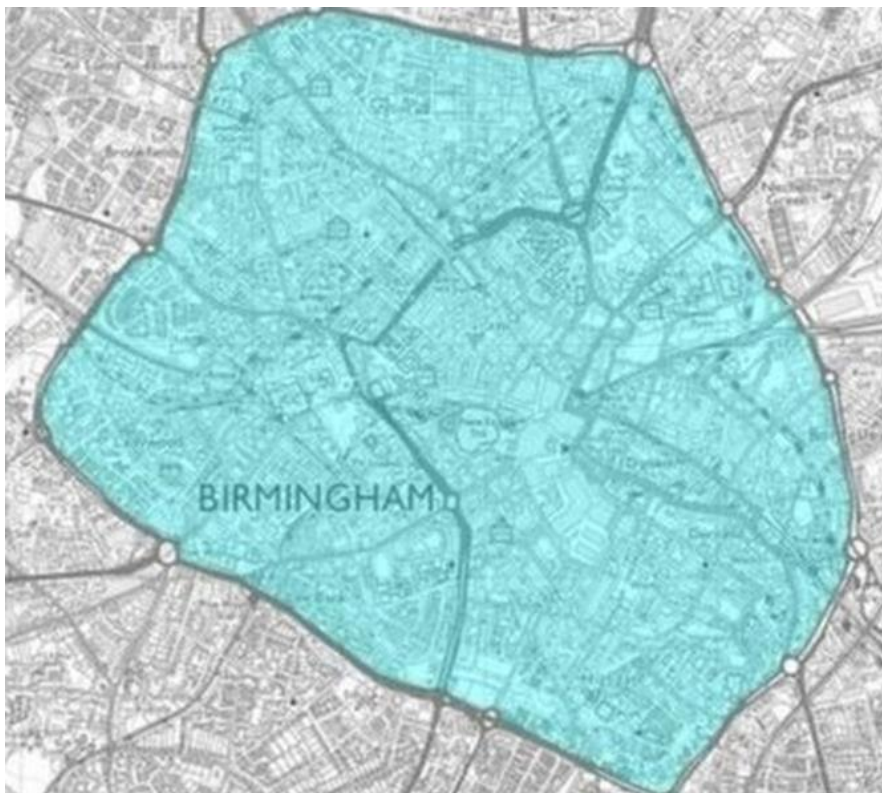
City Centre On-Street Parking

To support an efficient and effective transport system, the management of on street parking in the city centre will include:

1. The roll-out of the city centre controlled parking programme which will remove all uncontrolled on-street parking in the city centre.

2. The removal of on-street parking, where necessary, to support improvements to public realm, public transport provision or to provide priority for walking, cycling, servicing and delivery, taxis, car clubs and electric vehicle charging.

3. No further Resident or Business permits will be issued in the Inner Controlled Parking Zone. The availability of on-street Resident and Business permits in other city centre quarters will be considered and provided where appropriate.

4. Parking charges structured to support short and medium stay uses and discourage long-stay or commuter parking activity in premium, on-street locations.

5. Wherever possible, protection of the overall levels of disabled parking provision in easily accessible locations, with improved provision of rest and shelter opportunities in public areas.

City Centre Off-Street Parking

Off street parking in the city centre will be managed in the following ways to support an efficient and effective transport system:

1. Replacement standalone off street parking and new off street parking in the city centre will not be supported unless it can be demonstrated that there is a deficit in local publicly available off-street parking, or that it will help to relieve on-street parking problems. .

2. Given the significant levels of Private Non-Residential Parking located within the city centre, options for introducing a Workplace Parking Levy will be explored.

3. Applications for temporary car parks or time extensions for temporary car parks will not be supported unless exceptional circumstances can be demonstrated.

4. Off-street car parks will be linked to the city's traffic management systems to provide real-time parking information (supplied as open data on the city council's open data portal[11]) and assist with wider network management, also linked to variable messaging signage.

Why we have taken this approach

As the most important economic centre for employment and business in the Midlands, Birmingham city centre attracts over 200,000 people during a weekday morning with nearly half a million journeys made every weekday. It is home to more than 30,000 people and a further 13,000 homes are planned for construction by 2031, optimising land-use through high-density development.

8

To deliver high-density development, city centre land must be used as efficiently as possible. This will require a reduction in space hungry provision for residential and commuter parking. A key focus for the city centre is to reduce the need for private car journeys by ensuring viability of alternative modes.

The management of parking, alongside sustained improvement of sustainable travel modes, is key to supporting growth objectives and to encouraging changes in travel behaviour. It is recognised that for some journeys and business activities, travelling to the city centre by car is the most suitable, or in some cases the only viable option. The Council also recognise that on occasions users may require long-stay access. It is not therefore the objective of our policy to entirely prohibit long-stay parking activity in the city centre, rather to ensure that it is in the first instance directed towards appropriate off-street facilities in more peripheral locations.

A review of the current parking supply in the city centre and its use was undertaken in 2016. This showed that there are currently some 60,000 parking spaces in the city centre of which around 37,000 are available for public use with the remaining 23,000 comprised of private non-residential (predominantly workplace) parking.

Even allowing for an additional 15% surplus the indications are that the city centre has more than 10,000 spaces that remain unused throughout the course of the working day. Of the c. 10,000 spare spaces, it is estimated that around 7,500 are located in publicly available car parks (c. 6,000 in off-street locations and c. 1,500 on-street) and the remaining c. 2,500 are located in private non-residential (predominantly workplace) car parks.

The main objective in the city centre is to support continued regeneration while balancing the needs of its different users and reducing environmental impacts by:

- Managing the parking stock in the city centre to efficiently and effectively meet the needs of all of its customers.
- Managing parking to reduce demand for car travel, minimise congestion and environmental impacts of car access.
- Improving the safety and experience of city centre residents, user and visitors.
- Operating the car park estate on a financially sustainable basis.

9

Edge of City Centre

Introduction

Just outside the A4540 Ring Road, the edge of city centre area includes a diverse mix of land use ranging from office-based commercial uses around Five Ways / Hagley Road, the densely populated residential streets of Sparkbrook and Small Heath to the south-east and Lozells and Winson Green to the north-west. There are significant areas of industrial commercial use to the north-east. Please note that although this area is loosely illustrated in Figure 2 there is no definitive boundary to the 'edge of city centre' area, rather these locations are defined by their transport characteristics such as high trip generation, high levels of through traffic and potential parking stresses.

Figure 2   Edge of City Centre (NB indicative diagram only- no definitive boundary)

10

Edge of City Centre

To support an efficient and effective transport system, parking on the edge of the city centre will be managed through:

1. Implementation of a controlled parking programme in areas close to the city centre and other transitional areas, to control parking capacity and protect the amenity of local communities.

2. Large new developments with off-street parking provision must consider making their parking publicly available to make efficient use of land, reduce parking pressure in local areas and support the local economy.

3. Applications for temporary car parks or time extensions for temporary car parks will not be supported unless exceptional circumstances can be demonstrated.

Why we have taken this approach

Locations on the edge of the city centre generate parking demand from a wide range of users, from residents to businesses and, in some cases, commuters. There is evidence that parking pressure has begun to increase in some peripheral areas including Duddeston and Five Ways, where there are limited levels of public off-street parking. In some city centre peripheral areas that may be subject to parking pressures and overspill parking from city centre commuters, on-street controls (including Residents' Parking Schemes) are in place or planned.

The main objectives of the parking strategy for edge of the city centre are to:

- Ensure that the impact of city centre growth is managed in ways that minimise congestion and protect the amenity of residential occupiers.
- Support delivery of the Clean Air Zone.
- Support enhanced connections by public transport, walking and cycling from these areas to the city centre and the rest of the city.
- Ensure an appropriate level of good quality, safe and convenient parking for the needs of all users.

11

Urban Centres and Growth Areas

Introduction

Outside the city centre there are numerous urban centres and 9 key growth areas as defined by the Birmingham Development Plan. Urban centres range from large multi-functional centres such as Sutton Coldfield and Selly Oak with large concentrations of employment to smaller centres such as Cotteridge and Balsall Heath which serve more local needs. They all have a central role in delivering the city's agenda for inclusive economic growth and are focal points for future investment, jobs, housing, cultural activity and connectivity.

Urban Centres and Growth Areas

The approach to parking in urban centres and growth areas will balance the needs of the local economy and accessibility requirements while improving the health, safety and wellbeing of the local community.

1. A phased programme of parking control measures across the city will be introduced to ensure that on-street parking can be managed, without placing financial pressures on local business. The following locations will be prioritised initially:

   - Selly Oak
   - Perry Barr (linked to Commonwealth Games)
   - Harborne
   - Erdington
   - Sutton Coldfield

2. Large new developments with off street parking provision must consider making their parking publicly available to make efficient use of land, reduce parking pressure in local areas and support the local economy.

3. Wherever possible, there will be protection of the overall levels of disabled parking provision in easily accessible locations, with improved provision of rest and shelter opportunities in public areas.

Why we have taken this approach

Over recent years the traditional role of urban centres and the way in which people use urban centres has changed. Changes in shopping habits, new uses of space and consumer demands have made it challenging for them to remain simply as shopping destinations. An increased shift towards the provision of leisure and other services has allowed some centres to meet this challenge but others need to evolve to remain attractive, viable and vibrant places.

As set out in the Urban Centres Framework[14], successful urban centres are places that offer diversity, not just in the uses, but in the environments and activities that occur there. It is essential that they are accessible by a range of modes of transport with good connections into their local communities and the wider city.

Approaches to parking should take account of the different locations of centres, the communities they serve and the often complex range of demands placed upon them.

12

A review of parking in district and local centres revealed that most experience some parking pressures. A particular issue in urban centres was the concern that long-stay commuter parking limited the availability of short-stay parking for those coming into the area to shop or do business. Pressures in residential areas near to major employment generators and suburban stations were also identified.

In light of the issues identified, the main objectives of the parking strategy for urban centres and growth areas are to:

- Support the improvement of public transport and walking and cycling routes that connect centres to their neighbourhoods and employment opportunities;

- Support the vitality and viability of centres as a focus for local community life and activity;

- Ensure an appropriate level of good quality, safe parking to support local businesses and cater for those with mobility needs, whilst ensuring streets are not dominated by parked cars and that balance is made with encouraging more sustainable transport modes; and

- Ensure provision of accessible and secure cycle parking to help transform the experience of cycling to and within these areas.

Suburban/ Primarily Residential Areas

Introduction

A markedly different approach from that taken in the city centre and edge of city centre must be taken for predominantly residential suburbs of the city. These areas are characterised by generally lower development densities to the city centre and urban centres and have a lower level of public transport accessibility.

Residential Parking

To support an efficient and effective transport system in suburban and primarily residential areas:

1. Birmingham City Council will apply the parking standards contained within Appendix A of this SPD for new residential development.

2. Residential parking will generally be prioritised over long-stay commuter parking in areas without off-street parking provision.

Why we have taken this approach

In areas with fewer travel alternatives to the car, parking standards will need to ensure an appropriate level of parking provision while maintaining the amenity of nearby residents and occupiers and encouraging sustainable travel.

A balance has to be struck between the need to place reasonable restrictions on parking supply to discourage car usage, whilst ensuring that this policy is not likely to result in an overspill of parking activity on the highway. This will be achieved through the application of revised parking standards for new development contained in this document. These standards link an area's accessibility to public transport, car ownership and the presence of local parking controls with the parking rate applied. A typical level of provision for residential uses will be applied in lower accessibility areas to ensure that lack of provision does not create detrimental 'overspill' parking onto local roads and pavements.

The main objectives of the parking strategy for predominantly residential areas are to:

- Support the creation of sustainable neighbourhoods characterised by good access to facilities and convenient options to travel by foot, cycle and public transport;

- Protect and maintain good levels of residential amenity; and

- Ensure an appropriate level of parking to meet the needs of residents and visitors.

14

Parking Standards

Introduction

This document sets out parking standards for new developments in the city including cycle parking, disabled parking, electric vehicle charging and other servicing requirements. Levels of provision are set out for different land uses in different locations in Appendix A. Detailed guidance on the application of the standards is also contained in this document.

Parking Standards
To support an efficient and effective transport system in suburban and primarily residential areas: 1. Birmingham City Council will apply the parking standards guidance contained within Appendix A of this SPD.

Why we have taken this approach

Birmingham will continue to apply maximum parking standards in Zones A and B for all land uses as these locations benefit from greater public transport accessibility. In Zone C, a typical level of provision is given for all land uses, allowing some flexibility as set out in the parking standard rules on page 25.

In addition, minimum parking standards for car parking will be applied to residential developments in Zones B and C in the form of unallocated parking. This is further explained on page 33.

Provision of parking for people with a disability, cycle provision, motorcycle provision, and electric vehicle charging is set as a minimum standard. These types of provision support the delivery of a sustainable transport network. It is important that they are designed into the delivery of all new developments to meet the transport needs of the development and avoid expensive and complicated retrofitting at a later date.

15

Controlled On-Street Parking (including residents parking schemes)

Introduction

Controlled parking can be used to safeguard residential parking, whilst also balancing the needs of shoppers, visitors and local business - providing for efficient deliveries and servicing. This section sets out the City Council's approach to the introduction of further parking control in the city.

Controlled Parking

1. The City Council will implement parking control schemes, subject to funds being made available. This will include Controlled Parking Zones and Residents Parking Schemes in order to manage on-street parking in areas experiencing parking stress or where parking problems are likely to occur due to land use changes.

2. All on-street parking within the Clean Air Zone (within the A4540 Ring-road) will be subject to parking control measures as part of CAZ implementation.

3. Decisions concerning the in-principle introduction of a parking control scheme will be determined through the Council's governance process, informed by technical advice and evidence and the prioritisation criteria in this SPD.

4. Controlled parking scheme design will be open to consultation with local residents and businesses.

5. Houses of Multiple Occupancy (HMOs) will be considered as a single dwelling regarding entitlement to purchase parking permits.

6. Where there is a need to safeguard on-street parking permit availability for existing residents, future residential developments with low parking provision may be subject to planning conditions restricting access to parking permits for their residents. Developers must make purchasers and tenants aware of such restrictions, and any variations to existing Parking Places Orders which are necessary to achieve this will be at the developer's expense.

Why we have taken this approach

Parking can be controlled and enforced in a variety of ways. Key types of controlled parking include:

- **No waiting** – this generally takes the form of double (no waiting at any time) or single yellow lines (no waiting at specified times) which prevent vehicles from waiting in a marked location.

- **Limited waiting** – it is free to park in these locations; however, a motorist may only do so for a set period of time and may not return to the bay again until a set time has elapsed.

- **Pay and Display** – Any motorist is permitted to use these parking spaces if they have paid for the parking, either by displaying a ticket purchased at a machine or by paying over the phone.

16

- **Permit parking** – Only cars with appropriate permits can park in these locations. Often permits are issued to residents to enable them to park near their home in busy areas. Business permits are also issued in some locations.

Various combinations of these methods will be used across the city to effectively manage parking and to prevent unsafe or inconsiderate parking.

Parking controls will also support the parking standards within this SPD. In areas where parking supply is limited, controls help to ensure that parking does not 'overspill' onto surrounding streets.

Controlled parking reduces traffic and parking congestion for residents who live in or near urban centre or tourist/ visitor hotspots. Controlled parking can help to allow the flow of traffic and emergency vehicles down streets with high levels of parking; and allow residents to park near their homes.

There are a number of areas of the city where the introduction of parking controls will be required to address and effectively manage existing parking and to support more stringent parking standards.

Controlled parking may be introduced in the following circumstances:
- Within, or in areas affected by, the Clean Air Zone, including locations outside the zone.
- Where the level of parking demand exceeds the level of on and off-street parking supply (as evidenced from parking surveys).
- Where there is a clear need to manage the impact of parking on the operation of the network.
- Where excessive parking demand causes operational or safety issues, particularly for vulnerable road users.
- Where parking controls can be effectively enforced.

If the above circumstances are applicable, the following criteria will be used to prioritise delivery schedules:
- Parking occupancy data evidencing parking stress.
- Demonstrable safety concerns evidenced through safety audits and/or accident data.
- Areas within parking standard zones A and B.
- Demonstrable demand from residents/councillors/district engineers.
- Funding availability.

Design of new parking schemes should ensure that consideration has been made of all types of potential parking requirement (as set out in Table 1) including (but not limited to) disabled parking, car clubs, and cycle and motorcycle parking.

17

Parking Permit restrictions for 'car free/low car' developments

Where new developments are provided with very low or zero parking provision, it may be necessary to ensure that future residents of these buildings do not have access to parking permits. This safeguards available on-street parking for existing residents.

18

Park and Ride

Transport for the West Midlands currently provide over 9,000 Park and Ride spaces across the whole West Midlands region, 2390 of these are in Birmingham. Usage of rail park and ride facilities is very high at 91.9% occupancy across the region (2017 West Midlands Travel Trends). Standard bays tend to have an even higher occupancy rate.

Together with its key regional partners, the City Council is currently assessing the role of Park and Ride in providing part of a balanced access strategy for Birmingham. A successfully implemented Park and Ride system can deliver environmental enhancements, reduce congestion and support economic growth and activity by improving access to labour markets and facilitating business travel.

Subject to further funding being secured by TfWM and partners, a number of other potential sites are also being looked at across the West Midlands for the delivery of new Park and Ride sites or Park & Ride expansions. In Birmingham, these include potential sites on the A34 and at Minworth to serve the Sprint Bus Rapid Transit routes.

Alongside the Park & Ride expansion and development programme, TfWM is working to encourage cycling and walking to key transport hubs where this is a feasible option for customers. Cycle storage is available at all stations and cycle hubs can be found at Longbridge, Selly Oak, Rowley and Stourbridge. Where new stations are built or existing stations are expanded, the Council will seek appropriate levels of secure and high quality cycle storage.

Wider parking control may be required in some areas around Park and Ride sites to prevent overspill parking issues.

Park and Ride

1. The City Council will support the production and implementation of a Park and Ride Strategy for the West Midlands, to be led by Transport for West Midlands.

2. The City Council will seek to ensure that parking control measures on local roads and associated costs are considered as part of any measures to manage park and ride sites.

School Parking

Parking outside schools can be a particular concern for pupil safety and air quality and inconsiderate parking is a frequent issue raised by residents living near to schools. A Road Safety Strategy for Birmingham[2] sets out the city's approach to parking management on roads near schools

Car Free School Streets, or School (Traffic) Exclusion Zones[17], restrict vehicles from driving in, out or through an area close to the school entrance for up to an hour at the beginning and end of the school day. Local residents and other identified groups can apply for a permit which exempts them from this. The City Council successfully piloted 6 of these schemes as part of the 2019/2020 Safer Routes to School programme, and will be rolling out further schemes in future.

Idling – cars remaining stationary or parked with their engines running, can significantly contribute to poor air quality. The Council's Switch Off School Streets campaign provides a toolkit to support schools in raising awareness and reducing idling in the vicinity of schools. The toolkit can be found at: https://www.birmingham.gov.uk/downloads/download/3342/switch_off_school_streets_toolkit

School Parking
1. The City Council will encourage a 'park and stride' approach for parents and pupils who are unable to walk or cycle to school. Careful consideration of parking control measures should be made for any new or expanded school development. This must include a traffic regulation order on all School Keep Clear markings to ensure they are enforceable.
2. New schools or expanded schools, should ensure appropriate parking enforcement controls or measures to discourage pavement parking are in place on surrounding roads. Provision of cycle and non-motorised scooter (as set out in Appendix A) parking will be required. This should be supported by a travel plan through the Modeshift Stars[18] process.

Car Club bays

Any new highways scheme where parking is affected should evaluate current and potential provision for car club bays. Liaising with the current Birmingham City Council provider, new bays should be introduced wherever market viability and available resources allow. Further guidance for new development is set out on page 32.

2

https://www.birmingham.gov.uk/info/20163/safer_greener_healthier_travel/361/birmingham_road_safety_strategy

Disabled Parking

Many disabled people rely on the private car as their principle mode of transport. The ease of their journey is largely dependent on whether it is possible to park close to their destination. It is therefore vital that well located, well designed disabled parking bays are provided at key locations e.g. home, work, shops and other public sites in order to improve accessibility for those who are mobility impaired.

However, it must be acknowledged that some public realm and sustainable transport schemes, particularly in the city centre may result in the removal of some Blue Badge parking bays. The Council aims to mitigate the impact of this as much as possible and will consult Access Birmingham and other relevant groups and stakeholders where changes are being considered.

The parking standards within this document set out clear requirements for future developments to help ensure that off road parking for new sites provides a high level of parking for disabled people.

Detailed guidance on the design of disabled parking is contained within the emerging Birmingham Design Guide.

Parking for disabled people

1. Wherever possible, the Council will seek to protect the overall levels of Blue Badge parking provision in easily accessible locations, with improved provision of rest and shelter opportunities in public areas.

2. Any future public realm improvement schemes in the city centre or urban centres must aim to provide a good level of rest and shelter opportunities to support those with reduced mobility.

3. The Council will ensure that any proposed changes to disabled parking provision are subject to consultation with appropriate disability action groups, relevant stakeholders and Access Birmingham.

21

Parking Standards

Parking Standards Zones

Birmingham has applied different parking standards over three zones since 2012. The zoning process has been re-defined to reflect a wider and more nuanced set of characteristics impacting on the approach and level of standards to be applied. Three zones have been identified using public transport accessibility mapping, car ownership levels, opportunities for future public transport, and the presence of parking restrictions/ traffic regulation orders. Further detail on the methodology for setting these zones is available in the Evidence Base Report for the Parking Standards[3].

The characteristics for each zone are broadly summarised in Table 2. Figure 3 shows mapping of the zones.

Table 2: Parking Standards Zone Characteristics

Zone	Zone Characteristics	Parking Provision Characteristics
A	• Very high or high public transport accessibility • All locations within the Clean Air Zone • High population density • Well served by cycle and walking facilities • Primarily retail and commercial with high density residential • Comprehensive on-street parking restrictions.	• Low and car free development • High provision for cycling, Car Clubs, ULEV (and bike hire where appropriate). • Adequate servicing and operational provision.
B	• High public transport accessibility • High to medium population density • Well served by cycle and walking facilities • Includes the most accessible urban centres and growth areas	• Restricted maximum parking levels for all land uses. Unallocated parking requirement for residential. High provision for cycling, Car Clubs, ULEV. • If not in place already, these locations will be prioritised for on-street parking controls in the future.

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[3] https://www.birminghambeheard.org.uk/economy/parkingspdevidence/consultation/download

22

C	• Medium to low public transport accessibility • Medium to low population density • Predominantly residential	• Typical parking levels seek appropriate parking provision to ensure development doesn't generate parking pressure on local roads. Unallocated requirement for residential. Good provision for cycling and ULEV (and Car Clubs where market demand allows).

23

Figure 3   Birmingham Parking Standards Zones
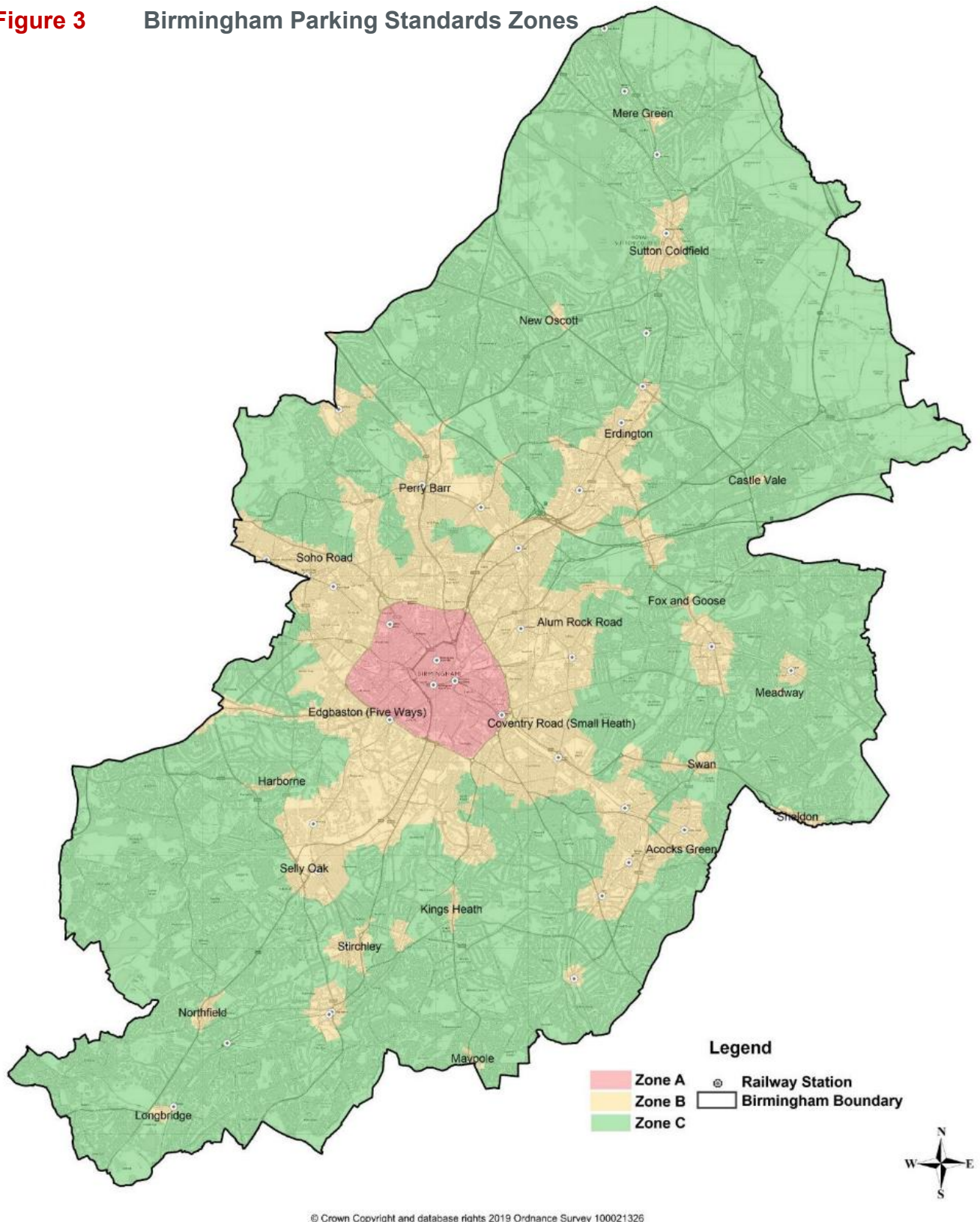
© Crown Copyright and database rights 2019 Ordnance Survey 100021326

Zone A - Total 2017 Population that can access grid square within 45 minutes future public transport >1,500,000
Or within the Clean Air Zone
Zone B - Total 2017 Population that can access grid square within 45 minutes future public transport < 1,500,000 and >750,000
Or within an area with on-street parking controls, or within a district or growth local centre
Zone C - Total 2017 Population that can access grid square within 45 minutes future public transport >750,000

Zone boundaries have been rationalised to road and property boundaries, including further consideration of car ownership levels.

NB - Services coded in to the future public transport model include:-
Metro Extension to Edgbaston
Source - MOTT MACDONALD accessibility analysis
Sprint - A34 Walsall
Sprint - A45 Airport/Solihull
Camp Hill Line

* Indicative timetables sourced from PRISM

Birmingham
City Council

Parking Standards Rules

When determining the absolute number of parking spaces to be provided, the following principles will apply:

- The standards set out in Appendix A show the detailed parking standards expected for each type of land use to be applied to all planning applications and prior approvals/notifications.

- The car parking standards should be considered as a maximum for all uses in Zones A and B. Zero or low car parking development will be supported as long as it can be demonstrated that this would not result in detrimental problems on the local highway.

- In Zone C, the car parking standards define 'typical levels of parking'. The 'typical car parking' levels are not a minimum or maximum requirement. This guidance allows for flexibility to reduce or increase parking provision depending on factors such as location, car ownership, public transport accessibility, walking and cycling provision catchment, and typical end user.

- In zones A and B it is recognised, that in exceptional circumstances, there may be occasions when it could be appropriate to have a lower or higher level of parking depending on the specific details of the application.

- Any departure from the parking standards should be fully and appropriately justified with detailed supporting evidence. In most cases this should be included within the associated Transport Statement or Assessments which should include:
    - Surveys of parking capacity and occupancy levels on surrounding streets and parking areas;
    - Consideration of likely trip generation and parking accumulations for the proposed development with supporting evidence;
    - Details of how the parking will be managed and how that will mitigate any under or overprovision. This should include consideration of how parking space may be repurposed at a later date should it no longer be required.
    - Evidence of any delayed delivery of planned infrastructure/ improvements impacting on the accessibility of the site.

    This is not considered to be an exhaustive list, and there may be other factors associated with the specific characteristics of each site which may need to be considered. In all cases, where an applicant is considering a departure from the standards, the Council encourages early pre-application discussions.

    Where a reduction in parking could lead to a transfer of parking into other locations, appropriate financial contributions may also be required for the introduction or expansion of Residents Parking Zones/parking control measures.

- Car parking requirements for unallocated spaces apply in Zones B and C. This is explained in detail on pages 33.

- Provision of parking for disabled people, bicycle parking, motorcycle parking and electric vehicle charging is set as a minimum. All calculated parking provision for a planning application is to be rounded up to the next whole number.

25

- For mixed use developments, the parking standards will be applied for each different land use. Facilities which provide for multiple uses in an efficient way are encouraged and may reduce overall provision.

- Where the footprint of a development falls into more than one zone, the parking zone standards to be applied will be considered on a case by case basis.

- All standards should be calculated on gross internal floor space (sq.m.) unless otherwise stated.

- Staff members will be calculated on a Full Time Equivalent (FTE) basis.

- It is not possible to identify parking standards for every potential type of residential development/ use. Where a development/ use does not have an ascribed parking standard, the likely parking requirements will be assessed taking into account the nature of the intended use, location, site and other relevant factors.

- For non-residential development, car parking standards are not applicable to parking requirements for operational fleet, as defined on page 40. Provision for operational fleet will be agreed on a case by case basis.

- The parking standards will not apply to any detailed or reserved matters planning applications that are already registered prior to the adoption of the SPD or to any full and outline planning permission where there has been significant pre-application discussion.

Summary of parking standard approach:

Land Use	Zone A	Zone B	Zone C
Car Parking			
Residential	Maximum	Maximum Plus an additional unallocated spaces requirement	Typical level of parking Plus an additional unallocated spaces requirement
Non-residential	Maximum	Maximum	Typical level of parking
Cycle, Disabled parking, Electric Vehicle Charging Points (EVCP), Motorcycles**			
Residential	Minimum	Minimum	Minimum
Non-residential	Minimum	Minimum	Minimum

*see page 33 for guidance on unallocated spaces)

** Residential motorcycle parking only specified for apartments/flats

26

Disabled Parking Standards

Disabled parking provision will be in addition to standard car parking provision.

Birmingham has applied a higher rate of disabled parking to the first 200 parking spaces for many land uses, and a lower rate thereafter. This approach aims to reflect actual likely demand and ensure adequate provision without creating considerable over-provision of disabled parking that may lead to its abuse. Active management of disabled parking provision to match actual demand is a recommended function and good practice for those seeking accreditation under the Disabled Parking Award Scheme[19].

Disabled parking bays should be 3.6m wide or alternatively should consist of two standard 2.4 m bays with shared spaces of 1.2m between. In addition, a 1.2m safety zone should be provided for boot access and cars with rear hoists. The 1.2m safety/unloading zone at the rear of the accessibility parking bays should not project into the 6m minimum width maneuvering roadway in car parks, as this would expose disabled drivers to being reversed on within the 'safe zone'.

On-street parking bays should be 6.6m long with width of 3.6m and dropped kerb access at one end[20]. Accessibility 'on street' parallel parking bays should allow for additional length for a tailgate/rear unloading ramp, with a drop kerb alongside. Scope for driver and passenger side unloading onto the pavement would mean a choice of bays being provided in an area.

Disabled parking spaces should be clearly marked, located as close as possible to the main accessible entrance to the building and with level or ramped access from the bay to the entrance. Wherever possible this should be undercover.

Planning conditions may be attached to planning consents requiring active management of spaces to help prevent abuse.

Wherever possible, disabled bays should not be allocated to individual dwellings, but a pool of disabled parking bays should be available at each site for use by any Blue Badge-holding residents/visitors.

Consideration should be given to safe storage and charging point locations for mobility scooters when designing Retirement/Sheltered Housing Developments or wheelchair accessible dwellings.

Car free developments must still provide an appropriate level of disabled parking spaces. Guidance is provided on the minimum standards required in the parking standards table (Appendix A) however, wherever possible, a non-residential development should aim to provide Disabled Parking bays to accommodate at least 6% of the predicted staff and visitors/customers for the site. Proximity of access is important for these spaces.

For residential developments, when parking is not provided within the curtilage of a dwelling, provision of disabled parking spaces for 5% of all dwellings/units must be made. This is also applicable to zero or low car parking developments.

27

Standards for Cycle Parking

The cycle parking standards outlined are provided to make parking a bicycle at both its origin and destination convenient and secure, encouraging cycling and reducing the theft of bikes. This removes a barrier to cycling and thus supports the vision for cycling for Birmingham.

Like car parking, cycle parking should be designed into developments at an early stage. To increase the attractiveness of commuting by cycle, it is important to provide facilities for cyclists at their destination, particularly in larger workplace developments of 40 or more staff. Where the number of staff are unknown, a threshold of 500 sq.m will be used for office and light industrial uses; 1,440 sq,m. for B2 use and 2,800 sq.m. for B8 use. For all other land uses a threshold will be provided on a case by case basis. This should include storage areas for personal items, showers, and changing rooms. Facilities should be provided on the basis to cater for a minimum of 10% of staff.

Cycle parking is specified for different users to cater for short and long stay usage. The former is provision for those visiting the site as customers or service users. Long stay cycle parking is relevant for employees, pupils or residents.

In design terms, short stay cycle parking should focus on accessibility and convenience; for long stay parking, security, lighting, protection from the weather and potentially the proximity to different access points into the building are all important. Cycle parking should be located as prominently as possible within a development. Detailed parking design guidance in set out in the emerging Birmingham Design Guide SPD. Further guidance is also available in the TFWM Cycle Design Guide[21]. The preferred cycle stand design is 'Sheffield stand' provision, or similar. Cycle storage which only allows for bikes to be secured by one point of contact, particularly a single wheel ('wheel bender' designs) will not be supported. When correctly sited, one 'Sheffield' stand provides two cycle spaces.

Electric bikes are becoming increasingly popular and offer a good urban mobility solution. Secure storage and charging provision for these should be considered, particularly for residential accommodation or other large developments where long stay cycle parking is required.

All new residential properties are required to provide appropriate cycle storage. This is to be within a structure with roof and lockable door. For houses, cycle storage may be provided in garages or other outbuildings at the front of the property. Storage in outbuildings at the rear of the property is acceptable subject to access to these buildings being achieved without the need to pass through the dwelling. For apartments, secure, communal cycle shelters are to be provided. Buildings used for waste bins or plant are not acceptable for cycle storage without adequate clear separation of areas of use.

Larger residential properties are also required to provide short stay accessible, convenient and secure cycle parking for visitors and guests.

Birmingham City Council will consider commuted sums (secured through legal agreement) for developers unable to satisfy the requirements and/or in situations where off-site unallocated provision of cycle parking, such as in the public footway, may better serve the needs of the site and wider community. However, on site provision is the preferred approach.

28

Scooter Provision for Primary Schools

Whilst not specified in the standards, it is recommended that primary schools provide scooter storage alongside cycle storage. Scooter storage ensures that cycle racks do not get blocked with scooters. Adoption of active travel in early years promotes sustained healthy choices in later life.

West Midlands Cycle Hire and provision for other micro-mobility options

To support the provision of cycle hire and Transport for West Midland's Cycle Hire Scheme[22] all hotels, large scale residential developments of 200+ units, and major non-domestic developments of 1,000 sq.m or more should consider the viability of incorporating cycle hire stand provision. As legislation allows, consideration should also be given to provision for other micro-mobility options such as e-Scooter hire.

Standards for Powered Two-Wheeler (Motorcycle) Parking

The standards for motorcycle parking provision are set as a minimum. However, it is unlikely to be necessary for overall levels to exceed 10 spaces per development. Designated provision for motorcycle parking (as opposed to standard car parking space), is considered important to ensure efficient use of space and security of the parked vehicle.

Motorcycle parking has many similar requirements to cycle parking. It must be near, clear, secure and safe to use. It must be located in well-lit areas which are close to destinations and visible and/or have CCTV coverage so as to deter theft.

Motorcycle parking should have dropped kerb or level access, and should be on a solid, level surface. Anchor points should be provided for security. Raised level anchor points in the form of a raised bar at a height of around 600mm is preferable to ground level anchors. A continuous horizontal rail can allow for efficient use by bikes of varying sizes. Anchor points should be welded and not screwed into place and there should be sufficient space to manoeuvre around them. Layout of anchor points should not present a hazard to other road users or pedestrians (particularly those with visual impairment. Motorcycle parking should be clearly signed, indicating it is for Powered Two Wheelers only. Where possible stands should be under cover.

Car free or low car developments should still aim to provide motorcycle parking to accommodate at least 2% of the total predicted staff and visitors/customers for the site.

Standards for Electric and Low Emission Vehicles

As the uptake of Electric Vehicles increases, and with proposals for the sale of petrol and diesel cars to end shortly, it is vital that sufficient charging infrastructure is provided to this support electrification of transport. This is a very important tool for supporting decarbonisation and improvement in air quality.

29

Residential Charging Provision

Every new residential building with an associated car parking space must have at least one EV chargepoint. This applies to buildings undergoing material change of use to create a new dwelling.

Every residential building undergoing major renovation with more than 10 parking spaces must also have one chargepoint and cable routes for an electric vehicle chargepoint for one in five spaces.

Note: where no parking spaces are provided there is no requirement to install an electric vehicle chargepoint.

For unallocated residential parking provided on-street, an assessment must be made in liaison with the network provider, to take account of existing chargepoint availability and whether this is appropriate provision for the likely demand generated by the development. Where further provision is required, a planning obligation will require the developer to work with the network provider to make satisfactory arrangements for this. The preferential provision for highway charging is rapid charging hubs. Where necessary, contributions will be sought from the developer towards implementation.

Non-Residential Charging Provision

Non-residential developments with more than 10 parking spaces are subject to both active and passive provision requirements.

New buildings other than dwellings, or major renovations for buildings, which have a minimum of 11 parking spaces, must provide a minimum of one EV chargepoint. In addition, a minimum of one in every 5 spaces should have either an EV chargepoint or enabling infrastructure for future EV chargepoint installation.

A general principle applies that a minimum of one chargepoint, or 5% of the chargepoints, whichever is greater, should be accessible to drivers with disabilities.

Where on-site provision of ULEV requirements is not achieved, a commuted sum payment towards public charging provision will be considered.

Technical requirements for EV chargepoints

Each electric vehicle chargepoint should meet all of the following specifications:

a. Be designed and installed in accordance with the appropriate parts of BSEN 61851.
b. Have a minimum rated output of 7kw, measured or calculated at a nominal supply voltage of 230 VAC.
c. Be fitted with a universal socket (known as an untethered electric vehicle chargepoint).
d. Be fitted with a charging equipment status indicator using lights, LEDs or display.
e. Provide a minimum of Mode 3 or equivalent.

For buildings other than dwellings, in addition to the above, each electric vehicle chargepoint should meet the requirements of The Alternative Fuels Infrastructure Regulations 2017 [24]

30

Technical requirements for enabling infrastructure for EV chargepoints

Each parking space requiring enabling infrastructure should have an identified future connection location, suitable for use for electric vehicles with different charging inlet locations. In many cases the optimum position for a future connection location will be at one corner of the parking space.

A future connection location may serve more than one parking space provided that the enabling infrastructure is adequate for each space to be used simultaneously for recharging once the EV chargepoint infrastructure is installed.

Enabling infrastructure should be provided from a metered electricity supply point up to the future connection point and should include:

a. Sufficient physical space for a new electrical connection at a metered supply point, such as a consumer unit or feeder pillar.

b. A dedicated, safe, unobstructed route for electrical cabling from the electrical supply point to the future connection location (using electrical containment systems).

c. A future connection location (as specified above), clearly identified and labelled/signed.

d. Provisions to facilitate the safe installation of an EV chargepoint meeting the standards in BS 7671. This may require a suitable location to be identified for an earth electrode.

31

Standards for Car Club Provision

Car clubs have the potential to have a significant impact on reducing car ownership when provided within or close to residential developments, particularly in city centre locations where the density of potential users is high and the need to own and use a car on a regular or frequent basis may be low.

Birmingham has an assigned provider[25] for all highway car club bays and these operate under a 'return to base' model. This means hired vehicles must be returned to where they are collected from.

All residential developments over a threshold size will be required to provide a car club parking bay accessible to the public, or commuted sums to enable provision on the highway.

This will not be required where evidence that at least three accredited car club operators (including the City's main provider) have all declined to provide a car club service for the site due to existing adequate provision locally or that is demonstrated to be financially unviable. Instead, commuted sums to support existing local car club provision will be acceptable.

Outside the city centre, it is recognised that there may be less demand car clubs, and thus requirements are lower. In Zone C the intent is that car clubs can reduce second and marginal car ownership.

Car club facilities should provide the following elements:

- Dedicated and convenient parking which is identified on submitted plans and managed according to the parking management plan.

- Vehicle parking that is always accessible and available to use by the wider public.

- Operation by an accredited car club provider (nationally recognised accreditation).

- Be in place and promoted to potential residents prior to occupation, ideally with a free initial membership deal.

- Developments below the threshold for providing an on-site car club facility within the city centre will be required to provide either;
    - a contribution per dwelling towards community car club facilities; or
    - a number of years' free membership to the nearest car club bay provider for all residents/occupiers.

Although there are no minimum standards applied to non-residential developments, it is recommended that all developments consider the viability of car clubs and car share opportunities for staff and business use. In city centre locations residential and corporate car club provision can be complementary, with businesses utilising the service for fleet purposes during weekdays, and residential usage at evenings and weekends.

32

Standards for Car Parking

Residential Developments

Maximums and Typical levels of car parking provision

All residential developments in Zones A and B in Birmingham will be subject to maximum parking standards. The maximums are set to ensure that developments continue to come forward with levels of parking provision that remain commensurate with the vision to reduce car dependency and to promote alternative sustainable transport options.

In Zone A only disabled user car parking will be expected to be provided. There will be a preference for car free development unless there is a demonstration of clear need for car parking provision (please refer to Parking Standard Rules on page 25). The maximum provision would 1 space per 10 residential units.

In Zone C guidance is provided on a typical level of parking provision to reduce the level of overspill that any site may generate. Where developers can demonstrate that a development will have minimal impact on local on-road parking, developments in Zone C with a lower level of parking provision will be supported.

Unallocated Car Parking provision

Unallocated parking is parking provided in a way that can be accessed and used by all those with legitimate purpose for being on the development site - residents and their visitors. It may be on-street or designed within the development for shared use (such as a 'mobility hub' design). This is in contrast to allocated or on-plot parking that is by virtue of being within a residential curtilage, only for use by the tenant or owner of that specific property. Evidence shows that parking provision can be reduced to less than 75% where it is unallocated rather than allocated. Unallocated spaces also allow for flexibility should the needs of the community change. It is preferable that as much parking as possible should be designed and provided in an unallocated way.

In Zones B and C, residential developments of 10 or more dwellings will be expected to provide 1 space per 10 dwellings as unallocated parking. This can be in addition to the allocated parking standards set out in the standards table in Appendix A, but does not have to be.

Providing unallocated parking on smaller developments may be problematic and not conducive to good design. As such, developments of 9 dwellings and below will not be required to provide a minimum level of unallocated parking but may do so where appropriate.

Detailed design guidance on unallocated parking design is contained in the Birmingham Design Guide SPD.

33

Summary of approach to unallocated parking in Zones B and C

Scale of development	9 dwellings and below		10 dwellings and above	
Is unallocated parking required?	No		Yes	
Dwelling size	1 and 2 bed dwelling	3+ bed dwelling	1 and 2 bed dwelling	3+ bed dwelling
Requirement	No unallocated parking required	No unallocated parking required	At least 1 space per 10 dwellings.	At least 1 space per 10 dwellings

Worked Examples of parking standards for residential schemes

A development of 5 houses
Comprising: 3 bed house x 5

Type	Zone A	Zone B	Zone C
Car	Maximum of 1 car parking bay where clear need can be demonstrated.	Maximum of 5 parking spaces. (No unallocated spaces required)	Typical provision of 10 parking spaces (No unallocated spaces required)
Disabled Parking	1 space per wheelchair accessible unit. Plus 1 space in zero/low car developments or if parking provision is non-curtilage.		
Cycle	15 secure covered cycle storage spaces.		
EVCP	All car parking spaces to be active EVCP.	5 active EVCPs if each dwelling has an allocated parking space. Or 20% active EVCP and 80% passive spaces if all parking is unallocated.	
Car Club	2 years membership to nearest car club upon occupation for each dwelling.	-	-

A development of 10 houses

34

Comprising: 3 bed house x 6, 4 bed house x 4

Type	Zone A	Zone B	Zone C
Car	Maximum of 1 car parking bay where clear need can be demonstrated.	15 spaces plus 1 unallocated space = 16 total	20 spaces plus 1 unallocated space = 21 total
Disabled Parking	1 space per wheelchair accessible unit. Plus 1 space in zero/low car developments or if parking provision is non-curtilage.		
Cycle	34 secure covered cycle storage spaces.		
EVCP	All car parking spaces to be active EVCP.	10 active EVCPs if each dwelling has an allocated parking space. Or 20% active EVCP and 80% passive spaces if all parking is unallocated.	
Car Club	2 years membership to nearest car club upon occupation for each dwelling.	-	-

A development of 100 houses
Comprising: 2 bed house x 25, 3 bed house x 50, 4 bed house x 25

Type	Zone A	Zone B	Zone C
Car	Maximum of 10 car parking bays where clear need can be evidenced.	138 spaces plus 10 unallocated spaces = 148 total	175 spaces plus 10 unallocated spaces = 185 total
Disabled Parking	1 space per wheelchair accessible unit. Plus 5 spaces space in zero/low car developments, or if parking provision is non-curtilage.		
Cycle	300 secure, covered cycle storage spaces.		
EVCP	All car parking spaces to be active EVCP.	100 active EVCPs if each dwelling has an allocated parking space. Or 20% active EVCP and 80% passive spaces if all parking is unallocated.	
Car Club	2 car club bays operated by an accredited provider such as Co-Wheels		-

35

A development of 50 flats

Comprising: 1 bed x 25, 2 bed x 25

Type	Zone A	Zone B	Zone C
Car	Maximum of 5 car parking bays where clear need can be demonstrated.	50 spaces plus 5 unallocated spaces = 55 total	50 spaces plus 5 unallocated spaces = 55 total
Disabled Parking	5 disabled parking bays plus 1 space per wheelchair accessible unit.		
Cycle	75 secure, covered cycle storage spaces, plus 5 short stay visitor spaces.		
EVCP	All car parking spaces to be active EVCP.	50 active EVCPs if each dwelling has an allocated parking space. Or 20% active EVCP and 80% passive spaces if all parking is unallocated.	
Car Club	2 car club bays	2 car club bays	-
Motorcycle	3 motorcycle parking spaces		

Garages

Garages will only be accepted as contributing towards parking provision for development if they have adequate functional space. Where garages are also used to provide cycle storage, additional space must be provided to accommodate this. Further guidance regarding recommended dimensions is available in the TFWM cycle design guide[4] or the emerging Birmingham City Council Design Guide.

Extra Care Housing/ Independent Living Housing

Extra care housing is comprised of self-contained homes with design features and support and care services available to enable self-care and independent living. Each household has its own front door. It is for people whose disabilities, frailty or health needs make ordinary housing unsuitable but who do not need or want to move to long term care (residential or nursing homes.

The level of parking provision on Extra Care Housing schemes will vary depending upon a range of factors, including:

- The spectrum of care being provided and the likely mobility and connectivity needs of resident, visitors and staff (including opportunities for social interaction);
- The availability, distance and ease of access of residents to key services/facilities on site, in the near vicinity and within the extra care facility itself – taking into account

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[4] https://corporate.tfwm.org.uk/media/2713/2019-07-15-wm-guidance-wcovers.pdf

36

and likely mobility issues;

- The availability and frequency of public transport to key services and facilities;
- Connectivity and standard of routes to local services and facilities; and
- Servicing requirements of the scheme.

For these reasons no specific parking standards are set out within this SPD. Instead, applicants are required to consider and address the above factors as part of a holistic approach towards ensuring the accessibility of schemes in order to maximise accessibility and connectivity, which may include necessary infrastructure upgrades.

When designing a parking solution for an Extra Care Housing Scheme applicants are required to justify the approach accordingly as part of any submitted planning application for consideration. This will need to include details of the proposed layout, parking standards for cars and cycles, disabled parking and servicing requirements and would likely be set out within the Transport Assessment or Transport Statement, as appropriate.

Houses in Multiple Occupation (HMOs) and shared housing

In Zones B and C provision of 0.5 parking spaces per bedroom is recommended for HMOs and shared housing. This level of provision acknowledges that HMOs and shared housing tend to attract occupiers with lower-than-average levels of car ownership compared to the general population.

If sufficient parking cannot be provided off street, the following criteria must be met to justify use of on-street parking provision:

- The street/road must not be on an existing bus route.
- There must be no objections to provision of on-street parking from statutory consultees, including the emergency services.
- The developer must demonstrate through parking surveys, accumulation estimation, etc, that use of on-street parking will not lead to demand exceeding supply of on-street parking.
- Peak hour two-way traffic flow on road/street should not exceed 500 veh/hr.

Tandem off-street parking bays are not acceptable for HMOs and shared housing as they are difficult to manage for occupants who are not related to each other.

The provision of off-street parking through the replacement of traditional front gardens with open hard standing and the removal of front and side boundary walls will be resisted. Removal of these elements can negatively impact on existing character of the street and, in some cases, exacerbate localised flooding.

Commuted sums for parking control or other measures to mitigate the effect of parking demand generated (such as contributions towards Car Club provision) will be considered for developments that do not satisfy requirements.

New HMO and shared housing developments in zone A should only provide parking for disabled residents and visitors/drop-off. As per Controlled Parking principle 6 (page 16) in this document, new HMO and shared housing developments in zone A will be excluded from

37

residents' parking schemes; residents or tenants will not be eligible for on-street parking permits to safeguard parking availability for existing residents and encourage a low car approach to such developments.

Student Accommodation

Student accommodation proposals in Zone A should not include car parking except for some visitor and drop off/pick up provision and disabled parking for residents. Where car parking is proposed clear need for provision must be demonstrated. This will be limited to maximum of up to 10% of the number of bed spaces.

In Zone B, 1 space per 10 bed spaces will be permitted where clear need can be demonstrated. In Zone C, provision for 1 space per 3 bed spaces is permitted based on clearly demonstrated need.

'Clear need' is likely to relate to students who have a specific travel need related to their course – e.g. travel to placements, which cannot easily be accommodated by public transport.

Accommodation providers should also strongly discourage students from bringing their cars to the city for the duration of their academic studies through code of conduct agreements and travel plans and/ or parking management plans.

Mixed Use Developments

Where development includes both residential and other uses, consideration should be given to how parking spaces can be shared between uses, particularly where the non-residential use is more likely to attract the need for parking during the day. A parking management plan may be required to demonstrate how these shared spaces will be managed.

38

Non-Residential Developments

All non-residential car parking standards in Zones A and B are expressed as maximums. For Zone C non-residential developments, car parking standards are given as a typical parking level.

In Zone A only disabled user car parking will be expected to be provided. There will be a preference for car free development unless there is a demonstration of clear need for car parking provision. The maximum provision would be for up to 10% of expected staff and customer/visitor capacity for the development.

Use Class E

Recent changes to the Town and Country (Use Class) Order 1987 consolidates the former uses Classes A1, A2, A3, B1 and elements D1 and D2 into a single use Class E.

Where it can be identified through a planning application/ prior approval how the proposed development will be used e.g. shop, day nursery, restaurant – the most relevant parking standards in Appendix A will be applied to determine the appropriate level of parking provision.

Where an 'unspecified' E class use is proposed and it is not possible to determine from a planning application/ prior approval how the development will be used within the E class, the appropriate level of parking will be determined on a case by case basis according to the merits of the application and the site context.

Places of Worship

Places of worship can generate a high level of short-term demand. Some places of worship will draw users from a very local area and generate only limited car-based demand. Others may have a much more substantial hinterland leading to a greater volume and car mode share.

Parking maximums will apply in zones A and B to places of worship for any on-plot provision. Applicants must demonstrate adequate parking capacity is available at the typical times of worship within an 800 metre walk distance of the place of worship for the expected car-based demand. Appropriate travel planning mechanisms should be in place to reduce demand for car travel wherever possible.

Applicants will be required to undertake surveys to an agreed specification and produce evidence to satisfy this requirement. Where adequate parking capacity is demonstrably unavailable locally, maximum parking standards for on-plot provision may be reviewed. This would be with an expectation that more extensive parking provision can be used by the wider community to make efficient use of space.

Other Requirements

A number of land uses are subject to other parking provision requirements. These consist of operational, servicing and specific service user needs to ensure parking provision is suitable for planned use.

Operational Parking

Operational parking is specifically identified as that required for the purposes of the site to conduct the business or service operated. This may be space for:

- Vehicles that are used by staff to perform the task (cars used by estate agents to visit properties or those used by restaurants to deliver takeaway food).

- Servicing and goods vehicles. Appropriate off-street parking, loading/ unloading, waiting and turning areas should be provided for HGV's to prevent obstructions to the highway causing delays and road safety issues. For developments generating high levels of freight movement, consideration must be given towards safe overnight lorry parking and rest facilities.

- Storage of vehicles that are being serviced or repaired (such as at a garage/vehicle repair/ MOT centre). Adequate on-site provision for vehicles is required (minimum of 4 spaces per working bay)

Operational parking excludes parking for patrons, visitors or service users. Furthermore, operational parking is not parking provided for employees unless the vehicle is substantively used by that employee in the course of their day-to-day business. While Appendix A sets out broad guidelines, the provision of operational parking will also be considered on a case by case basis.

It will be necessary to demonstrate in an application and through Transport Statements / Transport Assessments how goods vehicles will be managed as part of the proposed development, particularly in areas where the presence of HGV's has the potential to cause traffic management and road safety issues.

Drop-Off and Loading Areas

Parking for bus/coach drop off/ pick up will be considered appropriate and necessary for some land uses, notably leisure and education. General guidelines are set out in Appendix A but this will be unique to each site and considered on a case by case basis.

Developments may be required to provide a larger parking bay close to the entrance for use by special needs transport. This is considered good practice to improve the safety and convenience of those using coach or bus to reach the development. Some land uses may be required to make provision for family parking which accommodates those with pushchairs or who require proximity due to childcare or pregnancy/maternity needs.

40

A mobility hub approach

Evidence of best practice regarding transport provision for new developments shows that a mobility hub approach can prove successful in promoting sustainable transport and reducing car dependency. Particularly for large developments, developers are encouraged to consider co-locating mobility options to ensure that occupants, visitors and residents have the best access to a variety of travel modes. Mobility hubs have three key characteristics:

- Co-location of public and shared mobility modes

- The (re)design of space to reduce private car space and improve the surrounding public realm

- A pillar or sign which identifies the space as a mobility hub which is part of a wider network and ideally provides digital travel information.

Components of a mobility hub could include:

- **Shared transport** – eScooters, cargo bicycles, West Midlands Cycle Hire, bike loans, Car Clubs.
- **Public transport interchanges** – bus and metro stops, taxi ranks, train and coach stations.
- **Active travel support** – wayfinding maps, bike hangars, tool stations, public transport timetables
- **Public space** – shelter, seating, micro-parks.
- **Commerce** – micro food and retail, parcel lockers.

Further useful information on Mobility Hubs is available from Como.org.uk here: https://como.org.uk/wp-content/uploads/2019/10/Mobility-Hub-Guide-241019-final.pdf

Developer Contributions

In appropriate cases, the City Council will also seek contributions from new developments through S106 agreements or Community Infrastructure Levy.

Infrastructure resulting from these contributions should be provided in a timely manner, to meet the first occupation of a site in order to influence travel behaviour from the earliest opportunity.

41

APPENDIX A

Parking Standards Tables

E CLASS LAND USES

Land Use	Parking Type	Zone A	Zone B	Zone C
E(a) Shops (Convenience/ Food Retail) Up to 1000m²	**Car parking**	Disabled user car parking only	1 space per 28 m²	1 space per 14m²
	Bicycle Spaces	**Staff:** 1 space per 10 staff (long stay) **Customer:** 1 space per 125m² (short stay) Minimum of 2 spaces		
	Disabled Parking	6% of staff and customer/visitor capacity	6% of total car parking capacity or 1 space, whichever is greater.	
	Motorcycle spaces	Minimum of 1 space		
	Electric Vehicle Charging	Over 10 parking bays: Min 1 EVCP Plus EVCP or passive provision for every 1 in 5 bays 5% EVCP (min 1) to be accessible to disabled drivers		
	Other requirements	Over 250m², identification of adequate loading space for size of operation		
E(a) Shops (Convenience/ Food Retail) Over 1000m²	**Car parking**	Disabled user car parking only	1 space per 20 m²	1 space per 18m²
	Bicycle Spaces	**Staff:** 1 space per 10 staff (long stay) **Customer:** 1 space per 250m² (short stay) Minimum of 2 spaces Showers and changing facilities as per detail on page 28		
	Disabled Parking	6% of staff and customer/visitor capacity	6% of total car parking capacity or 1 space, whichever is greater. Over 200 bays: 4% of total car parking capacity or 12 spaces, whichever is greater.	
	Motorcycle spaces	Minimum 1 space or 2% of the total predicted staff and visitors/customers capacity, whichever is greater.		
	Electric Vehicle Charging	Over 10 parking bays: Min 1 EVCP Plus EVCP or passive provision for every 1 in 5 bays 5% EVCP (min 1) to be accessible to disabled drivers		
	Other requirements	Larger parking bay for Ring and Ride and special needs transport close to entrance. Family/maternity Parking spaces close to entrance. Appropriate loading and servicing bays with associated off-street manoeuvring space.		

42

Land Use	Parking Type	Zone A	Zone B	Zone C
E(a) Shops (Comparison/ Non-Food Retail)	**Car parking**	Disabled user car parking only	1 space per 40 m²	1 space per 30m²
	Bicycle Spaces	**Staff:** 1 space per 10 staff (long stay) **Customer:** 1 space per 250m² (short stay) Minimum of 2 spaces Showers and changing facilities as per detail on page 28		
	Disabled Parking	6% of staff and customer/visitor capacity	6% of total car parking capacity or 1 space, whichever is greater. Over 200 bays: 4% of total car parking capacity or 12 spaces, whichever is greater.	
	Motorcycle spaces	Minimum 1 space or 2% of the total predicted staff and visitors/customers capacity, whichever is greater.		
	Electric Vehicle Charging	Over 10 parking bays: Min 1 EVCP Plus EVCP or passive provision for every 1 in 5 bays 5% EVCP (min 1) to be accessible to disabled drivers		
	Other requirements	Appropriate loading and servicing bays with associated off-street manoeuvring space.		

Land Use	Parking Type	Zone A	Zone B	Zone C
E (c) (i) (ii) (iii) Financial and Professional services (Banks, Estate Agents, Building Societies)	**Car parking**	Disabled user car parking only	1 space per 60m²	1 space per 30m²
	Bicycle Spaces	**Staff:** 1 space per 10 staff (long stay) **Customer:** 1 space per 150m² (short stay) Minimum of 2 spaces Showers and changing facilities as per detail on page 28		
	Disabled Parking	6% of staff and customer/visitor capacity	6% of total car parking capacity, or 1 space, whichever is greater.	
	Motorcycle spaces	Minimum 1 space or 2% of the total predicted staff and visitors/customers capacity, whichever is greater.		
	Electric Vehicle Charging	Over 10 parking bays: Min 1 EVCP Plus EVCP or passive provision for every 1 in 5 bays 5% EVCP (min 1) to be accessible to disabled drivers		
E(b) Food and Drink (Restaurants, Cafes, snack bars) **Sui Generis Drinking**	**Car parking**	Disabled user car parking only	1 space per 20 m² of public floor space	1 space per 10m² of public floor space
	Bicycle Spaces	**Staff:** 1 space per 10 staff (long stay) **Customer:** 1 space per 200m² (short stay) Minimum of 2 spaces Showers and changing facilities as per detail on page 28		

43

Establishments/ Public Houses	**Disabled Parking**	6% of staff and customer/visitor capacity	6% of total car parking capacity or 1 space, whichever is greater. Over 200 bays: 4% of total car parking capacity or 12 spaces, whichever is greater.	
	Motorcycle spaces	Minimum 1 space or 2% of the total predicted staff and visitors/customers capacity, whichever is greater.		
	Electric Vehicle Charging	Over 10 parking bays: Min 1 EVCP. Plus EVCP or passive provision for every 1 in 5 bays. 5% EVCP (min 1) to be accessible to disabled drivers		
	Other requirements	Adequate provision for delivery and servicing vehicles		
Sui Generis Hot Food Takeaways	**Car parking**	Disabled user car parking only	1 space per 35m² of public floorspace	1 space per 20m² of public floorspace
	Bicycle Spaces	**Staff:** 1 space per 10 staff (long stay) **Customer:** 1 space per 200m² (short stay) Minimum of 2 spaces Showers and changing facilities as per detail on page 28		
	Disabled Parking	6% of staff and customer/visitor capacity	6% of total car parking capacity or 1 space, whichever is greater.	
	Motorcycle spaces	Minimum 1 space or 2% of the total predicted staff and visitors/customers capacity, whichever is greater.		
	Electric Vehicle Charging	Over 10 parking bays: Min 1 EVCP Plus EVCP or passive provision for every 1 in 5 bays 5% EVCP (min 1) to be accessible to disabled drivers		
	Other requirements	Appropriate provision for delivery and servicing vehicles		

44

Land Use	Parking Type	Zone A	Zone B	Zone C
E(g) (i)Office (ii) Research and Development	**Car parking**	Disabled user car parking only	1 space per 60m²	1 space per 40m²
	Electric Vehicle Charging	10% (minimum 1) of disabled user bays to be EVCP	Over 10 parking bays: Min 1 EVCP Plus EVCP or passive provision for every 1 in 5 bays. 5% EVCP (min 1) to be accessible to disabled drivers	
	Bicycle Spaces	**Staff:** 1 space per 10 staff (long stay) **Visitor:** 1 space per 400m² (short stay) Minimum of 2 spaces Showers and changing facilities as per detail on page 28		
	Disabled User Parking	6% of staff and customer/visitor capacity	6% of total car parking capacity or 1 space, whichever is greater. Over 200 bays: 4% of total car parking capacity or 12 spaces, whichever is greater.	
	Motorcycle spaces	Minimum 1 space or 2% of the total predicted staff and visitors/customers capacity, whichever is greater.		
	Other requirements	Appropriate provision for servicing and delivery vehicles.		
E(g) (iii) Industrial processes	**Car parking**	Disabled user car parking only	1 space per 120 m2	1 space per 60 m2
	Electric Vehicle Charging	10% (minimum 1) of disabled user bays to be EVCP	Over 10 parking bays: Min 1 EVCP Plus EVCP or passive provision for every 1 in 5 bays. 5% EVCP (min 1) to be accessible to disabled drivers	
	Bicycle Spaces	**Staff:** 1 space per 10 staff (long stay) **Visitor:** 1 space per 400m² (short stay) Minimum of 2 spaces Showers and changing facilities as per detail on page 28		
	Disabled User Parking	6% of staff and customer/visitor capacity	6% of total car parking capacity or 1 space, whichever is greater. Over 200 bays: 4% of total car parking capacity or 12 spaces,	

45

			whichever is greater.
	Motorcycle spaces	Minimum 1 space or 2% of the total predicted staff and visitors/customers capacity, whichever is greater.	
	Other requirements	Appropriate provision for servicing and delivery vehicles.	
B2 General Industry and Warehousing	Car parking	Disabled user car parking only	1 space per 120m²	1 space per 60m²
	Electric Vehicle Charging	10% (minimum 1) of disabled user bays to be EVCP	Over 10 parking bays: Min 1 EVCP plus EVCP or passive provision for every 1 in 5 bays. 5% EVCP (min 1) to be accessible to disabled drivers
	Bicycle Spaces	**Staff:** 1 space per 10 staff (long stay) **Visitor:** 1 space per 400m² (short stay) Minimum of 2 spaces Showers and changing facilities as per detail on page 28	
	Disabled User Parking	6% of staff and customer/visitor capacity	6% of total car parking capacity or 1 space, whichever is greater. Over 200 bays: 4% of total car parking capacity or 12 spaces, whichever is greater.
	Motorcycle spaces	Minimum 1 space or 2% of the total predicted staff and visitors/customers capacity, whichever is greater.	
	Other Requirements	Appropriate provision for HGVs/ Lorries/ Freight, including rest/overnight parking facilities where necessary.	

46

Land Use	Parking Type	Zone A	Zone B	Zone C
B8 Storage and Distribution	**Car parking**	Disabled user car parking only	1 space per 150m²	1 space per 60m²
	Electric Vehicle Charging	10% (minimum 1) of disabled user bays to be EVCP	Over 10 parking bays: Min 1 EVCP plus EVCP or passive provision for every 1 in 5 bays. 5% EVCP (min 1) to be accessible to disabled drivers	
	Bicycle Spaces	1 space per 10 staff Minimum of 2 spaces Showers and changing facilities as per detail on page 28		
	Disabled User Parking	6% of staff and customer/visitor capacity	6% of total car parking capacity or 1 space, whichever is greater. Over 200 bays: 4% of total car parking capacity or 12 spaces, whichever is greater.	
	Motorcycle spaces	Minimum 1 space or 2% of the total predicted staff and visitors/customers capacity, whichever is greater.		
	Other Requirements	Appropriate provision for HGVs/ Lorries/ Freight, including overnight parking facilities where necessary.		

47

C CLASS LAND USES

Land Use	Parking Type	Zone A	Zone B	Zone C
C1 Hotels Hotels, boarding and guest houses	**Car parking**	Disabled user car parking only	Under 50 bed spaces: 1 per 4 beds Over 50 bed spaces: 1 per 6 beds	Under 50 bed spaces: 1 per 2 beds Over 50 bed spaces: 1 per 3 beds
	Electric Vehicle Charging	Over 10 parking bays: Min 1 EVCP Plus EVCP or passive provision for every 1 in 5 bays 5% EVCP (min 1) to be accessible to disabled drivers.		
	Bicycle Spaces	**Customers:** 1 space per 10 bed spaces (long stay) **Staff:** 1 space per 10 staff Minimum of 2 spaces Showers and changing facilities as per detail on page 28		
	Disabled Parking	6% of staff and customer/visitor capacity	Plus 6% of total car parking capacity or 1 space, whichever is greater. Over 200 bays: 4% of total car parking capacity or 12 spaces, whichever is greater.	
	Motorcycle spaces	Minimum 1 space or 2% of the total predicted staff and visitors/customers capacity, whichever is greater.		
	Other requirements	Must consider viability of TFWM cycle hire provision. Larger parking bay for special needs transport close to entrance. Adequate provision for delivery and servicing vehicles Adequate taxi pick up and drop off. Over 50 bed spaces: min 1 coach drop-off.		
C2 Residential Institutions - Residential Care homes, Nursing homes	**Car parking**	1 per 2 staff	1 per 2 staff Visitors – 1 space per 8 residents	
	Electric Vehicle Charging	Over 10 parking bays: Min 1 EVCP Plus EVCP or passive provision for every 1 in 5 bays. 5% EVCP (min 1) to be accessible to disabled drivers.		
	Bicycle Spaces	**Staff:** 1 per 10 staff (long stay) **Visitor:** 1 per 10 bed spaces (short stay) Minimum of 2 spaces Showers and changing facilities as per detail on page 28		

48

	Disabled Parking	6% of staff and customer/visitor capacity	6% of total car parking capacity or 1 space, whichever is greater. Over 200 bays: 4% of total car parking capacity or 12 spaces, whichever is greater.
	Motorcycle spaces	Minimum 1 space or 2% of the total predicted staff and visitor capacity, whichever is greater.	
	Other requirements	Adequate provision for delivery and servicing vehicles	

C2 Hospitals, C2A Secure Residential Institutions, independent living housing, and extra care housing will be determined on a case by case basis and assessed on its own merits. For independent living/ extra care housing see pages 36-37 for guidance.

Land Use	Parking Type	Zone A	Zone B	Zone C
C3 Dwelling Houses	Car parking spaces per dwelling	Disabled Parking only (or 1 space per 10 residential units where clear need can be demonstrated)	1 bed and 2 bed: 1 space per dwelling Plus 1 unallocated space per 10 dwellings (on developments of 10+ dwellings)	1 bed and 2 bed: 1 space per dwelling Plus 1 unallocated space per 10 dwellings (on developments of 10+ dwellings)
			3+ bed: 1.5 spaces per dwelling Plus 1 unallocated space per 10 dwellings (on developments of 10+ dwellings)	3+ bed: 2 spaces per dwelling Plus 1 unallocated space per 10 dwellings (on developments of 10+ dwellings)
	Car Club	5 to 50 units: 2 years membership to the nearest car club bay provider (1 per unit) upon occupation. Between 51- 300 units: 1 car club bay per 50 units.	Between 100 – 300 units, 1 car club bay per 50 units. 1 car club bay per each subsequent 500 units.	Over 300 dwellings: 2 car club bays per 300 units.

49

		1 car club bay per each subsequent 500 units.	
	Electric Vehicle Charging	All car parking spaces to be active Electric Vehicle Charging Point (EVCP).	**Allocated parking:** 1 Active EVCP per dwelling with an associated parking space. **Unallocated parking off street:** 5 parking spaces or more: 20% active EVCP provision. Passive capacity for all spaces. **Unallocated parking on street:** Subject to EV Network Charging requirements.
	Bicycle Spaces	**Housing:** One secure, covered cycle storage space per bedroom. **Flats/apartments:** 1 secure, covered cycle storage space per unit, plus 1 visitor space (short stay) per 10 units.	
	Disabled Parking	1 space per wheelchair accessible unit. **Wherever parking is non-curtilage:** 1 space or 5% of total units, whichever is greater.	
	Motorcycle spaces	**Flats/apartments:** 1 space per 20 units.	

Land Use	Parking Type	Zone A	Zone B	Zone C
Sui Generis Purpose Built Student Accommodation	**Car parking**	Disabled Parking only	1 space per 10 bedrooms where clear need for provision can be demonstrated, unallocated parking only	1 space per 3 bedrooms where clear need for provision can be demonstrated, unallocated parking only
	Electric Vehicle Charging	**Allocated parking:** 1 Active EVCP per dwelling **Unallocated parking off street:** Over 10 parking spaces: EVCP or passive provision for each space.		
	Bicycle Spaces	1 secure, covered cycle storage space per 3 bed spaces (long stay) plus 1 visitor space per 20 bed spaces (short stay)		
	Disabled Parking	1 space per wheelchair accessible unit. **Wherever parking is non-curtilage:** 1 space or 5% of total units, whichever is greater.		
	Motorcycle spaces	1 space per 20 bed spaces.		
	Other requirements	Sufficient space for drop off and pick up/ moving. Timed management arrangements for student moving		

50

			days. Adequate provision for delivery and servicing vehicles
C4 Houses in Multiple Occupancy (HMO) **And Sui Generis HMOs**	**Car parking**	Disabled Parking only	0.5 unallocated spaces per bedroom generally sought. Alternative provision levels considered on a case by case basis.
	Electric Vehicle Charging	**Allocated parking:** 1 Active EVCP per dwelling **Unallocated parking off street:** Over 10 parking spaces: EVCP or passive provision for each space.	
	Bicycle Spaces	1 secure, covered cycle storage space per bedroom.	
	Disabled Parking	1 space per wheelchair accessible unit. **Wherever parking is non-curtilage:** 1 space or 5% of total units, whichever is greater.	

51

D CLASS LAND USES

Land Use	Parking Type	Zone A	Zone B	Zone C
E Clinics and Health Centres	**Car parking**	4 spaces per consulting room and 1 per treatment room*	4 spaces per consulting room and 1 per treatment room*	4 spaces per consulting room and 1 per treatment room
	Electric Vehicle Charging	Over 10 parking bays: Min 1 EVCP Plus EVCP or passive provision for every 1 in 5 bays 5% EVCP (min 1) to be accessible to disabled drivers.		
	Bicycle Spaces	**Staff:** 1 space per 10 staff (long stay) **Visitor:** 1 space per 20 people expected to use the facility at any one time (short stay) Minimum of 2 spaces Showers and changing facilities as per detail on page 28		
	Disabled Parking	6% of staff and customer/visitor capacity	6% of total car parking capacity or 1 space, whichever is greater. Over 200 bays: 4% of total car parking capacity or 12 spaces, whichever is greater.	
	Motorcycle Spaces	Minimum 1 space or 2% of the total predicted staff and visitors/customers capacity, whichever is greater.		
	Other requirements	Larger parking bay(s) for special needs transport or ambulance close to entrance. Consideration of family parking needs. Adequate provision for delivery and servicing vehicles *Lower levels of parking would be supported if the nature of the clinic, or its connectivity mean that parking is not as necessary.		
E Crèches, Day Nurseries, Day Centres and Madrassahs	**Car parking**	Staff: 1 per 4 staff Visitors: 20% of staff parking	Staff: 1 per 2 staff Visitors: 20% of staff parking	Staff: 1 per 2 staff Visitors: 20% of staff parking
	Electric Vehicle Charging	Over 10 parking bays: Min 1 EVCP Plus EVCP or passive provision for every 1 in 5 bays 5% EVCP (min 1) to be accessible to disabled drivers.		
	Bicycle Spaces	**Staff:** 1 space per 10 staff **Visitor:** 1 space per 50 pupils Minimum of 2 spaces Showers and changing facilities as per detail on page 28		

52

	Disabled Parking	6% of staff and pupil capacity	6% of total car parking capacity or 1 space, whichever is greater. Over 200 bays: 4% of total car parking capacity or 12 spaces, whichever is greater.
	Motorcycle Spaces	Minimum 1 space or 2% of the total predicted staff and visitor's capacity, whichever is greater.	
	Other requirements	Demonstrable available short-term parking space within 100 metres for 1 car per 5 pupils. Provision should be made for buggy and scooter parking.	

Land Use	Parking Type	Zone A	Zone B	Zone C
F.1 Educational Establishments Primary, Infant and Junior Schools, Secondary and 6th form Schools/Colleges	**Car parking**	Staff: 1 per 4 staff Visitors: 10% of staff parking	Staff: 1 per 2 staff Visitors: 10% of staff parking	Staff: 2 spaces per 3 staff (1:1.5) Visitors: 10% of staff parking
	Electric Vehicle Charging	Over 10 parking bays: Min 1 EVCP Plus EVCP or passive provision for every 1 in 5 bays 5% EVCP (min 1) to be accessible to disabled drivers.		
	Bicycle Spaces	**Staff:** 1 space per 10 staff **Visitors and Pupils:** 1 space per 10 pupils Minimum of 2 spaces Showers and changing facilities as per detail on page 28		
	Disabled Parking	6% of staff and pupil capacity	6% of total car parking capacity or 1 space, whichever is greater. Over 200 bays: 4% of total car parking capacity or 12 spaces, whichever is greater.	
	Motorcycle Spaces	Minimum 1 space or 2% of the total predicted staff and visitor capacity, whichever is greater.		
	Other requirements	Provision for SEN transport. **Primary:** Space for minimum 1 coach. Provision for scooter parking. **Secondary:** Space for min 2 coaches		
F.1 Educational Establishments Higher and further	**Car parking**	Disabled Parking only	Staff: 1 per 2 staff Visitors: 10% of staff parking	Staff: 1 per 2 staff Visitors: 10% of staff parking

53

	education	Electric Vehicle Charging	Over 10 parking bays: Min 1 EVCP Plus EVCP or passive provision for every 1 in 5 bays 5% EVCP (min 1) to be accessible to disabled drivers.

	Bicycle Spaces	**Staff:** 1 space per 10 staff **Visitors and Pupils:** 1 space per 10 pupils Minimum of 2 spaces Showers and changing facilities as per detail on page 28

	Disabled Parking	6% of staff and pupil capacity	6% of total car parking capacity or 1 space, whichever is greater. Over 200 bays: 4% of total car parking capacity or 12 spaces, whichever is greater.

	Motorcycle Spaces	Minimum 1 space or 2% of the total predicted staff and visitor capacity, whichever is greater.

	Other requirements	Space for 1 coach. Provision for SEN transport.

Land Use	Parking Type	Zone A	Zone B	Zone C
F.1 Halls and Places of Worship	**Car parking**	Disabled Parking only	1 space per 15 m²	1 space per 10m²
	Electric Vehicle Charging	Over 10 parking bays: Min 1 EVCP Plus EVCP or passive provision for every 1 in 5 bays 5% EVCP (min 1) to be accessible to disabled drivers.		
	Bicycle Spaces	**Staff:** 1 space per 10 staff **Visitor:** 1 space per 20 people expected to use the facility at any one time (typical peak occupancy). Minimum 2 spaces Showers and changing facilities as per detail on page 28		
	Disabled Parking	6% of staff and pupil capacity	6% of total car parking capacity or 1 space, whichever is greater. Over 200 bays: 4% of total car parking capacity or 12 spaces, whichever is greater.	
	Motorcycle Spaces	Minimum 1 space or 2% of the total predicted staff and visitors/customers capacity, whichever is greater.		
	Other requirements	Provision for special needs transport, parking and loading within the site. Consideration of family parking needs.		
Sui Generis Assembly and	**Car parking**	Disabled Parking only	1 space per 10 seats	1 space per 5 seats

54

Leisure Cinemas, Bingo, Casinos, Conference Centre, Music and Concert Halls, Theatres	**Electric Vehicle Charging**	Over 10 parking bays: Min 1 EVCP Plus EVCP or passive provision for every 1 in 5 bays 5% EVCP (min 1) to be accessible to disabled drivers.		
	Bicycle Spaces	**Staff:** 1 space per 10 staff **Visitor:** 1 space per 20 people expected to use the facility at any one time (typical peak occupancy) Minimum of 2 spaces Showers and changing facilities as per detail on page 28		
	Disabled Parking	6% of staff and pupil capacity	6% of total car parking capacity or 1 space, whichever is greater. Over 200 bays: 4% of total car parking capacity or 12 spaces, whichever is greater.	
	Motorcycle Spaces	Minimum 1 space or 2% of the total predicted staff and visitors/customers capacity, whichever is greater.		
	Other requirements	Where appropriate, adequate provision for coach drop off and HGV loading bays provided. Must consider viability of TFWM cycle hire provision.		
F.2 Swimming Pools, Leisure centres, Gyms and Sports Centres	**Car parking (maximum)**	Disabled user parking only	1 space per 35m²	1 space per 25m²
	Electric Vehicle Charging	Over 10 parking bays: Min 1 EVCP Plus EVCP or passive provision for every 1 in 5 bays 5% EVCP (min 1) to be accessible to disabled drivers.		
	Bicycle Spaces	**Staff:** 1 space per 10 staff **Visitor:** 1 space per 15 people expected to use the facility at any one time (typical peak occupancy) Minimum of 2 spaces Showers and changing facilities as per detail on page 28		
	Disabled Parking (minimum)	1 space per disabled employee, where known. Plus 3 spaces or 6% of total capacity, whichever is greater Over 200 parking bays: 12 bays plus 4% of total capacity		
	Motorcycle Spaces	Minimum 1 space or 2% of the total predicted staff and visitors/customers capacity, whichever is greater.		
	Other requirements	Adequate provision for coach drop off. Adequate provision for delivery and servicing vehicles. Consideration of family parking needs.		

55

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57

Parking Supplementary Planning Document

Consultation Statement

1. Introduction

Birmingham City Council consulted on the Parking Supplementary Planning Document (SPD) in January and February 2020. The consultation ran simultaneously with consultation on the publication version (regulation 19) of the Development Management in Birmingham Development Plan Document (DMB) to provide clarity on the connectivity policies in the DMB.

This statement details the level and type of responses received to the Parking SPD proposals and how they will be addressed in a revised version of the document. The statement has been prepared in accordance with Regulation 12(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and the Birmingham Statement of Community Involvement.

2. Purpose

The Parking SPD will replace the existing Car Parking Guidelines SPD (2012). Revised parking standards are required to reflect new national guidance and support the delivery of the Birmingham Development Plan as well as wider air quality and climate change objectives. The SPD also sets out a coherent and equitable parking strategy for the city.

Public consultation was carried out for 7 weeks from 9th January 2020 to the 28th February 2020, when views were sought from stakeholders and the public on the proposed guidance within the document.

3. Engagement approach

The draft SPD and supporting documents were uploaded onto the City Council's consultation website BeHeard with a structured survey inviting comments on each section of the document.

There was extensive publicising of and engagement on the consultation through a variety of channels:

- A press release

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- Numerous posts on the City Council's social media channels (including Birmingham Connected communications),
- The councils email bulletin and website
- Letters sent to all specific and general consultees (required by the relevant regulations) identified in the Planning and Development Consultation Database, including:
    o Developers and agents
    o Sustrans
    o Cycling and walking stakeholders groups, charities and clubs
    o Community groups
    o Emergency services
    o Public transport operators
    o Neighbourhood forums
    o Ward councilors
    o Members of Parliament
    o West Midlands Combined Authority
    o Neighbouring Local Authorities
    o Chambers of Commerce
    o Greater Birmingham and Solihull Local Enterprise Partnership
    o Disability User Groups
- Attendance at various transport events including Birmingham Transport Plan workshops, Calthorpe Residents Transport Conference, and the Birmingham Transport Summit.

Links to examples of engagement material are available below:

Be Heard: https://www.birminghambeheard.org.uk/economy/parkingspd

Website link:
https://www.birmingham.gov.uk/info/20109/parking/2045/draft_birmingham_parking_supplementary_planning_document_consultation

Press release:
https://www.birmingham.gov.uk/news/article/490/draft_sustainable_parking_strategy_set_for_consultation

4. Responses

In total 225 responses were received to the consultation, including 198 responses from individual citizens and 27 from groups or organisations. This included 943 individual comments within the online response and further written representations received by letter and email. All of the feedback has been analysed to establish how the SPD draft should be amended before taking it forward for adoption.

Summarised responses and proposed changes are provided in Appendix A, Organisational comments and Appendix B Individual Citizen Comments.

Internal comments have also been received and these have been reflected in the amendments to the SPD.

Key comments include:

- Concerns about impact of parking removal on the city centre economy, particularly leisure and the night-time economy as there is a lack of alternative provision to private car at off peak times.

- Some felt that motorists were being targeted too much. Parking levels should be increased.

- Public transport is not good, safe or reliable enough to offer a viable alternative to car travel. Public transport should be improved first before reducing car travel.

- Proposed measures will put more pressure on edge of city where already congested.

- New developments provide too little parking which has led to on-street and pavement parking.

- Objection to maximums set on residential car parking provision in Zone C.

- General support for management of residential parking and preventing commuter parking blocking residential streets.

- Some felt that the city should remove the option of car use entirely to end car culture.

- Parking in the city centre (particularly on street) should be substantially reduced/banned.

- Support high density housing with zero parking to meet housing need. Developments close to rail stations should be zero parking and high density.

- Strong support for additional park and ride provision, although some felt it encouraged short car journeys and is not appropriate.

- Some responses did not recognise station car parks as park and ride provision and feel the city requires dedicated bus park and ride provision close to the city centre.

- Concerns regarding the management of commuter on-street parking in residential streets around stations. Requests for additional enforcement of this and some requests for expansion of station car parks.

- Concern regarding parking levels outside schools and strong support for encouraging walking. Requests for parking to be completely banned/ strongly restricted in the vicinity of schools.

- There should be more consideration of disabled drivers/ Blue Badge Holders and those with mobility issues. Concern regarding any removal of blue badge parking

bays. A number of people raised concerns about those who have mobility difficulties, but do not necessarily have a blue badge.

- Parking provision for powered two wheelers (motorcycles) should be better quality, more secure and close to/visible from key destinations.

- Pavement parking should be addressed/ banned.

- Kerbside waiting and idling vehicles should be addressed/banned. Particular concerns raised regarding taxis idling near stations.

- Better parking enforcement is required.

- More provision is needed for rapid Electric Vehicle (EV) charging on street.

- A number of responses feel that provision for cyclists is too low/unambitious and should match Birmingham Cycle Revolution aspirations for future levels of cycling.

- Changing and shower facilities for cyclists should be provided in developments with a large number of staff.

- More provision for residential visitor parking should be made.

- Car parking for educational uses should be increased.

- Places of worship in Zone A and retail uses in Zone B have not got high enough parking provision.

- Concern about the viability implications for development and the lack of evidence to justify EV charging requirements.

- Controlled parking is generally supported as a way to manage high demand for on street parking, but some comments said additional charges should not be made for this, whilst others questioned whether further controlled parking would be rolled out extensively.

- Flexibility should be built into the SPD so that applicants can justify an alternative level of parking, where there are legitimate reasons for doing so.

- Clarity needed on how the zone boundaries and parking standards are set.

In response to internal BCC comments, the SPD has been further refined in the following ways:

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1.1 A detailed response to each comment and how the issues raised have been addressed in the SPD has been set out in appendices A and B. All responses received have been analysed and considered in the preparation of the final SPD. This has led to some changes to the initial draft documents. In summary the key changes include:

- Zone A (city centre) will remain disabled user parking only. However, it is acknowledged that in some instances parking may be required for staff/visitors e.g. where developments are predominantly used at off-peak times when public transport availability is lower. A 10% maximum of total staff/visitors will be set, where clear justification can be evidenced.
- Maximum car parking standards will remain for Zones A (city centre) and B (urban centres). Zone C (suburban/ residential) car parking standards for residential developments will be an 'expected level of provision' to comply with national planning policy. Accordingly, the values for the residential parking standards have been lowered.
- A simpler approach has been taken to allocated and unallocated parking with worked examples provided. The approach to residential parking provides for visitor parking.
- Adjustment of the car parking standard for large retail development to ensure adequate provision in Zones B and C. Zone A will remain disabled user parking only.
- Cycle standard for educational uses has been increased to 1 space per 10 staff plus 1 per 10 pupils (from 1 per 20 in the draft).
- A requirement has been added for all developments of 40 or more staff to provide adequate shower and changing facilities.
- Staff car parking provision for Primary and Secondary schools in Zone C (suburban) to increase from 1 per 2 staff to 1 per 1.5 staff acknowledging the need for staff to travel with books/ equipment etc. in less accessible areas of the city. Similarly, the parking maximum for nurseries in Zone C has been increased from one space per 8 children, to one space per 4 children.
- Further guidance and consideration have been given to motorcycle parking in the SPD.
- Additional text relating to how the standards will be flexibly applied has been incorporated.
- Further detail on how the zones have been determined has been included.
- Strengthening of proposals around disabled parking to ensure that appropriate levels of provision are available in the city centre and local centres.
- Clarification regarding application of standards to detailed and reserved matters planning applications which are registered prior to adoption of the SPD
- Greater emphasis of the modal split of journeys into the city centre.
- Additional detail regarding development on and operation of the canal network.
- Greater emphasis on the benefits of active travel and how this can be supported through parking policy.
- Additional detail regarding provision for fleet vehicles
- Amendment of parking standards for different types of supported residential accommodation (such as C2 Extra Care and C3 Sheltered accommodation).
- Greater reference to design guidance and the Draft Birmingham Design Guide

Appendix A

Draft Parking SPD – Summary of organisations' comments and Council response

Rep ID	Name	Main Issues raised	Council response and how issues have been addressed
GENERAL (NON-TOPIC SPECIFIC)			
G1	Argent LLP	Generally supportive of the SPD, however, would welcome confirmation and clarity as to how the Council will approach schemes which already benefit from outline planning permission with well-established parking allowances. The SPD should ensure that there is a degree of flexibility to allow the Council to consider the requirements of 'special' cases and ensure continuity across major schemes, particularly where applications for different phases of development will be determined and delivered within differing policy contexts. Suggest that the SPD recognises there will need to be a 'transition period' for developments which will be determined and delivered in the short to medium-term during, or shortly after, the adoption of the new standards.	Additional text has been added to clarify that the standards will not apply to detailed and reserved matters applications that are already registered prior to the date of adoption of the SPD. The SPD will have flexibility to allow the Council to consider the requirements of 'special' cases for example major schemes which are phased over long periods of time.
G2	Argent LLP	Where public transport infrastructure / improvements are planned but have not yet been delivered, the Council should recognise that there may be a requirement for parking in the short-term. Parking management plans could then be used to ensure these spaces are efficiently utilised and can be re-used for other purposes once areas	Guidance and standards have been aligned to existing public transport infrastructure and only take into account transport infrastructure delivery projects which are timetabled for delivery within 3 years. Therefore, unless very short-term parking requirements can be demonstrated, prior to this 3-year timescale, the standards in this SPD should already be appropriate to existing

Rep ID	Name	Main Issues raised	Council response and how issues have been addressed
		are sufficiently served by public transport.	public transport service.
			Without strong enforcement capabilities, there is a risk that short term parking provision may become permanent and affect trip generation, reduce public transport uptake, and network management.
			The SPD has been amended to account for delayed public transport infrastructure schemes, only in relation to those which have been identified for delivery within the next 3 years.
G3	Argent LLP	Argent welcomes the inclusion of suitable caveat from a feasibility/ viability perspective in regard to the provision of car club bays.	Support noted.
G4	Push Bikes & Bike West Midlands Network	More should be made of the fact that the overwhelming majority of people visiting the city centre do not come in a car - it is important that we provide an efficient transport system for that majority, rather than giving an unfair share of highway space to people in their own cars.	Agree the modal split of visitors to the city centre should be highlighted. The SPD has been amended to include more emphasis on modal split of visitors to city centre.
G5	Bloor Homes	Support residential parking being given a 'high priority' in predominantly residential areas but parking opportunities elsewhere should not be unnecessarily restricted. In certain areas access to public transport is problematic for a variety of different reasons. Car parking must be made available in order to allow people to commute efficiently throughout the city.	There is strong evidence that restricting parking at destinations reduces car usage, supported by good public transport connectivity and local parking enforcement/management. Whilst car ownership and provision at 'origin' may be appropriate, in locations with good transport connectivity, it is necessary that parking provision is limited to essential requirements at destinations so as to reduce impact on the transport network. Where public transport connectivity is more limited, parking standards are higher.
G6	Canal and River Trust	In order to achieve a reduction in private vehicle usage, there should be a robust policy basis that seeks the requirement to provide suitable alternatives. We seek to	The promotion of sustainable travel is included within policies in the Birmingham Development Plan (BDP) notably TP38 Sustainable Transport Network, TP39 Walking, TP40 Cycling, TP41 Public

Rep ID	Name	Main Issues raised	Council response and how issues have been addressed
		promote the use of our network for sustainable travel. New developments should: • Provide or contribute towards signage & wayfinding of alternative, sustainable travel routes • Provide or contribute towards improved access points onto the canal network (including signage/wayfinding) • Provide or contribute towards enhancing the quality/longevity of the canal network • Promote the existence and opportunities of the network of canal routes to staff, residents, visitors etc. (as appropriate to the type of development) • Where sites are located adjacent to water space, parking provision should be screened from view from the canal corridor, ideally by being located behind natural screening, boundary treatments or built form • Raise awareness of the options for using the canal network as part of a longer journey, for example to lead to/from public transport hubs. Our network should be included and suggested for use where appropriate (real time data) to assist with wider travel network management. Installation of cameras/counters or other infrastructure should also be a requirement of developments where appropriate and necessary.	Transport, PG3 Place making. Canals are recognised as important part of the cycling network in TP40 Cycling which promotes cycling through further development and enhancement of an extensive off-road network of canal towpaths and green routes; wayfinding and improved direction signing; and ensuring that new development incorporates appropriately designed facilities which will promote cycling as an attractive, convenient and safe travel method. Canals are a heritage asset and the historic importance of canals is very much recognised in the BDP under TP12 Historic Environment which states: "The historic importance of canals is acknowledged, and important groups of canal buildings and features will be protected, especially where they are listed or in a Conservation Area. Where appropriate the enhancement of canals and their settings will be secured through development proposals." However, text has been added to the SPD to reiterate the importance of the canal and river network as part of our transport network. The draft Birmingham Design Guide also include detailed design guidance on development adjacent to canals. It recognises that canals provide a multi-functional resource that can act as a catalyst for regeneration and provides a network of spaces serving as travel routes, locations for sports, leisure and cultural activities, and ecological and biodiversity habitats and corridors. Design Principle 21 sets detailed guidance relating to developing adjacent to water assets.

Rep ID	Name	Main Issues raised	Council response and how issues have been addressed
			The Design Guide also sets out detailed guidance on parking design. This includes minimising and managing car parking, ensuring it does not dominate. Comments regarding parking design have been relayed to the Design Guide consultation for consideration.
G7	Canal and River Trust	Keen to minimise any potential negative impacts on our operations teams and the way they work to maintain the network, including providing access to the network for maintenance vehicles and equipment. Such requirements should be taken into account where parking restrictions are to be applied or provision removed in close proximity to the canal network. It should be identified as a potential requirement of developments near water that maintenance access must be retained/provided as necessary.	The SPD has been amended to take to consider the impact of parking restrictions and development on the operation of the canal. Comments have also been relayed to the Design Guide consultation for consideration.
G8	Canal and River Trust	Where development proposals could impact on existing/future parking provision or travel options for boaters, there should be a requirement for this to be considered and adequately addressed in development proposals.	The SPD has been amended to take to consider the impact of parking restrictions and development on the operation of the canal. Comments have also been relayed to the Design Guide consultation for consideration.
G9	Canal and River Trust	Whilst supportive of requirements for bus/coach parking spaces to be provided relative to some types of developments such as destinations and attractions, we are keen to ensure that this is proportionate and includes consideration of context and likely need, to ensure that it does not preclude potentially beneficial economic development.	Standards are given as guidance to ensure bus/coach parking is accommodated where relevant and appropriate. It will not be imposed in locations where it is not required.
G10	Canal and River Trust	Measures should not reduce the attractiveness of city centre accommodation, in order that gaining rental	Proposed measures are not considered likely to reduce attractiveness of city centre accommodation as they support a cleaner, greener,

Rep ID	Name	Main Issues raised	Council response and how issues have been addressed
		income does not become less likely or successful.	more people-friendly living environment.
G11	Canal and River Trust	The document refers to the intention to have a city-wide cycle hire scheme and the Trust would also like to be consulted on this project as it develops.	Noted. The Council will pass this request on to appropriate officers leading on the scheme in TfWM.
G12	Canal and River Trust	Advice on the design of various infrastructure requirements, such as cycle parking, disabled spaces, EV charging points etc This should also identify that when near the canal network, there may be additional considerations such as barriers preventing vehicles from entering water, screening, signage, lighting etc.	Detailed guidance on parking design is contained in the draft Birmingham Design Guide. Relay comments to the Design Guide consultation.
G13	Canal and River Trust	Facilities for cyclists/runners etc such as shower/changing provision support and encourage the use of sustainable travel modes and a lack of them can result in a barrier to sustainable travel. The document should be more robust in requiring their provision and detailing when/why they are required as an alternative to providing parking.	Additional guidance has been included in the SPD in relation to the thresholds and types of development which will be expected to include shower/ changing facilities
G14	Canal and River Trust	Water borne transport options should also be included as a requirement for consideration on sites in close proximity to the canal network. This could include a requirement for future-proofing of infrastructure such as providing services (power, water & mooring bollards) to the canalside for future infrastructure provision such as water bus stops.	The draft Design Guide encourages developments adjacent to waterways to enhance them and their functions; benefiting occupants and the wider users of the network. Refer comment to the Design Guide consultation.
G15	Historic England	No specific comments to make on the draft Parking SPD. Cycle stands, painted on-street bay delineations and EV charging points have the potential to impact on the historic environment, heritage assets and their setting. We look forward to seeing the Council's Design Guide as it	Noted.

Rep ID	Name	Main Issues raised	Council response and how issues have been addressed
		progresses.	
G16	Langley Sutton Coldfield Consortium	The Consortium objects to the approach taken within the emerging Parking SPD which requires all development within Zone C to have a "blanket" imposition of maximum car parking standards. This is considered to be contrary to the requirements of paragraphs 105 and 106 of the National Planning Policy Framework	The Council acknowledges the requirements of para 106 of the NPPF and has reviewed the imposition of a maximum standard in Zone C. The SPD has been amended to remove the imposition of a maximum standard for residential and non-residential development in Zone C.
G17	Sport England	There should be reference in the document to the benefits of active travel to the physical and mental health and well-being of Birmingham's citizens. This should be visible within overall Vision and Principles, and also within the Parking Strategy.	The benefits of active travel are already emphasised in the BDP, Birmingham Connected, the draft Birmingham Transport Plan, and the Walking and Cycling Strategy but agree that this can be reiterated in the SPD.
CITY CENTRE PARKING			
CC1	Argent LLP	Supportive of the caveat included for hotel and residential uses, which allows for standard parking spaces to be provided if a clear need can be demonstrated. Query why a similar caveat has not been included for office developments?	The approach to providing a caveat for certain developments has been reviewed and no specific land-use is now referenced. The guidance will allow for a departure from the standards where fully and appropriately justified.
CC2	Push Bikes & Bike West Midlands Network	We support the aim to remove all no-fee on-street car parking, but we think that on-street parking, other than for disabled users, should be fully removed. Only disabled users should have a need to park on the street other than for loading and unloading.	Support noted. On street city-centre parking provision is significantly reducing in the city centre. It is not deemed appropriate or necessary to remove all on-street parking as this would be detrimental to local business. However should reallocation of on-street parking space be required to improve sustainable transport provision, this is likely to be prioritised and further parking will be removed.
CC3	Push Bikes & Bike West	We support the intention to not support applications for temporary car parks.	Support noted.

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	Midlands Network		
CC4	Push Bikes & Bike West Midlands Network	We support the proposal of introducing a Workplace Parking Levy. We feel that this is important for providing funds to invest in greener modes of transport and to give businesses the incentive to encourage better travel patterns.	Support noted.
CC5	Bloor Homes	If restrictions are placed on parking provision in the City it must be ensured this does not adversely affect the prosperity of the City. There must, therefore, be clear evidence to demonstrate that alternative access options to the City Centre are available and achievable across the City. It is not clear if public transport infrastructure is capable of accommodating the additional public transport movements this strategy could create.

Businesses may look to locate outside of the City Centre, or outside of Birmingham altogether if they are not served by adequate car parking or public transport connections. | While the right amount of parking provision can help support local business, cater for those with mobility needs and deter inconsiderate and unsafe parking, we must also ensure that valuable street space is not dominated by parked cars.

Birmingham Connected and the draft Birmingham Transport Plan provide a clear steer for the Parking SPD in their aim create an efficient, attractive, sustainable healthy and equitable transport system by seeking a reduction in reliance on the car and supporting walking, cycling and public transport. The BTP seeks to ensure that public transport will be the preferred choice for most people travelling into and out of the city centre. There is clear evidence that the city centre is already highly accessible by public transport. This is set to further improve with investment in and extensions to bus, bus rapid transit, train and tram networks including prioritisation over private car travel to reduce the negative impact that congestion and travel disruption has on productivity. The economic costs linked to congestion are also very significant, currently costing £632 million a year. This figure is expected to rise as demand increases. There is also evidence that large businesses who are choosing to locate in the city centre are placing greater emphasis on public transport use and active travel opportunities for staff. The new HSBC headquarters in Birmingham, for example, do not provide any parking for their 2,500 |

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			staff except for disabled spaces. The company have invested heavily in providing facilities to support cycling to work for their employees, including shower facilities and bike parking. They recognise that supporting employees to travel actively can bring significant health benefits to their workforce. ([Source](#))
CC6	Canal and Rivers Trust	Keen to ensure that our staff are not disadvantaged by the changes to parking provision within the city, whilst acknowledging that wherever possible we seek to encourage alternative, more sustainable travel modes. Staff based in city centre offices who require a car to do their job in order to be able to react to incidents and/or carry out site visits should not be disadvantaged by these proposals.	We acknowledge the importance of provision for fleet vehicles to support necessary working practices. The SPD recognises that for some journeys and business activities travelling to the city centre by car if the most suitable, or in some cases the only viable option. Within the parking standards for new developments there is acknowledgement of the need for accommodating fleet vehicles where necessary.
CC7	Salvation Army, Birmingham Citadel	Concerns with proposal to 'roll out the city centre controlled parking programme which will remove all no fee on street parking in the city centre'. We rely on the availability of no fee on street parking for the sustainability of our worship services on Sundays and weekday evenings. The availability of free access parking outside of normal business hours offers is considered essential for the sustainability and growth of the church and its community work. It is agreed that 'a balanced approach to parking provision' is needed and that proper provision should be made 'for those with mobility needs'. Use class D1 'Halls and Places of Worship', the maximum parking provision is 1 space per 20 seats for Zone A locations. This would be woefully short of the requirement as, in common with other churches we 'generate a high	The controlled parking programme which is in place across the city centre includes different traffic regulations (and parking charges/timings) for different areas. Each parking 'zone' is designed according to the appropriate requirements for managing parking in that area, and accommodating the needs of residents, businesses and organisations where possible. It is accepted that wording regarding removal of all no fee on street parking is misleading. This will be revised to 'removal of all uncontrolled on-street parking'. In other words, whilst there will be parking restrictions put in place throughout the city centre, this does not necessarily mean that all locations will incur parking charges at all times of the day and all days of the week. Prior to the introduction of any new parking restrictions or changes, we will consult with premises in the local area and work with organisations/ businesses affected to ensure that operational needs

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		level of short-term demand'. It is also noted that 'Operational Parking' excludes parking by operational users. The Salvation Army does not operate any commercial activities and therefore cannot demonstrate a loss of business, but will no doubt affect church attendance and operation. The document should be amended to clearly permit exceptions in cases which add – not detract – to the thriving culture of the city. If such an amendment can be confirmed, then we shall be grateful to engage in detailed discussions relating to our specific situation.	can still be met wherever possible.
CC8	Unite	Site/area specific policy should be added to enable new car parks in regeneration zones where the new parking has other 'spin off' benefits. The approach particularly the 'zero parking' position in the SPD will displace current parking problems whilst at the same time creating an obstacle to delivering regeneration. It is critical that policies to reduce the level of car parking within the city centre are brought forward alongside significant investment in public transport to ensure there are genuine travel alternatives to the private car. The emerging policies have an unintended consequence of potentially stifling innovation in the parking sector as an inability to deliver new modern car parks will mean existing car parks (which often lack low emissions / vehicle charging) will continue to be relied upon. A more robust and	This amendment is not considered necessary. Even in regeneration areas levels of parking provision need to be managed to limit adverse impact on the transport network, air quality and the environment. Existing wording allows standalone parking in regeneration areas, as long as it can be demonstrated to meet a deficit in local publicly available off-street parking or to help relieve on-street parking problems.

Rep ID	Name	Main Issues raised	Council response and how issues have been addressed
		sustainable approach would be to encourage new state of the art standalone car parks in accessible locations on the edge of the city centre.	
		The Knowledge Quarter is one such location. A master planned and strategic approach to car parking in the KQ will release existing car park sites for future development in full knowledge that essential car parking can be accommodated elsewhere within the site, which reduces overall parking numbers in the area. Therefore, a strategic approach to parking in this area could be a much needed 'release valve' which enables future regeneration. Suggest policy wording supporting provision of new standalone car parks.	
CC9	Oval Real Estate	Oval fully supports the approach taken in the draft SPD to manage on-street parking in the city centre, including Digbeth. In particular, Oval welcomes the removal of on-street car parking to support improvements to public realm and to provide priority for walking, cycling, servicing and delivery.	Support noted.
CC10	Oval Real Estate	Oval do not generally support this detailed guidance principle given it does not take into account any transitional arrangements, phasing and the need to deliver parking strategies over a prolonged period of time, which is sometimes the case when delivering major complex regenerative schemes in the city centre.

It is recommended that the detailed guidance is amended to allow for flexibility in the provision of off-street parking as follows: | The SPD has been amended to clarify that it will not apply to detailed and reserved matters applications that are already registered prior to the date of adoption of the SPD.   The SPD will have flexibility to allow the Council to consider the requirements of 'special' cases for example major schemes which are phased over long periods of time.

Existing wording allows standalone parking in regeneration areas, as long as it can be demonstrated to meet a deficit in local publicly available off-street parking or to help relieve on-street parking problems. |

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		"Replacement off street parking and new off street parking in the city centre will not be supported unless it can be demonstrated that there is a gap in provision and it reflects location specific circumstances."	
CC11	Mcnaughton Associates	A number of people need cars as a working tool to be able to visit other parts of the Midlands to carry out their job. Making it difficult for people to use cars for business or pleasure will see those people not use the city centre. People will shop in other locations. The shops are struggling in every city. If people do not use the shops, they will close. The council will lose revenue from Business Rates. Companies will move out of town. Families will not move into the city without parking. Limiting parking will destroy the economy of the city.	While the right amount of parking provision can help support local business, cater for those with mobility needs and prevent inconsiderate and unsafe parking, we must also ensure that our valuable street space is not dominated by parked cars.

Birmingham Connected and the draft Birmingham Transport Plan provide a clear steer for the Parking SPD in their aim create an efficient, attractive, sustainable healthy and equitable transport system by seeking a reduction in reliance on the car and supporting walking, cycling and public transport. The BTP seeks to ensure that public transport will be the preferred choice for most people travelling into and out of the city centre.

There is clear evidence that the centre is already highly accessible by public transport. This is set to further improve with investment in and extensions to bus, bus rapid transit, train and tram networks including prioritisation over private car travel to reduce the negative impact that congestion and travel disruption has on productivity. The economic costs linked to congestion are also very significant, currently costing Birmingham's economy £632 million a year (source: Birmingham Transport Plan). This figure is expected to rise as demand increases.

There is also evidence that large businesses who are choosing to locate in the city centre are placing greater emphasis on public transport use and Active travel opportunities for staff - see response above to ref ID CC5 for further detail. |

Rep ID	Name	Main Issues raised	Council response and how issues have been addressed
			A city centre parking survey undertaken in 2016 showed that there is significant over-supply of parking in the city centre which represents an inefficient and uneconomic use of land. Provision for essential fleet vehicles will not be limited by the proposed parking standards.
CC12	Clarke Print	Concern staff may have to pay for street parking and believe business may suffer as a result.	Wherever controlled parking measures are introduced the Council will consult closely with local residents and businesses to accommodate operational needs as far as is possible. Business permits are issued in many controlled parking schemes and we would refer the respondent to the Parking Control Team in this instance in regard to site specific queries.
CC13	National Express West Midlands	National Express West Midlands supports the approach to city centre parking and the reduction of the need for private car journeys by ensuring viability of alternative modes. The management of parking is key to encouraging changes in travel behaviour. The provision of spaces in some locations encourages extra circulation of traffic. Premium space locations need to be considered carefully, with routes to/from them not using bus routes (e.g. Colmore Row).	It is agreed that the approach to parking in premium locations must be carefully considered. The SPD, and the Birmingham Transport Plan state that reallocation of parking space for sustainable transport modes will be prioritised where viable. However it is also the case that a balanced approach may be necessary to ensure that appropriate provision remains for servicing, delivery, blue badge parking, and facilities such as car clubs or EV charging.
CC14	Motorcycle Action Group	We believe that motorcycle parking should be aligned with the approach adopted for cycle parking and recommend that the term single track vehicles be adopted to encompass both pedal and powered cycles. Thus providing the necessary detachment of motorcycles from cars in terms of categorisation. The "single track vehicle" term also has flexibility to encompass micromobility vehicles such as stand-on e scooters when legislation	Whilst it is agreed that motorcycles and pedal cycles have similar requirements in some circumstances, and dual provision will be encouraged where appropriate, it is still considered appropriate to identify them separately rather than amalgamating all standards under 'single track vehicles'. The SPD has been amended to provide further guidance on provision for motorcycles.

Rep ID	Name	Main Issues raised	Council response and how issues have been addressed
		inevitably develops to legalise the use of these vehicles	
CC15	St Joseph Homes Ltd	Concerns in terms of any future levy's eventual application and the operational aspects of such an approach. Our principle concern relates to that of the potential detrimental impact of a 'double dipping' through the CAZ and a workplace parking levy, possibly considerably impacting the viability of SMEs by prohibiting unavoidable employee or customer business trips. This could be a hindrance to the BDP's commitments to nurturing sustainable, mixed communities as only larger businesses may be able to afford the levy if it is too great. We would hope, therefore that any levy is evidence based and viable in terms of cost to the business. We request a public consultation is heard in the event that such an option is to be pursued as to better understand and inform the methodology to be employed in calculating the levy.	WPL investigations have been temporarily suspended in light of Covid19. Extensive impact analysis and evidence will need to be gathered to support any future decisions regarding introduction of a WPL. No scheme would be implemented before 2023. It is anticipated that a large proportion of vehicles would be CAZ compliant by this time. A comprehensive workplace parking study supported by a detailed parking survey would be undertaken to inform any potential levy. Engagement with employers would also be undertaken and the Council will work closely with the Chamber of Commerce and other businesses to understand the impact of the WPL. The Transport Act (2000) provides the enabling legislation for WPL and provides flexibility to allow exemptions and discounts to certain user groups. Exemptions relate to spaces which do not have to be licensed at all such as spaces used by a particular vehicle type e.g. motorbikes, delivery or fleet vehicles. Discounts relate to spaces which need to be licensed but are not chargeable. 100% discounts will be considered for workplace parking spaces provided for registered Blue Badge holders and small businesses who provide a low number of workplace spaces (e.g. 10 or fewer chargeable spaces). Formal consultation will be undertaken which will enable better understanding of any potential scheme including chargeable spaces, exemptions, discounts and levy potential. The findings of all consultations and further technical assessments will be made public and will be brought to the Council's Cabinet for consideration.

Rep ID	Name	Main Issues raised	Council response and how issues have been addressed
	Network Rail	As Birmingham City Council is implementing a clean air zone, Network Rail would be interested to understand what the anticipated impact is on the wider transport network, specifically any policies relating to railway station car parking.	Birmingham City Council do not have direct control over railway station car parking as this is all managed by TfWM. At present Clean Air Zone proposals have no direct impact on railway station car parking. However the authority will ensure that Network Rail are fully appraised of all potential impacts on the wider transport network from Clean Air Zone proposals.
EDGE OF CITY CENTRE PARKING			
EC1	Push Bikes & Bike West Midlands Network	The Parking SPD suggests encouraging large developments to make their parking available to the public. We suggest that large developments be encouraged to provide facilities for 'park and cycle', where appropriate, to reduce motor traffic going into the city centre and encourage more people to cycle at least part of the journey.	BCC has arranged 2 'Park, roll and stroll' sites in response to Covid 19, as part of the Emergency Active Travel measures. Options to encourage other large developments to join this, or future similar schemes will be explored. This would be more appropriate as part of our Demand Management work with all businesses, rather than through new development which is likely to come with lower parking provision in the future. Liaise with Demand Management Team regarding more long-term park and pedal opportunities.
EC2	Adlington Retirement Living	The SPD suggests that large new developments with off street parking must consider making their parking publicly accessible. The policy needs to be supported by additional information: a) what is a large development (this needs to be defined)? b) what does consideration mean? c) does consideration depend on the Use Class/nature of the Concern that some development will not have the capacity to make parking publicly accessible.	Agree that clarification is required. The SPD has been amended to clarify the definition of : a) 'Large developments' as those with more than 50 car parking spaces. b) and c)'Consideration' - developers will need to demonstrate that they have explored the practicality and viability of making their parking publicly available taking into account the use and nature of the development.
EC3	National Express West Midlands	National Express West Midlands agrees with the aim of supporting enhanced connections by public transport and with the approach outlined.	Support noted. The SPD sets out proposals for comprehensive edge of centre parking controls. A review of city centre CPZs is also underway.

Rep ID	Name	Main Issues raised	Council response and how issues have been addressed
		We believe some edge-of-centre sites need parking controls to enable buses to get through, or to give decent, safe walking routes to bus corridors.	
EC4	Motorcycle Action Group	Recommend that motorcycle parking policy aligns with cycle parking policy. This is best facilitated by the definition of single-track vehicles as described in the previous question.	See response to CC14
URBAN CENTRES AND GROWTH AREAS			
UC1	Langley Sutton Coldfield Consortium	The Consortium recognises that car parking in Urban Centres and Growth Areas will need to take into account the needs of the economy, accessibility requirements and community health, safety and wellbeing considerations. However, developments within Growth Areas should be allowed to consider car parking provision on a site by site basis, including the appropriateness of on-street parking control measures and the ability to share parking areas between multiple buildings / uses, in addition to the general approach to providing sufficient car parking to meet the needs of the uses proposed within the Growth Area in question.	Development in Growth Areas should also take account of accessibility, health, safety and wellbeing considerations. The consideration of on-street parking control measures, the ability to share parking and the general approach to providing appropriate levels of parking also applies to Growth Areas.
UC2	National Express West Midlands	National Express West Midlands agrees that it is essential that urban centres are accessible by a range of modes of transport with good connections into their local community and the wider city. Parking in urban centres is often the cause of traffic slowing and considerable congestion. Any on-street parking needs to be consistent e.g. not have different times on different sides of the road.	Support noted.

Rep ID	Name	Main Issues raised	Council response and how issues have been addressed
		The latter inevitably leads to both sides being used and reducing the through road to effectively one lane for both directions. Any review of parking here also needs to look at where off-street parking is located and access to it. Bus stops need to have priority and better access than car park spaces. We believe Kings Heath, Small Heath, Alum Rock, Stratford Road, Handsworth, Cape Hill and Northfield need to be prioritised.	
UC3	St Modwen Homes Ltd	Generally, agree. This approach has been taken in Longbridge Town Centre where parking is available to the public and measures are in place to manage on-street parking.	Support noted.
SUBURBAN/ PRIMARILY RESIDENTIAL AREAS			
SR1	Bloor Homes	Support the recognition in the SPD that sufficient car parking should be provided for residential properties to maintain residential amenity and to prevent inappropriate on-street parking. Support the principle of Paragraph 5.15 of the Draft DMDPD which provides for garages to count towards parking spaces if they have adequate functional space. The proposed approach will allow for a greater quantum of car parking provision in areas which are less accessible to public transport which is also supported.	Support noted.
SR2	Langley Sutton Coldfield Consortium	The Consortium endorses the identified requirement for a markedly different approach from that taken in the City Centre and edge of City Centre to be taken for the predominantly residential suburbs of the city. The Consortium agrees that parking standards applied to the predominantly residential suburbs need to ensure an	Support noted.

Rep ID	Name	Main Issues raised	Council response and how issues have been addressed
		appropriate level of parking provision for residents and visitors, whilst maintaining the amenity of nearby residents and occupiers. The Consortium also supports Birmingham City Council's goal of encouraging sustainable travel through the creation of sustainable neighbourhoods characterised by good access to facilities, and convenient options to travel by foot, cycle and public transport.	
SR3	Langley Sutton Coldfield Consortium	The Consortium does not agree on the proposal to *"place reasonable restrictions on parking supply to discourage car usage"*. Sutton Coldfield currently has very high levels of car ownership and, in general, family dwellings in suburban locations such as Sutton Coldfield often tend to, and will continue to, attract higher levels of car ownership than for dwellings in better connected higher density areas such as town centres and city centres. It is contended that car parking standards for new developments in suburban locations should be allowed to take account of and, where necessary, reflect demographic / social factors and existing levels of car ownership within particular areas rather than seek to control car ownership. It is important for the Birmingham parking standards to incorporate flexibility for the design and layout of new residential development proposals in suburban locations to provide the opportunity to accommodate a sufficient amount of conveniently situated suitable and safe off-street car parking, to avoid car parking being displaced onto streets.	The Council acknowledges the requirements of para 106 of the NPPF and has reviewed the imposition of a maximum standard in Zone C. The SPD has been amended to remove the imposition of a maximum standard for residential in Zone C. The evidence supporting the parking standards will be made available. Consideration of housing type and mix is demonstrated within the SPD through the introduction of differentiation dependant on dwelling size. The zonal mapping also reflects the nature of different locations across the city, with consideration made to ensure that local centres and suburban locations, for example, are approached differently with regards to parking standards. When setting the zonal boundaries, car ownership levels were overlaid into the decision-making process to avoid applying zone A or B parking standards in locations with very high levels of car ownership. The Council guidance seeks to achieve a balance where Electric Vehicle charging for new developments is prioritised,efficient, well designed parking provision. This may mean a mix of on plot and on-street parking where the on-plot spaces could have charging provision. Alternatively, there are increasingly viable on-street charging options for parking which is provided in an unallocated way.

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		There is a need for the delivery of a significant quantum of high-quality family housing to meet the existing and future needs of Birmingham. Imposing stringent car parking restrictions on new homes provided in suburban locations may deter families from moving into the area. This would undermine the focus for the Langley SUE to provide predominantly family housing to meet the identified need. The Consortium contends that the proposal to introduce the stringent maximum parking standards for suburban / predominantly residential areas is contrary to the requirements of the National Planning Policy Framework paragraphs 105 and 106. Whilst the consultation document recognises the importance of considering the accessibility of the location and the availability of and opportunities for public transport, it does not provide a reasoned consideration of: the implications of housing type / mix, including the provision of family homes in suburban locations; local car ownership levels; or the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles. It is unclear how the increasing shift towards all new cars being sold in the UK to be electric, and thereby requiring access to electric charging points, can be served by a guidance approach that may restrict the ability for vehicles to be parked in dedicated spaces which have a close and clear relationship to the dwellings that they serve and access to suitable charging points. The evidence for the proposed parking standards that the consultation document refers to is not published or	In other, perhaps higher density, more highly accessibly developments, it may be more appropriate to provide shared, fast charging facilities, or even electric vehicle car club provision in locations where car ownership is less necessary. It is not felt that the guidance precludes the provision of on plot EV charging, but the wording has been reviewed to add greater clarity to how a mix of parking typologies can best achieve a balance in provision. This includes cross-referencing with the draft Birmingham Design Guide which provides design guidance on different parking typologies.

Rep ID	Name	Main Issues raised	Council response and how issues have been addressed
		analysed as part of or alongside the consultation. There is currently no clear and compelling justification for setting maximum parking standards.	
SR4	St Modwen Homes Ltd	The approach is generally supported. However, there should be reference to the need to take account of site-specific considerations. Therefore, the "unless demonstrated otherwise" should be added to Point 1.	Agreed that site specific considerations should be taken into account and that this should be reflected in the SPD. Additional text has been added to ensure that site specific considerations and/or operational needs of the development, which may support an alternative level of parking provision, will be taken into account.
CONTROLLED ON STREET PARKING			
CP1	Bloor Homes	Support the regularisation of car parking in principle but must be ensured that any parking controls are not so restrictive to cause wider problems. Sufficient car parking provision must be made available with developments in appropriate locations to ensure that properties are adequately serviced by car parking levels.	The Council seeks to apply a balanced approach to parking restrictions and provision of parking spaces. When controlled parking measures are introduced, care is taken to mitigate transference of parking elsewhere. The solution cannot simply be to provide additional parking as this does not address the impact of car travel on the transport network and the environment.
CP2	Langley Consortium	Any proposal to limit on-street car parking should be supported by fully evidenced justification; subject to an appropriate level of consultation and scrutiny; and considered in the context of the area and / or development proposal to which it relates. To avoid a situation arising where there becomes a need to look at imposing unexpected on-street car parking restrictions in new developments in suburban locations, the ability to consider an appropriate level of dedicated off-street car parking or areas for on street car parking to serve the specific locational and housing mix characteristics of each new development needs to be considered through the	Delivery of on-street parking controls are subject to clear project delivery requirements which include justification, consultation, scrutiny and consideration.

Rep ID	Name	Main Issues raised	Council response and how issues have been addressed
		design and layout of the proposals, as part of the planning application process.	
CP3	Clarke Print	Control parking as long as there is minimal costs involved for my business.	Comment noted.
CP4	National Express West Midlands	We support the introduction of controlled parking where there is a clear need to manage the impact of parking on the operation of the network. Enforcement is absolutely crucial. Many of our bus routes suffer from delays every single day caused by blatant and unpunished illegal parking.	Support noted.
PARK AND RIDE			
PR1	Push Bikes & Bike West Midlands Network	The Parking SPD should provide the details of cycle parking spaces at and the level of occupancy of any cycle parking.	Information on current levels of cycle parking at Birmingham stations will be included in the SPD. Station facilities are managed by TfWM so further detail on station facilities is available at https://www.tfwm.org.uk/operations/park-ride/
PR2	Push Bikes & Bike West Midlands Network	The Parking SPD needs to reflect the potential for 'Cycle and Ride' and the need to have a cycle parking strategy for public transport locations in order to facilitate that. Look at ways to increase the use of cycles to access the location as cycle parking is far more space efficient than car parking.	Station parking (and cycle provision) is managed by TfWM but BCC recognise the importance of cycle park and ride in the Walking and Cycling strategy and will continue to work with TfWM to improve cycle park and ride. The Birmingham Walking and Cycling Strategy Policy 10 states that 'We will facilitate multi-modal travel and linked trips to public transport interchanges'. This includes a commitment to 'Support secure, long-stay cycle parking and bike hire at public transport interchanges.' The SPD has been amended to emphasise our commitment to supporting multi-modal travel through cycle parking and facilities at public transport interchanges.
PR3	Canal and River Trust	Where park and ride is proposed in close proximity to the canal network, and/or associated with the canal network,	Agree that safe, secure cycle parking areas are needed at Park and

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		it should include the provision of safe, secure cycle parking areas, to allow for onward connections.	Ride sites and additional wording has been added to emphasize this.
PR4	Langley Consortium	There is no planning policy requirement for a Park and Ride site to be located within the Langley SUE site and the emerging outline planning application proposals for this development therefore do not include such a facility. However the Consortium would be supportive of the provision of a Park and Ride facility within the vicinity of the SUE if this would assist with improving the connectivity of the SUE with Birmingham City Centre by public transport and thereby encourage residents to leave their car(s) parked at home.	Comment noted.
PR5	National Express West Midlands	More Park and Ride is needed in and around Birmingham. Active consideration should be given to bus/Sprint-based Park and Ride at key motorway junctions e.g. M6 J7 and M5 J3. Free parking at train stations encourages people to switch away from bus and is difficult to justify when station car parks are full by 0730 every morning.	Comments noted and relayed to TfWM for consideration.
SCHOOL PARKING			
SP1	Push Bikes & Bike West Midlands Network	Strongly support the expansion of Car Free School Streets Exclusion Zones. As noted in the Parking SPD, encouraging children to use active travel can build habits that make them more likely to use active travel in the future. Creating safe streets around schools is part of that.	Support noted
SP2	Bloor Homes	The school parking policy makes reference to the use of measures such as traffic regulation orders and parking enforcement controls on roads and around schools. These are not matters that can be controlled by a developer.	The document sets out both parking requirements for development and the city's wider parking strategy for the city. It is not intended solely as planning guidance, but as a wider parking document hence

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		This falls outside the planning system and does not need to be enshrined in SPD.	the inclusion of matters outside the planning system.
SP3	Langley Consortium	Car parking provision for staff and parents of ew and expanded schools should be considered on an individual case-by case basis, with opportunities explored for shared / dual use car parking with other facilities and the incorporation of drop-off / pick-up areas, where possible and where appropriate. There should also be an ability for applicants to put forward their own proposals for parking enforcement controls or measures to discourage inappropriate parking near new or expanded schools. Whilst it is acknowledged that the 'Car Free School Streets' and 'School (Traffic) Exclusion Zones' referred to within the consultation document are one way in which parking could be managed, this should not be the only option. There should be an allowance for a range of options to be considered to achieve an appropriate strategy for each school.	New school developments should aim to make areas around schools as low traffic as possible. The Council is opposed to the provision of drop-off/pick-up areas in the vast majority of instances as these encourage car use and can often become a safety hazard or create queuing and air quality problems. The Council will consider alternative proposals for parking enforcement controls/measures. The document does not prohibit different options from being considered.
DISABLED PARKING			
DP1	Canal and River Trust	The illustration on page 30 appears to block the disabled parker's access to the pavement with an EV charging point. Further advice on good design would be beneficial, and a clear indication of whether illustrations are of good or bad examples.	Advice on good parking design is included in the draft Birmingham Design Guide. The SPD has been amended to include a different photo.
DP2	Argent LLP	Acknowledge importance of providing disabled parking to ensure places are accessible and inclusive. Note that the SPD seeks to ensure that any changes to existing disabled parking spaces are the subject of consultation with	Agreed. The SPD has been amended to include consultation with other relevant stakeholders.

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		"appropriate disability action groups and the access forum". Argent would recommend that there should be an element of flexibility on who should be consulted in each case. Suggest this is reworded as follows: "The Council will ensure that any proposed changes to parking for disabled people face constructive consultation with the access forum, disability action groups, and/or any other appropriate stakeholders."	
PARKING STANDARDS ZONE CHARACTERISTICS AND LOCATIONS			
Z1	Langley Consortium	Agree that more generous car parking standards should apply to new developments in suburban / predominantly residential locations in Zone C. It is not considered appropriate to apply maximum car parking requirements across the whole of this Zone.	The Council acknowledges the requirements of para 106 of the NPPF and has reviewed the imposition of a maximum standard in Zone C. The SPD has been amended to remove the imposition of a maximum standard for residential and non-residential development in Zone C.
Z2	Planning Prospects Ltd (on behalf of St Modwen Homes Ltd)	The Zone B area defined for Longbridge Growth Area should be expanded to include the entire Longbridge Town Centre development (including land yet to be developed). It should include all land bounded by Cooper Way to the south, the railway line to the east, Longbridge Lane to the north and A38/B4120 to the west. All land within Longbridge Town Centre meets the characteristics defined for Zone B. It is a highly accessible location with good access to public transport including Longbridge Train Station as well as bus connections to Birmingham City Centre and the wider area. It is also well served by cycle and walking facilities.	The Longbridge boundary has been reviewed and remains unchanged as at present the areas mentioned do not meet the accessibility standards or on-street parking control requirements to enable a change in zone. However the standards will always be applied as guidance, and local flexibility will be considered, particularly where future development proposals include or can demonstrate improvements in accessibility and parking management to facilitate lower parking provision.

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PARKING STANDARDS				
PS1	Push Bikes & Bike West Midlands Network	Cycle parking	There are no standards provided for provision of electric cycle parking. This is a growth market which needs to be catered for. The Parking SPD needs to include standards for electric cycle parking.	As this is an emerging market there is a current lack of evidence to identify demand and best practice. The Council will monitor the need for electric cycle parking provision and support provision where appropriate.
PS2	Push Bikes & Bike West Midlands Network	Cycle parking	The design criteria for short and long stay cycle parking are well stated, but phrases like 'as possible' and 'potentially' should be removed. The cycle parking should be prominent and close to access points. The criteria should also include: The number of gates and doors that need to be passed through to access the cycle parking should be kept to an absolute minimum required to maintain security, and they should all be easy to operate while pushing a laden cycle.	The suggestion regarding gates and doors will be included in the Birmingham Design Guide where parking design guidance sits.
PS3	Push Bikes & Bike West Midlands Network	Cycle parking	It is appropriate for Birmingham City Council to offer developers the option to finance off-site unallocated cycle parking. However, there is a risk that insecure off-site cycle parking may be seen as a cheaper option than on-site secure cycle parking. Clarification should be included to dissuade developers from taking this route.	Agree that clarification is inserted for preference for on-site cycle parking. However, off-site provision may be considered where appropriate.
PS4	Push Bikes &	Cycle hire	Cycle hire requirements should apply to all major trip generators, not only leisure	Agree. The draft SPD promotes the provision for cycle hire in leisure developments and hotels. This can be expanded to include

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	Bike West Midlands Network		facilities.	all major non-domestic development.
PS5	Push Bikes & Bike West Midlands Network	Cycle hire	Suggest including the option for hotels to choose to provide cycle hire for their guests instead of spaces for the cycle hire scheme. This would facilitate longer term cycle hire by hotel guests, who are likely to be the main users of any cycle hire docks located at hotels.	Agree. The SPD has been amended to include the option to provide own cycle hire as an alternative to the TfWM Cycle Hire Scheme.
PS6	Bike West Midlands Network	Cycle parking	Where the parking standards specify a minimum of 2 spaces, as for A1 shops, that means 1 Sheffield stand. It would be better to have a minimum of 4 spaces (2 Sheffield stands) so that if one of the Sheffield stands is damaged, there is still cycle parking available. The space required and the expense is not much greater than providing a single stand, but it makes a significant difference in the long term for people using cycles.	Agree. The SPD has been amended to from 'minimum 2 spaces' to 'minimum 2 Sheffield stands* or suitable equivalent'. *Where proven that space prohibits this, 1 Sheffield stand is sufficient for small developments.
PS7	Bike West Midlands Network	Cycle parking	Educational establishments should not have a reduced level of provision compared to other businesses. There should be a higher level of cycle parking provision for students who should be encouraged to cycle to school.	Cycle parking levels for education uses have been reviewed and have been amended so it is consistent with other uses and provide for higher levels of cycle parking provision.

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PS8	Bike West Midlands Network	Cycle Parking	Overall, the parking standards should have a minimum of at least 1 cycle stand for every 10 people. Birmingham City Council has the stated aim of achieving a 10% modal share for cycle traffic.	In general, the cycle parking standards require at least 1 cycle stand for every 10 people. Cycle parking levels for education uses have been reviewed and have been amended so it is consistent with other uses and provide for higher levels of cycle parking provision
PS9	IM Properties (Peddimore)	Cycle parking	The cycle parking standards no longer relate to floorspace which could be difficult to establish for speculative developments. Consequently, it is suggested that the minimum in the Draft SPD should be based on the lower of the standards from the 2012 SPD and Draft SPD.	Further information has been added to the SPD to clarify the approach to parking standards for speculative developments. This includes thresholds for floorspace equivalents where staff/visitor figures are not available.
PS10	Canal and River Trust	General	The approach to applying the proposed parking standards is not clear.	The SPD has been amended to provide greater clarity regarding the application of parking standards.
PS11	IM Properties (Peddimore)	General	Under the B2 guidance, there is reference to requirements for vehicle maintenance/repair/tyre and exhaust fitting. It is assumed this relates to these specific uses under the B2 and not the operational requirements of general B2 units.	Yes, this reference specifically relates to vehicle repair/maintenance type uses. Clarification/separation has been made in the amended SPD.
PS12	Bloor Homes	Car parking Residential	Concerned that in certain circumstances the standards refer to fractions of a car parking space in seeking to combine allocated and unallocated parking. This would create unnecessary disparity of car parking provision and dedication issues between individual properties.	The residential parking standards have been reviewed and simplified. Where overall levels of provision for a development are not a whole number, it will be rounded up. Examples have been included in the SPD for ease of understanding how the standards will be applied.

Rep ID	Name	Land use/mode	Main Issues raised	Council response and how issues have been addressed
			The standards also need to distinguish between apartments and houses and should be rounded up to the nearest whole dwelling space.	
PS13	Bloor Homes	Car parking Residential	The 'unallocated' car parking requirement should be separate and in addition to the maximum car parking standards. There is a highly limited allowance for visitor parking in larger properties. Unless specific unallocated car parking provision is made for visitors on new residential developments this will result in on-road car parking Appropriate provision should be made for visitor parking and new residential schemes. As presented, the matrix combination of allocated and un-allocated parking within different zones and the introduction of fractions of car parking space is overly complicated, impractical and unnecessary. The standards should be simplified to specify allocated parking requirements per property (i.e. dedicated) and specify the required amount of unallocated spaces within development schemes as a %. It should also acknowledge that apartments and houses may present different parking requirements depending on factors such as location.	The residential parking standards have been reviewed and simplified.

Rep ID	Name	Land use/mode	Main Issues raised	Council response and how issues have been addressed
PS14	IM Properties (Peddimore)	Car parking Employment	The Parking Standard Rules should allow the maximum car parking standards for employment uses to be exceeded at the discretion of Planning and Transportation officers subject to a suitable evidence base and a robust Travel Plan with an appropriate car driver modal share target.	It is also acknowledged there is a need to reflect local circumstances, context and requirements of individual developments when assessing applications. The standards provide a guide on the appropriate levels of parking, but the City Council will take account of whether there are any circumstances, related either to the site, or the operation of the development, which may support an alternative level of parking provision. The SPD has been amended to reflect this.
PS15	Bloor Homes	Car Clubs	Unclear how the 'car club' car parking spaces would be used in practice. It is suggested that residential developments of over 100 units should provide car club spaces. It is unclear how this would be controlled. Whilst we have no objection to car club car parking spaces, these should be rolled into general visitor provision.	This query misunderstands the nature of formalised car club provision which is not the same as personal car sharing between 2 people living in the same development. Car Clubs are a nationally recognised tool for reducing car ownership and usage. As detailed in the SPD, provision of this facility must align with nationally recognised accreditation therefore the accredited provider would manage and control the provision of any car club spaces. Developers would therefore not be expected to control/manage use of car club spaces themselves; the provider would do this.
PS16	Bloor Homes	EVCP	The proposed requirement for 'one Active EVCP charging per dwelling with associated parking space' needs further clarification. It should not be mandatory that the EVCP Unit itself is installed. This is a matter for individual choice according to need. It is more appropriate to ensure that the infrastructure is in place to enable an occupier to install an EVCP charging unit which meets their requirements in future.	The DfT consultation provided detailed evidence to support proposed EVCP requirements. BCC supports these proposals. EVCP provision is an important element of achieving decarbonisation of transport and our Route to Zero targets.

Rep ID	Name	Land use/mode	Main Issues raised	Council response and how issues have been addressed
PS17	Bloor Homes	EVCP	It is excessive for 20% electric vehicle charging provision in the areas of off street car parking where there are five spaces or more. It is agreed it is necessary to futureproof offsite parking provision, however this level of provision cannot be supported. Instead infrastructure should be made available for additional charging points to be installed in future, but on-street EVCP parking spaces should not be sought at the present time.	As above – ref PS16.
PS18	Bloor Homes	EVCP	The SPD refers to the July 2019 Department for Transport consultation on electric vehicle charge points. The SPD seek to assure that developments align, or exceed, these requirements. This is inappropriate, the Department for Transport document is simply a consultation document. It is not adopted policy and can be afforded no weight in the decision-making process. The standards within it could change and there is no justification for seeking any level of provision over and above that contained in the consultation document.	Whilst not adopted policy, BCC is supportive of the proposals within the DfT consultation and the evidence supplied by the government to support these. EVCP provision is an important element of achieved decarbonisation of transport and our Route to Zero targets. The proposed standards in the SPD do not exceed the requirements in the government consultation, but in the absence of detailed adopted national guidance or legislation, it is felt appropriate to future proof our local standards so that when legislation is adopted we are likely to be aligned with this. The SPD has been amended to clarify that development will not be expected to exceed forthcoming Government standards, but the Council will be supportive of development which do exceed the standards of their own accord.
PS19	St Modwen Homes Ltd	EVCP	No evidence base has been provided to justify EV charging requirements. Any requirements for EV charging should be addressed in accordance with other	The DfT consultation provided detailed evidence to support proposed EVCP requirements. BCC supports these proposals. EVCP provision is an important element of achieving decarbonisation of transport and our Route to Zero targets.

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			legislation (i.e. Building Regulations) if it is necessary and can be justified.	
PS20	Langley Consortium	EVCP	Department for Transport Consultation on Electric Vehicle Charging in Residential and Non-Residential Dwellings identified preference for charging points to be introduced via an update to the Building Regulations. Whilst there should be an opportunity for developers to exceed any standard introduced through Building Regulations where appropriate to do so, it is not considered appropriate for an unjustified requirement for any residential or non-residential use to exceed the national standard to be brought in through the SPD. The SPD should recognise that the requirements to provide electric vehicle charging points need to take into account the ability for the electricity network to support the number and type of charging facilities installed. Not restricting the allocated (off-street) residential parking to the proposed maximum provision may improve the ability for residents to charge their private electric vehicles at a convenient location (at home),	See response to PS18.
PS21	Aston Universty		Will these requirements need to be put in for any new buildings or only those including parking into new builds? I.e. if we are looking	Yes, the expected minimums for non-car-based parking provision are separate to car parking levels and standards will need to be generally followed for all new developments.

Rep ID	Name	Land use/mode	Main Issues raised	Council response and how issues have been addressed
			to build a new building will we automatically have to have that many bicycle parking stands, car charging even if parking wasn't going to be included?	
PS22	Sport England	Cycle parking	Sport England supports the intention for prescribed cycle parking standards for all the identified planning uses set out in the land uses table and is pleased to see this is appropriately inclusive of all users including residents, staff, customers, visitors, guests and so on.	Support noted.
PS23	Sport England	Cycle facilities	Sport England supports the provision of standards for showers and changing facilities in proposed employment (B Class) uses. Wish to see the provision of showers, changing and lockers being included as a requirement for any proposed developments that generate significant employment numbers, not just those within the B Class Uses.	Additional guidance has been included in the SPD in relation to the thresholds and types of development which will be expected to include shower/ changing facilities
PS24	Sport England	Cycle parking	In balancing the provision of car parking, with other forms of provision including cycle parking, developers should be required to demonstrate how this will achieve a carbon neutral approach to provision, to be assessed via their transport impact assessment. Emphasis should be on cycling provision being safe and secure as much as achieving the prescribed standards of cycle parking	Agree, that Transport Assessments should include how development encourages modal shift and contribute to carbon neutral objective. The Design Guide provides detailed design guidance on cycle parking.

The SPD does make provision for commuted sums to be secured where developers are unable to satisfy the requirements. |

Rep ID	Name	Land use/mode	Main Issues raised	Council response and how issues have been addressed
			spaces. Where on site secure cycle parking provision is not possible/practicable, the SPD should make it clear that contributions towards provision of conveniently located off-site secure cycle parking, and/or cycle hire facilities will be expected. The SPD should set out the Council's expectations for off-site contributions including a method for calculating such contributions.	
PS25	Adlington Retirement Living	C2 housing	The parking standards contained in the SPD for new residential development do not differentiate between different forms of specialist elderly accommodation which are becoming more prominent. Parking standards for C2 Extra Care (very different from a care home but still within the same use class) and C3 Sheltered Accommodation need to be provided and clearly set out. The Parking standard for C2 extra care should be 50% parking provision i.e. for 60 apartments, this would mean 30 parking spaces. This is sufficient for staff, visitors and residents and is the standard level of parking provided on schemes of this nature.	Further detail has been provided regarding specialist elderly accommodation.
PS26	National Express West Midlands		Zones and max/min levels should also take account of delays parking may cause to bus	The zone mapping uses the TRACS system which is based on real public transport timetabling. As peak period timetabling takes congestion levels into account this is deemed to be the most

Rep ID	Name	Land use/mode	Main Issues raised	Council response and how issues have been addressed
			routes	appropriate way of assessing overall levels of accessibility. It is not currently possible to factor real time accessibility into this system. However impacts of new developments on the transport network, including bus routes, is always a key consideration in the development control process.
PS27	St Joseph Homes Ltd		The residential parking standards in Zone A would have serious viability implications for development in Birmingham. Market research suggests that 2 or 3 bedroom homes without car parking spaces will be significantly less desirable than those that have them, which has implications on the viability and deliverability of such schemes. A 10% provision of parking spaces is not supported because the public transport infrastructure in Birmingham is not currently sufficient to support such proposals. The proposals in the emerging Birmingham Transport Plan will greatly improve the public transport options in Birmingham; however, the full breadth of the Transport Plan proposals is not to be fully implemented for a decade. We therefore suggest that the proposed residential parking standards are re-considered, and the evidence base and viability implications are considered further.	The Zones and parking standards within the SPD have been set based on current levels of public transport accessibility therefore they are already considered to be appropriate and justified. However the SPD has been amended to acknowledge that in exceptional circumstances, there may be occasions when it could be appropriate to have a lower or higher level of parking depending on the specific details of the application.
PS28	St Modwens Homes Ltd	Minimum standards	Further clarification of minimum levels should be provided.	Further clarification regarding minimum has been provided in the SPD.

Rep ID	Name	Land use/mode	Main Issues raised	Council response and how issues have been addressed
PS29	St Modwens Homes Litd	Garages	The SPD states that garages will contribute towards parking provision where they have adequate functional space. This approach is supported.	Support noted.
PS30	St Modwens	General	Site-specific considerations should be taken into account when applying the standards in Appendix A to new development proposals.	Agree. Additional text has been added to ensure that site specific considerations and/or operational needs of the development, which may support an alternative level of parking provision, will be taken into account.
PS31	Lidl	General	The SPD does not specify whether thresholds are to be measured with reference to gross or net floorspace figures.	Agree. The SPD has been amended to clarify that all thresholds and standards which reference floorspace are to be calculated as gross floorspace.
PS32	Lidl	Retail	Concerned that proposed standards are overly restrictive. The standards as proposed could significantly constrain our Client's ability to provide that appropriate amount of parking when it brings forward new stores. A material difference exists between the amount of parking that Lidl would typically expect to provide, which is appropriate to its operation, and the amount that the new standards would permit. The difference is particularly pronounced in those locations inside Zone B (Urban Centres)	It is acknowledged that appropriate parking provision is required for this land use. The standards have been reviewed to ensure they are not overly restrictive. The standards in the SPD have been amended for Class E Shops over1000m2 in zones B and C.
PS33	Lidl	Retail	The draft standards stipulate that new convenience retail development of 1,000 sqm or more will need to provide dedicated motorcycle parking (a minimum of 1 space	Dedicated provision for powered two wheelers is stipulated within the standards to ensure that parking is appropriately designed and secure. However, the guidance has been amended to allow consideration for the associated needs of the type of

Rep ID	Name	Land use/mode	Main Issues raised	Council response and how issues have been addressed
			and overall provision of 1 space per 400 sqm of floorspace). Lidl does not provide dedicate motorcycle spaces. This is because of: a) the limited likelihood of shoppers visiting the site by motorbike and b) where shoppers do visit by motorbike, Lidl is content that these are parked in car parking spaces.	development proposed.
PS34	Lidl	General	Request flexibility us built into the SPD, so that it is open to applicants to justify an amount of parking not in accordance with the standards, where there are legitimate reasons for doing so.	Additional text has been added to ensure that site specific considerations and/or operational needs of the development, which may support an alternative level of parking provision, will be taken into account.
PS35	Moda	General	Welcome the vision and principles behind the city council's revised Parking Standards and supports its aim to further support sustainable transport and deter reliance on the private car. However, would like to see further clarity on how cases will be dealt with during the 'transition period' following adoption of the policy whilst necessary public transport infrastructure is still lacking, whilst allowing greater flexibility when considering proposals for replacement and new off-street parking.	Support noted. Guidance and standards have been aligned to existing public transport accessibility levels which supports the proposed parking levels. The accessibility data only takes into account transport infrastructure delivery projects which are timetabled for delivery within 3 years. Therefore, unless very short-term parking requirements can be demonstrated, prior to this 3-year timescale, the standards in this SPD should already be appropriate to existing public transport service. Without strong enforcement capabilities, there is a risk that short term parking provision may become permanent and affect trip generation, reduce public transport uptake, and be detrimental to network management. The SPD has, however been amended to account for delayed public transport infrastructure schemes, only in relation to those

Rep ID	Name	Land use/mode	Main Issues raised	Council response and how issues have been addressed
				which have been identified for delivery within the next 3 years. Additional text has been added to clarify that the standards will not apply to detailed and reserved matters applications that are already registered prior to the date of adoption of the SPD. The SPD will have flexibility to allow the Council to consider the requirements of 'special' cases for example major schemes which are phased over long periods of time.
OTHER				
AI1	St Modwens Homes Ltd		An evidence base to justify the EV charging point requirements should be provided to enable consultees to consider and comment fully. Clarification on minimum standards parking standards for residential development in Zone C.	The evidence base supporting the parking standards has now been made available for public comment. Minimum parking standards are clarified in the amended SPD.

Appendix B

Draft Parking SPD – Summary of citizens' comments and Council response

Rep ID	Main issues raised	Council response and how issues have been addressed
CITY CENTRE PARKING		
CC1	Concern regarding impact of proposals on the economy – shops/businesses/leisure. This will put people and businesses off coming to Birmingham.	There are substantial economic costs to Birmingham as a result of congestion, poor air quality and environmental damage/ carbon emissions which are associated with increasing private car usage. This is not sustainable for the city and therefore a balanced approach must be taken to ensure travel into and within the city can be made by more sustainable means whilst supporting the economy. Congestion currently costs Birmingham's economy £632 million a year. This figure is expected to rise as demand increases. There is also substantial evidence to show how sustainable transport can support and attract business to the city; a healthier workforce and residents. Less congested, more car-free environments can help to create healthy high streets. Birmingham Connected and the draft Birmingham Transport Plan provide a clear steer for the Parking SPD in their aim to create an efficient, attractive, sustainable healthy and equitable transport system by seeking a reduction in reliance on the car and supporting walking, cycling and public transport. The BTP seeks to ensure that public transport will be the preferred choice for most people travelling into and out of the city centre. There is clear evidence that the centre is already highly accessible by public transport. This is set to further improve with investment in and extensions to bus, bus rapid transit, train and tram networks including prioritisation over private car travel to reduce the negative impact that congestion and travel disruption has on productivity. There is also evidence that large businesses who are choosing to locate in the city centre are placing greater emphasis on public transport use and active travel opportunities for staff - The new HSBC headquarters in Birmingham, for example, does not provide any parking for their 2500 staff except for disabled spaces. The company have invested heavily in providing facilities to support cycling to work for their employees, including shower facilities and bike parking. They recognise

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		that supporting employees to travel actively can bring significant health benefits to their workforce. ([Source](#))
		A city centre parking survey undertaken in 2016 showed that there is significant over-supply of parking in the city centre which represents an inefficient and uneconomic use of land.
		Provision for essential fleet vehicles will not be limited by the proposed parking standards.
CC2	There should be more parking for disabled drivers/ Blue Badge Holders and those with mobility issues. Concern regarding any removal of blue badge parking bays.	Extensive redevelopment of the city centre and its urban realm/ highways mean that there are occasions when Blue Badge parking bays must be removed. BCC has committed to relocating any Blue Badge parking bays as close as possible to their original location on such occasions. Further assessment will be undertaken to establish if more blue badge spaces can be provided and how/where best to locate these.
CC3	There should be more parking provision for powered two wheelers (motorcycles). Provision should be better quality, more secure and close to/visible from key destinations.	The SPD has been revised to include additional guidance on powered two-wheeler parking provision. It should be noted that in the city centre in particular, there is substantial competing demand for kerb side space and it is not always possible to dedicate space specifically for motorcycle parking close to all key destinations.
CC4	Public transport is not good enough/ reliable enough/ safe enough to offer a viable alternative to car travel. Public transport should be improved first before reducing car travel.	There is record investment in the public transport network across the West Midlands and in Birmingham. This is set to further improve with investment in and extensions to bus, bus rapid transit, train and tram networks as set out in Birmingham Connected and the Birmingham Transport Plan. The zonal mapping for parking standards takes public transport accessibility into account with regards to the approach to parking provision. Therefore, where accessibility is lower, parking provision will be higher.
CC5	Public transport is not a viable alternative for those with mobility issues or disabilities.	It is acknowledged that public transport may not always be an option for those with mobility issues or disabilities. Therefore, the approach to parking supports the maintaining Blue Badge parking provision across the city centre. It is also felt that encouraging more sustainable travel amongst the whole population will ensure that for those who do need to use a car, roads are less congested, and parking is more readily available.

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CC6	Pavement parking should be addressed/ banned.	The government have proposed national legislation which would support local authorities in tackling pavement parking. The Council has submitted a response to government consultation on these proposals which outlines our support for greater controls to ban pavement parking and enforce this. Further text regarding BCC policy on pavement parking has been added.
CC7	Concern regarding impact on places of worship.	The controlled parking programme which is in place across the city centre includes different traffic regulations (and parking charges/timings) for different areas. Each parking 'zone' is designed according to the appropriate requirements for managing parking in that area, and accommodating the needs of residents, businesses and organisations where possible. It is accepted that wording regarding removal of all no fee on street parking is misleading. This will be revised to 'removal of all uncontrolled on-street parking'. In other words, whilst there will be parking restrictions put in place throughout the city centre, this does not necessarily mean that all locations will incur parking charges at all times of the day and all days of the week. Prior to the introduction of any new parking restrictions or changes, we will consult with premises in the local area and work with organisations/ businesses affected to ensure that operational needs can still be met wherever possible.
CC8	Concern regarding impact on leisure industry, particularly the night-time economy as there is a lack of alternative provision to private car at off peak times and security concerns about parking further from work.	The controlled parking programme which is in place across the city centre includes different traffic regulations (and parking charges/timings) for different areas. Each parking 'zone' is designed according to the appropriate requirements for managing parking in that area, and accommodating the needs of residents, businesses and organisations where possible. It is accepted that wording regarding removal of all no fee on street parking is misleading. This will be revised to 'removal of all uncontrolled on-street parking'. In other words, whilst there will be parking restrictions put in place throughout the city centre, this does not necessarily mean that all locations will incur parking charges at all times of the day and all days of the week. Prior to the introduction of any new parking restrictions or changes, we will consult with premises in the local area and work with organisations/ businesses affected to ensure that operational needs can still be met wherever possible. Regarding provision for the night-time economy this is generally accommodated by the freeing up of spaces which are only utilised at peak times, however it is acknowledged that this issue needs

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		careful consideration on a case by case basis. Text has been included in the SPD to acknowledge that in exceptional circumstances, there may be occasions when it could be appropriate to have a lower or higher level of parking depending on the specific details of the application. Localised off-peak accessibility issues and site-specific security concerns could be considered in this instance.
CC9	Kerbside waiting and idling vehicles should be addressed/ banned. Particular concerns raised regarding taxis idling near stations (e.g. Stephenson Street).	The council is keen to address the issue of idling and the impact this has on air quality and therefore public health. However it should be noted that it is very difficult and resource intensive to legally enforce anti-idling measures. Local authorities have the power to issue £20 fixed penalties for emission offences and stationary idling. However, this can only be imposed after a period of time if a motorist refuses to switch off their engine off when asked to do so by an enforcement officer. The majority of drivers will therefore drive off without receiving a penalty. The council's Switch Off School Streets campaign provides a toolkit to support schools in raising awareness and reducing idling in the vicinity of schools. Reference and a link to the toolkit has been added to the School section of the SPD. Work has also begun assess the practicality of installing air quality sensors in all (initially) primary schools. This will support measures to raise awareness of air quality issues such as idling and to gather data for targeting action where it is most needed. The council acknowledges the need to increase signage and advertising to tackle the issue of idling. It is proposed this will be addressed through the forthcoming Clean Air Strategy.
CC10	Car owners in the city centre are being treated unfairly.	The option to own and use a car in the city centre is not being removed. Evidence shows that there is an excess of parking provision in the city centre and many developments in the past were built with extensive parking provision. It is important that congestion and air quality issues in the city centre are tackled, and that land use is efficient and sustainable. The SPD aims to take a balanced approach that sustains the highest possible levels of access to the city centre and reflects the fact that tens of thousands of people travel into and around the city centre every day without a private

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		car.
CC11	Motorists should not be targeted. Driving/owning a car is a fundamental freedom.	It is not possible or desirable to sustain current levels of growth in private car usage whilst also providing for a growing population. The impacts of private car usage on the environment, air quality, public health and congestion are very significant and it is essential that the city works to provide and promote alternative, more sustainable travel options.
CC12	Comments both for and against a potential Workplace Parking Levy. Some feel it is another tax on motorists, others feel it is necessary for reducing car use and generating investment in public transport/walking and cycling.	WPL investigations have been temporarily suspended in light of Covid19. Extensive impact analysis and evidence will need to be gathered to support any future decisions regarding introduction of a WPL. No scheme would be implemented before 2023. It is anticipated that a large proportion of vehicles would be CAZ compliant by this time. A comprehensive workplace parking study supported by a detailed parking survey would be undertaken to inform any potential levy. Engagement with employers would also be undertaken and the Council will work closely with the Chamber of Commerce and other businesses to understand the impact of the WPL. The Transport Act (2000) provides the enabling legislation for WPL and provides flexibility to allow exemptions and discounts to certain user groups. Exemptions relate to spaces which do not have to be licensed at all such as spaces used by a particular vehicle type e.g. motorbikes, delivery or fleet vehicles. Discounts relate to spaces which need to be licensed but are not chargeable. 100% discounts will be considered for workplace parking spaces provided for registered Blue Badge holders and small businesses who provide a low number of workplace spaces (e.g. 10 or fewer chargeable spaces). Formal consultation will be undertaken which will enable better understanding of any potential scheme including chargeable spaces, exemptions, discounts and levy potential. The findings of all consultations and further technical assessments will be made public will be brought to the Council's Cabinet for consideration.
CC13	Better parking enforcement is required.	The City Council has a large team of civil enforcement officers, employed through NSL, who work hard to enforce parking restrictions across the city. This is a huge task given the size of Birmingham and the density of streets on which there are parking restrictions.

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		The Council issues an Annual Parking Report which details enforcement activity and how the authority is meeting it's enforcement obligations. A team of Civil Enforcement Officers (CEOs) employed through NSL ensure that the parking restrictions throughout Birmingham are enforced as well as delivering additional benefits under the Birmingham Business Charter for Social Responsibility.
CC14	There should be less parking in the city centre. Parking charges are not enough of a deterrent to change travel behaviours. All on street parking in the city centre should be banned.	The Council aims to take a balanced approach to parking which ensures that, whilst promoting travel behaviour change through demand management measures, businesses and individuals are not unfairly impacted by overly stringent measures.
CC15	Short stay/stopping/unloading/needs to be catered for.	Provision for unloading and short stay is an important part of kerbside usage and availability and management of this will continue to be a priority. Additional text has been added to emphasise the importance of loading/ stopping and short stay provision for new developments.
CC16	Paradise/Brindley Street Multi Storey Car Park should not be closed – insufficient alternatives to car travel for the night-time economy.	A 2016 study on parking in the city centre demonstrated that there is a significant over provision of parking, equivalent to almost 10,000 spaces. The current number Private of Non-Residential long stay spaces per worker in the city centre is significantly higher than other comparable cities (Manchester and Nottingham).
		It is essential that private car usage is reduced in Birmingham to support achieving Climate Change and Air Quality targets and to manage the economic and environmental damage caused by congestion on the road network. There is therefore sound policy justification for the closure of Brindley (Paradise Circus) Multi-storey, Cambridge Street. However, it is acknowledged that there are additional considerations which must be taken into account regarding any closure proposal in this specific location, including provision for the night-time economy, shift/off-peak workers and replacement of Blue Badge parking bays.
		It should be noted that the Paradise development will bring additional car parking capacity to the immediate vicinity, with provision of 510 parking spaces including 31 Blue Badge parking spaces. There remain a significant number of other alternative parking options within the city centre. The Metro, with a stop outside Birmingham library, now provides tram services every 15

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		minutes until beyond midnight.
		Views and comments will be fed into any future decision making regarding this site or other parking issues in the Westside area of the city.
CC17	Parking in the city centre (particularly on street) should be substantially reduced/banned. Parking charges are not enough of a deterrent to change travel behaviours.	The City Council is making significant changes to both the public realm and the transport network in the city centre, and is seeking to reduce overall levels of parking. However, a balanced and gradual approach is important to ensure that parking is still available for those who do not have viable alternatives, and to support the city's economy.
EDGE OF CITY CENTRE PARKING		
EC1	Proposed measures will put more pressure on edge of city where already congested.	For all scheme proposals, careful analysis of impacts and detailed consultation with residents will be undertaken. Schemes will always be designed to limit 'knock on' impacts elsewhere, although depending on the proposals, it is never possible to fully mitigate this. The parking management proposals for 'edge of city' areas as set out within the SPD are designed to help ensure that additional pressure is not generated or can be managed through parking enforcement.
EC3	Allocate 1 parking permit per house and charge more for additional cars.	It is agreed that permit allocation should be limited in locations where they are highly in demand. A review of permit allocation processes will be undertaken separately to the Parking SPD.
EC4	Build more cheap car parks on outskirts of city centre.	Availability of land on the edge of the city centre is very limited. Additional car parking provision would not be an efficient use of valuable land and would be contrary to the core policies within Birmingham Connected and Birmingham Transport Plan. The approach set out in the SPD aims to manage parking demand in edge of city areas, through parking controls, to minimise congestion and protect amenity for local residents.
EC5	Remove the option of car use entirely to end car culture.	The Council is keen to discourage private car use wherever viable, however a balanced approach must be taken which does not unfairly impact both citizens and businesses.
EC6	Clean air zone approach should be applied by schools and busy junctions.	The scope of the Parking SPD does not directly cover air quality management. Comments have been passed on to the CAZ Team for consideration.

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EC7	Need 'real' park and ride, not train station ones. Consider last part of journey from bus stop to destination.	Whilst some think of 'traditional park and stride' schemes as being large out of city car parks with shuttle bus facilities, the TfWM stations provide an extensive network of park and ride opportunities which are equivalent to many other bus-based park and ride schemes in other cities. Birmingham is fortunate to have such a high density of over-land rail routes that many other cities do not have. Whilst opportunities for suburban bus or bus rapid transit park and ride provision are being considered both within and just outside the authority boundary, it is important not to overlook existing rail park and ride provision which equates to nearly 2400 parking spaces. Clarity is provided within the SPD regarding different types of park and ride provision and the validity of rail park and ride.
EC8	Not enough detail provided on this policy.	Further detail has been added with regards to roll out of edge of city parking controls.
EC9	Support high density housing with zero parking to meet housing need.	Support noted.
EC10	Developments close to rail stations should be zero parking and high density.	The Council aims to take a balanced approach to parking which ensures that, whilst promoting travel behaviour change through demand management measures, businesses and individuals are not unfairly impacted by overly stringent measures. Developments close to rail stations will be in zone B where there will be restricted maximum parking levels. Higher density development is encouraged in areas well served by public transport responding to the site context and local housing need.
EC11	Detached housing with parking near stations should be rejected.	Proposals for new housing will need to comply with policies in the Birmingham Development Plan. Policies are set out in relation to the type, size and density of new housing. To meet the city's wide-ranging housing needs, it would not be appropriate to exclude certain types of housing, although the Council does support higher density development in areas with good public transport accessibility.
EC12	Shops need parking as heavy shopping can't be taken on public transport.	The parking standards have been set to reflect the need for parking for bulk shopping, with suitable parking for larger shops.
EC13	Some amenities not accessible by public transport.	The parking standards reflect the public transport accessibility of locations. In areas of medium to

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		low public transport accessibility, more generous car parking provision is afforded.
EC14	Time and loss of productivity accessing work without car	These concerns are acknowledged, and the Council does not seek to make journeys to work overly onerous. The accessibility mapping which has underpinned the approach to parking standards only considers journeys to work of less than 45 minutes at peak times on public transport. Much of the city has high levels of public transport accessibility within this timeframe, however it is acknowledged that this is not the case for some parts of Birmingham and therefore a balanced approach has been taken to ensure that sufficient parking is available for those for whom public transport is less viable.
URBAN CENTRES AND GROWTH AREAS		
UC1	Need more commuter parking for off peak workers and disabled people.	It is acknowledged that the parking supply within urban centres should be prioritised for those who have most need for it which is why the approach to urban centres includes careful parking management and enforcement. Generally, there is a good supply of parking provision at off peak times in urban centres.
UC2	Need more parking restrictions on minor roads to support local bus services.	This is an approach which BCC support in appropriate locations and we are working closely with TfWM to improve bus reliability through a variety of public transport prioritisation measures across the city.
UC3	Provide clusters of fast public EVCPs for those without off street parking.	A city-wide electric charging strategy is being produced which will include provision for fast charging, publically available on-street chargers. This will include consideration of residential requirements for on-street parking. Comment forwarded to colleagues leading on the city's EV charging strategy.
UC4	Provide free parking in Sutton Coldfield.	A Sutton Coldfield Town Centre Masterplan has been prepared by Sutton Coldfield Town Council, Sutton Coldfield Town Centre Regeneration Partnership and Birmingham City Council. This sets out connectivity and parking proposals for the town centre. Provision of free parking is not mentioned within the masterplan, however it does set out an objective to consolidate parking and promote flexible solutions.
UC5	BCC should robustly challenge the myth that	Agree, however, the Council is mindful that a balanced and localised approach is taken which also

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	local centres need more parking.	recognises centres as important focal points for growth.
UC6	More parking enforcement/management needed in local centres.	The City Council has a large team of civil enforcement officers who work hard to enforce parking restrictions across the city's local centres. However civil enforcement officers must be allocated in a balanced way to make best use of the limited resource in this team.
SUBURBAN/ PRIMARILY RESIDENTIAL AREAS		
SR2	Don't demonise drivers.	The Council is not seeking to demonise drivers however it is not possible or desirable to sustain current levels of growth in private car usage. The impacts of private car usage on the environment, air quality, public health and congestion are very significant and it is essential that the city works to provide and promote alternative, more sustainable travel options.
SR3	Actively encourage car free development in proximity to stations.	The SPD seeks to encourage car free development where appropriate. The zonal approach ensures that car free development is encouraged in locations with high public transport accessibility. However, balance is necessary to ensure that such developments do not generate 'overspill' parking issues should residents still choose to own their own vehicle.
SR4	Ban parking of commercial vehicles and vans on residential streets.	
SR5	Balance residential and visitor parking.	The Council agrees that it is important to balance visitor and resident parking. The revised standards seek to ensure that sufficient parking is available for both residents and visitors and is provided in an efficient.
SR6	Concern that commuters are parking on residential streets all day.	These concerns are acknowledged and where possible the Council will seek to discourage such commuter parking through parking controls such as short stay limits (for local centres) and residents permit schemes. However, it should be noted that implementation of controlled parking schemes can be very resource intensive and will be delivered in a prioritised way looking at locations with highest levels of parking pressure first.
SR7	New residential developments should not provide zero parking on the premise there is on street parking available.	Zero parking provision will be based on a site's accessibility to public transport and car ownership levels. Where parking surveys can demonstrate that there is on-street parking surplus, it may be deemed appropriate for some residential development to utilise this. The parking standards for the

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		city centre, where such developments are encouraged, are designed to promote car free living, with access to car clubs as an alternative should occasional car use be required. Further clarity has been added to the SPD to explain that zero parking developments must be promoted and managed as such.
SR8	New developments provide too little parking which has led to on-street /pavement parking.	The SPD seeks to avoid this by ensuring that developments with lower levels of parking provision are focussed in areas with highest accessibility to alternative transport modes. They should also be supported by local parking control measures as well so that on-street parking can be enforced.
SR9	Must improve cycling and walking infrastructure	The Council strongly supports improvements in cycling and walking infrastructure and has undertaken a significant amount of work to increase the uptake of cycling and walking through the Birmingham Cycle Revolution. In total, £58 million has been spent on highway schemes, off-road schemes including canal towpaths and green routes, and a range of supporting measures. Further proposals regarding cycling and walking in the city are set out in the Birmingham Cycling and Walking Strategy, which includes the Local Cycling and Walking Infrastructure Plan. The plan details the infrastructure priorities for cycling and walking in Birmingham.
CONTROLLED ON STREET PARKING		
CP1	General support for management of residential parking and preventing commuter parking blocking residential streets.	Support noted.
CP2	Each dwelling should only be allowed one parking permit, or there should be higher additional charges for extra permits.	It is agreed that permit allocation should be limited in locations where they are highly in demand. A review of permit allocation processes will be undertaken separately to the Parking SPD.
CP3	Concern regarding the approach to HMOs and whether this will lead to overspill parking. Further clarity sought on how the HMO approach will be delivered.	The concerns regarding HMO parking are acknowledged and the SPD seeks to ensure that HMOs does not create additional parking pressure in residential areas. Further clarity is provided within the SPD text to explain the Council's approach to HMO parking.

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CP4	Some responses stated that HMOs should not be allowed any parking allocation, or it should be strictly limited to ensure a prevalence of HMOs does not create excess parking pressure.	A balanced approach needs to be undertaken to ensure HMO development does not lead to increased parking pressure. Further clarity is provided within the SPD text to explain the Council's approach to HMO parking.
CP5	Powered two-wheeler parking should be provided/retained in all controlled parking schemes. Request that this is free parking.	It is agreed that powered two-wheeler parking should be given consideration when controlled parking schemes are implemented, however it may not always be possible to provide additional powered two-wheeler provision, or to guarantee free parking. Text has been added regarding consideration of powered two wheeler provision when controlled parking schemes are delivered.
CP6	Greater enforcement of controlled parking is required.	The City Council has a large team of civil enforcement officers, employed through NSL, who work hard to enforce parking restrictions across the city. This is a huge task given the size of Birmingham and the density of streets on which there are parking restrictions.

The Council issues an Annual Parking Report which details enforcement activity and how the authority is meeting its' enforcement obligations. A team of Civil Enforcement Officers (CEOs) employed through NSL ensure that the parking restrictions throughout Birmingham are enforced as well as delivering additional benefits under the Birmingham Business Charter for Social Responsibility. |
CP7	Question the resource required to effectively manage controlled parking (civil enforcement officers).	It is acknowledged that it is important to have sufficient resource to effectively manage controlled parking schemes. However the delivery of any parking scheme will include a Full Business Case that considers resource implications and ensures they are manageable. The Annual Parking Report sets out the financial statistics for all parking enforcement activity in the city.
CP8	Pavement parking should be addressed through parking controls.	The government have proposed national legislation which would support local authorities in tackling pavement parking. The Council has submitted a response to the government consultation on these proposals which outlines our support for greater controls to ban pavement parking and enforce this. Further text has been added to the SPD regarding pavement parking.
CP9	Further detail/specifics required on how controlled parking will be prioritised/	The Parking SPD sets high-level principles for parking, but detailed technical notes will be produced that set out specifics on scheme prioritisation and delivery for controlled parking.

Rep ID	Main issues raised	Council response and how issues have been addressed
	delivered.	
CP10	Significant concerns regarding antisocial/ dangerous/ illegal parking, particularly in residential areas.	Concerns regarding dangerous, inconsiderate and illegal parking are acknowledged. The Council enforcement team and the police work closely together to help tackle such parking issues. The government have proposed national legislation which would support local authorities in tackling pavement parking. The Council has submitted a response to government consultation on these proposals which outlines our support for greater controls to ban pavement parking and enforce this. Further text has been added to the SPD regarding pavement parking.
CP11	Parking Zones must consider residents, especially those on low incomes. Consider relevant housing legislation and whether parking restrictions may impact tenancy conditions.	These are valid considerations for the implementation of controlled parking zones. Whilst the SPD sets out a high-level approach to parking in the city, delivery-specific considerations such as these will be set out in a technical note regarding Controlled Parking. Any controlled parking scheme will include detailed consultation with location residents, businesses and relevant housing associations.
PARK AND RIDE		
PR1	Strong support for additional park and ride provision, although there were also comments which felt park and ride encourages short car journeys and is not appropriate.	Park and Ride can deliver environmental enhancements, reduce congestion and support economic growth and activity by improving access to labour markets and facilitating business travel. It is agreed that park and ride can encourage short car journeys in some instances. Therefore additional text has been included in the SPD which notes the importance of discouraging short car trips to park and ride facilities and refers to the 'last mile' transport policy approach within the Birmingham Transport Plan.
PR2	Some responses did not recognise station car parks as park and ride provision and feel the city requires dedicated bus park and ride provision close to the city centre.	Subject to further funding being found, TFWM are looking at a number of other sites in close liaison with local councils for the delivery of new car parks or Park & Ride expansions. These include new car parks on the A34 and at Minworth for express bus/Sprint.
PR3	Significant concern regarding the management of commuter on-street parking in residential streets around	Whilst the approach to park and ride sites is being led by TfWM as part of a regional Park and Ride Strategy, the Council will work closely with our Combined Authority colleagues to ensure that the approach taken ensures provision of Park and Stride parking at stations is of greatest possible

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	stations. Requests for additional enforcement of this and some requests for expansion of station car parks.	benefit to the wider transport network. The SPD includes a commitment to ensuring parking control measures on local roads are considered as part of the strategy and managing Park and Ride. It should be noted that provision of controlled parking measures can be very costly and time-consuming to implement. Locations around stations are generally considered a priority, if significant parking issues are demonstrated, but implementation of such measures will always be budget dependant.
PR4	Against large park and ride schemes - create congestion and emissions in suburban areas.	It is acknowledged that wider parking control measures may be required in some areas around Park and Ride sites to prevent overspill parking issues. Birmingham City Council will seek to ensure that parking control measures on local roads and associated costs are factored in when considering new park and sites and managing existing park and ride sites.
SCHOOL PARKING		
SP1	Strong concern regarding parking levels outside schools and strong support for encouraging walking.	Support noted.
SP2	Requests for pavement parking controls and anti-verge parking measures such as double kerbing.	The government have proposed national legislation which would support local authorities in tackling pavement parking. The Council has submitted a response to government consultation on these proposals which outlines our support for greater controls to ban pavement parking and enforce this. Further text has been added to the SPD regarding pavement parking.
SP3	Scepticism about school 'park and stride' approach and whether this will just push parking problems elsewhere at school-run times.	The park and stride approach ensures that the immediate vicinity outside a school is kept as car-free as possible for the safety of all pedestrians. Asking parents/carers to park further away from a school and walk the remaining distance to school helps to dissipate/dilute localised parking issues rather than just pushing them elsewhere. It also supports air quality issues and promotes active and safe travel behaviours for children. These approaches will always require some local consideration for the circumstances of individual schools which is why the council supports the production of individual School Travel Plans through the Modeshift STARS resource.
SP4	Requests for parking to be completely	The SPD recognises that parking outside school can be major concern for pupil strategy and air

Rep ID	Main issues raised	Council response and how issues have been addressed
	banned/ strongly restricted in the vicinity of schools.	quality. The Road Safety Strategy for Birmingham sets out the city's approach to parking management on roads near schools. The City Council will encourage a 'park and stride' approach for parents and pupils who are unable to walk or cycle to school.
CAR CLUB BAYS		
SP5	Whilst the Car Club option is useful and good, how would this be guaranteed by the applicant if no car clubs are interested in serving the proposed location Could this be an alternative to providing parking, rather than in addition to - or if you had a Zone C site but put in some car club bays then you could be treated as a Zone B site?	The Council will encourage car clubs as an alternative to car parking provision in new developments, particularly in the city centre and locations with high public transport accessibility. Car Clubs are a nationally recognised tool for reducing car ownership and usage. As detailed in the Car Club section of the SPD, provision of this facility must align with nationally recognised accreditation. Therefore if a development can demonstrate that it has offered the opportunity for car club provision to at least 4 accredited providers without a company accepting the opportunity, then a commuted sum may be considered for provision of on-street car club bays which are operated by our contracted on-street car club provider, Co-Wheels.
DISABLED PARKING		
DP1	Significant concerns about Blue Badge abuse/ fraudulent usage and how this is enforced.	As part of its commitment to tackle the problem of blue badge misuse across the City, in 2018 we employed blue badge investigation officers. These officers are in addition to the Civil Enforcement Officers who already routinely look out for invalid blue badges as part of their patrol. The investigation officers have the authority to seize blue badges where they are invalid or a driver is misusing a badge for the purpose of advantageous or free parking, and process the evidence for court, where we continue to achieve successful prosecutions. From August 2018 to March 2019 there were 69 cases where the blue badges were seized, of which 55 cases so far have resulted in successful prosecutions and total fines imposed by the courts of £11,388.
DP2	Requests for disabled parking all to be free. Requests for private MSCP in the city centre to provide free parking for Blue Badge holders. A few responses disagreed and felt that Blue Badge holders should not	The Council has no jurisdiction over the charges which private parking companies apply to their property. However, all Birmingham City Council owned Blue Badge parking is currently free to use, within the enforcement parameters set (there may be time restrictions for use for example). There are currently no proposals to charge for Blue Badge parking.

Rep ID	Main issues raised	Council response and how issues have been addressed
	automatically receive free parking, one response suggested it should be means tested.	
DP3	Concern regarding provision for those who have mobility impairment/illness/disabilities/ short term conditions/ age-related issues which do not make them eligible for a Blue Badge but mean that alternatives to car use are not always available/an option.	The Council acknowledges and is mindful of people with greater need for car use. By providing and encouraging the use of non-car-based travel options into and around the city for all those who are able to do so, the network and parking availability will be freed up for those who have most need for private car travel. Information has been added on how Blue Badge parking is allocated/prioritised and how it can be applied for.
DP4	Rest opportunities requested for those who have limited mobility (but are not necessarily Blue Badge holders).	The SPD includes acknowledgment of the importance of rest opportunities for those with limited mobility. This is also included in the draft Birmingham Design Guide, the Walking and Cycling Strategy and will be further acknowledged in the forthcoming Birmingham Transport Plan. BCC will continue to prioritise the provision of rest opportunities in future development and public realm schemes.
DP5	Some concern regarding limited up take of disabled parking bays in car parks (particularly station car parks). It was felt this is inefficient provision.	The SPD aims to ensure that disabled bay provision is balanced, this is why for future developments the disabled parking standard ratio reduces for particularly large car parks. Demand for disabled parking bays is growing so there is likely to be increasing demand for any bays which are currently underused. However comments regarding provision in railway station car parks will be passed on to TFWM for further analysis regarding usage and whether there is justification for revisiting current levels of provision.
EV1	Concern regarding enforcement of EV bays and ensuring that they are not blocked by combustion engine vehicles.	Electric Vehicle bays on the public highway or in BCC owned car parks, are enforced by our parking enforcement team to prevent abuse by non-electric vehicles. The forthcoming Electric Vehicle Charging Strategy will include additional protocol on how EV bays will be enforced to ensure that the short stay criteria for the new charging bays is adhered to.

Rep ID	Main issues raised	Council response and how issues have been addressed
EV2	More provision is needed for rapid charging on street.	An electric charging strategy is being produced which will include provision of fast charging, publicly available on-street chargers.
Z1	Requests for clarity on how the zone boundaries are set.	Explanation of how the zones have been determined is set out in the SPD.
Z2	A number of site specific references were received where it is felt the zone allocations are not correct. Generally, these feel that certain areas are more accessible than the zone allocated	All site specific zone queries have been assessed to determine if the boundary demarcations should be altered. No changes have been seen as appropriate following this review, however where developments wish to provide lower levels of parking provision due to locally evidenced accessibility levels the parking standards will accommodate this.
PARKING STANDARDS		
PS1	Developments of 40 or more staff should have to provide shower and changing facilities for cyclists.	The SPD has been amended to provide greater clarity on when changing facilities/ shower developments will be required.
PS2	A number of responses feel that provision for cyclists is too low/unambitious and should match Birmingham Cycle Revolution aspirations for future levels of cycling.	In general, the cycle parking standards require at least 1 cycle stand for every 10 people which aligns with Birmingham Cycle Revolution ambitions. Cycle parking levels for education uses have been reviewed and have been amended so it is consistent with other uses and provide for higher levels of cycle parking provision
PS3	Questions over whether zones A and B should be referred to as 'well served' for walking and cycling.	It is acknowledged that, whilst the accessibility mapping exercises looks at public transport accessibility, a comprehensive walking and cycling accessibility mapping exercise has not been undertaken. Therefore, it is not appropriate to deem all locations within zones A and B as 'well served' for walking and cycling. The SPD has been carefully aligned with the Walking and Cycling strategy and the Local Cycling and Walking Infrastructure Plan to ensure that areas which have been highlighted as needing walking and cycling infrastructure improvements are prioritised in the infrastructure plan. Investment in these locations can then be sought through funding opportunities and developer contributions where appropriate. Reference to walking and cycling in zones A and B has been amended to remove blanket reference as 'well served'. Reference has

Rep ID	Main issues raised	Council response and how issues have been addressed
		been added regarding the prioritisation of walking and cycling investment according to the LCWIP.
PS4	Motorcycles need greater consideration/provision including appropriate facilities and design/location guidance.	The SPD has been revised to include further guidance for powered two wheelers, including information on design and location of motorcycle parking. The SPD also signposts to the Design Guide, which includes further detail on design best practice.
PS5	Not enough provision for visitor parking for residential	The Council agrees that it is important to balance visitor and resident parking. The revised standards seek to ensure that sufficient parking is available for both residents and visitors and is provided in an efficient.
PS6	Not enough provision for visitor parking for businesses in zone B	The standards for zone B have been adapted to ensure that where businesses have a specific visitor parking requirement this can be accommodated for, with sufficient evidence. However the overall levels of parking provision, outside of visitor parking, are felt to be appropriate.
PS7	Feel the current parking standards are not fit for purpose.	This is why revised standards have been proposed.
PS8	C3 Dwelling Houses in Zone C: car parking maximums for 3-bed should be 2 spaces not 2.5 and for 4+-bed should be 2.5 spaces not 3. Reason: to deliver higher density development and/or more green space, and to reduce car dependency.	In setting parking standards, consideration must be given to car ownership levels and public transport accessibility. The residential parking standards have been reviewed and simplified.
PS9	D1 development outside Zone A needs more than 1 space per 2 staff; should be 2 spaces per 3 staff. Reason: most staff in education have to drive to work because public transport into residential areas is inadequate, and therefore to avoid staff parking on residential roads.	The Council considers this to be a reasonable level of provision which is consistent with other local authorities.

Rep ID	Main issues raised	Council response and how issues have been addressed
PS10	D2 Assembly and Leisure development in Zone A should not be permitted 1 car parking space per 20 seats and should instead be limited to Disabled parking only as other use classes. Reason, no good reason to treat differently to other uses.	The justification for provision of some parking allocation for these developments is that public transport accessibility can be more limited in off peak periods so we are aiming to provide for those venues which have evening and off-peak events that may require additional parking provision.
PS11	Costs for new houses will be unaffordable with EV chargers.	A Financial Viability Assessment (FVA) prepared by BNP Paribas Real Estate (November 2019) (EBD71) to support the Development Management in Birmingham Document. This was undertaken in line with the National Planning Policy Framework and National Planning Practice Guidance. The FVA assumes that 100% of spaces will require a charging point, which significantly exceeds the number of electric cars currently in use in the UK (which is currently 0.5% of all vehicles). The assumption of 100% of spaces exceeds current levels of supply. The FVA concludes that this does not have a significant impact on viability. (See sections 3.16, Table 4.5.1 and 5.5 in FVA).
PS12	Should be higher levels of provision for electric vehicles – 'at least 1 in 2 spaces'.	Whilst high levels of provision for electric vehicle charging will be supported, it is not felt viable to insist on a 50% level of charging provision for all types of parking. There is a cost implication to providing charging units. There is also not a need for electric vehicles to charge every time they stop. So, at some destinations rapid chargers where a vehicle can 'top up' quickly and then park elsewhere may be a more sensible approach. Publicly available charging units will be provided across Birmingham to help support and encourage the uptake of Electric Vehicles.
PS13	Standards should include space for wheelie bins which can end up blocking pavements otherwise.	Design guidance on waste storage provision is set out in the draft Birmingham Design Guide.
PS14	Some respondents felt the parking standards are too complicated to understand and comment on	We have endeavoured to make the parking standards as clear as possible, however a great deal of information and differentials must be included to ensure that appropriate provision is set for a wide variety of land uses and types of parking requirement. The SPD has been amended to make the standards easier to understand and worked examples have been provided.

Appendix C Survey Data from all BeHeard Responses

Are you responding to this consultation as:

Option	Total	Percent
An individual citizen	198	94.29%
A representative of a group or organisation (including elected members)	12	5.71%
Not Answered	0	0.00%

Where do you usually work?

Option	Total	Percent
I work in Birmingham city centre	87	41.43%
I work elsewhere in Birmingham	37	17.62%
I work outside Birmingham	25	11.90%
I work from home	15	7.14%
Not applicable	30	14.29%
Not Answered	16	7.62%

How often do you travel in Birmingham by the following types of transport?

Walk

Option	Total	Percent
5 days per week	40	19.05%
2-4 days per week	30	14.29%
Once per week	13	6.19%
Once per month	7	3.33%
Less than once a month	11	5.24%
Never	45	21.43%
Not Answered	64	30.48%

Cycle

Option	Total	Percent
5 days per week	16	7.62%
2-4 days per week	20	9.52%
Once per week	7	3.33%
Once per month	3	1.43%

	13	6.19%
Less than once a month	13	6.19%
Never	87	41.43%
Not Answered	64	30.48%

Public transport

Option	Total	Percent
5 days per week	28	13.33%
2-4 days per week	25	11.90%
Once per week	23	10.95%
Once per month	31	14.76%
Less than once a month	30	14.29%
Never	25	11.90%
Not Answered	48	22.86%

Motorcycle

Option	Total	Percent
5 days per week	4	1.90%
2-4 days per week	3	1.43%
Once per week	2	0.95%
Once per month	2	0.95%
Less than once a month	4	1.90%
Never	117	55.71%
Not Answered	78	37.14%

Car or van

Option	Total	Percent
5 days per week	44	20.95%
2-4 days per week	45	21.43%
Once per week	31	14.76%
Once per month	18	8.57%
Less than once a month	22	10.48%
Never	21	10.00%
Not Answered	29	13.81%

Taxi (including services such as Uber)

Option	Total	Percent
5 days per week	1	0.48%
2-4 days per week	1	0.48%

Once per week	12	5.71%
Once per month	31	14.76%
Less than once a month	46	21.90%
Never	47	22.38%
Not Answered	72	34.29%

Do you or someone you regularly travel with have a Blue Badge for disabled parking?

Option	Total	Percent
I have a Blue Badge	11	5.24%
Someone I regularly travel with has a Blue Badge	12	5.71%
No	170	80.95%
Not Answered	18	8.57%

If you drive a car or motorcycle to these places, where do you usually park?

Home

Option	Total	Percent
I do not drive here	9	4.29%
My private garage or driveway	118	56.19%
Shared private parking	7	3.33%
On-street near home (for free)	31	14.76%
On-street near home (paid for)	2	0.95%
Somewhere else near home	3	1.43%
Not Answered	40	19.05%

Work

Option	Total	Percent
I do not drive here	58	27.62%
Car park provided by my employer (for free)	48	22.86%
Car park provided by my employer (paid for)	9	4.29%
On-street near work (for free)	13	6.19%
On-street near work (paid for)	4	1.90%
Other car park (for free)	1	0.48%
Other car park (paid for)	24	11.43%
Somewhere else near work	9	4.29%
Not Answered	44	20.95%

Shopping or leisure activities in Birmingham city centre

Option	Total	Percent
I do not drive here	58	27.62%
Car park (for free)	12	5.71%
Car park (paid for)	69	32.86%
On-street (for free)	22	10.48%
On-street (paid for)	4	1.90%
Somewhere else in Birmingham city centre	7	3.33%
Not Answered	38	18.10%

Shopping or leisure activities elsewhere in Birmingham

Option	Total	Percent
I do not drive here	23	10.95%
Car park (for free)	54	25.71%
Car park (paid for)	52	24.76%
On-street (for free)	30	14.29%
On-street (paid for)	5	2.38%
Somewhere else near shopping/leisure facilities	6	2.86%
Not Answered	40	19.05%

Organisations

Thinking about the location of the postcode of your group or organisation:

How many people work here (paid or voluntary)?

Option	Total	Percent
0	0	0.00%
1-10	3	1.43%
11-50	4	1.90%
51-100	0	0.00%
Over 100	4	1.90%
Not Answered	199	94.76%

How many car parking spaces do you provide here including spaces for disabled users and electric vehicle charging points?

Option	Total	Percent
0	3	1.43%
1-10	3	1.43%
11-50	1	0.48%
51-100	1	0.48%
Over 100	2	0.95%
Not Answered	200	95.24%

How many car parking spaces for disabled users do you provide here?

Option	Total	Percent
0	5	2.38%
1-10	3	1.43%
11-50	1	0.48%
51-100	0	0.00%
Over 100	0	0.00%
Not Answered	201	95.71%

How many electric vehicle charging points do you provide here?

Option	Total	Percent
0	8	3.81%
1-10	2	0.95%
11-50	0	0.00%
51-100	0	0.00%
Over 100	0	0.00%
Not Answered	200	95.24%

How many motorcycle parking spaces do you provide here?

Option	Total	Percent
0	7	3.33%
1-10	2	0.95%
11-50	1	0.48%
51-100	0	0.00%
Over 100	0	0.00%
Not Answered	200	95.24%

How many bicycle parking spaces do you provide here?

Option	Total	Percent
0	6	2.86%
1-10	3	1.43%
11-50	0	0.00%
51-100	1	0.48%
Over 100	0	0.00%
Not Answered	200	95.24%

Do you generally agree with the approach to city centre on-street parking?

Option	Total	Percent
Yes	105	50.00%
No	88	41.90%
Don't know	15	7.14%
Not Answered	2	0.95%

Do you generally agree with the approach to city centre off-street parking?

Option	Total	Percent
Yes	98	46.67%
No	91	43.33%
Don't know	20	9.52%
Not Answered	1	0.48%

Do you generally agree with the approach to edge of city centre parking?

Option	Total	Percent
Yes	107	50.95%
No	76	36.19%
Don't know	24	11.43%
Not Answered	3	1.43%

Do you generally agree with the approach to parking in urban centres and local growth areas?

Option	Total	Percent
Yes	107	50.95%
No	62	29.52%
Don't know	38	18.10%
Not Answered	3	1.43%

Do you generally agree with the approach to residential parking?

Option	Total	Percent
Yes	123	58.57%
No	55	26.19%
Don't	25	11.90%
Not Answered	7	3.33%

Do you generally agree with the approach to controlled parking?

Option	Total	Percent
Yes	109	51.90%
No	64	30.48%
Don't know	32	15.24%
Not Answered	5	2.38%

Do you generally agree with the approach to park and ride?

Option	Total	Percent
Yes	128	60.95%
No	50	23.81%
Don't know	27	12.86%
Not Answered	5	2.38%

Do you generally agree with the approach to school parking?

Option	Total	Percent
Yes	131	62.38%
No	39	18.57%
Don't know	34	16.19%
Not Answered	6	2.86%

Do you generally agree with the approach to parking for disabled people?

Option	Total	Percent
Yes	143	68.10%
No	31	14.76%
Don't know	28	13.33%
Not Answered	8	3.81%

Do you generally agree with the parking standards zone characteristics and locations?

Option	Total	Percent

Yes	105	50.00%
No	53	25.24%
Don't know	45	21.43%
Not Answered	7	3.33%

Do you feel that the information provided has enabled you to make an informed comment on the proposals?

Option	Total	Percent
Yes	152	72.38%
No	51	24.29%
Not Answered	7	3.33%

Planning and Compulsory Purchase Act 2004 (as amended)

Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)

Birmingham Parking Supplementary Planning Document

Adoption Statement

In accordance with Regulation 14 of the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended), Birmingham City Council hereby gives notice that the Parking Supplementary Planning Document (SPD) was adopted on 9th November 2021.

The SPD provides supplementary guidance and detail to support policies TP38-44 in the Birmingham Development Plan 2031 and policy DM15 in the Development Management in Birmingham Document to be adopted in Winter 2021/22. The SPD was modified following the comments received on the public consultation on the draft SPD in January to March 2020.

The adopted Parking SPD, the Consultation Statement (including a summary of the main issues raised and how they have been addressed in the SPD) and this Adoption Statement can be viewed on the Council's website at: www.birmingham.gov.uk/parkingspd

Any person aggrieved by the adoption of the Parking SPD may make an application to the High Court under Section 113 of the Planning and Compulsory Purchase Act 2004 on the grounds that:

> a) the document is not within the appropriate powers conferred by Part 2 of the Planning and Compulsory Purchase Act 2004;

> b) a procedural requirement of the Planning and Compulsory Purchase Act 2004 has not been complied with.

Any such application must be made promptly, and in any event no later than the end of the period of six weeks of the date of the adoption of the Parking SPD.

Appendix 4 – Risk Assessment of the Adoption of the Parking SPD

No	Risk	Probability	Impact	Mitigation	Milestone
1.	Delays in adopting the SPD before planning applications are determined.	Low	High	Existing Parking Standards SPD in place to determine planning applications.	N/A
2.	Some detailed objections received on the draft SPD.	Low	Medium	Comments have been analysed in detail and amendments have been proposed to the SPD to address the issues raised where appropriate.	April 2021
4.	Additional costs from preparing the SPD	Low	Medium	Cost management arrangements put in place to ensure they remain within approved revenue budgets	N/A
5.	Parking does not meet the guidance contained in the SPD	Low	High	Monitoring of the SPD will be undertaken to ensure it is having the desired effect. It will also be supported by the Birmingham Design Guide which provides detailed guidance on parking design.	Ongoing

008314/2021

Statement of Reasons – Strategic Environmental Assessment (SEA) screening for the Birmingham Draft Parking Supplementary Planning Document (SPD)

Criteria (from Annex II of SEA Directive and Schedule I of Regulations)	Birmingham City Council's Response
Characteristics of the plan or programme	
(a) The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.	The Birmingham Parking Supplementary Planning Document expands on the existing policies of the Birmingham Development Plan (BDP), with particular reference to policies TP38 to TP45. These policies have been subject to detailed Sustainability Appraisal, incorporating the SEA regulation requirements. The SPD will provide further guidance on parking provision around the city and the requirements of new developments in respect of parking levels and design (including provision for cycling, electric vehicles, disabled parking, car sharing and servicing requirements). The SPD will therefore supplement existing policies rather than setting the framework. The detailed design and development of facilities for subsequent schemes or developments is not covered within the scope of the document.
(b) The degree to which the plan or programme influences other plans and programmes including those in a hierarchy.	As noted above the SPD will supplement policies contained within the BDP. It also aligns to national guidance within the National Planning Policy Framework. As such it is influenced by other higher level plans, rather than influencing them. In terms of a hierarchy, the Strategy sits below the Birmingham Connected Transport Strategy and Birmingham Development Plan.
(c) The relevance of the plan or programme for the integration of environmental considerations, in particular with a view to promoting sustainable development.	The SPD is relevant to promoting and developing sustainable transport options in the city, in the wider context of the Birmingham Development Plan, which sets out policies on sustainable development. Guidance within the document will be aligned to adopted policies in the BDP, where environmental considerations on the policies were subject to Sustainability Appraisal (see [A] above). The SPD will therefore not have significant effect on environmental considerations which have not already been considered.
(d) Environmental problems relevant to the plan or programme.	Guidance within the SPD can support a decrease in air pollution and noise pollution by supporting provision of a sustainable, integrated transport network and by limiting travel demand through levels of parking provision.
(e) The relevance of the plan or programme for the implementation of Community (EU) legislation on the environment (for example, plans and programmes linked to waste management or water protection).	As noted above the SPD will support the Birmingham Clean Air Strategy and 'Brum Breathes' programme which is aimed at meeting EU and UK standards on air quality.

Characteristics of the effects and of the area likely to be affected	
(a) The probability, duration, frequency and reversibility of the effects.	The SPD will deliver on policies contained within the BPD. It will not in itself bring developments or projects forward; these will need to go through separate approval processes (e.g planning applications or transport schemes subject to Environmental Impact Assessments) The guidance set out in the SPD will promote sustainable development through well-defined parking standards, appropriate management of on and off-street parking, and a focus on greater provision for sustainable transport. However there is no mechanism for significant environmental effects to arise from the SPD itself which have not or been considered as part of the production of the BDP SEA. The effects of individual projects which will take guidance from the SPD will be subject to individual planning applications and environmental assessments in relation to future project delivery.
(b) The cumulative nature of the effects	As noted above there is no mechanism for significant environmental impacts to arise from the SPD itself. Should cumulative parking impacts arise from parking provision, the City Council will, through the determination of planning applications, ensure such issues are appropriate addressed.
(c) The trans-boundary nature of the effects	As noted above, there is no mechanism for significant environmental effects to arise from the SPD itself. It is therefore unlikely that any trans-boundary impacts will arise. Where these effects are likely to arise, the City Council will, through the determination of planning applications, ensure such issues are appropriately addressed.
(d) The risks to human health or the environment (for example, due to accidents)	As noted above, there is no mechanism for significant environmental effects to arise from the SPD itself. It is therefore unlikely that any risks to human health or the environment impacts will arise. Where these effects are likely to arise, the City Council will, through the determination of planning applications, ensure such issues are appropriately addressed.
(e) The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	The SPD applies to the entire city of Birmingham – with a resident population of 1,141,400 people (2018 mid-year population estimate). It is considered that any effects not previously considered as part of the BDP will be limited in magnitude.

(f) The value and vulnerability of the area likely to be affected due to:
i) Special natural characteristics or cultural heritage;
ii) Exceeded environmental quality standards or limit values;
iii) Intensive land-use.
	Given the nature of the document:
	  i) None;
	  ii) None;
	  iii) None
	The SPD will provide guidance but will not bring individual schemes forward – which will be subject to other environmental assessments.

(g) The effects on areas or landscapes which have recognised national, Community or international protection status.	No significant effects are considered to arise on the adoption of the SPD in line with BDP policies.

Title of proposed EIA	Adoption of The Birmingham Parking Supplementary Planning Document
Reference No	EQUA281
EA is in support of	New Policy
Review Frequency	Two Years
Date of first review	01/10/2022
Directorate	Inclusive Growth
Division	Planning
Service Area	Transport Policy
Responsible Officer(s)	🟩 Naomi R Coleman
Quality Control Officer(s)	🟦 Uyen-Phan Han
Accountable Officer(s)	🟦 Maria Dunn
Purpose of proposal	To inform Cabinet of the outcome of the public consultation on the draft Parking Supplementary Planning Document (SPD) carried out during January and February 2020 and to seek authority from Cabinet to adopt the Parking Supplementary Planning Document
Data sources	Survey(s); Interviews; relevant reports/strategies; Statistical Database (please specify); Other (please specify)

Please include any other sources of data

ASSESS THE IMPACT AGAINST THE PROTECTED CHARACTERISTICS

Protected characteristic: Age	Wider Community
Age details:	The Parking SPD sets out a strategy which will impact the level of parking in Birmingham. It is recognised that this may have an impact on transport options for older age groups who may have more limited physical mobility. However the overall impact of the document is considered to be positive for those of all age groups.
	The document includes a commitment to seek increased opportunities for seating and resting to support those with limited mobility.
	Requirements have been put in place within the parking standards to ensure that new developments fully consider all parking requirements for different

age groups, including parking for families where appropriate (such as large retail developments), and provision for blue badge parking and ring and ride/taxi pick-up.

The strategic approach taken in the Parking SPD aligns with the Birmingham Transport Plan (BTP) and Delivery Plan, Parking Management is one of the key principles within the BTP. This approach seeks a more integrated, accessible and comprehensive transport network in Birmingham which will better cater for the diverse travel needs of a wide range of age groups and user types, resulting in a broadly positive outcome overall. The aim to effect modal shift away from private car usage and ownership will support prioritisation of road space and parking space for those who rely most on car use, particularly those with mobility need whilst providing alternative options for those who can choose other modes of travel.

Parking Management is an important tool in achieving reduced vehicle emissions and improved air quality through modal shift. This will have a positive impact for young children and older people who are more adversely affected by air pollution in Birmingham. As an example, children in pushchairs and at walking height to vehicle exhausts are particularly exposed to pollutants such as diesel particulates which cause respiratory conditions. Policies within the Parking SPD such as the implementation of School Streets, which prevent parking in the vicinity of schools, will support a reduction in this type of exposure.

Any new developments or projects which may be delivered in future as a result of/in accordance with the Parking SPD guidance will be subject to further equality analysis and relevant governance and consultation processes.

Protected characteristic: Disability

Disability details:

Wider Community

The Parking SPD includes a number of guidelines which will be beneficial to people with a disability. These include clear standards for disabled parking provision in all new developments. These align to national best practice guidance such as the Disabled Parking Award Scheme. Care has been taken, when setting the parking standards, to ensure that, even where developments may be otherwise 'car free', adequate parking for people with disabilities is still provided. Guidance has also been included which requires that disabled parking spaces are easy to use, convenient, and located close to access points.

The parking standards include levels of provision for EV charging points and specify consideration of accessible/disabled charging provision. Research by Motability identifies that by 2035, up to 1.35 million disabled people in the UK will be wholly or partially reliant on public charging infrastructure. The Motability scheme enables a person in receipt of a state provided mobility allowance to use all or part of their allowance to lease a new vehicle with insurance, road tax, servicing, tyres and breakdown cover all included. A number of Electric Vehicles are already available through the Motability scheme and this is likely to increase significantly going forward. Therefore increased provision of the EV charging points within new developments will have a significantly positive impact on disabled people.

It is recognised that the wider parking strategy, which includes support for city centre pedestrianisation proposals and parking removal for transport infrastructure, may result in the removal of some disabled parking bays. To mitigate this the SPD includes a commitment relocate any blue badge

parking bays which may need to be moved, with proximity to destination remaining an important priority. The council has committed to no net reduction in the number of disabled parking bays available. All Birmingham City Council owned Blue Badge parking is free to use, within the enforcement parameters set (there may be time restrictions for use, for example). A policy also remains in place which allows any driver with a blue badge to park for free in any Birmingham City Council pay and display bay.

Opportunities will also be sought to provide increased seating and resting facilities for those with limited mobility

Some concern was raised in the public consultation on the draft Parking SPD regarding provision for people with illness, disabilities, short term conditions or age-related issues which do not make them eligible for a Blue Badge but mean that alternatives to car use are not always available/an option. To mitigate this issue the parking standards include guidance regarding unallocated parking provision for all new developments. This will cater for visitors and those who have no alternative travel options but car use. Additional flexibility has also been added into the Parking SPD regarding city centre 'Zone A' parking standards which pursue largely car free development. The flexibility will allow for provision of a limited number of car parking spaces which may help At a strategic level, in alignment with the Birmingham Transport Plan, the Parking SPD supports provision for and encouragement of the use of non-car-based travel options into and around the city for all those who are able to do so. This will help to ensure the network and parking availability will be freed up for those who have most need for private car travel. Information has been added to the Parking SPD on how Blue Badge parking is

allocated/prioritised and how it can be applied for.

Any new developments or projects which may be delivered in future as a result of the Parking SPD guidance will be subject to further equality analysis and relevant governance and consultation processes.

Protected characteristic: Sex	Not Applicable
Gender details:	
Protected characteristics: Gender Reassignment	Not Applicable
Gender reassignment details:	
Protected characteristics: Marriage and Civil Partnership	Not Applicable
Marriage and civil partnership details:	
Protected characteristics: Pregnancy and Maternity	Wider Community
Pregnancy and maternity details:	Parking management policy, as set out in the Parking SPD, is a principle element of the Birmingham Transport Plan. The SPD will therefore support the a reduction in vehicle emissions and improved air quality which will have a positive health impact during pregnancy, when evidence shows that air pollution can be particularly harmful. The Parking SPD also sets out requirements for some land uses such as large retail to consider family parking provision. It is clarified that this should consider space for those with pushchairs or those who require proximity due to childcare of pregnancy/maternity needs.
Protected characteristics: Race	Not Applicable
Race details:	
Protected characteristics: Religion or Beliefs	Not Applicable
Religion or beliefs details:	
Protected characteristics: Sexual Orientation	Not Applicable
Sexual orientation details:	
Socio-economic impacts	
Please indicate any actions arising from completing this screening exercise.	All consultation feedback has been analysed and considered to produce

the final version of the Parking SPD. The Parking SPD includes a number of mitigations, as detailed above for relevant protected characteristics to ensure that parking provision in the city is balanced and does not disproportionately affect any protected characteristic group.

Any new developments or projects which may be delivered in future as a result of/in accordance with the Parking SPD guidance will be subject to further equality analysis and relevant governance and consultation processes.

Please indicate whether a full impact assessment is recommended	NO
What data has been collected to facilitate the assessment of this policy/proposal?	
Consultation analysis	A comprehensive public consultation process has taken place to ensure that stakeholders representing all protected characteristic groups were engaged and their views are taken into account for the final version of the strategy. All feedback has been thoroughly analysed, considered, and appropriate amendments have been made to the SPD. Detailed responses to issues raised have been included in a Parking SPD Consultation Report.

Consultation was carried out in accordance with the adopted Birmingham Statement of Community Involvement 2008 and the draft Statement of Community Involvement 2019. The approach to public consultation ensured that protected characteristics are fully considered and the views of groups representing age and disability characteristics are included. Relevant organisations with an interest in equalities were consulted.

An engagement strategy was developed to set out how the public consultation will be carried out on the Draft SPD. The engagement strategy for public consultation on the draft

Parking SPD met the requirements of the relevant regulations and guidance. The broad range of specific and general stakeholders were informed about the draft strategy and invited to comment. Consultation methods included letters, emails, a press release, social media publicity and a Be Heard consultation site for feedback. Meetings were offered/ carried out with key stakeholders. Covid 19 meant that some of these meetings were unable to take place face to face however all meeting attendees were referred to the online consultation to provide feedback in this way or via email and phone calls.

Adverse impact on any people with protected characteristics.

Could the policy/proposal be modified to reduce or eliminate any adverse impact?

How will the effect(s) of this policy/proposal on equality be monitored?

What data is required in the future?

Are there any adverse impacts on any particular group(s)   No

If yes, please explain your reasons for going ahead.

Initial equality impact assessment of your proposal

Consulted People or Groups

Informed People or Groups

Summary and evidence of findings from your EIA

It is broadly felt that the impact of the draft Parking Supplementary Planning Document on those with protected characteristics, in particular those with a disability, young people, and elderly people will be positive. The guidance in the document requires all new developments to provide adequate parking and/or facilities for a wide variety of transport modes and for people of all protected characteristic groups.

There is also likely to be a positive impact as a result of the Parking SPD on traffic congestion, air quality, health and wellbeing, and groups across all socio economic groups and particularly

in the city centre and local centres where inequalities across protected characteristics are more concentrated. The protected characteristic groups likely to benefit from the proposed lower levels of parking provision/better infrastructure standards to achieve a modal shift to more sustainable travel are set out in the Parking SPD. These include the ageing population who may choose to walk more than those of working age, the younger/student population who do not drive, those with long term life limiting illness e.g.asthma aggravated by poor air quality, those on lower incomes who may walk and cycle as a means of travel. The Parking SPD will ensure that the momentum improves the upward trend in Birmingham to make public transport, cycling and walking easier and more attractive to all. There are no groups with protected characteristics that will be disproportionately affected as a result of the adoption of the Parking SPD.

The Parking SPD supports Birmingham Development Plan policies and the Planning Service to ensure appropriate parking provision is delivered as part of new development schemes. When such schemes are submitted to the local planning BCP Equality Impact Assessment Screening Tool, the standards and requirements set out in the Parking SPD will be expected to be complied with to ensure safe and sustainable parking provision is delivered. Any other projects which may be delivered in future as a result of or in accordance with the Parking SPD guidance will also be subject to further equality analysis and relevant governance and consultation processes.

QUALITY CONTORL SECTION

Submit to the Quality Control Officer for reviewing?	No
Quality Control Officer comments	Proceed to Approving Officer 8.10.19

Decision by Quality Control Officer	Proceed for final approval
Submit draft to Accountable Officer?	No
Decision by Accountable Officer	Approve
Date approved / rejected by the Accountable Officer	03/10/2019
Reasons for approval or rejection	Approved 28th October 2021
Please print and save a PDF copy for your records	Yes

Julie Bach

Person or Group

Content Type: Item
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Last modified at 28/10/2021 03:24 PM by Workflow on behalf of █ Maria Dunn

Close

Birmingham City Council
Report to Cabinet

9 November 2021

Subject:	**ADOPTION OF THE 'DEVELOPMENT MANAGEMENT IN BIRMINGHAM' DEVELOPMENT PLAN DOCUMENT**
Report of:	**ACTING DIRECTOR, INCLUSIVE GROWTH**
Relevant Cabinet Member:	**Councillor Ian Ward, Leader of the Council**
Relevant O &S Chair:	**Councillor Saima Suleman, Economy and Skills**
	Councillor Liz Clements, Sustainability and Transport
Report author:	Uyen-Phan Han, Planning Policy Manager Telephone No: 0121 303 2765 Email Address: uyen-phan.han@birmingham .gov.uk

Are specific wards affected?	☐ Yes	☒ No – All wards affected
If yes, name(s) of ward(s):		
Is this a key decision?	☒ Yes	☐ No
If relevant, add Forward Plan Reference: 009059/2021		
Is the decision eligible for call-in?	☒ Yes	☐ No
Does the report contain confidential or exempt information?	☐ Yes	☒ No
If relevant, provide exempt information paragraph number or reason if confidential:		

1   Executive Summary

1.1   Cabinet is asked to note the Planning Inspector's report (Appendix 1) on the 'Development Management in Birmingham' Development Plan Document (DMB) and recommend to Council adoption of the DMB as submitted and subsequently amended by the main modifications (Appendix 2) and additional (minor) modifications. (Appendix 3).

1.2   Upon adoption of the DMB, the remaining parts of the Birmingham Unitary Development Plan 2005 (Chapter 8) (Appendix 4) are to be superseded.

2 Recommendations

2.1 Notes the report of the Planning Inspector on the 'Development Management in Birmingham' Development Plan Document (DMB) (Appendix 1) and the Inspector's schedule of main modifications (Appendix 2).

2.2 Recommends to City Council the adoption of the DMB incorporating the Inspector's main modifications and additional (minor) modifications in accordance with the provisions of Regulations 26 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

2.3 Notes the final version of the Strategic Environmental Assessment (SEA)/ Sustainability Appraisal and Habitats Regulation Assessment (HRA) (Appendix 7)

2.4 Notes the accompanying DMB Adoption Statement (Appendix 9) and Sustainability Appraisal Adoption Statement (Appendix 8).

2.5 Approves the revocation and withdrawal of the remaining parts of the Birmingham Unitary Development Plan 2005 (Chapter 8) (Appendix 4) and the withdrawal of relevant superseded Supplementary Planning Guidance referenced within it (Appendix 5).

2.6 Delegates authority to the Acting Director of Inclusive Growth in consultation with the Leader to make any typographical, grammatical, graphical, and presentational changes to the final DMB prior to adoption.

3 Background

3.1 The adoption of the DMB means that it will become part of Birmingham's Local Plan and it will support the adopted Birmingham Development Plan (2017) (BDP) by setting out non-strategic planning policies for the determination of planning applications. It will be one of the Council's key planning policy documents alongside the BDP and it replaces the remaining extant policies of the Birmingham Unitary Development Plan (2005) (UDP) which will be revoked.

3.2 The DMB document has been subject to four public consultation events which have all been previously approved by Cabinet.

Stage 1 – Development Management DPD Consultation (Regulation 18) (June 2015) Consultation period 7 September - 19 October 2015 (6 weeks)

Stage 2 - Preferred Options Document Consultation (Regulation 18) (January 2019) Consultation period 4 February and 29 March 2019 (8 weeks)

Stage 3 – Publication DMB Document (Regulation 19) (October 2019) Consultation period 9 January – 21 February 2020 (6 weeks)

Stage 4 – Proposed Main Modifications to the DMB document following Examination Hearings (Regulation 22) (March 2021) Consultation period 24 March – 5 May 2021 (6 weeks)

3.3 Following Stage 3 (Publication), the DMB was published and submitted to the Ministry for Housing, Communities and Local Government (MHCLG) in July 2020 for examination by the Planning Inspectorate (PINS). A Planning Inspector (Kelly

Ford) was appointed to carry out the Examination in Public of the DMB. As part of the Examination, public hearings took place between the 10th and 12th November 2020.

3.4　At the end of the hearings, the Inspector agreed a set of 12 main modifications with council officers which were deemed to be required to make the document sound and compliant. As set out in paragraph 3.2 above (Stage 4), these modifications were then approved by Cabinet and subject to consultation earlier this year. Primarily, the modifications added additional text to the policies and/or the supporting text to clarify and assist in the application of the policies. The thrust of the policies themselves remained the same.

3.5　Following consultation on the proposed main modifications, 16 individual representations were received and forwarded to the Planning Inspector for her consideration. The Inspector issued her final report on 30 September 2021 which was published soon after receipt in line with Regulation 25 of the Town and Country (Local Planning) (England) Regulations 2012. The report is attached as Appendix 1 and is available on the Council's website. In addition, those who responded at the Regulation 19 consultation have been notified of the publication of the report in line with Regulation 35. The report concludes that with the recommended main modifications (Appendix 2) being incorporated into the DMB, it satisfies the requirements of Section 20(5) of the Planning and Compulsory Purchase Act 2004 and meets the tests of 'soundness' as set out in the National Planning Policy Framework 2012.

3.6　In summary the key effects of the Inspector's main modifications are as follows:

MM1- DM1 Air quality – clarification of terms 'unacceptable deterioration' and 'unacceptable levels' to improve effectiveness of the policy.

MM2 – DM2 Amenity – cross reference to other relevant policy and definition of what 'in the vicinity' means in relation to point h. of the policy which is concerned with the individual and cumulative impacts of development proposals in the immediate area.

MM3 – DM3 Contaminated land – consistency with the NPPF with regards to the mitigation of risk where proposals for new development are to be located on land which is known to be or potentially contaminated or unstable.

MM4 – DM4 Landscaping and trees – additional wording to improve the effectiveness of the policy and to clarify that the provision of new trees will be expected in appropriate locations within the multi-functional green infrastructure network. Additional wording in relation to Ancient Woodland or Ancient/ Veteran trees to ensure consistency with the NPPF. Clarity on the definition of quality trees in reference to the British Standard for Trees BS5837. Reference to category A, B and C trees in relation to replacement provision.

MM5 – DM6 Noise and vibration - clarification that the criteria of the policy apply only where it is relevant. Changes to the supporting text to clarify that noise assessments will be based on an understanding of the existing and predicted levels of environmental noise at both the development site and nearby receptors.

MM6 – DM8 Places of worship – clarification that the preferred location for such uses will be the network of centres, as defined in Policy TP21 of the BDP and outside of this where identified criteria are met.

MM7 – DM9 Day nurseries and early years provision - clarification that the preferred location for such uses will be the network of centres, as defined in Policy TP21 of the BDP and outside of this where identified criteria are met.

MM8 – DM10 Standards for residential development – clarification on when the policy applies and makes clear the status of the Places for Living SPD.

MM9 – DM13 Self and Custom Build Housing – defines larger sites and explains that affordable self and custom build should not be substituted for social rented and affordable rented housing where it is needed.

MM10 - DM14 Transport Access and Safety - additional supporting text to clarify where details of the future transport improvements referred to in part 6e of the policy can be found.

MM11 - DM15 Parking and Servicing – deletion of reference to the Parking SPD within part 1 of the policy and additional wording in the supporting text to clarify the status of the SPD as guidance.

MM12 – Monitoring framework – amendments to identify appropriate targets and trigger to enable effective monitoring.

3.7 Where the Inspector's report recommends that main modifications are needed, the Council must incorporate the recommended main modifications if it wishes to adopt the DMB. The report is not binding on the Council, but the Council may not adopt an unsound plan.

3.8 Adoption of the DMB provides the city with a comprehensive Local Plan framework. The DMB will be given full weight in determining planning applications and appeals decisions.

3.9 During the preparation of the Local Plan Review the Council is required by law (Planning and Compulsory Purchase Act 2004 and Environmental Assessment of Plans and Programmes Regulations ["the SEA Regulations]) to carry out a Sustainability Appraisal (SA) and a Strategic Environmental Assessment (SEA) of the plan as it developed. This legal requirement is an important element of testing the "soundness" of local plans that is required by National Planning Policy Framework 2012 paragraph 182. Both the SA and SEA requirements were met through a single integrated process (referred to as SA), the method and findings of which were described in numerous SA reports published alongside the different versions of the DMB during its development.

3.10 The SA (incorporating SEA) of the DMB commenced following the publication of the SA Scoping Report in December 2014 which was updated in May 2018. Iterative stages of the SA were then published by the Council: SA of Preferred Options (January 2019); SA of Publication Document (October 2019); and SA Addendum (May 2020). There are no implications on the SA of the main modifications. A SA

Post Adoption Statement (Appendix 8) has been prepared ready for publication upon adoption of the DMB.

3.11 The adoption of the DMB means that the document now supersedes what remains of the Birmingham Unitary Development Plan (UDP) (Chapter 8). The UDP was originally adopted in full in 2005 but the majority of the document was revoked in 2017 when the Birmingham Development Plan was adopted, apart from the development control policies set out as Chapter 8 and attached as Appendix 4. The DMB will also supersede a number of outdated Supplementary Planning Documents and Guidance. Authority is therefore also sought to revoke and withdraw this remainder of the UDP as a result of the adoption of the DMB.

4 Options Considered and Recommended Proposal

4.1 **Option 1- Do Nothing**: Not adopting the DMB would delay having up to date Development Management policies in place to help determine planning applications and appeals. The option of not adopting the DMB is not recommended. The DMB has been found sound, subject to the recommended modifications. If the DMB is not adopted there is uncertainty over the planning framework for the city. In turn this will assist in facilitating poor or inappropriate development.

4.2 **Option 2 – Adopt the DMB Without Accepting the Recommendations Set Out by the Planning Inspector or the Proposed Main Modifications Set Out in the Report:** This approach would risk the DMB being challenged as 'unsound' and not legally compliant and would risk the delay of having an up to date set of policies to help determine planning applications.

4.3 **Option 3 – Seek Approval to Adopt the DMB and Revoke and Withdraw the Remaining Birmingham Unitary Development Plan (UDP) Policies and List of out-dated SPD/Gs.** Based on the evidence heard during the examination hearings and the subsequent consultation on the proposed main modifications, this is considered the most appropriate way forward. This is necessary to enable the City Council to adopt the DMB and ensure that sound and legally compliant development management policies are in place to help determine planning applications and appeals. Adoption of the DMB provides the city with a comprehensive Local Plan framework. The DMB will then be given full weight in determining applications and appeal decisions. The recommended proposal is to proceed with the adoption of the DMB.

5 Consultation

5.1 The DMB itself has been subject to public consultation on three occasions followed by a further consultation earlier this year on the proposed main modifications which had been agreed with the Planning Inspector. All consultations are detailed in paragraph 3.1 above and have been carried out in accordance with the Council's adopted Statement of Community Involvement, under the provisions of the Planning and Compulsory Purchase Act 2004, and the revised procedures required by the Town and Country Planning (Local Planning) (England) Regulations 2012.

5.2 Representations in support of the proposed main modifications were received on behalf of National Grid, Canals and Rivers Trust, Historic England and Natural England. Representations were also received on behalf of Bloor Homes and the Langley Consortium which raised objections to some of the proposed modifications relating to issues they had previously raised at the examination hearings in November 2020. As set out in paragraph 3.4 above, all responses were forwarded to the Planning Inspector for her consideration in accordance with the provisions of Regulation 25 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

6 Risk Management

6.1 The main risk associated with failure to adopt the DMB document is the absence of up to date policies to guide development management decisions. The programme and timetable for adoption of the DMB has allowed for flexibility to account for any potential issues. The previous consultation on the Main Modifications held earlier this year (March - May 2021) was one such issue where flexibility in the timetable and process enabled it to be carried out without undue risk to the overall programme.

7 Compliance Issues:

7.1 How are the recommended decisions consistent with the City Council's priorities, plans and strategies?

7.1.1 The DMB is consistent with the national and local planning policies, the Council Plan 2018-2022 (as updated in 2019) and in particular the outcome; 'Birmingham is an Entrepreneurial City to learn, work and invest in', by providing up to date policies against which planning applications for development will be assessed.

7.2 Legal Implications

7.2.1 The preparation of the DMB is being carried out in accordance with the Planning and Compulsory Purchase Act 2004 and its adoption is prescribed under Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

7.3 Financial Implications

7.3.1 There are no direct financial implications from adopting the DMB. Preparation of the DMB and associated evidence, including all consultation stages and the Examination in Public, have been carried out using existing Inclusive Growth Directorate (Planning and Development) staff resources and specialist external consultants to prepare specific evidence in its support. The cost of preparing the documents is funded from existing approved Inclusive Growth revenue budgets.

7.4 Procurement Implications (if required)

7.4.1 No implications.

7.5 Human Resources Implications (if required)

7.5.1 No implications

7.6 Public Sector Equality Duty

7.6.1 The DMB has been prepared in line with Section 149 of the Equality Act 2010 in ensuring that public bodies, in the exercise of their functions, have due regard to and consider the needs of all individuals in shaping policy. Preparation of the DMB document includes the carrying out of an integrated Sustainability Appraisal at each formal stage which ensures positive social, economic and environmental impacts. An Equality Analysis (EA) has also been carried out during each stage and has been updated once more for its adoption and attached as Appendix 10.

8   Appendices

- Appendix 1 – Report of the Planning Inspectorate for the 'Development Management in Birmingham' Development Plan Document

- Appendix 2 - Main modifications

- Appendix 3 – Additional (minor) modifications

- Appendix 4 – Saved policies of the Birmingham Unitary Development Plan 2005 (Chapter 8) to be superseded

- Appendix 5 – Supplementary Planning Guidance to be superseded through the adoption of the Development Management in Birmingham Development Plan Document

- Appendix 6 – The Development Management in Birmingham Development Plan Document, including the main modifications and additional (minor) modifications

- Appendix 7 - Sustainability Appraisal of the Development Management in Birmingham Development Plan Document and Addendum

- Appendix 8 - Sustainability Appraisal of the Development Management in Birmingham' Development Plan Document Post Adoption Statement

- Appendix 9 - Development Management in Birmingham Development Plan Document Adoption Statement

- Appendix 10 – Equalities Analysis of the final version of the 'Development Management in Birmingham' Development Plan Document

9   Background Documents

- Cabinet Report 27th July 2015 - Public Consultation on the Development Management Development Plan Document (Issues and Options)

- Cabinet Report 22nd January 2019 - Public Consultation on the 'Development Management in Birmingham' Development Plan Document. (Preferred Options).

- Cabinet Report 29th October 2019 - Public consultation on the Publication version of the 'Development Management in Birmingham' Development Plan Document

- Cabinet Report 23rd June 2020 – Submission of the 'Development Management in Birmingham' Development Plan Document

- City Council Report 14th July 2020 - Submission of the 'Development Management in Birmingham' Development Plan Document

- Cabinet Report 16th March 2021 – Consultation on Main Modifications to the 'Development Management in Birmingham' Development Plan Document

The Planning Inspectorate

Report to Birmingham City Council

by K Ford MSc MRTPI

Inspector appointed by the Secretary of State

Date: 30 September 2021

Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the Development Management in Birmingham Development Plan Document

The Plan was submitted for examination on 17 July 2020

The examination hearings were held between 10 and 12 November 2020

File Ref: PINS/P4605/429/10

Contents

2

Abbreviations used in this Report

AONB	Area of Outstanding Natural Beauty
BDP	Birmingham Development Plan
The Council	Birmingham City Council
MM	Main Modification
NDSS	National Described Space Standard
NPPF	National Planning Policy Framework
The Plan	Development Management in Birmingham Development Plan Document
SRDTP	Standards for Residential Development Topic Paper (EBD40)
SPD	Supplementary Planning Document

3

Non-Technical Summary

This report concludes that the Development Management in Birmingham Development Plan Document (the Plan) provides an appropriate basis for the planning of the City, provided that a number of main modifications (MMs) are made to it. Birmingham City Council has specifically requested that I recommend any MMs necessary to enable the Plan to be adopted.

Following the hearings, the Council has prepared schedules of the proposed modifications. The MMs were subject to public consultation over a 6 week period. In some cases I have amended their detailed wording where necessary. I have recommended their inclusion in the Plan after considering all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- Deletion of part of Policy DM15 on parking standards.

- Changes to the monitoring framework.

- A number of other modifications to ensure the plan is positively prepared, justified, effective and consistent with national policy.

4

Introduction

1. This report contains my assessment of the Development Management in Birmingham Development Plan Document (the Plan) in terms of Section 20(5) of the Planning and Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is compliant with the legal requirements and whether it is sound. The National Planning Policy Framework 2021 (paragraph 35) (NPPF) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.

2. The starting point for the examination is the assumption that the Council has submitted what it considers to be a sound plan. The Plan, submitted in July 2020 is the basis for my examination. It is the same document as was published for consultation in January 2020.

Main Modifications

3. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any main modification (MMs) necessary to rectify matters that make the Plan unsound and not legally compliant and thus incapable of being adopted. My report explains why the recommended MMs are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2** etc and are set out in full in the Appendix.

4. Following the examination hearings, the Council prepared a schedule of proposed MMs. The MM schedule was subject to public consultation for 6 weeks. I have taken into account the consultation responses in coming to my conclusions in this report and reflecting this I have made some amendments to the detailed wording of the main modifications where necessary for consistency and clarity. None of the amendments significantly alters the content of the modification as published for consultation or undermines the participatory process. Where necessary I have highlighted these amendments in the report.

Policies Map

5. The Council must maintain an adopted Policies Map which illustrates geographically the application of the policies in the adopted development Plan. When submitting a local plan for examination, the Council is required to provide a submission Policies Map that would result from the proposals in the submitted local plan. In this case, there are no changes proposed to the Policies Map.

Context of the Plan

5

6. The Plan is proposed to replace the saved policies in the Birmingham Unitary Plan, adopted in 2005. The Plan area covers the city of Birmingham which has a population of over one million people. This is expected to rise to 1.25 million by 2031.

7. The city is a major employment centre, drawing workers from across the West Midlands to work in a wide range of employment sectors. The city centre is surrounded by many leafy suburbs and other residential areas. More than a fifth of the city's area consists of parks, nature reserves, allotments, golf courses and playing fields making Birmingham one of Great Britain's greenest cities.

8. The coronavirus pandemic started before the hearing sessions necessitating that they be undertaken virtually. Lockdown restrictions were also taken into account in the consultation arrangements on the MMs. The short, medium and long term social, economic and environmental impacts of the pandemic for the city and for the implementation of the Plan are unknown at the present time. Nevertheless, the Plan forms part of the framework to support the city's environment, communities and economy as it moves forward from the pandemic.

Public Sector Equality Duty

9. I have had due regard to the aims expressed in S149(1) of the Equality Act 2010. This has included my consideration of several matters during the examination including the need for accessible and adaptable housing and inclusive design in development.

Assessment of Duty to Co-operate

10. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.

11. The Council's Duty to Co-operate Statement sets out the work that has been undertaken with relevant Council's and prescribed bodies. There are no strategic policies in the Plan. However, the Council consulted relevant bodies when preparing the Plan. No strategic issues were identified and no concerns have been raised by prescribed bodies about cross boundary issues under the Duty to Co-operate.

12. I am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the Duty to Co-operate has therefore been met.

Assessment of Other Aspects of Legal Compliance

6

13. The Plan has been prepared in accordance with the Council's Local Development Scheme.

14. Consultation on the Plan and the MMs was carried out in compliance with the Council's Statement of Community Involvement and I am satisfied that individuals have had suitable opportunity to engage meaningfully in the development of the Plan.

15. The Council carried out a sustainability appraisal of the Plan, prepared a report of the findings of the appraisal and published the report along with the Plan and other submission documents under regulation 19. The appraisal was reviewed to assess the main modifications. The SA is considered adequate.

16. The Council has reviewed the Plan against the requirements of the Habitats Regulations and Section 4.4 of the Sustainability Appraisal (October 2019) sets out why an Appropriate Assessment is not necessary. The Plan will not introduce any new effect pathways and will not have any significant effects on any European sites as a result of its implementation as it is an expansion and clarification of the strategic policies in the BDP. The BDP was determined not to have any likely significant effects on European sites, either alone or in combination with other plans.

17. The Plan, taken as a whole, includes policies designed to ensure that the development and use of land in the Council's area contributes to the mitigation of, and adaptation to climate change. This includes policies DM1, DM4, DM14 and DM15.

18. The Plan complies with all other relevant legal requirements, including the 2004 Act (as amended) and the 2012 Regulations.

Assessment of Soundness

Main Issues

19. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings, I have identified 6 main issues upon which the soundness of the Plan depends. This report deals with these main issues. It does not respond to every point or issue raised by representors. Nor does it refer to every policy or policy criterion in the Plan.

Issue 1: Whether the Plan gives effect to and is consistent with the Birmingham Development Plan

7

20. The Birmingham Development Plan was adopted in 2017 (BDP). It sets out the vision and objectives that will guide the future development of the City during the period up to 2031. It also establishes the spatial strategy and context for growth and how it will be planned, managed and delivered.

21. The role of the Plan, as set out in the Local Development Scheme is to provide detailed policies on a range of planning matters to ensure development in the city happens in the right place, delivers the best design and enhances infrastructure. The Plan builds on the strategic policies contained in the BDP, providing greater detail on a range of subjects for development management purposes. In doing so it assists in delivering the vision for the city and the 11 objectives contained in the BDP.

22. For the reasons set out above, I conclude that the Plan gives effect to, and is consistent with the BDP.

Issue 2: Are the environment and sustainability policies justified, **effective and consistent with national policy*?***

Policy DM1 Air Quality

23. Birmingham has some of the highest levels of nitrogen dioxide exceedances outside of London and the whole city is designated as an Air Quality Management Area. It is estimated that poor air quality is responsible for some 900 premature deaths in the city each year. Policy DM1 seeks to ensure that new development considers air quality and is accompanied by an appropriate scheme of mitigation where negative impacts are identified. For effectiveness, **MM1** is necessary to identify that air pollution exposure will be considered at the development site or other relevant receptors and clarify that mitigation measures will be required as necessary. In the supporting text **MM1** also defines what is meant by unacceptable deterioration and unacceptable levels of air quality. This is necessary for effectiveness.

Policy DM2 Amenity

24. Policy DM2 seeks to protect the amenity of occupiers and neighbours of development with the aim of ensuring that places are fit for purpose and that development proposals are acceptable. In the case of residential development, the requirements of Policy DM10 link to the requirements of Policy DM2. More specifically, the separation distances referred to in Policy DM10 link to the achievement of criteria a, b and c of Policy DM2 and criterion d of Policy DM2 links to point 4 of Policy DM10. Cross reference to Policy DM10 is therefore necessary to make this effective. This is achieved through **MM2**.

25. For effectiveness **MM2** also defines what 'in the vicinity' means in relation to point h of the policy which is concerned with the individual and cumulative

impacts of development proposals in the immediate area. This is necessary for the purpose of effectiveness and clarity. There is little to indicate that the requirements of the policy are overly prescriptive or would stifle appropriate development, particularly in relation to noise. The supporting text identifies that businesses should not be subject to unreasonable restrictions where nearby land uses have changed since they were established. This is in line with paragraph 187 of the NPPF.

Policy DM3 Land affected by Contamination, Instability and Hazardous Substances

26. Policy DM3 seeks to ensure that land affected by contamination, instability and hazardous substances is brought back into use in a safe manner. **MM3** is necessary to ensure consistency with paragraph 174 of the NPPF with regards to the mitigation of risk where proposals for new development are to be located on land which is known to be or potentially contaminated or unstable.

Policy DM4 Landscaping and Trees

27. The Council recognises green infrastructure within the city as an asset that provides an important visual backdrop for development as well as a resource in mitigating the impacts of climate change.

28. Provisions within Policy DM4 ensure landscaping is integrated into the design of new development and takes a criteria-based approach in considering how existing landscaping should be factored into development proposals. The policy ensures that development takes opportunities to provide high quality landscapes that enhance landscape character and green infrastructure within the city. The policy is consistent with provisions in the NPPF in this regard.

29. For effectiveness it is necessary to specify in part 2 of the policy that the provision of new trees will be expected in appropriate locations within the multi-functional green infrastructure network. Following consultation on the MMs reference to 'other green infrastructure' has been deleted from **MM4** as it is unnecessary.

30. In part 3 of the policy it is necessary to make clear that development resulting in the loss or deterioration of Ancient Woodland or Ancient/ Veteran trees will be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists. This is to ensure alignment with the provisions of paragraph 180 of the NPPF.

31. Part 5 of the policy requires contributions to off-site tree planting where on site replacement is not achievable. For effectiveness, it is necessary to make reference to the Council's Tree Strategy, a Supplementary Planning

9

Document (SPD) that will contain the methodology for calculating the contributions.

32. For clarity on the definition of quality trees, reference to the British Standard for Trees BS5837 and associated terms used within it is necessary in the supporting text. It is also necessary for effectiveness to refer a requirement to replace category A, B and C trees if they are removed as a result of development. Although category C trees are lower quality they generate significant benefits in an urban environment and their loss could have a significant impact on total tree coverage in the city. Therefore, in order to be effective and protect the environment in line with the policy aims, reference to category C trees alongside category A and B trees is justified. **MM4** achieves the required amendments.

Policy DM6 Noise and Vibration

33. Policy DM6 identifies a requirement for new development to be designed, managed and operated in such a way that it reduces exposure to noise and vibration. For effectiveness **MM5** is necessary to clarify that the criteria of the policy apply only where it is relevant because of the presence of a sensitive receptor. In doing so the policy demonstrates flexibility.

34. **MM5** also makes changes to the supporting text which clarifies that noise assessments will be based on an understanding of the existing and predicted levels of environmental noise at both the development site and nearby receptors. The supporting text also refers to a guidance note on noise and vibration. For certainty it is necessary to explain that the document does not have SPD status. This is achieved through **MM5**.

Conclusion on Issue 2

35. In conclusion, subject to the aforementioned modifications, the Environment and Sustainability policies within the Plan are justified, effective and consistent with national policy.

Issue 3: Are the economy and network centres policies justified and consistent with national policy and will they be effective?

Policy DM8 Places of Worship and Faith Related Community Uses

36. With a diverse population, there are a wide range of faiths within Birmingham that generate a need for faith premises. The policy states that the preferred location for faith related community uses will be the network of centres, as defined in Policy TP21 of the BDP and outside of this where identified criteria are met. However, the BDP also identifies some site allocations where faith related uses would be acceptable. For clarity and to ensure the policy is effective the policy should be amended in line with **MM6** so that such allocations are also the Council's preferred location for places of

10

worship and faith related community uses, as well as the network of centres and locations that meet the policy criteria.

Policy DM9 Day Nurseries and Early Years Provision

37. Policy DM9 seeks to balance the need for suitable child care facilities for children with the need to protect the amenity of the occupiers of neighbouring development. To achieve this the policy takes a criteria-based approach to ensure the care facilities for children are appropriately located. The policy directs day nurseries and facilities for the care, recreation and education of children to the network of centres defined in Policy TP21 of the BDP and the locations that meet the listed criteria. However, in addition to this there may be allocations in the BDP where such facilities would be appropriate. For effectiveness and clarity **MM7** is therefore required.

38. For effectiveness the threshold number of children, above which a home would be considered a day nursery, does not include the children living at the address. For effectiveness, **MM7** also ensures cross reference is made to the Council's Parking Guidelines and Car Park Design Guide SPDs to ensure sufficient safe parking is provided at such developments.

Conclusion on Issue 3

39. In conclusion, subject to the above modifications the policies in the Plan on the economy and network centres are clear, justified, effective and consistent with national policy.

Issue 4: Are the homes and neighbourhoods policies justified and consistent with national policy and will they be effective?

Policy DM10 Standards for Residential Development

40. Policy DM10 deals with development standards for residential dwellings. This includes the nationally described space standard (NDSS), residential internal space standards and accessible and adaptable homes.

41. Planning Practice Guidance on Housing (optional technical standards) indicates that in establishing a need for internal space standards, local planning authorities should take account of need, viability and timing. The Council's Local evidence on the space standard in the Standards for Residential Development Topic Paper EBD40 (SRDTP) indicates that developments are meeting the space standard voluntarily. However, this could not always be guaranteed. Of the developments not according with the space standard a notable amount were more than 10% below the standard. The requirement in the policy is therefore justified.

42. For effectiveness, in point one of the policy it is necessary to make clear that the requirement to meet the NDSS does not include specialist accommodation which is covered by Policy DM12 and paragraph 4.27 of the Plan.

43. Part 2 of the policy requires that housing developments of 15 or more dwellings should seek to provide at least 30% of dwellings as accessible and adaptable homes, in line with Building Regulations Part M4(2). The SRDTP identifies that during the period 2019-2031 the number of people in the city aged 65 and over is expected to increase from 147,900 to 188,500, accounting for 15.1% of the total population. By 2031 47,142 people aged 65 and over are expected to have limiting long term illnesses whose day to day activities will be limited a little. A further 55,730 people's activities will be limited a lot. Overall, this equates to a 19.6% increase between 2019-2036. There is predicted to be a 7.4% increase in people aged 18-64 with moderate or severe learning disability living with a parent by 2030. In addition, it is also apparent from the SRDTP that the housing stock in Birmingham tends to be older and therefore more difficult and expensive to adapt. Based on the evidence, cumulatively there is a clear need for the provision of accessible and adaptable homes.

44. The viability evidence does not indicate that the requirements of part 2 of the policy would render development unviable. In individual instances where the requirements of part 2 of the policy may make development unviable there is provision for the requirements to be reviewed. The policy is effectively flexible in this regard.

45. There is scope within national policy to apply a transitional period during which the requirements of the policy do not apply. Given the length of time that has elapsed since the proposed submission document was subject to consultation, the development industry has been aware of the potential for such a policy for some time, even if it was not adopted policy. It is not considered necessary to provide a transitional period. Nonetheless, for effectiveness it is necessary to make clear that the policy does not apply to applications registered prior to the adoption of the Plan. Following consultation on the MMs I have added additional words to **MM8** to clarify this point.

46. There is little to demonstrate that the requirements of the policy would prevent housing sites from coming forward for development. Nevertheless, Policy DM10 makes provision for exceptions in part 6 and is therefore flexible. However, for clarity and effectiveness it is necessary to include further detail explaining that exceptions may be acceptable where physical constraints or financial viability issues can be demonstrated. For

12

effectiveness, the wording in the footnote to policy DM10 should make clear that the Places for Living SPD will have the status of guidance. **MM8** makes the necessary amendments that have been identified.

Policy DM13 Self and Custom Build Housing

47. The Self-Build and Custom Housebuilding Act 2015 requires Councils to keep a register of those seeking to acquire a plot for self-build and to have regard to the register in carrying out their planning, housing, land disposal and regeneration functions. Policy DM13 is a reflection of the increasing number of people on the register in Birmingham.

48. It is reasonable that affordable and custom build housing is considered a suitable product within the affordable housing requirement on larger sites. **MM9** is necessary for effectiveness to define what is meant by larger sites, with the definition of 200 dwellings justified with reference to the Council's monitoring threshold of largescale major developments. For effectiveness **MM9** also explains that it should not be substituted for social rented and affordable rented housing where it is needed.

Conclusion on Issue 4

49. In conclusion, subject to the identified modifications the homes and neighbourhood policies of the Plan are clear, justified, effective and consistent with national policy.

Issue 5: Are the connectivity policies justified and consistent with national policy and will they be effective?

Policy DM14 Transport Access and Safety

50. Policy DM14 sets out the transport and traffic considerations of new development to ensure there is no negative impact on the efficiency and safety of the system. An amendment to part one of the policy regarding the need to ensure the safety of highway users by avoiding unacceptable adverse impacts is necessary for consistency with paragraph 111 of the NPPF.

51. Part 5 of the policy deals with access points onto the strategic highway network within the city. The strategic highway network is defined in the BDP. For consistency with the BDP reference to other principle and main distributor routes should be deleted.

13

52. Amongst other things, part 6 of the policy supports new vehicle access points where it would not prevent or restrict the implementation of necessary or future transport improvements. For effectiveness, additional supporting text is necessary to clarify where details of the future transport improvements referred to in part 6e of the policy can be found. **MM10** achieves all the necessary amendments.

Policy DM15 Parking and Servicing

53. Policy DM15 seeks to manage parking and servicing provision within the city. As worded the policy directs details of the parking standards to the Council's Parking SPD. In the absence of evidence to demonstrate the parking standards in the document are justified, reference to the Parking SPD should be deleted. As identified in paragraph 008 in the Planning Practice Guidance on Plan Making SPDs cannot be used to introduce new policy and set standards.

54. For effectiveness, additional supporting text is necessary to explain the use of the SPD as a guide in the determination of planning applications. Furthermore, for effectiveness and to reflect the status of the SPDs as guidance the supporting text should also identify that the Council will take into account other circumstances in which an alternative level of parking provision will be considered. **MM11** achieves these changes.

55. Representors made reference to Government consultation to make electric vehicle charging facilities mandatory through Building Regulations. Nevertheless, any changes associated with the consultation have not yet been confirmed or implemented. The NPPF supports the transition to a low carbon future in a changing climate and encourages measures that contribute to the reduction of greenhouse emissions. The NPPF also identifies that, where practical, developments should be designed to incorporate facilities for charging plug-in and other ultra-low emission vehicles. The policy is consistent with national policy in this regard. The Council's Financial Viability Assessment indicates that the requirements of the policy would not have a significant impact on the viability of a development. **MM11** ensures that the policy promotes the provision of on street and off-street charging points. This is necessary for effectiveness and clarity.

56. For effectiveness and clarity, it is necessary through **MM11** to refer to the Parking SPD in the supporting text of Policy DM15 as the source of guidelines on the expected size of garages where they are to count towards parking provision. Following consultation on the MM's I have amended the wording in paragraph 5.16 to ensure it is clear that the reference is to guidance. **MM11** also includes requirements for servicing as well as parking to be designed to be secure and accessible to users and adhere to relevant SPDs. This is necessary for effectiveness.

14

Conclusion on Issue 5

57. Overall, subject to the above modifications, the connectivity policies in the Plan are clear, justified, effective and consistent with national policy.

Issue 6: Will the Plan be viable and deliverable and are the monitoring arrangements robust?

58. The Council's Financial Viability Assessment provides an assessment of Plan viability taking into account the requirements of the policies in the Plan. The assessment indicates that the Plan clearly sets out policy requirements so that they can be priced into land. Flexibility has been built into the policies where it can be justified and demonstrated that the requirements would impact on development viability.

59. Overall, the evidence is proportionate for its purpose and indicates that the deliverability of the Plan would not be put at serious risk as a consequence of the policies contained within it.

60. The monitoring framework for the Plan sets out a range of monitoring indicators. **MM12** is necessary to identify appropriate targets and triggers to enable the effective measurement of success in the delivery of the policies.

Conclusion on Issue 6

61. Subject to modification **MM12**, the Plan is viable and deliverable and provides robust monitoring arrangements.

Overall Conclusion and Recommendation

62. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explained in the main issues set out above.

63. The Council has requested that I recommend MMs to make the Plan sound and capable of adoption. I conclude that the duty to co-operate has been met and that with the recommended main modifications set out in the Appendix the Plan satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound.

K Ford

INSPECTOR

15

This report is accompanied by an Appendix containing the Main Modifications.

16

Appendix 2

Development Management in Birmingham Inspector Report
Schedule of Main Modifications

MM Reference	Policy and/ or paragraph number	Proposed Modifications Deleted text is ~~struck through~~; new text is in **bold and underlined**.
MM1	Policy DM1 Air Quality	Policy DM1 Part 1 1. …or increase exposure **at the development site or other relevant receptors** to unacceptable levels of air pollution will not be considered favourably. Policy DM1 Part 2 2. **Where required,** mitigation measures such as low and zero carbon energy, green infrastructure and sustainable transport ~~can~~ **to** help to reduce and/or manage air quality impacts ~~and~~ will be proportionate to the background air quality…
	Paragraph 2.7	Paragraph 2.7 (last sentence) 2.7 …'Unacceptable' deterioration **and 'unacceptable levels'** ~~is~~ **are** defined as where ~~the~~ development, **in isolation or cumulatively,** would result in exposure to pollutant concentrations ~~close to the limit values~~ **within 5%** ~~of~~ **below the nationally or locally set objectives at the development site and/ or other relevant receptors; and where development would result in further exceedances where pollutant concentrations are already over the limit values.**
MM2	Policy DM2 Amenity	Add the following footnote to Policy DM2 Amenity: **See also Policy DM10 'Standards for Residential Development' where proposals relate to residential development.**
	Paragraph 2.20	Paragraph 2.20 2.20 Consideration should not only be given to the impact of individual developments, but also to cumulative impacts of development proposals in the vicinity. **As a minimum, the definition of 'in the vicinity' is the area immediately adjoining and directly opposite the application site; but each proposal will be assessed on a site-by-site basis with scope agreed between the applicant and the Council through the planning application process.**
MM3	Policy DM3 Land affected by contamination,	Policy DM3 Part 2 2. All proposals for new development on land which is known to be, or potentially, contaminated or unstable, will be required to submit a preliminary risk assessment, and where appropriate, a risk management and remediation strategy based on

1

MM Reference	Policy and/ or paragraph number	Proposed Modifications Deleted text is ~~struck through~~; new text is in **bold and underlined**.
	instability and hazardous substances	detailed site investigation to **minimise and mitigate** ~~remove~~ **unacceptable** risks to both the development and the surrounding area and/ or groundwater.
MM4	Policy DM4 Landscaping and trees	Policy DM4 Part 2 2. The composition of the proposed landscape should be appropriate to the setting and the development, as set out in a Landscape Plan*, with opportunities taken to maximise the provision of new trees **in appropriate locations within a multi-functional green infrastructure network,** ~~and other green infrastructure~~, create or enhance links from the site to adjacent green infrastructure and support objectives for habitat creation and enhancement as set out in the Birmingham and Black Country Nature Improvement Area Ecological Strategy 2017-2022 and subsequent revisions. Policy DM4 Part 3 3. Development proposals must seek to avoid the loss of, and minimise the risk of harm to, existing trees **of quality**, woodland, and/or hedgerows of visual or nature conservation value, including but not limited to trees or woodland which are subject to a Tree Preservation Order.~~, or which are designated as~~ **Development resulting in the loss or deterioration of** Ancient Woodland or Ancient/ Veteran Trees **will be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.** ~~or which are designated as~~ Where trees and/or woodlands are proposed to be lost as a part of development, this loss must be justified as a part of an Arboricultural Impact Assessment (AIA) submitted with the application. Policy DM4 Part 5 (Last sentence) 5. … Where on-site replacement is not achievable, contributions to off-site tree planting will be sought through a Section 106 Agreement. **The method of calculating these contributions will be contained within the city's Tree Strategy.**
	Paragraph 2.37	Paragraph 2.37 2.37 Trees **of quality** classified **in line with BS5837** as being of categories A or B in ~~value~~ **quality and woodland and/ or hedgerows of visual or nature conservation value** should be considered as worthy of protection and development proposals should seek to avoid their loss and minimise risk of harm.
	Paragraph 2.39	Paragraph 2.39 2.39 Where development would result in the loss of ~~a~~ **(BS5837) category A, B or C** tree(s) ~~and / or other landscaping~~, adequate replacement planting will be assessed against the existing value of the tree(s) removed, calculated using the Capital Asset Value for Amenity Trees (CAVAT) methodology (or other future equivalent)~~, pre-development canopy cover and biodiversity considerations~~. Reasonable deductions will…
MM5	Policy DM6 Noise and vibration	Policy DM6 Part 2 2. **Applications for** ~~N~~**n**oise and/or vibration-generating development must, **where relevant**, be accompanied by an assessment of the potential impact of any noise and/ or vibration generated by the development on the amenity of its

MM Reference	Policy and/ or paragraph number	Proposed Modifications Deleted text is ~~struck through~~; new text is in **<u>bold and underlined</u>**.
		occupiers, nearby residents and other noise sensitive uses/ areas, including nature conservation. Where potential adverse impact is identified, the development proposal shall include details on how the adverse impact will be reduced and/or mitigated. Policy DM6 Part 3 3. **<u>Applications for</u>** ~~N~~noise-sensitive development (such as residential uses, hospitals and schools) must, **<u>where relevant</u>**, be accompanied by an assessment of the impact of any existing and/or planned sources of noise and vibration in the vicinity of the proposed development including transport infrastructure, entertainment/cultural/community facilities and commercial activity. Where potential adverse impact is identified, the development proposal shall include details on how the adverse impact will be reduced and/or mitigated.
	Paragraph 2.52	Paragraph 2.52 2.52 In all cases, the assessment will be based on an understanding of the existing and **<u>predicted</u>** ~~planned~~ levels of environmental noise **<u>at both the development site and nearby receptors</u>** and the measures needed to bring noise down to acceptable levels for the existing or proposed noise-sensitive development. A noise assessment and scheme mitigation will be required as part of the planning application. The determination of noise impact will be based on the Noise Policy Statement for England and the Planning Practice Guidance on Noise. **<u>Although not a Supplementary Planning Document,</u>** the Council also has a detailed guidance note on Noise and Vibration maintained by Environmental Health.
MM6	Policy DM8 Places of worship and faith related community uses	Policy DM8 Part 1 1. **<u>Except for any specific allocation in the Local Plan,</u>** the Council's preferred locations for the development of places of worship and faith related community uses are in the network of centres as defined in Policy TP21 of the Birmingham Development Plan. Proposals for development outside ~~of the network of centres~~ **<u>these locations</u>** will be considered favourably where…
	Paragraph 3.10	Paragraph 3.10 3.10 The **<u>preferred</u>** ~~most appropriate~~ locations for places of worship and faith related community uses is in the network of centres as is defined in Policy TP21 of the BDP **<u>and as part of any specific allocations in the Local Plan</u>**. These are the most sustainable locations in terms of transport accessibility and parking. Other locations ~~outside of the network of town centres~~ will be considered favourably where the criteria outlined in the policy can be satisfactorily met. Proposals for places of worship and faith related community uses should also comply with other relevant local plan policies and guidance.
MM7	Policy DM9 Day nurseries and early years provision	Policy DM9 Part 1 1. **<u>Except for any specific allocation in the Local Plan,</u>** the Council's preferred locations for the development of day nurseries and facilities for the care, recreation and education of children are in the network of centres as defined in Policy

MM Reference	Policy and/ or paragraph number	Proposed Modifications Deleted text is ~~struck through~~; new text is in **bold and underlined**.
	Paragraph 3.18	TP21 of the Birmingham Development Plan. Proposals for development outside ~~of the network of centres~~ **these locations** will ~~only~~ be considered favourably where… Paragraph 3.18 (4th sentence) 3.18....The network of centres as defined by Policy TP21 of the Birmingham Development Plan **and as part of any specific allocations in the Local Plan, are** ~~is~~ considered the ~~most appropriate~~ **preferred** locations **for such uses**, but **other** locations ~~outside of centres~~ will be considered appropriate where the policy criteria are met...
	Paragraph 3.19	Paragraph 3.19 3.19 If you are using your home (dwellinghouse) for childcare provision and more than seven children are minded, **not including your own children,** ~~for more than two hours a day, or most of the rooms within your dwellinghouse is used for childcare so that the main use no longer as your home,~~ this will be considered as a day nursery and planning consent would be required.
	Paragraph 3.20.	Paragraph 3.20 (last sentence) 3.20 …It is therefore important that sufficient safe parking is provided, **following the guidance set out in the Council's Parking Guidelines and Car Park Design Guide Supplementary Planning Documents and any subsequent revision** ~~in a location that will not endanger other road users or pedestrians~~.
MM8	Policy DM10 Standards for residential development	Policy DM10 Part 1 1. All residential development will be required to meet the minimum Nationally Described Space Standards (Appendix 1). **This does not include specialist accommodation covered by Policy DM12 and defined in paragraph 4.27 of this document.** Policy DM10 Part 6 6. Exceptions to all of the above will only be considered **where it can be robustly demonstrated with appropriate evidence that** to deliver innovative high quality design, deal with ~~exceptional~~ site **specific** issues **or** respond to local character, **adhering to the standards is not feasible due to physical constraints or financial viability issues. Any reduction in standards as a result must** ~~and where it can be~~ demonstrated that residential amenity will not be significantly diminished. Footnote to Policy DM10 * ~~Standards~~ **Guidelines** are set out in Places for Living SPD which will be replaced by the Birmingham Design Guide.
	Paragraph 4.5	Add to Paragraph 4.5: 4.5…**The Policy will not apply to any planning applications that are already registered prior to the date of adoption of the DMB.**

MM Reference	Policy and/ or paragraph number	Proposed Modifications Deleted text is ~~struck through~~; new text is in **<u>bold and underlined</u>**.
	Paragraph 4.11	Add additional paragraph at 4.11. **<u>4.11 'Physical constraints', as described in Part 6 of the policy, may include (but are not limited to) site specific constraints such as topography, flood risk, ground conditions, location of services or heritage and character considerations.</u>**
MM9	Policy DM13 Self and custom build housing	Policy DM13 Part 3 3. Affordable self-build plots will be considered and encouraged as a suitable product within the affordable housing ~~requirement~~ **<u>mix provided</u>** on larger sites **<u>(200 dwellings or more) where it is demonstrated to meet an identified need and is not substituted for needed social rented and affordable rented housing</u>**.
MM10	Policy DM14 Transport Access and Safety	Policy DM14 title. ~~Highway Safety and Access~~ **<u>Transport Access and Safety</u>** Policy DM14 Part 1 1. Development must ensure that the safety of highway users is properly taken into consideration and that any new development would not have an **<u>unacceptable</u>** adverse impact on highway safety. Policy DM14 Part 5 5. On Birmingham's strategic highway network, ~~and other principle and main distributor routes,~~ development must seek opportunities to remove unnecessary access points. New direct vehicular accesses will be supported where specified in a local plan or where there are no practical alternatives (including consideration of impacts on public transport, walking and cycling routes and road safety).
	New paragraph 5.10	**<u>In relation to criteria 6.e.of the policy, 'necessary or future transport improvements' are defined as those included in policies, strategies and programmes published by Birmingham City Council, West Midlands Combined Authority, West Midlands Rail Executive, Network Rail, Highways England, National Government and other relevant public sector organisations.</u>**
MM11	Policy DM15 Parking and Servicing	Policy DM15 Part 2 2. New development will **<u>need</u>** ~~be required~~ to ensure that the operational needs of the development are met ~~and~~ **<u>in terms of</u>** parking provision, including parking for people with disabilities, cycle parking and infrastructure to support the use of low emission vehicles and car clubs. ~~is in accordance with the Council's Parking Supplementary Planning Document.~~ Policy DM15 Part 3

MM Reference	Policy and/ or paragraph number	Proposed Modifications Deleted text is ~~struck through~~; new text is in **<u>bold and underlined</u>**.			
	Paragraph **5.14** (formerly 5.13) Paragraph **5.15** (formerly 5.14) Paragraph **5.16** (formerly 5.15)	3. Proposals for parking and servicing shall avoid highway safety problems and protect the local amenity and character of the area. Parking **and servicing** should be designed to be secure and ~~fully~~ accessible to **its** ~~all~~ users and adhere to the principles of relevant Supplementary Planning Documents." Paragraph 5.1**4 (formerly 5.13)** … It provides revised parking standards for all new developments in the city to reflect the National Planning Policy Framework. The approach to the provision of parking aims to promote sustainable transport, reduce congestion, improve road safety and reduce pollution. **<u>The Parking SPD will be used as a guide in the determination of planning applications. The City Council will take account of whether there are any circumstances, related either to the site or the operation of the development, which may support an alternative level of parking provision.</u>** The Parking SPD will also set out how the city will manage on-street (public highway) and off-street parking provision across the city." Paragraph 5.1**5 (formerly 5.14)** 5.14 The Council will support and promote the provision of **<u>on-street and off-street</u>** charging points for ultra-low emission vehicles and car clubs. The availability of… Paragraph 5.1**6 (formerly 5.15)** 5.15 Garages will only be accepted as contributing towards parking provision for development if they have adequate functional space. **<u>Guidance on this is contained within the Parking SPD</u>**. This will help…			
MM12	Appendix 2: Monitoring Framework	Appendix 2: Monitoring Framework			
		Policy	**Monitoring Indicator**	**Target**	**Trigger**
		Policy DM1 Air Quality	• Number of applications ~~refused approved where proposals exceed nationally or locally set objectives for air quality, particularly for nitrogen dioxide, or increase exposure to unacceptable levels of air pollution~~ **<u>approved contrary to the policy</u>** • ~~Number of applications for fuelling stations refused due to air quality and percentage successfully defended at appeal~~ **<u>Number of applications refused on air quality grounds and successfully defended at appeal</u>**	• **<u>All relevant applications meet the policy requirements</u>** • **<u>All relevant appeal decisions uphold air quality impact as valid reason for refusal</u>**	• **<u>10% of applications approved contrary to policy</u>** • **<u>10% of appeals where inspector rejected air quality as a reason for refusal</u>**
		Policy DM2 Amenity	• Number of applications ~~refused on amenity grounds and percentage of~~	• **<u>All relevant applications meet the policy requirements</u>**	• **<u>10% of applications approved contrary to policy</u>**

MM Reference	Policy and/ or paragraph number	Proposed Modifications Deleted text is ~~struck through~~; new text is in **bold and underlined**.			
			~~refusals successfully defended at appeal~~ **approved contrary to the policy** • ~~Use of conditions securing compliance with the policy~~ **Number of applications refused on amenity grounds and successfully defended at appeal**	• **All relevant appeal decisions uphold loss of amenity as valid reason for refusal**	• **10% of appeals where inspector rejected amenity as reason for refusal**
		Policy DM3 Land affected by Contamination and Hazardous substances	• ~~Number of applications where there are outstanding EA/HSE objections and no submission of a preliminary risk assessment, and where appropriate, a risk management and remediation strategy~~ • **Number of applications approved contrary to the policy** • **Number of applications refused on contamination grounds and successfully defended at appeal**	• **All relevant applications meet the policy requirements** • **All relevant appeal decisions uphold risk of contamination as a valid reason for refusal**	• **10% of applications approved contrary to policy** • **10% of appeals where inspector rejected contamination as reason for refusal**
		Policy DM4 Landscaping and Trees	• Ha/ sq. m. in loss of ancient woodland • Number of applications ~~providing replacement trees/landscaping~~ **approved without tree replacement provision (where relevant)**	• **No loss of ancient trees/ woodland** • **No applications approved without tree replacement provision (where relevant)**	• **10% loss of ancient trees/ woodland** • **10% of applications approved without tree replacement provision (where relevant)**
		Policy DM5 Light Pollution	• Number of applications ~~refused on light pollutions grounds and percentage successfully defended at appeal~~ **approved contrary to the policy** • Number of applications refused on light pollution grounds and successfully defended at appeal	• **All relevant applications meet the policy requirements** • **All relevant appeal decisions uphold light pollution as a valid reason for refusal**	• **10% of applications approved contrary to policy** • **10% of appeals where inspector rejected light pollution as reason for refusal**
		Policy DM6 Noise and Vibration	• ~~Number of successful planning enforcement cases carried out in relation to noise~~ • Number of applications approved contrary to the policy • Number of applications refused on noise **impact** grounds and ~~percentage~~	• **All relevant applications meet the policy requirements** • **All relevant appeal decisions uphold noise impact as a valid reason for refusal**	• **10% of applications approved contrary to policy** • **10% of appeals where inspector rejected noise impact as reason for refusal**

MM Reference	Policy and/ or paragraph number	Proposed Modifications			
		Deleted text is ~~struck through~~; new text is in **bold and underlined.**			
			~~of refusals~~ successfully defended at appeal • ~~Number of applications approved with successful mitigation schemes~~		
		Policy DM7 Advertisements	• ~~Number of enforcement cases successfully concluded~~ • **Number of applications approved contrary to the policy** • Number of applications refused **on this policy** and ~~percentage~~ successfully defended at appeal	• **All relevant applications meet the policy requirements** • **All relevant appeal decisions uphold the reason(s) for refusal related to the policy**	• **10% of applications approved contrary to policy** • **10% of appeals where inspector rejected the reason(s) for refusal related to the policy**
		Policy DM8 Places of Worship	• ~~Percentage of permissions for places of worship granted inside/outside the network of centres~~ • **Number of applications approved contrary to the policy** • Percentage of applications refused **on this policy and** successfully defended at appeal	• **All relevant applications meet the policy requirements** • **All relevant appeal decisions uphold the reason(s) for refusal related to the policy**	• **10% of applications approved contrary to policy** • **10% of appeals where inspector rejected the reason(s) for refusal related to the policy**
		Policy DM9 Day nurseries and early years provision	• ~~Percentage of permissions for day nurseries granted inside/outside the network of centres~~ • **Number of applications approved contrary to the policy** • Percentage of applications refused **on this policy and** successfully defended at appeal	• **All relevant applications meet the policy requirements** • **All relevant appeal decisions uphold the reason(s) for refusal related to the policy**	• **10% of applications approved contrary to policy** • **10% of appeals where inspector rejected the reason(s) for refusal related to the policy**
		Policy DM10 Standards for Residential Development	• ~~Percentage of applications refused on space standards not being met successfully defended at appeal~~ • **Number of dwellings meeting NDSS.** • **Number of dwellings provided as accessible and adaptable** • ~~Percentage~~ **Number** of applications refused on 45 Degree Code successfully defended at appeal	• **100% of dwellings meet NDSS** • **100% of development of 15 or more dwellings provide 30% accessible homes** • **All relevant appeals on 45 Degree Code policy successfully defended**	• **Provision of NDSS compliant homes falls below 80%** • **Provision of accessible and adaptable homes falls below 80%.** • **10% of appeals where inspector rejected 45 Degree Code policy as reason for refusal**
		Policy DM11 House in multiple occupation	• ~~Percentage of applications refused successfully defended at appeals~~	• **No new areas with over 10% concentration of HMOs**	• **Increase in areas with over 10% concentration of HMOs**

MM Reference	Policy and/ or paragraph number	Proposed Modifications Deleted text is ~~struck through~~; new text is in **bold and underlined**.		
		• **New areas with over 10% concentration of HMOs**		
		Policy DM12 Residential conversions and specialist accommodation	• ~~Percentage~~ **Number** of applications ~~refused on criteria not being met and successfully defended at appeal~~ **approved contrary to policy**	• **All relevant applications to meet the policy requirements**	• **10% of applications approved contrary to the policy**
		Policy DM13 Self and custom build~~ing~~ **housing**	• ~~Number and of individuals and groups listed on the self-build register each year~~ • ~~Number of new homes granted exemption from CIL due to self/custom build Status~~ • Numbers of plots made available for self and custom build each year	• **No specific target**	• **No specific trigger**
		Policy DM14 Highway and safety access	• ~~Percentage~~ **Number** of ~~major~~ applications ~~which are accompanied by a Transport Assessment and a Travel Plan~~ **approved contrary to the policy** • ~~Percentage of refused applications successfully defended on appeal~~	• **All relevant applications meet the policy requirements**	• **10% of applications approved contrary to the policy**
		Policy DM15 Parking and servicing	• **Number of applications approved contrary to the policy** • Number of applications refused **on this policy** ~~on car parking or servicing grounds~~ successfully defended at appeal	• **All relevant applications meet the policy requirements**	• **10% of applications approved contrary to the policy**
		Policy DM16 Telecommunications	• ~~Percentage~~ **Number** of applications ~~refused successfully defended at appeal~~ **approved contrary to the policy**	• **All relevant applications meet the policy requirements**	• **10% of applications approved contrary to the policy**

Appendix 3

Schedule Proposed additional (minor) changes to the Development Management in Birmingham Publication Document

This schedule details the minor changes to Development Management in Birmingham (Development Plan Document).

All of the changes identified relate to typographical errors and factual updates.

Text proposed to be deleted is struck through; text proposed to be added is in bold and underlined.

The changes are minor and do not materially change the policies or strategic direction of the Plan. The reasons for making each of the changes are clearly set out in the schedule.

The schedule of proposed changes should be read in conjunction with the Publication document. The page/paragraph numbers in the table refer to this document.

Page No.	Para / Policy No.	Amendment	Reason
5	N/A	~~Waheed Nazir~~ **Ian MacLeod** **Acting** Director of Inclusive Growth	Change in personnel.
6	1.1 (bullet points below)	**Adopted** Balsall Heath Neighbourhood Development Plan **Adopted** Bordesley Park Area Action Plan	For consistency.
10	Policy DM1 Air Quality, Part 1	1. Development proposals will need to contribute to the management of air quality and support the objectives of the local Air Quality Action Plan and Clean Air Zone, **particularly for nitrogen dioxide and particulate matter**. Development that would, in isolation or cumulatively, lead to an unacceptable deterioration* in air quality, result in exceedances of nationally or locally set objectives for air quality~~, particularly for nitrogen dioxide and particulate matter,~~ or increase…	Re-ordering.
15	2.29	Advice on how to ensure that development is suitable to its ground conditions and how to avoid risks caused by unstable land or subsidence is provided in the Planning Practice ~~Guide~~ **Guidance on** Land stability.	For consistency.
18	2.45	Proposals involving or adjacent to designated and ~~un-designated historic assets~~ **non-designated heritage assets**, must apply a...	Terminology correction.
20	2.50	'Planned' sources of noise mean sites in the nearby vicinity that are under construction; **sites with** extant consents; sites that have planning consent which are not yet started; and sites which are allocated in the development plan.	For consistency.
22	DM7 Advertisements Point 2	2. Illuminated advertisement**s** and signs…	Spelling error

Appendix 3

Page No.	Para / Policy No.	Amendment	Reason
22	DM7 Advertisements Point 3	3. The siting of advertisement~~s~~ hoardings….	Spelling error
24	3.12	Proposal**s** will need to include travel plans…	Spelling error.
26	3.18	…mitigation measures will be put in place to minimise the impact ~~form~~ **from** noise and disturbance.	Spelling error.
26	3.21	…~~car~~ parking **provision** and transport patterns,…	For clarity.
26	DM9, Point b	local amenity, parking**,** public and highway safety;	Missing comma.
31	4.21 Stage 2	…privatel~~y~~ flats.	Spelling error
34	4.26	The BDP (Policies TP27 and 30) seek**s** to ensure that hew housing…	Spelling error.
34	4.29	~~If a site lies within an identified Area of Restraint, p~~**P**lanning permission may be refused on grounds that further development of such uses will have a harmful impact on local character, appearance, amenity and sustainable communities.	Explanatory text correction.
34	DM12, point c	…needs of it~~'~~s intended occupiers…	Delete apostrophe.
36	Between 4.36 and 4.37	Bullets should be paragraph numbers: First bullet should be 4.37 Second bullet should be 4.38 Third bullet should be 4.39 Subsequent paragraphs should be numbered 4.40 – 4.43	Missing paragraph numbers.
42	Paragraph 5.13	5.13. The Council**'s** parking **standards currently set out in the** ~~is currently consulting on a new Parking Supplementary Planning Document (SPD) which will replace the existing~~ Car Parking Guidelines Supplementary Planning Document (2012) **will be replaced by updated standards in the Parking Supplementary Planning Document** ~~and elements of the Birmingham Parking Policy (2010)~~.	Rephrasing.
44	5.21	…the cumulative exposure will not exceed the International Commission on **N**~~n~~on-~~I~~ionising **R**~~r~~adiation **P**~~p~~rotection **(ICNIRP) G**~~g~~uidelines is needed….	Capital letters.
46	6.2	The Birmingham Authority Monitoring Report (AMR) will monitor the effectiveness ~~of the policies~~ of the Development Management policies.	Repetition.
46	Add a new paragraph 6.4	**Once the Development Management in Birmingham DPD is adopted, a review of the document will be undertaken at least every five years.**	Review period.
50	Appendix 2 Policy DM13	Self and Custom Buildi~~ng~~ **Housing**	Wrong title

Appendix 3

Page No.	Para / Policy No.	Amendment	Reason
50	Appendix 2 Policy DM13	• Number ~~and~~ of individuals and groups listed on the self-build register each year • Number of new homes granted exemption from CIL due to self/custom build status ~~Numbers of plots made available for self and custom build each year~~ • **Numbers of plots made available for self and custom build each year**	Delete 'and'. Additional bullet point.
51	Appendix 3 The Design of new development (paras 3.14 – 3.14D)	Replaced by 'DM2 Amenity, **BDP PG3 Place making**'	Additional policy reference.
51	Appendix 3 Hotels and guest houses (paras 8.18-8.22)	Replaced by '**Policy TP24 Promotion of diversity of uses within centres, Policy TP25 Tourism and cultural facilities,**' not DM2 Amenity, DM12 Residential conversions and specialist accommodation	Incorrect reference.
52	Appendix 3 DC11 Car Park Design Guide	Replaced by '**Emerging Birmingham Design Guide SPD**' not by the emerging Parking SPD.	Incorrect reference.
53 & 54	Appendix 3	Table headings DMB or other policy/ guidance **replacement**	Missing word.
53	ENV2 Nature Conservation Strategy for Birmingham	~~BDP TP12 Historic environment~~ **Retain**	Explanatory error.
53	Appendix 3 Areas of restraint	~~Retain boundary and r~~**R**eplace policy with DM12 Residential Conversions and Specialist Accommodation **and DM11 Houses in multiple occupation**	Explanatory error.
56	Glossary	~~Company Process Order~~ **Compulsory Purchase Order** (CPO): an order which enables a statutory authority to purchase an area of land compulsorily for an approved project.	Incorrect term used plus spelling error
58	Glossary	'Statement of Community Involvement' entry needs to be separated from 'Modeshift STARS'	Layout error.

Appendix 4

Birmingham Unitary Development Plan 2005

Saved Policies to be superseded

This document contains the policies of the Birmingham UDP (2005) which were saved following the adoption of the Birmingham Development Plan (BDP) on 10th January 2017.

009059/2021

The Design of New Development

3.14 *[New developments will be expected to contribute, in terms of their design and landscaping, to the enhancement of the City's environment. In particular, the planting of trees will be encouraged where appropriate.] A high standard of design is essential to the continued improvement of Birmingham as a desirable place to live, work and visit. The design and landscaping of new developments will be expected to contribute to the enhancement of the City's environment. Good design may also help to promote and secure sustainable forms of development.*

3.14A *In order to ensure a high standard of design in all new developments in accordance with the advice set out in PPG 1 – General Policy and Principles, the City Council has set out below a series of general good design principles. These are concerned with the design of and the relationship between buildings, streets, squares, parks, nature conservation areas, waterways and other spaces that make up the public domain. This includes the nature and quality of the public domain itself, the relationship of one part of the City with other parts, and the patterns of movement and activity which are thereby established.*

3.14B *In submitting applications for new development, including outline applications, developers will be expected to demonstrate that the scheme has been considered as part of its context. Apart from very minor applications affecting unlisted buildings outside conservation areas, and changes of use which do not affect the character or appearance of an existing building, all development proposals should be accompanied by a short written statement setting out the design principles adopted. In addition, all proposals should be accompanied by plans, elevations and drawings or photographs showing the site and the proposed development in relation to the surrounding buildings and uses. Where appropriate, developers should also provide illustrations showing the impact of their proposals at a detailed level. In more complex schemes, pre-application discussions are recommended in order to avoid unnecessary delays at a later stage. Design statements should be part of such discussions. To avoid problems of piecemeal and incremental development on very large development sites, comprehensive master plans or development briefs should be prepared to aid in the formulation and consideration of individual proposals*

3.14C *Development should have regard to the development guidelines set out in "Places for All," "Places for Living," the Birmingham Nature Conservation Strategy, the Conservation Strategy, the Canalside Development Design Guidelines and any other relevant Supplementary Planning Guidance/ Documents.*

Good Urban Design Principles

3.14D *Applications for new development will be assessed against the following principles:*

• *The City Council will have particular regard towards the impact that the proposed development would have on the local character of an area, including topography, street patterns, building lines, boundary treatments, views, skyline, open spaces and landscape, scale and massing, and neighbouring uses;*

• *Local characteristics which are considered detrimental in terms of urban design and which undermine the overall character of the area should not be used as a*

1

precedent for the design of new developments; for example, buildings that back onto the public realm;

- *The scale and design of new buildings and spaces should generally respect the area surrounding them, and should reinforce and evolve any local characteristics, including natural features such as watercourses, which are considered to be positive;*

- *People should be able to move around freely, easily and safely throughout the City: therefore in new developments, streets and routes should generally link up rather than take the form of culs-de-sac and dead ends;*

- *Mixed uses will be encouraged in centres, and in other areas where they can contribute towards meeting an identified local need;*

- *To ensure that places feel safe, pleasant and legible, the fronts and backs of buildings should be clearly defined. Windows and more active rooms should face the public realm and main entrances should open onto the public realm, whereas the backs of buildings should be private and face other backs;*

- *Landscaping should be an integral part of all major development proposals, and this should be designed to complement the new development and the surrounding area;*

- *Any existing mature trees should be retained where possible, and the planting of new trees will be required where appropriate in accordance with the policy set out in paragraph 3.16A below.*

2

CHAPTER 8 - ADDITIONAL CITY-WIDE POLICIES

Introduction

8.1   There are a number of specific issues which are not dealt with in previous chapters which require detailed development control guidance. These relate to applications for or affecting the following:

• Hot food shops and restaurants/cafes

• Amusement centres and arcades

• Car hire booking offices

• Day nurseries

• Hotels and guest houses

• Houses in Multiple Paying Occupation

• Flat conversions

• Hostels and residential homes

• Places of worship

• Development affecting Archaeological Remains

• Notifiable Installations

• *The 45º Code for House Extensions*

• *Parking of vehicles at commercial and industrial premises adjacent to residential property*

• *Planning Obligations*

• *Telecommunications*

• *Development in the Green Belt*

• *Enforcement Policy*

8.2   Detailed policies for these matters [uses] are set out here. These seek to make proper provision for development whilst at the same time taking account of the need to protect, and wherever possible improve the physical quality of the environment. They therefore give positive guidance on suitable locations for certain uses, where appropriate, and the criteria that will be considered to ensure that the development does not adversely affect residential amenities or the locality generally. *Guidance on the use of planning obligations is also provided in this chapter.*

3

8.3   As well as the detailed policies set out here planning applications will be considered in the context of the following:

•   **Strategic policies set out in chapters two to seven**

•   **Constituency Statements in chapters nine to twenty-one**

•   **Supplementary Planning Guidance** *(SPG)***:** *[current documents are listed in Annex 2.] all current and proposed City-wide SPG documents (at 2001) are listed at the end of this chapter (see Other Policies). Current and proposed area - and site- specific SPG documents (at 2001) are listed at the end of each Constituency Statement. The City Council's policies towards SPG are set out in paragraphs 8.70 - 8.72 below.* **This provides further information on the standards and criteria which the City Council will use to assess planning applications, and may be amended/supplemented as necessary.**

8.4   Examples of strategic policies from chapters two to seven which will be applied in conjunction with the policies set out below when assessing applications for the uses dealt with in this chapter include the following:

•   **Applications for service uses in shopping centres (eg. amusement centres, hot food shops) should also be considered in the context of policies for shopping in chapter seven. For example, these state that service uses should not be permitted where they create significant areas of dead frontage or would be at the expense of the primary retail function of the centre.**

* N.B. The policy towards SPG in this Chapter pre-dates the Planning and Compulsory Purchase Act 2004. No new SPG has been prepared by the City Council since it came into effect. The lists of SPG in this Chapter and in the Constituency Chapters were accurate at the time that the UDP Alterations were prepared early in 2001. An up-to-date listing of SPG currently in use and new Local Development Documents (LDDs) in preparation may be found in the current Local Development Scheme (LDS) for Birmingham.

•   **Applications involving alterations to existing premises and new development should be considered in the context of policies for the built environment in chapter three which states that the design of new buildings should contribute to the enhancement of the City's environment.**

8.5   Finally, the policies set out here are not exhaustive as they do not cover all circumstances, and there may be instances where other matters may be relevant. Each application will therefore be considered on its merits having regard to these guidelines, and any other material considerations.

Hot Food Shops and Restaurants/Cafes

8.6   This policy applies to restaurants, cafes and premises used for the sale of hot food for consumption off the premises (take-away hot food shops), which are uses that fall within Class A3 of the Town and Country Planning (Use Classes) Order 1987 (as amended). They will also be largely applicable to wine bars but will not apply to public houses.

4

8.7   The following criteria have been approved by the [Planning Committee] City Council and give general guidance as to where new hot food shops, restaurants and cafes can acceptably be located. They will therefore be used by the City Council when considering planning applications for such development. However the guidelines will only represent one consideration; the City Council is required to consider each proposal on its individual merits and it must be emphasised that this will be done. There may well be circumstances where, due to the specific type of operation proposed, any likely adverse impact may be lessened and hence consent could be granted to that specific use. More detailed advice on the interpretation and application of these guidelines may be obtained from the Department of Planning and Architecture.

- **Due to the amenity issues usually associated with such development (late night opening, noise, disturbance, smell and litter) and their impact on traffic generation, hot food shops and cafes/ restaurants should generally be confined to shopping areas or areas of mixed commercial development.**

- **Within such areas and wherever similar facilities exist, account will be taken of the cumulative impact of such development particularly in terms of impact on the amenity of the area and traffic generation. Where concentrations of facilities exist that are already causing such problems planning consent may well be refused if the additional use would cause further demonstrable harm.**

- **Where a proposal involves evening opening (and this is likely to be the case in most instances), account will be taken of the following factors in addition to other considerations: proximity (to both the premises themselves and areas that are likely to be used for car parking purposes) and extent of any nearby residential accommodation, the nature and character of the centre, and ambient noise levels. With these factors in mind, the Council will be particularly concerned to ensure that proposed hot food shops and cafes/restaurants do not give rise to additional problems of noise and disturbances, such as to cause demonstrable harm, for the occupiers of any nearby dwellings. _To ensure this, conditions may be attached restricting evening opening hours, normally requiring the premises to be closed and cleared of customers by 11.30 p.m._**

- **When considering a proposal, and particularly the change of use from an existing shop, account will be taken of the impact that it will have on the vitality and viability of the frontage and centre of which it forms part. Where a primary retail frontage has been identified within a shopping centre, the change of use of existing retail premises to a hot food shop/restaurant or cafe will not be permitted. Elsewhere, within shopping areas or areas of mixed commercial development, a proposal will be considered on its merits with account being taken of the character and prosperity of the centre (e.g. as evidenced by the number of vacant units) and subject to the other specified criteria.**

- **In all cases, account will be taken of proposed opening hours in considering the merits of a proposal.**

- **The availability of _public transport,_ convenient on/off street car _and cycle_ parking provision and impact on highway safety will be important considerations. Where there is insufficient car parking or likely traffic**

5

movements are such as to create a traffic hazard planning consent is likely to be refused.

• *If a proposal is for a specific use which it is alleged would not give rise to the problems outlined above, full supporting justification must be given. In such cases, if consent is granted, a condition would normally restrict the use to that applied for.*

[Further guidance on likely conditions is outlined in Supplementary Planning Guidance.]

Amusement Centres and Arcades

8.8   Amusement centres are premises used exclusively or predominantly for the conduct of games of chance for profit. Amusement arcades are premises used exclusively or predominantly for the conduct of games for amusement only.

8.9   Amusement centres and arcades may appropriately be located within larger shopping areas and areas of mixed commercial uses. However, regard will need to be paid to the likelihood of noise and disturbance problems for the occupants of any nearby residential accommodation (e.g. above shops) and issues relating to the safety and free flow of pedestrians and vehicles on the adjoining highway.

8.10   Planning permission is likely to be refused for amusement centres or arcades in cases where:

• The site is situated within a predominantly residential area.

• The site forms part of an identified primary retail frontage *or is identified as an area where planning permission will be refused for additional non-retail uses*

• The proposal would generate a degree of noise and disturbance demonstrably greater than existing levels of noise and activity in the surrounding area, and which would adversely affect occupiers of residential accommodation in close proximity to the site*, in particular, living accommodation above shops.*

• It can be demonstrated that noise and disturbance likely to be generated by the proposal would be unduly obtrusive to users of places of worship, schools, hospitals or other community, cultural or institutional premises in the vicinity of the application site.

• The proposal would adversely affect the appearance or setting of a statutorily listed building, or the character or appearance of a conservation area.

• The proposal would prejudice the safety and free movement of pedestrians and motor vehicles due to a combination of circumstances in the vicinity of the site.

• *Proposals would result in the creation or consolidation of areas of "dead frontage" within predominantly retail frontages, which would detract from the shopping character and attractiveness of such areas, or where the loss of a*

6

retail use would be detrimental to the maintenance of a local shopping facility for the local community.

8.10A Any external works, such as alterations to the front elevation of premises, should be sympathetic to the overall character and appearance of the surrounding area. This includes the treatment of the street frontages of individual units within indoor shopping developments.

[Further guidance on likely conditions is contained in Supplementary Planning Guidance.]

Car Hire Booking Offices

8.11   This policy applies to private car hire booking offices, but not to self drive car hire booking offices.

8.12   Applications will normally be granted where:

• **There is no residential accommodation within 50 metres of the proposed premises.**

• **The proposed development would not adversely affect the amenities of the occupiers of dwellings in the area because of noise and disturbance.**

• **The proposal does not make use of accommodation which could readily be used for housing purposes.**

• **Nearby highways are not subject to 'no waiting' restrictions.**

• **Off-street parking is available adjacent to the booking office and is adequate for the number of vehicles used by the applicant.**

8.13   Applications will be likely to be refused where:

• **The proposed premises are within 50 metres of residential accommodation and the hours of operation extend beyond the normal working day.**

• **No parking facilities are provided off the highway or where parking proposals are inadequate or unsuitable for the number of vehicles used by the applicant.**

• **The proposed development would be likely to result in interference with the free flow of traffic in the adjoining highway, or is generally dangerous to traffic.**

Day Nurseries

8.14   Day nurseries fall within the Class D1 - Non-residential Institutions Use Class of the Town and Country Planning (Use Classes) Order, 1987 (as amended). Although a day nursery and child minding use are essentially the same there is a fundamental difference in scale, with a day nursery existing where premises *[are used to supervise more than seven children under school age.]* have been altered to provide facilities to meet registration standards required under the Children's Act 1989.

7

8.14A External play areas provided as part of day nurseries should be adequately screened, and a proportion of open area provided with a safe, all-weather finish.

Use of Dwellinghouses

8.15   The following guidelines will be used when considering planning applications for the use of dwellinghouses as day nurseries:

• **Day nurseries should generally be confined to detached houses. Properties which may be particularly appropriate are those which have good separation from adjacent residential properties or which are not adjoined on all sides by other residential uses and those which have adequate on-site parking with suitable and safe access and egress.**

• **Semi-detached and terraced residential properties due to their proximity to other adjoining residential property are not generally suitable for the location of day nurseries, except where adjoined by non-residential uses.**

• **Proposals for semi-detached houses may be considered where it can be demonstrated that the number of children proposed or the location of nursery rooms is unlikely to cause undue noise and disturbance nuisance to adjoining residential occupiers, and no suitable alternative exists in a particular area.**

• **Where a proposal relates to a site in an area which already contains premises in a similar use, properties used for hotels, hostels, residential care/nursing homes, self contained flats and houses in multiple paying occupation account will be taken of the cumulative effect of such uses upon the residential character and appearance of the area. If a site lies within an Area of Restraint identified in the Constituency Statements or in Supplementary Planning Guidance planning permission may be refused on grounds that further development of such uses would adversely affect the character of the area.**

• **Proposals for day nurseries in residential frontages should *[normally]* retain *[an element of] a predominantly* residential use *on the upper floor(s), with rooms facing onto the street being restricted to residential use. The residential use should provide a viable residential unit capable of being occupied by a minimum of two people. Any external work, such as alterations to the front and side elevation of residential properties should be sympathetic to the overall character and appearance of the surrounding area.***

• ***Day nurseries will not be accepted in residential roads which have a general absence of non-residential traffic and contain houses capable of single family occupation.***

The Use of Non Residential Properties and Locations Within Commercial/Mixed Use Frontages

8.16   The following guidelines will be used when considering planning applications for use of non-residential properties and locations within commercial/mixed use frontages:

8

- **Favourable consideration may be given to proposals for day nurseries within mixed use frontages and commercial areas. This will be subject to the availability of convenient on-street and where required off-street parking with satisfactory access; a satisfactory environment must also exist for the location of a day nursery.**

[8.17 Further Supplementary Planning Guidance is available on detailed requirements including car parking, external play areas and the type of planning conditions which may be appropriate.]

Hotels and Guest Houses

8.18 This policy applies to hotels and guest houses which fall within Class C1 of the Town and Country Planning Use Classes Order 1987 (as amended). It will not apply to hostels which are the subject of separate policy guidelines.

Policy for new major hotels

8.19 The following guideline will apply when assessing planning applications:

- **In order to provide a balanced range of hotel bedspaces capable of meeting the needs of tourism and business visitors, the provision of additional hotels and extensions will be encouraged subject to local planning, amenity and highway considerations.**

Policy for new small hotels and guest houses

8.20 The provision of new facilities will *[be encouraged where]* normally be refused where proposals do not comply with the following criteria:

- **The site is on a major traffic route in the City, *and is served by public transport.***

- **The section of the major traffic route is already predominantly commercial in nature.**

- ***The site is not on a major traffic route but is within a predominantly commercial area.***

- ***The site is on the fringe of an established centre, in a frontage which already contains mixed commercial/ residential uses and it can be demonstrated that the proposal would not adversely affect standards of residential amenity and the existing character of the area.***

- ***The property is not attached to any residential property.***

- **The existing properties are too large for residential occupation as single family accommodation.**

- **There is sufficient site area to accommodate car parking and provide physical separation from adjoining uses.**

9

Extensions to existing small hotels and guesthouses

8.21   The following guidelines will apply when assessing planning applications:

•   **Existing hotel premises which meet the criteria set out in paragraph 8.20 will be permitted to extend and improve existing facilities subject to compliance with** *[the relevant criteria set out in Supplementary Planning Guidance]* other relevant policies.

•   **Existing premises within predominantly residential areas may be permitted to extend and improve existing facilities where no additional amenity/traffic problems would be created.**

Ancillary Facilities

8.22 *[Supplementary Planning Guidance sets out detailed requirements for the design and layout of new developments and extensions, car parking, highway issues, and the use of ancillary facilities such as restaurants/bars and conference rooms by non-residents.] Many hotels now provide extensive ancillary facilities such as restaurants, bars, leisure/fitness centres, function rooms and conference facilities. Further car parking may be required to serve these facilities, over and above that associated with the number of bedrooms. The level of parking required will depend on the size and type of facilities, the hours of use, accessibility to public transport and the number of parking spaces already available. In situations where the provision of additional car parking spaces is not possible or acceptable, applications for non-residential uses will be refused.*

Houses in Multiple Paying Occupation

8.23   This policy applies to dwellings which are either let in one or more separate tenancies, or are occupied by persons who do not form a single household.

8.24   The following criteria will be referred to in determining planning applications:

•   **The effect of the proposal on the amenities of the surrounding area, and on adjoining premises;**

•   **The size and character of the property;**

•   **The floorspace standards of the   accommodation;**

•   **The facilities available for car parking;**

•   **The amount of provision in the locality.**

8.25   The following guidelines will also apply:

•   **Generally, the use of small terraced or small semi-detached houses for multiple paying occupation will cause disturbance to the adjoining house(s), and will** *[normally]* **be resisted. The impact of such a use will depend, however, on the existing use of adjoining properties and on the ambient noise level in the immediate area.***

10

* Sentence in the adopted plan which was proposed for deletion in Deposit Draft
Alterations but has been re-instated through the Proposed Modifications

- **Where a proposal relates to a site in an area which already contains premises in similar use, and/or properties converted into self-contained flats, and/or hostels and residential care homes, and/or other non-residential uses, account will be taken of the cumulative effect of such uses upon the residential character and appearance of the area. If a site lies within an Area of Restraint identified in chapters nine to twenty-one or in Supplementary Planning Guidance, planning permission may be refused on the grounds that further development of such uses would adversely affect the character of the area.**

Flat Conversions

8.26   This policy applies to the subdivision or conversion of properties into self-contained dwelling units. *The Supplementary Planning Guidance for the design of new residential developments also applies to flat conversions.*

8.27   The following guidelines will apply when assessing applications for such uses:

- **Proposals should not have an unduly adverse effect on the residential amenities of adjoining occupiers. The potential for noise and disturbance nuisance will vary according to the size and type of property involved, the number of flats proposed, the existing use of adjoining properties, and ambient noise levels in the vicinity. Generally, detached properties are most appropriate for flat conversions, semi-detached and terraced properties may be considered suitable but the potential effect on adjoining occupiers will be assessed particularly carefully.**

- **Properties should be of sufficient size to permit the creation of individual dwelling units of a satisfactory size and layout. (Favourable consideration will not normally be given to the sub-division of single dwellinghouses with 3 or less bedrooms into smaller dwelling units). Notwithstanding this, in some parts of the City there are particular shortages of large family accommodation and the City Council will be sensitive to any such need when considering proposals for flat conversions.**

- **Where a proposal relates to a site in an area which already contains premises in similar use, and/or houses in multiple occupation, and/or hostels and residential care homes, and/or other non-residential uses, account will be taken of the cumulative effect of such uses upon the residential character of the area. If a site lies within an Area of Restraint identified in chapters nine to twenty-one or in Supplementary Planning Guidance, planning permission may be refused on the grounds that further development of such uses would adversely affect the character of the area.**

- **Proposals should not prejudice the safety and free flow of pedestrians and traffic in the adjoining highway. Provision should generally be made for off-street car parking facilities for occupants, but the level of parking provision deemed appropriate in any particular instance will take into account the nature of the road(s) which a site adjoins, existing traffic conditions in the vicinity, the availability of alternative parking provision in the area and the importance of retaining site features which contribute to the character of the area.**

11

- *Any external works forming part of a proposal should be sympathetic to the character and appearance of the application property and the surrounding area.*

Hostels and
Residential Homes

8.28 **This policy applies to hostels and to residential care homes as defined by Class C2 (Residential Institutions) of the Town and Country Planning (Use Classes) Order 1987** (as amended). *[It also applies to hostels as defined by Class C1 (Hotels and Hostels) but does not apply to hotels and guest houses.]*

8.29 **The following guidelines will apply in assessing planning applications for such uses:**

- **Proposals should not cause demonstrable harm to the residential amenity of occupiers of nearby properties by reason of noise and disturbance nuisance. Hostels and residential care homes are normally most appropriately located in large detached properties set in their own grounds. The development of such uses in smaller detached or large semi-detached or terraced houses *[may also be acceptable, where]* will not be acceptable, unless *[the amenity of]* adjoining occupiers can be safeguarded against loss of amenity due to, for example, undue noise[,] or disturbance *[etc]*.**

- **Where a proposal relates to a site in an area which already contains premises in similar use, and/or houses in multiple paying occupation and/or properties converted into self-contained flats, account will be taken of the cumulative effect of such uses upon the residential character and appearance of the area. If a site lies within an Area of Restraint identified in chapters nine to twenty-one or in Supplementary Planning Guidance, planning permission may be refused on grounds that further development of hostels, residential care homes or other similar uses would adversely affect the character _and appearance_ of the area.**

- **Proposals should not prejudice the safety and free flow of traffic in the adjoining highway. The provision made for access for service and emergency vehicles and car parking facilities for staff, residents, and visitors will be taken into account, but these factors will be considered in conjunction with issues such as the retention of adequate outdoor amenity space and site features which contribute to the character _and appearance_ of the area.**

- **Proposals should include within the site boundary adequate outdoor amenity space to provide a satisfactory living environment for residents. The amount and location of such space should be related to the proposed number of residents and their particular needs. *This should normally be a minimum of 16 sq.m of space per resident, separate from car parking areas, access ways and circulation space, and should take account of factors such as privacy, aspect, shelter and gradient.***

8.30 *[Further guidance on likely conditions is outlined in Supplementary Planning Guidance.] In order to protect the amenity of occupiers of nearby properties and the character of the area, proposals should take account of other relevant policies in this*

12

Plan (e.g. the 45º Code for House Extensions - see paragraphs 8.39-8.44 - and Parking of Vehicles at Commercial, Institutional and Industrial Premises adjacent to Residential Property - see paragraphs 8.45-8.49), and in Supplementary Planning Guidance (e.g. Residential Buildings and Design, Design Guidelines for New Residential Development- "Places for Living", Access for People with Disabilities and Car Parking Guidelines).

Places of Worship

8.31   This policy relates to the use of land and buildings, for, or in connection with, public worship or religious instruction, which are uses which fall within Class D1 (Non-residential Institutions) of the Town and Country Planning (Use Classes) Order 1987 (as amended).

Purpose Built Places of Worship and/or Religious Instruction

8.32   The following guidelines will apply in assessing applications for such uses:

*   **In the case of premises which are intended to serve a wide catchment area and/or are likely to be used for festivals and ceremonies attracting substantial numbers of people, sites should be of sufficient size and located so as not to cause loss of amenity to occupiers of nearby residential accommodation through undue noise and disturbance nuisance. Sites which may be particularly appropriate are those which adjoin main roads and/or are on the fringe of commercial areas. Where a site is located in a predominantly residential area, the development should take account of the need to avoid attracting extraneous traffic to quiet residential streets, in order to minimise disturbance to residents.**

*   **The site should be capable of accommodating a development which may be non-domestic in scale and of non-traditional design.**

*   **In assessing the amount of car parking to be provided regard should be had to the capacity of the road network and proximity of public transport facilities, the availability of alternative parking in the area, the scale of the development and car ownership levels. Off-street car parking spaces should be located so as to minimise noise and disturbance to adjoining occupiers and safeguard the visual amenity of the surrounding area.**

Conversion of Existing Buildings to provide Places of Worship serving the needs of more than just the immediate local population

8.33   The following guidelines will apply in assessing applications for such uses:

*   **Such proposals generally relate to premises of domestic scale, and are intended to serve the needs of more than just the local community. The Council accepts that in principle such uses may be appropriately sited in residential areas. However, in certain instances all buildings e.g. commercial/ industrial may also be suitable for conversion.**

13

• The use of detached dwellinghouses or pairs of semi-detached houses will normally be considered acceptable in principle. Similarly the use of end terraced houses or one half of a pair of semi-detached houses will normally be acceptable where a Priest or other officer of the religious body occupies the adjoining house. The use of terraced houses and semi-detached where the Priest or other official does not live in an adjoining house may be considered favourably. However, in such cases when considering whether a particular proposal is acceptable regard will be had to:-

- *Whether the site is within an Area of Restraint (see paragraph 5.19B).*

- Results of the public participation exercise.

- The local population characteristics.

- The means of pedestrian access.

- The nature of the immediate surroundings.

- The likelihood of noise emanating from the premises, and the degree to which it can be prevented.

- The number of non-residential uses that already exist within a residential area.

• Except where sites adjoin busy traffic routes, proposals for developments of this type will not normally be required to include provision for off street parking.

Local Prayer Houses

8.34   This type of use serves only an immediate local or neighbourhood need and generally occupies smaller premises. The criteria applicable in assessing such properties are those stated in paragraph 8.33. Weddings, festivals and funerals which attract large numbers of people will not *[normally]* be permitted to take place in this type of facility.

Social, Cultural and Educational Facilities

8.35   The most common type of use in this category is educational establishments and these will usually vary in impact with activity linked to certain hours, noise and traffic generation problems may occur particularly with arrival and departures. The criteria used to assess proposals are listed in paragraph 8.33.

Development affecting Archaeological *[Sites and Monuments] Remains*

8.36   Development proposals affecting *[areas of]* archaeological *[importance] remains* will be considered in the light of the following policies:-

14

- *an assessment of* the archaeological aspects of development proposals will be [examined and evaluated] *required from applicants* before the planning application is determined. Planning permission will not [normally] be granted in cases where the assessment of the archaeological implications is inadequate.

- development proposals which will have an adverse effect on scheduled ancient monuments and other nationally important archaeological [sites and monuments] *remains* and their settings will not [normally] be allowed.

- development adversely affecting other known [sites and monuments of archaeological significance] *archaeological remains* will be resisted although permission may be granted if the applicant has demonstrated that particular archaeological [sites and monuments] *remains* will be satisfactorily preserved either in situ or, where this is not feasible, by record.

- *where appropriate, Section 106 agreements will be negotiated to protect, enhance and interpret archaeological remains.*

More detailed policies are contained in the Conservation Strategy (Supplementary Planning Guidance) and will be included in the Archaeology Strategy which is being has been prepared as Supplementary Planning Guidance.

Notifiable Installations

8.37   Certain sites and pipelines are designated as notifiable installations by virtue of the quantities of hazardous substance stored or used. The siting of such installations will be subject to planning controls aimed at keeping these separated from housing and other land uses with which such installations might be incompatible from the safety viewpoint. To this end, the advice of the Health and Safety Executive will be sought on the suitability of proposals for development of such notifiable installations in relation to the risks that the notifiable installation might pose to the surrounding population.

8.38   There are a number of installations within the City which handle notifiable substances, including high pressure natural gas transmission pipelines. Whilst these are subject to stringent controls under existing Health and Safety legislation, it is considered prudent to control the kinds of development permitted in the vicinity of these installations. In determining whether or not to grant consent for a proposed development on land within these consultation distances account will be taken of advice received from the Health and Safety Executive on risks to the proposed development from the notifiable installation.

15

The 45⁰ Code for House Extensions

8.39   This Code applies to new buildings and extensions to existing premises which might affect adjoining residential occupiers. Its purpose is to achieve a reasonable balance between the interests of those wanting to develop or extend, and the interests of the occupiers of adjoining residential accommodation by ensuring that development would not seriously affect the outlook or daylight of these properties.

8.40   To comply with the Code, new building work should be designed so as to not cross the appropriate 45⁰ line drawn from the nearest front or rear window of the residential accommodation that may be affected. This window must be the main source of light to a habitable room. (e.g. a living room, kitchen, conservatory or bedroom).

8.41   If the extension/building is single storey the line is drawn from the midpoint of the nearest ground floor window of the adjoining premises. If the extension/building is two storey the measurement is taken from the quarter point of the nearest ground floor window.

8.42   If the neighbouring property has already been extended, the measurement is normally taken from the nearest habitable room window of that extension. If the neighbouring property has an extension which is made mainly of glass the Code is applied to the original window opening in the wall where the extension has been added.

8.43   The Code will be applied if a further storey is added to an existing single storey extension. The Code is applied to applications for new conservatories built mainly of glass, although this is taken into account when looking at their potential impact.

8.44   Further details and information on applying the Code and circumstances which may affect the use of the Code are contained in a separate explanatory leaflet.

Parking of Vehicles at Commercial, Institutional and Industrial Premises Adjacent to Residential Property

8.45   These guidelines apply to car parking proposals relating to commercial, institutional and industrial premises which could cause noise, disturbance or loss of amenity to the occupiers of adjoining residential property. Parking proposals relating to commercial, institutional and industrial premises which cause unacceptable noise, disturbance or loss of amenity to the occupiers of adjoining residential property will not be permitted. Such proposals will be expected to comply with the City Council's Supplementary Planning Guidance relating to this issue.

Development adjoining rear gardens of houses

8.46   Reasonable distance separation should exist by virtue of the length of rear gardens. Where rear gardens are short, consideration will be given to setting the car parking spaces off the boundary to provide a buffer area. To maintain privacy screen fencing or walling should be provided on the boundary.

16

Development facing houses across the road

8.47   Whilst the highway should provide adequate distance separation parking areas should be screened by means of fencing/walling and planting. Without prejudice to highway safety a vehicular access if required should be positioned to avoid car headlights shining directly into the windows of houses opposite.

Development adjoining side curtilage of houses

8.48   Wherever possible a buffer strip of land with good quality planting should be maintained where a car park would otherwise abut the side of the curtilage of a house. Its depth and extent will be dependent on the proximity to the boundary of habitable rooms in the house, the presence of intervening structures e.g. a garage/ outbuilding, and the existing or proposed boundary treatments. As a guide, the minimum distance between the car park surfaced edge and the house gable wall should be 5m where no intervening structure exists.   Screen boundary fencing/walling will be required to provide privacy. Where a vehicular access is required and without prejudice to highway safety, it should normally be positioned away from the boundary to the adjoining house.

Development involving an extension to premises as well as new parking facilities

8.49   Where development involves an extension to premises as well as new parking facilities, an assessment of the general effect of the car park in conjunction with the extension on the residential area through any overall increase in vehicular traffic will need to be made, with particular reference to amenity and road safety considerations.

Planning Obligations

8.50   This policy relates to the use of planning obligations made under section 106 of the Town and Country Planning Act 1990 (as substituted by Section 12 of the Planning and Compensation Act 1991).

8.51   The City Council will take all appropriate opportunities to negotiate planning obligations (also known as planning benefits or planning agreements) to enable development to proceed, and to secure the proper planning of the development and of the area. The City Council will also encourage developers to provide other planning benefits which are beneficial to the development and the area. However, unacceptable development will not be permitted because of unnecessary or unrelated benefits offered by an applicant.

8.52   This policy applies to all proposed developments. Examples of obligations which may be sought in appropriate circumstances are set out in Figure 8.1. Where the need arises, measures other than those set out in Figure 8.1 will also be sought as planning obligations.

8.53   In determining the type, scale and mix of benefits, the City Council will have regard to the following:

*   -   This Plan*

17

- *Relevant Local Action Plans, Development Briefs and other Supplementary Planning Guidance*
- *Other relevant City Council policies*
- *Government Guidance*
- *The views of the community and other consultees, including Ward Sub-Committees*
- *The views of the developer*
- *The type of development*
- *Any specific local needs*

In assessing the appropriate level of benefit, the City Council will also take account of the economic viability of the scheme and any exceptional costs associated with the development - for example land reclamation costs, or exceptional costs associated with the conversion of an existing building.

8.54   The City Council has also produced a Code of Practice, which sets out the procedure for negotiating planning obligations. This aims to ensure that obligations are negotiated in a fair, open and reasonable manner.

18

FIGURE 8.1 EXAMPLES OF PLANNING OBLIGATIONS WHICH MAY BE SOUGHT

TYPE OF MEASURE/ OBLIGATION	*EXAMPLES*
1. TRANSPORT/PHYSICAL INFRASTRUCTURE	• *Public transport e.g. park and ride, LRT facilities, bus service improvements* • *Cycle facilities* • *Pedestrian facilities* • *Green Transport Plans* • *Highways e.g. improvements to road network and access to site* • *~~Commuted sums in lieu of parking~~* • *Improvements to public parking*
2. ENHANCING THE BUILT AND NATURAL ENVIRONMENT	• *Archaeology – retention/preservation/recording/public interpretation of archaeological remains* • *Archaeology – retention/recording of other feature* • *Restoration of listed building (whole or in part)* • *Restoration of building of local importance* • *Environmental enhancement/pedestrian facility including off-site landscaping* • *Public access within development* • *Public access to open space* • *Land reclamation* • *Nature conservation, e.g. retain feature/enhance value*
3. MEASURES TO OFFSET IMPACT ON ENVIRONMENT AND LOSS OF/IMPACT ON AMENITY/RESOURCE ON SITE OR NEARBY	• *Physical measures to alleviate for impact, e.g. traffic management, landscaping, noise insulation* • *Replacement/retention of recreation/environmental facilities e.g. playing field, nature conservation area* • *Replacement/retention of social economic facilities, e.g. training scheme, community facilities*
4. PROVISION OF FACILITIES/SERVICES TO SUPPORT DEVELOPMENT AND SECURE THE PROPER PLANNING OF THE AREA	• *Affordable housing and lifetime homes* • *Public (open) space* • *Play space* • *Sports facilities* • *Community and education facilities to support development* • *Other community facilities, e.g. primary health care*
5. OTHER OBLIGATIONS RELATED TO THE DEVELOPMENT	• *Public art* • *Childcare/creche/nursery* • *Training/employment facilities* • *Access for people with disabilities e.g. shopmobility* • *Crime prevention measures* • *Facilities for children* • *Toilet facilities, parent and child facilities* • *Appropriate maintenance provision e.g. for open space, public transport*

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Telecommunications

8.55   It is recognised that modern and comprehensive telecommunications systems are an essential element in the life of the local community and the economy of the City. ~~Chapter 3 states that new developments will be expected to contribute, in terms of their design and landscaping, to the enhancement of the City's Environment. Telecommunications infrastructure must take account of this policy.~~ In assessing applications for telecommunications equipment, account will be taken of the impact of radio masts, antennae and ancillary structures on existing landscape features, buildings and the outlook from neighbouring properties.

8.55A Within the City, there are locations that are considered more sensitive than others for the siting of telecommunications equipment. Sensitive locations include ~~transport corridors, predominantly residential areas,~~ listed buildings and conservation areas, historic parks and gardens, ~~public open space,~~ the Green Belt, and locations within or adjacent to the grounds of education and health institutions~~, and any other location identified in Supplementary Planning Guidance~~. Telecommunications equipment will only be acceptable in sensitive areas if the applicants are able to demonstrate that there is no other suitable location. The City Council will also seek to encourage telecommunications operators to locate new equipment away from residential areas and, where they are of high quality, areas of open space, wherever possible. Where applications are submitted within such areas, the City Council will require them to be accompanied by evidence confirming that no reasonable alternatives exist. In all cases, ~~and if the~~ equipment ~~has been~~ should be designed to minimise its impact on the visual amenity of the area.

8.55B Operators will be expected to share masts and sites wherever ~~possible to minimise their visual impact~~ this is desirable. Telecommunications equipment sited on buildings should be sited to minimise obtrusiveness, for example, by the use of permeable and opaque screens. Ground based equipment should be sited to take maximum advantage of backdrops to buildings and other screening opportunities. In assessing visual obtrusiveness, views from neighbouring properties and the street will be considered. Detailed guidance on the siting, location and design of telecommunications equipment is contained in Supplementary Planning Guidance (DC24) (see paragraph 8.72).

8.55C Developers and operators will be expected to have regard to the Government's Telecommunications Planning Policy Guidance (PPG8) and any other advice published by the ~~DETR~~ Government.

20

Development in the Green Belt

8.56 The following policies will apply to proposals for development within the Green Belt. These policies should be considered in conjunction with the Green Belt policy statement in Chapter 3.

New Agricultural Buildings

8.57 In some cases, agricultural buildings require planning permission. Proposals for such buildings will be considered favourably, provided that they are sited so as to minimise the impact on the openness of the Green Belt, and that their design is in keeping with the character of the Green Belt and appropriate to their function.

Re-use of Buildings

8.58 The re-use of buildings which are no longer required for their original purpose will ~~only be acceptable where it has been demonstrated that the buildings are genuinely redundant for agricultural use. In such cases, conversion to uses that are most likely to retain their character, such as riding/livery stables, offices or workshops, will be supported. If these alternative uses have been explored and can be demonstrated not to be viable, other uses may be acceptable in principle. In all cases, proposals for the re-use of agricultural buildings will only be permitted where~~ be acceptable in principle, provided that:

- *The proposal does not conflict with highway safety;*

- *The existing buildings are of permanent and substantial construction, are capable of being converted without major or complete reconstruction, and any alterations to the buildings are in keeping with the character of the buildings, the Green Belt and the surroundings;*

- *There is no adverse effect on the amenity of the surrounding area, and the development does not prejudice the openness of the Green Belt;*

- *The accommodation provided by the conversion is self-contained and the conversion does not involve significant extensions to the buildings.*

- *Where a change to residential use is proposed, it is supported by evidence that every reasonable attempt has been made to secure a suitable business re-use.*

In the case of residential conversions, permitted development rights may be removed by way of a condition, to control future extensions to the buildings. Strict control will also be exercised over any associated uses of land surrounding the building which might conflict with the openness of the Green Belt and the purposes of including land within it.

New Farm Dwellings

8.59 Proposals for new farm dwellings will only be allowed where:

21

- *The dwelling is essential for the proper functioning of the farm business, taking into account the processes involved, the number of workers needed, and the availability of existing accommodation;*

- *The dwelling is sited within or immediately adjacent to the farm complex;*

- *The farm business is viable.*

The applicant should provide evidence demonstrating the need for a new dwelling, and that the business is viable, as part of the application. In cases where the applicant is proposing to establish a new farm business, permission will not be granted for a permanent dwelling in the first instance. Permission may be granted for a temporary building for a period of up to three years, in order to allow the applicant sufficient time to demonstrate the viability of the enterprise. An agricultural occupancy condition will be attached to all consents for new farm dwellings.

Extensions to Existing Dwellings

8.60   Proposals for extensions to existing dwellings in the Green Belt will be allowed, provided that the proposed extension would not increase the total habitable floor area of the building by more than 50% or by more than 200 sq.m., whichever is the greater. Extensions approved and constructed within the 20 years preceding the application will be counted towards the 50% or 200 sq.m. figure. Garages will be included within the floor area measurement, where they are physically attached to the dwelling or are sited within 5 metres of it.

Outdoor Recreational Facilities

8.61   New outdoor recreational facilities which cannot be located within the built-up area may be permitted in the Green Belt, provided that they are in keeping with the character and appearance of the area. The most common types of proposals for recreational facilities in the Green Belt involve golf courses, playing fields and equestrian facilities. These will be assessed according to the policies below.

Golf Courses and Playing Fields

8.62   New golf courses and playing fields and extensions to existing golf courses and playing fields, will be acceptable in the Green Belt, provided that the layout is sympathetic to the landscape of the area. Applications for new development should comply with the design principles for sustainable development (see Chapter 3, paragraph 3.14E). In respect of high grade agricultural land (i.e. Grade 1, 2 and 3A), consideration should be given within the design stage to a possible future return to agricultural land and the economic use of the land for that purpose. Significant natural features such as woodland, hedgerows and streams should be retained wherever possible. Proposals affecting historic landscapes will be expected to retain in situ any significant historic features and archaeological remains. In such cases, applicants should have regard to the policies set out in Chapter 3 (paragraphs 3.20-3.33), in paragraph 8.36 above, and any relevant guidance issued by English Heritage.

8.62A New golf courses and playing fields and extensions to existing golf courses and playing fields, will be acceptable in the Green Belt, provided that the layout is

22

sympathetic to the landscape of the area. Applications for new development should comply with the principles of sustainable development (see Chapter 3, paragraph 3.14E). In respect of high grade agricultural land (i.e. Grade 1, 2 and 3A), consideration should be given within the design stage to a possible future return to agricultural land and the economic use of the land for that purpose. Significant natural features such as woodland, hedgerows and streams should be retained wherever possible. Proposals affecting historic landscapes will be expected to retain in situ any significant historic features and archaeological remains. In such cases, applicants should have regard to the policies set out in Chapter 3 (paragraphs 3.20-3.33), in paragraph 8.36 above, and any relevant guidance issued by English Heritage.

8.62B Applications for new golf courses and playing fields or extensions to golf courses and playing fields should be accompanied by an assessment of the impact of the development on the landscape and environment. Applicants should provide supporting information demonstrating that facilities such as car parks, changing rooms or club houses are genuinely ancillary to the golf course or playing fields. New buildings and car parks should also be designed so as to minimise the impact on the openness of the Green Belt, and should be visually in scale and sympathy with the character of the area.

23

Equestrian Facilities

8.63   Riding schools and livery stables should use existing farm buildings wherever possible. New riding schools should also be sited in close proximity to bridle paths. Proposals for new equestrian facilities will be acceptable in the Green Belt, provided that:

•   There is safe and adequate means of access to the highway;

•   The siting and design of any new buildings minimises the impact on the openness of the Green Belt, and is in keeping with the surrounding area;

•   The siting and design of jumps and other ancillary equipment is designed to minimise their obtrusiveness, and to enable their removal when not required.

Enforcement Policy

8.64   The City Council has established procedures to enforce planning legislation and the policies set out in this Plan. Common planning complaints relate to changes of use of land or buildings, development by householders without planning permission, and advertisements. All properly made complaints will be investigated to decide whether or not further action is appropriate. In all cases, records will be kept of action taken, and decisions made.

8.65   It is a criminal offence to lop, top or fell a protected tree without prior consent, to carry out alterations to or demolish a listed building without prior consent, to carry out development affecting a Scheduled Ancient Monument without prior consent, or to display certain types of advertisement without consent. In cases where evidence is obtained in respect of such offences, action will be taken in the Courts.

8.66   It is not an offence to carry out development without planning permission. However, if a breach of planning control occurs, action will be taken if it is considered that demonstrable harm has been caused to interests of acknowledged importance, such as the appearance of the area, the amenities of people living nearby or protected land, trees or buildings, and if it is considered expedient to do so.

8.67   There is no obligation to take action in every case. If the issue can be resolved by means other than enforcement action, such methods will be considered. If formal action is taken, this will be because it has been decided that this is the best way to solve the problem. In such cases, the enforcement procedures will be used to pursue the matter to a conclusion with the minimum of delay.

8.68   If the City Council believes the situation to be urgent, then immediate enforcement action may be taken. This may include dealing with threats to protected trees or buildings and in cases where public facilities could be seriously affected. Immediate action may also be taken if it is believed that planning regulations were knowingly breached. In such cases, the decision may be to decline any negotiation and instigate immediate legal action.

8.69   The City Council will also monitor major and significant developments to ensure that they comply with their planning permission, including any conditions imposed. Sites will be regularly inspected with the aim of preventing problems before they occur.

24

Aerodrome Safeguarding

8.69   Parts of Birmingham fall within the Birmingham International Airport Aerodrome Safeguarding Area. Within this area, planning applications for new development will be considered in the context of, and be subject to, the Aerodrome Safeguarding requirements, as identified in DETR Circular 2/92, Safeguarding Aerodromes, Technical Sites and Explosives Storage Areas: Town and Country Planning (Aerodromes and Technical Sites) Direction 1992. In assessing proposals for development within this area, the City Council will also consider the appropriateness of features that are likely to attract birds, and proposals for lighting that could confuse or distract pilots of landing aircraft. Proposals for the development of tall buildings and other tall structures will also be expected to comply with the Aerodrome Safeguarding requirements identified in Circular 2/92. Any new development or planning application must be considered in the context of, and be subject to, Aerodrome Safeguarding requirements, as laid out in Government Circulars or other national policy guidance relating to Aerodrome Safeguarding. Aerodrome Safeguarding requirements are intended to ensure the continued safe operation of aerodromes (including Birmingham International Airport) and do not constitute an automatic presumption against development.

8.69B Proposals for the development of tall buildings and other tall structures should ensure that there is no conflict with Aerodrome Safeguarding requirements as identified in Government Circulars or other national policy guidance.

8.69C Other Aerodrome Safeguarding requirements which should be borne in mind when assessing new development and planning applications include bird attracting features and lighting which could confuse or distract pilots.

25

Other Policies

8.70   In Birmingham, Supplementary Planning Guidance policies will be a material consideration in determining planning applications. Current Government guidance (e.g. PPG1, PPG12) indicates that development plans should avoid excessive detail, and this is the approach that the City Council has adopted in this Plan. In accordance with Government guidance, the City Council has prepared a series of specific, additional policies as Supplementary Planning Guidance (SPG). These policies contain more detail than it is possible to include in the UDP, and are intended to supplement the policies in the Plan. As they are more flexible than the Plan, they may be updated from time to time, to keep abreast of changed conditions or circumstances (such as new Government guidance). The City Council will prepare new SPG as and when required.*

8.71   There are four main types of SPG as follows:

- *Local Action Plans, Development Frameworks and Land Use Strategies for specific areas;*

- *Development and Planning Briefs for specific sites;*

- *Detailed Development Control Policies for specific types of use;*

- *Environmental, Design and Landscape Guidance.*

8.72   All current and proposed City-wide SPG (at 2001) is listed below.** Current and proposed area or site-specific SPG (at 2001) is listed at the end of each Constituency Statement.

* N.B. This policy pre-dates the Planning and Compulsory Purchase Act 2004. Following the Act, the City Council will no longer prepare Supplementary Planning Guidance (SPG), but will bring forward new Local Development Documents (LDDs) in accordance with its current Local Development Scheme (LDS).

** This list was accurate at the time that the UDP Alterations were prepared early in 2001. An up-to-date listing of SPG currently in use and new LDDs in preparation may be found in the current Local Development Scheme (LDS) for Birmingham.

26

Development Control Policies

DC1)   Design Guidelines for New Residential Development – "Places for Living"

Chapter 3 emphasises the need for all new developments to achieve a high standard of design, and to respect the character of the area surrounding them. In Chapter 5, the need to provide residential accommodation of all sizes and types in an attractive and safe environment is acknowledged. More detailed guidance on detailed design principles for new housing developments, including crime reduction measures, is provided in the revised residential design guidance, "Places for Living." The guidance also includes guidance on the development of infill and backland sites.

DC2)   ~~Buildings and Design~~ Home Extensions Design Guide - "Extending Your Home"

Chapter 3 emphasises the need for all new developments to achieve a high standard of design and to respect the surrounding area.   This includes house extensions, which should also complement and harmonise with the existing dwelling. ~~Buildings and Design (SPG)~~ Extending Your Home is being prepared as a Supplementary Planning Document and will provide~~s~~ specific, detailed guidance on altering, converting and extending existing ~~buildings~~ dwellings, including the design of new extensions, windows, doors, porches and roofs. This should be read in conjunction with "Places for Living" (DC1) and the 45º Code policies above. ~~Additional Supplementary Planning Guidance, specifically aimed at residential extensions, is also being prepared.~~

DC3)   Specific Needs Residential Uses: Houses in Multiple Paying Occupation, Hostels and Residential Care and Nursing Homes and Bedroom Sizes for Student Accommodation

Detailed policies on the development of new houses in multiple paying occupation, hostels and residential homes are set out in this chapter. The Specific Needs Residential Uses SPG provides more detailed guidance on the standards that the City Council expects for each of these types of development and for student accommodation.

DC4)   Access for People with Disabilities

Chapter 3 states that the design of new developments where the public are admitted or which are employment generating should make provision for the access and other needs of all sectors of the community, including people with disabilities. Access for People with Disabilities (SPG) includes detailed guidance on access requirements for new buildings, alterations, extensions and changes of use, comprehensive developments, parking standards, and residential developments. The Shop Front Design Guide (SPG - see below) contains more detailed guidelines on access requirements for new shop fronts.

DC5)   ~~Shop Front~~ Shopfronts Design Guide

27

Chapter 3 emphasises the need for all new developments to achieve a high standard of design and to respect the surrounding area. Chapter 7 also recognises the need for high design standards in new shopping developments, and the need to provide a pleasant, safe environment in shopping centres. The Shop Front Design Guide (SPG) provides detailed guidelines on the elements of good shop front design, including advertisements, security shutters and access for people with disabilities. A special design guide has been produced for Moseley shopping centre, which is within a Conservation Area. A SPG statement also exists dealing with medium and high level signs in the City Centre. A separate leaflet on the design of roller shutters is also available.

DC6) Electronic Information and Advertisement Signs

Electronic information boards and signs can provide a useful means of conveying information. Electronic Information and Advertisement Signs (SPG) provides detailed guidance on suitable locations and the design of such signs, and the conditions likely to be imposed where they are considered to be acceptable.

DC7) Use of Basement Floors for Entertainment Purposes

Applications involving the use of basement floors for entertainment facilities, such as public houses, wine bars, clubs and restaurants, will be expected to address the relevant public safety issues and should make adequate provision for escape in the case of fire or bomb threat. In assessing such applications, the City Council will have regard to the views of the Police and Fire Service, and the guidelines set out in Use of Basement Floors for Entertainment Purposes (SPG).

DC8) Petrol Filling Stations

Chapter 3 emphasises the need for all new developments to achieve a high standard of design and to respect the surrounding area. Chapter 7 contains policies towards new retail development. These policies apply to petrol filling stations, which usually include a variety of signs together with a canopy and a shop.   Petrol Filling Stations (SPG) contains detailed guidance on the design of canopies, pole signs, other signs, and the conditions likely to be imposed upon petrol station shops.

28

DC9) Guidelines for assessing Planning Applications for Development on or near to Landfill Sites

In Birmingham, most new development takes place on "brownfield" sites, i.e. sites which have previously been developed. Some of these sites have been subject to landfill, and to ensure that the development of such sites does not constitute a risk, the City Council has prepared Guidelines for assessing Planning Applications for Development on or near to Landfill Sites (SPG). The City Council will also have regard to the Landfill Sites policy set out in Chapter 3 and the advice in Planning Policy Guidance Note 14: Development on Unstable Land and Planning Policy Guidance Note 23: Planning and Pollution Control.

DC10) Car Parking Guidelines

Chapter 6 contains general policies towards the provision of car parking in different parts of the City. More detailed guidance ~~is~~ will be provided in ~~the Car Parking Guidelines (SPG) which contains~~ a new Development Plan Document setting out the Council's car parking standards. This will contain guidance on the level of parking expected for different types of development, including significant changes of use of existing buildings. It will also include~~s~~ detailed guidance on parking for people with disabilities and cycle and powered two wheeler parking provision. The City Council will also have regard to any parking guidelines published in future Local Transport Plans in ~~future reviews of its Car Parking Guidelines~~ preparing this document.

DC11) Car Park Design Guide

Chapter 3 emphasises the need for all new developments to achieve a high standard of design and to respect the surrounding area. The Car Park Design Guide (SPG) includes guidance on the key considerations in car park deign e.g. personal safety, crime prevention, accessibility, management and appearance.

DC12) Development involving Former Public Houses

Public houses can provide an important focal point for the local community. Proposals involving their redevelopment with other uses will be assessed according to the Supplementary Planning Guidance for development involving former Public Houses. This contains detailed guidance on issues such as the loss of leisure/social facilities, impact on adjacent land uses and other related matters.

29

DC13) Evening Opening of Licensed Betting Offices

The evening opening of licensed betting offices can create amenity problems for local residents. Detailed guidance on suitable locations, and instances where a temporary permission may be granted are included in Evening Opening of Licensed Betting Offices (SPG).

DC14) Development Involving Residential Accommodation Above Commercial Premises (Living ~~Over~~ Above the Shop)

The conversion of redundant non-residential buildings, including vacant upper floors in shopping centres, to residential accommodation is encouraged, both in Chapter 5 and in the Constituency Statements, particularly Chapter 15 - City Centre. The Living above the Shop policy (SPG) contains detailed guidance on residential development above commercial premises, including advice on suitable locations, the need for insulation works, space standards, car parking/highway considerations and external works. The SPG should be read in conjunction the Flat Conversions policy above.

DC15) Proposals involving Isocyanate Paints

Vehicle paint spraying processes involving isocynate paints in residential areas can have an adverse effect on nearby residents. Proposals for flues to ventilate such processes will be subject to the Proposals involving Isocyanate Paints (SPG) which contains detailed guidance on the appropriate design and siting of ventilation flues, and other issues which the City Council will consider in assessing such proposals.

DC16) Design Guidelines for Bottle and Recycling Banks at Supermarket Car Parks

Chapter 3 contains general policies relating to Waste Treatment and Disposal, including a commitment towards minimising waste through re-use and recycling. New supermarket developments provide a good opportunity for the placement of recycling banks.   Detailed guidance on appropriate siting and design of these facilities is set out in this SPG.

DC17) ~~Houseboat~~ Residential Moorings

Chapter 15 seeks to encourage new housing developments along canal frontages in the City Centre. Houseboat moorings can contribute towards the attractiveness of canal frontages, both in the City Centre and elsewhere on the canal network.   The Houseboat Moorings policy (SPG) contains detailed guidance on the issues that the City Council will consider in assessing proposals for new residential moorings. The SPG should be read in conjunction with the policies in Chapter 3, Chapter 5, the Constituency Statements, in particular Chapter 15 - City Centre, and the Canalside Development in Birmingham - Design Guidelines (SPG).

DC18) Policy for Ground Floor Non-Retail Uses in Shopping Centres

To maintain the vitality and viability of shopping centres, the City Council has prepared Supplementary Planning Guidance governing ground floor Non-Retail uses. This policy applies to all centres which do not have their own separate policy, including those where a separate policy is proposed but has not yet been prepared,

30

and provides more detailed guidance than Chapter 7 on the issues which the City Council will consider when assessing proposals for changes of use.

DC19) ~~Guidelines for the~~ Location of Advertisement Hoardings

Advertisement hoardings can be difficult to satisfactorily integrate with their surroundings. This policy aims to improve current practice, by advising prospective advertisers on the type of displays which are likely to be acceptable. It includes guidance on regulating both proposed and existing displays, general land use considerations, and more detailed guidance on landscaping and positioning adjacent to footpaths.

DC20) Floodlighting of Sports Facilities, Car Parks and Secure Areas (Light Pollution)

The floodlighting of sports pitches, open storage compounds and car parks can cause problems of light pollution, especially in residential areas. Proposals involving floodlighting should include the minimum level of lighting required for operational purposes and personal safety, and should be designed to minimise light glare and spillage. More detailed guidance on the circumstances where floodlighting is likely to be acceptable may be found in the Supplementary Planning Guidance on light pollution.

DC21) Affordable Housing

Chapter 5 emphasises the need to meet the full range of the City's housing needs, including balanced provision of Market and Social housing across the City. The Affordable Housing Supplementary Planning Guidance is currently being revised and will contain detailed guidance and policies relating to requirements for affordable and social housing.

31

DC22) Use of Section 106 Agreements to secure provision of Public Toilet Facilities as part of New Retail Developments

The instances where the provision of public toilet facilities will be required for new retail developments by means of Section 106 agreements may be found in the SPG dealing with the above subject.

DC23) Guidelines for Bedroom Sizes for Student Accommodation

Chapter 5 embraces the need to meet the full range of the City's housing needs. Students have specific space requirements. This SPG provides specific guidance on the floorspace standards for new buildings and changes of use.

DC24) Guidelines for the Location of Telecommunications Equipment (Mobile Telephone Infrastructure)

Chapter 3 contains strategic policies designed to protect and enhance the City's environment. This chapter includes a specific policy on Telecommunications (paragraphs 8.55-8.55B). Draft Supplementary Planning Guidance for the Location of Telecommunications Equipment provides more detailed guidance for the location of equipment, listing factors which will be relevant in assessing proposals and locations which are more sensitive than others for the siting of equipment. It also provides detailed guidance on design and appearance considerations.

Environmental, Design and Landscape Guidelines

ENV1) Conservation Strategy for Birmingham – "Regeneration through Conservation"

Chapter 3 contains the City Council's broad strategic policies towards the historic built environment and urban design. The City's 28 existing conservation areas are also identified on the Proposals Map, and proposed conservation areas are allocated as proposals in the Plan. In addition, the policy on development affecting archaeological remains above contains more detailed guidance (a separate Archaeology Strategy ~~is~~ has also ~~being~~ been prepared as Supplementary Planning Guidance – see below). The Conservation Strategy (SPG), revised in 1999, seeks to raise the profile of conservation in Birmingham, and identifies a series of policy objectives, which provide the foundation for this. The SPG also sets out detailed guidance on listed buildings, the "local list," conservation areas, historic landscapes, canals and archaeology.

32

ENV2) Nature Conservation Strategy for Birmingham

Chapter 3 contains the City Council's broad strategic policies towards nature conservation. The City's two Sites of Special Scientific Interest (SSSIs) and forty-one Sites of Interest for Nature Conservation (SINCs) are identified as proposals in the Plan. The Nature Conservation Strategy (SPG) builds on this policy context, providing more detailed guidance on protecting and managing the natural environment resource. The SPG identifies the main habitats and features, and sets out detailed policies, principles and guidelines for nature conservation activity. It also includes a strategy for future work.

ENV3) Canalside Development in Birmingham - Design Guidelines

Chapter 3 recognises the historic importance of the City's canals, and their potential for tourism, recreation and leisure. This is also reflected in the Conservation Strategy (draft SPG). The general design policies in Chapter 3 also emphasise the need for all new developments to achieve a high standard of design and to respect the surrounding area. The Canalside Development in Birmingham - Design Guidelines draft (SPG) is aimed at developers and designers, and will provide detailed urban design principles to guide development adjacent to canals. It will also include a character appraisal for each of the City's canals, and guidance on appropriate uses for canalside settings, access arrangements, conservation issues, and the types of materials to be used in buildings, towpaths and other canalside features.

ENV4) Birmingham Canals Action Plan

Chapter 3 recognises the historic importance of the City's canals, and their potential for tourism, recreation and leisure. Chapter 6 also recognises that the canals may have potential for the transportation of freight. The Birmingham Canals Action Plan will be a strategy for future environmental improvements to the canal network, and will identify the main principles and priorities for action. It will examine the scope for the use of canals for freight purposes, and will include detailed guidance on towpath improvements, interpretation, moorings, access, development opportunities, maintenance, safety, community involvement and other related issues.

ENV 5) Open Space Requirements for New Residential Developments

Chapter 5 establishes the need for new public open space to serve the needs of the occupiers of new residential developments. This SPG will set out the detailed requirements.

33

ENV6) Archaeology Strategy

The importance of the City's archaeological resource is recognised in Chapter 3, which contains broad strategic policies towards protecting remains. There are additional development control policies in this Chapter. The ~~future~~ Archaeology Strategy ~~will~~ includes more detailed guidance on the City's archaeological resource, including the main types of surviving remains. It ~~will~~ also contains detailed policies towards protecting and managing archaeology within the City. It ~~will be derived from~~ reflects the West Midlands Regional Archaeology Strategy~~, which is currently being prepared~~.

ENV7) Sustainable Development – "Places for the Future"

Chapter 3 recognises the need to move towards a more sustainable pattern of development. This will be examined in more detail in ~~SPG~~ a Supplementary Planning Document for sustainable development. This ~~SPG~~ will consider opportunities to secure more sustainable forms of development, such as renewable energy, waste minimisation, and more careful use of scarce resources.

ENV8) General Urban Design Principles – "Places for All"

Chapter 3 contains general policies towards the design of new development, including a series of Good Design Principles. As well as the special guidance for canalside developments and residential developments, a more detailed draft Supplementary Planning Guidance policy has been prepared, to provide more general guidance on the design of all types of development, City-wide.

ENV9) Lighting Strategy – "Lighting Places"

It is important that any new lighting is part of a co-ordinated strategy, particularly in the City Centre, that brings together all aspects of lighting. Detailed Supplementary Planning Guidance will be prepared that provides a framework for lighting the City and general guidance on the design of lighting proposals.

ENV10) Tall Buildings Policy – "High Places"

In certain localities, and in the City Centre in particular, pressures exist to develop tall buildings. Chapter 3 (paragraph 3.14D) recognises the need for new developments to be considered in relation to their impact on the local character of an area. The Birmingham Urban Design Studies and City Centre Strategy recognised the need to accommodate tall buildings and provides guidance for their design and location in the City Centre. The development of tall buildings also needs to be considered in the context of the policy on Aerodrome Safeguarding set out elsewhere in this Chapter, and ~~the Aerodrome Safeguarding requirements identified in DETR Circular 9/92~~. any requirements identified in Government Circulars or other national policy guidance relating to Aerodrome Safeguarding. More detailed Supplementary Planning Guidance on tall buildings City-wide ("High Places") ~~will be~~ has been prepared.

Appendix 5

Planning policies and Supplementary Planning Guidance to be superseded by the Development Management in Birmingham DPD (DMB) and/ or SPDs

Policy topics and paragraphs in Saved UDP	DMB or other policy / guidance replacement
The Design of new development (paras 3.14 – 3.14D)	DM2 Amenity, PG3 Place making
Hot food shops and restaurants/ cafes (paras 8.6 – 8.7)	DM2 Amenity, DM6 Noise and vibration, DM14 Transport access and safety, DM15 Parking and servicing, PG3 Place making, TP21 The network and hierarchy of centres, TP24 Promoting a diversity of uses within centres
Amusement centres and arcades (paras 8.8 – 8.10)	DM2 Amenity, DM6 Noise and vibration, DM14 Transport access and safety, DM15 Parking and servicing, PG3 Place making, TP21 The network and hierarchy of centres, TP24 Promoting a diversity of uses within centres
Car hire booking offices (paras 8.11-8.13)	DM2 Amenity, DM6 Noise and vibration, DM14 Transport access and safety, DM15 Parking and servicing, PG3 Place making, TP21 The network and hierarchy of centres, TP24 Promoting a diversity of uses within centres
Day nurseries (paras 8.14-8.16)	DM9 Day nurseries and early years provision, DM2 Amenity, DM6 Noise and vibration, DM14 Transport access and safety, DM15 Parking and servicing, PG3 Place making, TP21 The network and hierarchy of centres
Hotels and guest houses (paras 8.18-8.22)	PG3 Place making, Policy TP24 Promotion of diversity of uses within centres, Policy TP25 Tourism and cultural facilities,
Houses in Multiple Paying Occupation (paras 8.23-8.25)	DM11 Houses in multiple occupation (HMO), DM2 Amenity, DM6 Noise and vibration, DM14 Transport access and safety, DM15 Parking and servicing, PG3 Place making
Flat conversions (paras 8.26-8.27)	DM12 Residential conversions and specialist accommodation, DM2 Amenity, DM6 Noise and vibration, DM14 Transport access and safety, DM15 Parking and servicing, PG3 Place making
Hostels and residential homes (paras 8.28-8.30)	DM12 Residential conversions and specialist accommodation, DM2 Amenity, DM6 Noise and vibration, DM14 Transport access and safety, DM15 Parking and servicing, PG3 Place making
Places of worship (paras 8.31-8.35)	DM8 Places of worship and other faith related community facilities, DM2 Amenity, DM6 Noise and vibration, DM14 Transport access and safety, DM15 Parking and servicing, PG3 Place making, TP21 The network and hierarchy of centres, TP24

009059/2021

Appendix 5

	Promoting a diversity of uses within centres
Development affecting Archaeological Remains (para 8.36)	BDP TP12 Historic environment
Notifiable Installations (paras 8.37-8.38)	DM3 Land affected by contamination, instability and hazardous substances
The 45 Degree Code for House Extensions (paras 8.39-8.44)	DM10 Standards for residential development, DM2 Amenity, PG3 Place making
Parking of vehicles at commercial, institutional and industrial premises adjacent to residential property (para 8.45)	DM15 Parking and servicing
Planning Obligations (paras 8.50-8.54)	BDP TP47 Developer contributions
Telecommunications (paras 8.55-8.55C)	DM16 Telecommunications
Development in the Green Belt (paras 8.56-8.62B)	BDP TP10 Green Belt
Enforcement Policy (paras 8.64-8.69)	Local Enforcement Plan (adopted May 2021 and any subsequent revision)
Aerodrome Safeguarding (paras 8.69-8.69C)	Covered by National Planning Policy
Areas of restraint SPG	**DMB or other policy/guidance replacement**
Church Road, Erdington: Review of Interim Draft Area of Restraint (1998)	DM11 Houses in multiple occupation, DM12 Residential conversions and specialist accommodation
Gillott Road, area of Edgbaston (1991)	DM11 Houses in multiple occupation, DM12 Residential conversions and specialist accommodation
Moseley and Sparkhill (1994)	DM11 Houses in multiple occupation, DM12 Residential conversions and specialist accommodation
Wheelwright Road (1992)	DM11 Houses in multiple occupation, DM12 Residential conversions and specialist accommodation
Middleton Hall Road and Bunbury Road (1993)	DM11 Houses in multiple occupation, DM12 Residential conversions and specialist accommodation
Handsworth, Sandwell and Soho (1994)	DM11 Houses in multiple occupation, DM12 Residential conversions and specialist accommodation
SPGs Listed in Chapter 8 of Saved UDP	**DMB or other policy/guidance replacement**
DC1 Places for Living SPG	Emerging Birmingham Design Guide SPD
DC2 Extending your Home SPG	Emerging Birmingham Design Guide SPD
DC3 Specific Needs Residential Uses SPG	Emerging Birmingham Design Guide SPD
DC4 Access for People with Disabilities SPG	Emerging Birmingham Design Guide SPD
DC5 Shopfronts Design Guide SPG	Emerging Birmingham Design Guide SPD

Appendix 5

DC6 Electronic Information and Advertisement Signs SPG	DM7 Advertisements
DC7 Use of Basement Floors for Entertainment Purposes SPG	DM2 Amenity, DM6 Noise and vibration, DM14 Transport access and safety, DM15 Parking and servicing, PG3 Place making, TP21 The network and hierarchy of centres, TP24 Promoting a diversity of uses within centres
DC8 Petrol Filling Stations SPG	DM1 Air quality, DM2 Amenity, DM6 Noise and vibration, DM14 Transport access and safety, DM15 Parking and servicing
DC9 Guidelines for assessing Planning Applications for Development on or near to Landfill Sites SPG	DM3 Land affected by contamination, instability and hazardous substances
DC10 Car Parking Guidelines SPG	Emerging Parking SPD
DC11 Car Park Design Guide SPG	Emerging Birmingham Design Guide SPD
DC12 Development involving Former Public Houses SPG	Retain
DC13 Evening Opening of Licensed Betting Offices SPG	DM2 Amenity, DM6 Noise and vibration, DM14 Transport access and safety, DM15 Parking and Servicing, PG3 Place making, TP21 The network and hierarchy of centres, TP24 Promoting a diversity of uses within centres
DC14 Development Involving residential accommodation above commercial premises (Living above the shop) SPG	Revoked in 2012
DC15 Proposals involving Isocyanate Paints SPG	Not replaced
DC16 Design Guidelines for Bottle and Recycling Banks at Supermarket Car Parks SPG	Emerging Birmingham Design Guide SPD
DC17 Residential moorings SPG	Revoked in 2012
DC18 Policy for Ground Floor Non-Retail Uses in Shopping Centres SPG	Revoked in 2012
DC19 Location of Advertisement Hoardings SPG	Policy DM7 Advertisements
DC20 Floodlighting of Sports Facilities, Car Parks and Secure Areas (Light Pollution) SPG	DM5 Light pollution
DC21 Affordable Housing SPG	BDP TP31 Affordable housing
DC22 Use of S106 Agreements to secure provision of Public Toilet Facilities as part of new retail development SPG	Revoked in 2012
DC23 Guidelines for Bedroom Sizes for Student Accommodation SPG	BDP TP33 student accommodation
DC24 Guidelines for the location of Telecommunications Equipment (Mobile	DM16 Telecommunications

Appendix 5

Telephone Infrastructure)	
ENV1 Regeneration through conservation SPG	BDP TP12 Historic environment
ENV2 Nature Conservation Strategy for Birmingham SPG	Retain
ENV3 Canalside development in Birmingham – Design Guidelines SPG	BDP TP12 Historic environment, Emerging Birmingham Design Guide SPD
ENV4 Birmingham Canals Action Plan SPG	BDP TP12 Historic environment
ENV5 Open Space Requirements for New Residential Development SPG	Retain
ENV6 Archaeology Strategy SPG	BDP TP12 Historic environment
ENV7 Places for the future SPG	Emerging Birmingham Design Guide SPD
ENV8 Places for all SPG	Emerging Birmingham Design Guide SPD
ENV9 Lighting Places SPG	Policy DM5 Light pollution, emerging Birmingham Design Guide SPD
ENV10 High places SPG	Emerging Birmingham Design Guide SPD
Other SPD/Gs	**DMB or other policy/guidance replacement**
45 degree code (2006)	Emerging Birmingham Design Guide SPD
Loss of industrial land to alternative uses SPD (2011)	Retain
Mature suburbs SPD (2008)	Emerging Birmingham Design Guide SPD
Places of worship SPD (2011)	DM8 Places of worship and other faith related community facilities, DM2 Amenity, DM6 Noise and vibration, DM14 Transport access and safety, DM15 Parking and Servicing, PG3 Place making, TP21 The network and hierarchy of centres, TP24 Promoting a diversity of uses within centres
Sustainable management of urban rivers and floodplains SPD (2007)	Retain
Selly Oak, Edgbaston and Harborne: Houses in Multiple Occupation Article 4	DM11 Houses in multiple occupation (HMO)

BIRMINGHAM PLAN 2031

DEVELOPMENT MANAGEMENT IN BIRMINGHAM

Development Plan Document

December 2021

Contents

Foreword

Birmingham is going through exciting changes which will see significant levels of new development and infrastructure delivered in the city over the next 15 years. Through the Birmingham Development Plan (adopted in 2017), over 51,100 new homes and substantial amounts of employment land, retail and office development will be delivered by 2031.

At the heart of the Council's Local plan is the objective of sustainable growth which seeks to ensure that we build a strong and competitive economy, vibrant and healthy communities and protect and enhance our environment.

The Development Management in Birmingham (DMB) document aligns with the Birmingham Development Plan and the Council's key priorities, which are to make Birmingham a great city to live, grow up and age well in; as well as an excellent city to learn, work and invest in.

Growth must therefore be managed in the most positive, effective and sustainable way possible, which is why this document is important in providing detailed planning policies to support the implementation of the Birmingham Development Plan.

Ian Ward
Leader
Birmingham City Council

Building on the Birmingham Development Plan, which sets out the overall spatial strategy for the city, the Development Management in Birmingham (DMB) document will provide detailed development management policies that will be used to guide future development and determine planning applications. Overall, these policies will ensure that development is guided to the right location, is of a high standard, and that inappropriate development is deterred.

The DMB will help to ensure that the development which takes place in our city makes our city better and enhances and protects what is good, contributing to our vision and objectives for sustainable growth and development.

Ian MacLeod
Acting Director of Inclusive Growth
Birmingham City Council

1 Introduction

Birmingham's Local Plan

1.1 Birmingham has established a clear agenda to deliver sustainable growth meeting the needs of its population and securing high quality development and infrastructure. This agenda is set out through Birmingham's Local Plan which consists of a series of documents containing the strategy and policies for growth.

All proposals for development that require planning permission will be determined in accordance with the relevant policies in the Local Plan, which consists of the:

- Adopted Birmingham Development Plan (BDP).
- Adopted Aston, Newtown and Lozells Area Action Plan.
- Adopted Longbridge Area Action Plan.
- Adopted Balsall Heath Neighbourhood Development Plan.
- Adopted Bordesley Park Area Action Plan.

1.2 The Development Management in Birmingham Development Plan Document (DMB) replaces the 2005 Birmingham Unitary Development Plan policies and form part of Birmingham's Local Plan.

1.3 Other relevant planning documents which provide guidance on how planning policies will be applied include Supplementary Planning Documents and Guidance (SPD/ SPG) and non-statutory area frameworks. The Council is in the process of updating and consolidating existing design related SPDs and SPGs into one new SPD called the Birmingham Design Guide. A revised Parking SPD is also currently being prepared to replace the Council's existing Parking Guidelines SPD (2012). The Council also has Local Validation Requirements for Planning Applications which can be found at: https://www.birmingham.gov.uk/downloads/file/7362/local_validation_criteria_2018

Development Management in Birmingham

1.4 The purpose of the DMB is to provide detailed development management policies which are non-strategic and provide detailed often criteria based policies for specific types of development. The policies will give effect to, and support, the strategic policies set out in the Birmingham Development Plan (BDP), adopted in January 2017. It is intended that the policies contained within this document are to be applied City-wide unless specified otherwise.

1.5 This document contains 16 policies arranged in themes to reflect the BDP. They are informed by national policies and guidance which set out Government's planning policies for England and how it expects them to be applied.

1.6 The DMB provides detailed policies in areas where further detail is needed beyond that contained in the BDP. Each policy in the DMB seeks to deliver and/ or clarify in detail a BDP policy. The Council is satisfied that the DMB is in general conformity with the policies of the BDP and also takes full account of national planning policy and European Union Directives.

Objectives

1.7 The DMB will support the delivery of the objectives for the City as set out in the BDP. These are:

- To develop Birmingham as a City of sustainable neighbourhoods that are safe, diverse and inclusive with locally distinctive character.

- To make provision for a significant increase in the City's population.

- To create a prosperous, successful and enterprising economy with benefits felt by all.

- To promote Birmingham's national and international role.

- To provide high quality connections throughout the City and with other places including encouraging the increased use of public transport, walking and cycling.

- To create a more sustainable City that minimises its carbon footprint and waste, and promotes brownfield regeneration while allowing the City to grow.

- To strengthen Birmingham's quality institutions and role as a learning City and extend the education infrastructure securing significant school places.

- To encourage better health and well-being through the provision of new and existing recreation, sport and leisure facilities linked to good quality public open space.

- To protect and enhance the City's heritage assets and historic environment.

- To conserve and enhance Birmingham's natural environments, allowing biodiversity and wildlife to flourish.

- To ensure that the City has the infrastructure in place to support its future growth and prosperity.

Principles

1.8 The following key principles have been used to guide the preparation of the policies contained in the DMB

- Additionality - the DMB will provide detailed policies to support the delivery of the BDP. Where principles for development are addressed by national or BDP policies, they are not repeated. Some areas of policy will be supported by supplementary planning documents to provide more detailed advice about how particular policies will work in practice.

- Justification - the development management policies are based on an appropriate and deliverable strategy when considered against alternatives and relevant, proportionate and up-to-date evidence.

- Conformity - the development management policies have been developed in consultation with the relevant statutory consultees and other key stakeholders in accordance with the Duty to Co-operate and the Statement of Community Involvement. The policies are consistent with national policy and the BDP.

Structure of the document

1.9 The policies have been organised on a topic basis mirroring the structure of the BDP. Each policy begins with

an introduction setting out the purpose of the policy. The policy text is shown in a box. The explanatory supporting text provides a reasoned justification for the policy and important information on how the policy will be applied. Other relevant links are made including reference to BDP polices, relevant Supplementary Planning Documents (SPDs) and other guidance

Stages in producing the DMB
Initial Consultation Document consultation: September - October 2015

Preferred Options document consultation: February - March 2019

Publication document consultation:
November - December 2019

Submission to the Secretary of State: July 2020

Examination in Public:
November 2020

Main Modifications:
May 2021

Adoption:
December 2021

Duty to co-operate
1.12 Section 33A of the Planning and Compulsory Purchase Act 2004, as inserted by Section 110 of the Localism Act, places a duty on local authorities and relevant statutory bodies to cooperate on strategic planning issues. This duty requires ongoing, constructive and active engagement on the preparation of development plan documents. Duty to Co-operate bodies have been involved through the key stages of the process.

introduction / development management in birmingham

Sustainability appraisal

1.13 A Sustainability Appraisal (SA) assesses the social, economic and environmental effects of the proposed policies. It is a process that must be carried out during the preparation of a Local Plan. A Sustainability Appraisal (SA) of the impact of the DMB has been undertaken and is available in a separate document.

1.14 A Habitats Regulations Assessment Screening has been carried out in accordance with the European Union Directive to complement the SA. These have been undertaken as an integral and iterative part of the preparation of the DMB and their outcomes have been taken into account in formulating and refining the policies of the DMB.

1.15 Copies of the SA report and the Habitats Regulations Assessment Screening are available at www.birmingham.gov.uk/DMB.

Equality Duty

1.16 The Council has a commitment to equality which is also a statutory duty under the Equality Act 2010. The Act aims to promote equality, eliminate discrimination and encourage good relations between different groups. Engaging with residents and other stakeholders is key to meeting this duty in order to better understand the needs of diverse groups. Consultation on the DMB has been undertaken with a wide range of groups and an Equality Assessment has been undertaken.

Evidence base

1.17 The DMB has been informed by national and local planning policies, guidance and evidence produced by the Government, the Council and its partners. It has also drawn upon the evidence base which informed the development of the BDP. Evidence reports have also been specifically prepared for this DMB which form background evidence to the policy formation process. The evidence base

supporting the DMB can be found on the DMB page of the Council's website at www.birmingham.gov.uk/DMB.

introduction / development management in birmingham

2 Environment and sustainability

2.1 The policies in this chapter have a focus on ensuring that new development over its lifetime contributes towards improvements in the quality of life in Birmingham. This approach also supports the key objective of the BDP in bringing forward sustainable development and creating quality places.

DM1 Air quality

Introduction

2.2 The city's built environment and transport systems can have an impact on the City's air quality and, as a consequence, on health and wellbeing. Policies in the BDP seek to improve air quality within the city by taking a proactive approach to planning, regeneration and new development. This policy seeks to ensure that any proposal considers air quality and is accompanied by an appropriate scheme of mitigation where negative impacts are identified. The Government's current threshold for nitrogen dioxide is 40 micrograms/m3.

Why we have taken this approach and how the policy will be applied

2.3 Poor air quality is a public health concern at both a local and national level. The whole of Birmingham is designated as an Air Quality Management Area (AQMA) for nitrogen dioxide (NO_2) and the Council maintains an Air Quality Action Plan (AQAP) to direct compliance with national objectives.

2.4 In order to deliver compliance, Government has determined the need for Birmingham to introduce a Clean Air Zone (CAZ) to control road transport related emissions particularly NO_2. The Council's Cabinet has approved the preferred measures for a Birmingham Clean Air Zone that will seek to achieve air quality compliance with UK and EU statutory NO_2 limits in the shortest time possible, as part of a longer term air quality programme.

2.5 The positive management of air quality is a priority for the City, and it is imperative that development does not undermine the objectives of the CAZ, specifically that compliance within the CAZ is maintained and that no other areas become subject to requiring the declaration of a CAZ.

2.6 The AQAP, BDP and Birmingham Connected (the City Council's transport strategy) provide the framework to improve air quality in the city, including measures to encourage walking, cycling and the use of public transport, together with the support for the uptake of cleaner vehicle technologies through infrastructure provision, fleet transition and travel behaviour changes.

2.7 New developments have the potential to adversely affect air quality or be affected by air quality. This particularly relates to development that would trigger an Air Quality Assessment (AQA) as set out in the Local Validation Requirements. The assessment and mitigation approach contained within the West Midlands Low Emissions Towns and Cities Programme: Good Practice Air Quality Planning Guidance (2014) (or any subsequent future replacement) should be utilised to assess where relevant exposure may arise, calculate the emission damage

POLICY DM1 Air quality

1. Development proposals will need to contribute to the management of air quality and support the objectives of the local Air Quality Action Plan and Clean Air Zone particularly for nitrogen dioxide and particulate matter. Development that would, in isolation or cumulatively, lead to an unacceptable deterioration* in air quality, result in exceedances of nationally or locally set objectives for air quality, or increase exposure at the development site or other relevant receptors to unacceptable levels of air pollution, will not be considered favourably.
2. Where required, mitigation measures such as low and zero carbon energy, green infrastructure and sustainable transport to help to reduce and/or manage air quality impacts will be proportionate to the background air quality in the vicinity, including Clean Air Zone designations.
3. The development of fuelling stations for low emission and electric vehicles will be supported in principle where they establish a network of facilities to support the City's transport and air quality objectives. New or extended fuelling stations for petrol and diesel vehicles would need to be justified on the basis of addressing clear gaps in existing provision, demonstrate compliance with Part 1 of this policy and provide fuelling for low emission and electric vehicles.

*As defined in paragraph 2.7

Implementation

Local/ National Funding	Partnerships	CPO	CIL/ Section 106	Planning Management	Other Local Plan/ SPD/Regeneration Framework
✓	✓		✓	✓	

costs and identify mitigation. 'Unacceptable' deterioration and 'unacceptable levels' are defined as where development in isolation or cumulatively, would result in exposure to pollutant concentrations within 5% below the nationally or locally set objectives at the development site and/ or other relevant receptors; and where development would result in further exceedances where pollutant concentrations are already over the limit values.

2.8 AQAs must outline the current and predicted future pollutant concentrations at, and in the vicinity of, the development site. The AQA should also consider any potential cumulative impacts on air quality arising from planned development in the vicinity of the development site. The AQA should set out the planned mitigation measures to address any negative impacts. Mitigation measures should be provided on-site, however where this is impractical the AQA should demonstrate that it is possible to include measures in the local area which have equivalent air quality benefits. Mitigation measures may be secured either by planning condition or legal agreement where appropriate. Any impacts upon air quality will be considered in the context of the benefits the development brings to the City.

2.9 Mitigation measures will include ensuring that developments are designed to ensure walking and cycling is an obvious choice for short trips and that there is good public transport access to contribute towards the reduction in emissions, particularly nitrogen oxides and particulate matter. Where appropriate, new development should include low

emission vehicle charging points as part of their parking provision, and consideration should be given to options to introduce car clubs as an alternative model of car ownership. Further details will be set out in an updated Parking Supplementary Planning Document.

2.10 Developments for sensitive uses such as schools, hospitals and residential units should be located away from major sources/areas of air pollution. However, where this is not possible, developments must be designed and sited to reduce exposure to air pollutants by incorporating mitigation measures.

2.11 The City Centre offers an opportunity for air quality improvement with an extensive public transport network, good pedestrian access and cycle routes. Outside the City Centre, development proposals will also need to demonstrate how they will contribute towards improvements in air quality.

2.12 Where an AQA is required and the development involves significant demolition, construction or earthworks, the developer will also be required to assess the risk of dust and emissions impacts and include appropriate mitigation measures to be secured in a Construction Management Plan.

2.13 The UK Government has confirmed it will be outlawing the sales of new conventional petrol and diesel cars, as part of its 'Road to Zero' strategy. According to the proposals, no new cars or vans powered solely by a petrol or diesel engine will be sold in the UK from 2040. The Road to Zero strategy does, however, aim to considerably increase the viability and ease-of-use of electric cars.

2.14 Recent studies have shown that petrol fuelling stations are a source of higher rates of air pollution immediately adjacent to their operation and should therefore be subject to an AQA and subsequent mitigation requirements. New fuelling stations must also be capable of meeting the needs of new alternative fuel vehicles as well as electric vehicles to help meet growing demand.

2.15 Birmingham and the West Midlands have particular expertise and a strong skills base in relation to manufacturing processes, autonomous vehicles and energy technologies. These offer the opportunity to develop innovations and products in the ultra-low emissions and autonomous vehicles sector. The City is well placed to capitalise on the opportunity that this presents and put in place the infrastructure needed to support this policy.

Policy links
Birmingham Development Plan
- PG3 Place making
- TP1 Reducing the City's carbon footprint
- TP2 Adapting to climate change
- TP3 Sustainable construction
- TP4 Low and zero carbon energy generation
- TP5 Low carbon economy
- TP7 Green infrastructure network
- TP37 Health
- TP38 A sustainable transport network
- TP43 Low emission vehicles
- TP44 Traffic congestion and management

DM2 Amenity

Introduction

2.16 Birmingham seeks to sustainably manage growth so that it takes place in the most appropriate locations; meeting the city's needs while continuing to conserve and enhance the features that make Birmingham an attractive, vibrant, historic and interesting place to live, work and visit. Promoting and protecting high standards of amenity is a key element of ensuring sustainable growth and will be a major consideration when the Council assesses development proposals.

Why we have taken this approach and how the policy will be applied

2.17 The delivery of a high quality environment in Birmingham leaves a lasting impression on how the city is perceived and how it functions. In delivering the BDP, amenity is an important planning consideration to ensure places are fit for purpose and development proposals are acceptable.

2.18 Each development will have its own considerations, both within the site itself and its impact on the character of the area in which it is set. These factors will influence how amenity needs to be addressed. The careful design of development can ensure that proposals help to maintain or improve amenity. Development proposals should mitigate and reduce to a minimum, potential adverse impact on the amenity of nearby occupiers and neighbours. The Birmingham Design Guide, which will replace existing design guidance once adopted, will provide detailed design guidance relating to the policy criteria.

2.19 The built up nature of Birmingham presents opportunities for new uses to address and improve the amenity of the city. This can be achieved by ensuring that all developments are suitably located, well designed, adequately separated from neighbouring uses and operate in an appropriate way for the area in which they are located. Unless otherwise stated, this policy applies to all forms of development within the city, including changes of use and smaller proposals such as extensions.

2.20 Consideration should not only be given to the impact of individual developments, but also to cumulative impacts of development proposals in the vicinity. As a minimum, the definition of 'in the vicinity' is the area immediately adjoining and directly opposite the application site; but each proposal will be assessed on a site-by-site basis with scope agreed between the applicant and the Council through the planning application process. This will include committed and planned development proposals meaning those with planning permission and allocated in an adopted local plan.

2.21 The protection of amenity covers both living and working conditions. This means firstly that new development should provide for adequate day to day living and working conditions for those who will be occupying it. Secondly, it means that development should not have undesirable amenity impacts on the living conditions of neighbouring residents or compromise the continued operation of uses and activities which are already established in the locality. The NPPF is clear (with particular reference to noise) that businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established.

2.22 It may be necessary to apply planning conditions to new developments to ensure amenity standards are maintained such as hours of operation, requirements for ventilation equipment to be properly maintained, and delivery times.

Policy links

Birmingham Development Plan
- PG3 Place making, TP1-TP46.

POLICY DM2 Amenity

1. All development will need to be appropriate to its location and not result in unacceptable adverse impacts on the amenity of occupiers and neighbours. In assessing the impact of development on amenity, the following will be considered:

   a. Visual privacy and overlooking.
   b. Sunlight, daylight and overshadowing.
   c. Aspect and outlook.
   d. Access to high quality and useable amenity space.
   e. Noise, vibration, odour, fumes, dust, air or artificial light pollution.
   f. Safety considerations, crime, fear of crime and anti-social behaviour.
   g. Compatibility of adjacent uses.
   h. The individual and cumulative impacts of development proposals in the vicinity on amenity.

   See also Policy DM10 'Standards for Residential Development' where proposals relate to residential development.

Implementation

Local/ National Funding	Partnerships	CPO	CIL/ Section 106	Planning Management	Other Local Plan/ SPD/Regeneration Framework
				✓	✓

DM3 Land affected by contamination, instability and hazardous substances

Introduction

2.23 Regeneration of previously developed land is a key Government policy and is integral to the city's growth strategy for the creation of housing and jobs. While the Council supports development opportunities that bring areas of land affected by contamination or instability back into beneficial use, the potential for any risks associated with these issues should be appropriately considered to make development safe. This equally applies to any risks associated with hazardous substances.

Why we have taken this approach and how the policy will be applied

2.24 With the re-use of previously developed land in urban areas such as Birmingham, the potential for land contamination and instability is commonplace. The contamination of land can have adverse impacts on human health, wildlife and contribute to the pollution of water bodies. The pollution of land can have an adverse impact on its suitability for certain types of development. There is often a link between the contamination and stability of land. New development, however, presents an opportunity to bring contaminated land back into use.

2.25 Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner. When development is proposed on or adjacent to land that is known or suspected to be affected by contamination and/ or instability, or where development is proposed that would be sensitive to these risks, proposals for development should be accompanied by an appropriate level of supporting information. Early engagement with the local planning authority and environmental health, particularly if the land is determined as contaminated land under Part 2A of the Environmental Protection Act 1990, will clarify what assessment is needed to support the application and issues that need to be considered in the design of a development.

2.26 A preliminary risk assessment will be required to identify the nature and extent of contamination and/ or instability. Where the assessment identifies significant harmful risk to human health or the environment, the Council will require a full ground investigation and a risk assessment management and remediation strategy. Any remedial measures must be agreed by the Council before the development is commenced and completed prior to occupation. Planning conditions may be applied to ensure remedial measures are submitted to and approved by the Local Planning Authority. As part of this, the developer will be required to provide a report verifying that the works have been carried out as approved. The Planning Practice Guidance: Land affected by contamination provides further detail on how contamination may be identified, mitigated and remediated.

2.27 The Environment Agency will also have an interest in the case of 'special sites' designated under Part 2A of the Environmental Protection Act 1990 and all sites where there is a risk of pollution to controlled waters. Remediation will

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POLICY DM3 Land affected by contamination, instability and hazardous substances

1. Proposals for new development will need to ensure that risks associated with land contamination and instability are fully investigated and addressed by appropriate measures to minimise or mitigate any harmful effects to human health and the environment within the development and the surrounding area and/or groundwater.

2. All proposals for new development on land which is known to be, or potentially, contaminated or unstable, will be required to submit a preliminary risk assessment, and where appropriate, a risk management and remediation strategy based on detailed site investigation to minimise and mitigate unacceptable risks to both the development and the surrounding area and/or groundwater.

3. Proposals for development of new hazardous installations, or development located within the vicinity of existing hazardous installations, will only be permitted where it is demonstrated that necessary safeguards, in consultation with the Control of Major Accidents Hazards (COMAH) competent authority, are incorporated to ensure the development is safe; and that it supports the spatial delivery of growth as set out in the Birmingham Development Plan.

Implementation

Local/ National Funding	Partnerships	CPO	CIL/ Section 106	Planning Management	Other Local Plan/ SPD/Regeneration Framework
				✓	

need to meet their requirements. The developer should also check whether an environmental permit is required before development can start. See also BDP Policy TP6 Management of flood risk and water resources.

2.28 Remedial measures will need to be carried out in line with current legislation, guidelines and best practice, including applying the Environment Agency's principles in managing risks to groundwater (the precautionary principle, risk based approach and groundwater protection hierarchy).

2.29 When a new development is proposed that could cause land to become contaminated and/or unstable, for instance by nature of the proposed use or by reason of specific elements of the proposed development, the development should be designed in such a way as to minimise the risk of contamination or instability occurring. Advice on how to ensure that development is suitable to its ground conditions and how to avoid risks caused by unstable land or subsidence is provided in the Planning Practice Guidance on Land Stability.

2.30 Hazardous installations comprise a range of chemical process sites, fuel and chemical storage sites, and pipelines. It is important that any risks associated with the development of hazardous installations, or development near them, are appropriately considered through the planning process.

2.31 The Council will consult with the COMAH competent authority, which in most cases is the Health and Safety Executive (HSE) and Environment Agency acting jointly and for nuclear sites the Office of Nuclear Regulation and the Environment Agency, acting jointly. The Council will need to be completely satisfied that the proposal will not constitute a hazard to existing communities or the local environment.

2.32 Hazardous substances consent is required for the presence of certain quantities of hazardous substance stored or used. The hazardous substances consent process ensures that necessary measures are taken to prevent major accidents and limit their consequences to people and the environment. The list of substances and controlled quantities are set out in Schedule 1 to the Planning (Hazardous Substances) Regulations 2015. An application for hazardous substances consent must provide the information set out at regulation 5 of the Regulations. The Council will consult the COMAH competent

authority and others as required by legislation. It will consider the comments received and take account of local needs and conditions, the local plan, and any other material considerations. Further guidance is set out in the Planning Practice Guidance on Hazardous Substances.

Policy links
Birmingham Development Plan
- PG3 Place making.
- TP37 Health.

DM4 Landscaping and trees

Introduction

2.33 Maintaining and expanding the green infrastructure network throughout Birmingham is important to the city's growth agenda and provide net gains for biodiversity. Green landscaping (including trees, hedgerows and woodland) forms a critical part of this network and provide a multitude of benefits, having a positive impact on human health and improving the quality of visual amenity and ecological networks. This policy seeks to ensure that landscaping is an integral part of the overall design of development. It also sets out criteria for how existing landscaping should be considered in development proposals.

POLICY DM4 Landscaping and trees

Landscaping

1. All developments must take opportunities to provide high quality landscapes and townscapes that enhance existing landscape character and the green infrastructure network, contributing to the creation of high quality places and a coherent and resilient ecological network.

2. The composition of the proposed landscape should be appropriate to the setting and the development, as set out in a Landscape Plan*, with opportunities taken to maximise the provision of new trees in appropriate locations within a multi-functional green infrastructure network, create or enhance links from the site to adjacent green infrastructure and support objectives for habitat creation and enhancement as set out in the Birmingham and Black Country Nature Improvement Area Ecological Strategy 2017-2022 and subsequent revisions.

Trees, woodland and hedgerow protection

3. Development proposals must seek to avoid the loss of, and minimise the risk of harm to, existing trees of quality, woodland, and/or hedgerows of visual or nature conservation value, including but not limited to trees or woodland which are subject to a Tree Preservation Order. Development resulting in the loss or deterioration of Ancient Woodland or Ancient/ Veteran Trees will be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists. Where trees and/or woodlands are proposed to be lost as a part of development this loss must be justified as a part of an Arboricultural Impact Assessment (AIA) submitted with the application.

4. Where a proposed development retains existing trees or hedgerows on site, or where there is an incursion into a tree root protection area, provision must be made for their protection during the demolition and construction phase of development with monitoring and mitigation measures being put in place to ensure that development works do not have an adverse impact on retained trees, hedgerows and associated wildlife.

5. To ensure that the benefits of proposed development outweigh the harm resulting from the loss of any trees, woodlands or hedgerows, adequate replacement planting will be required to the satisfaction of the Council. Replacement should be provided on-site unless the developer can justify why this is not achievable. Where on-site replacement is not achievable, contributions to off-site tree planting will be sought through a Section 106 Agreement. The method of calculating these contributions will be contained within the city's Tree Strategy.

* see the adopted Local Validation Criteria

Implementation

Local/ National Funding	Partnerships	CPO	CIL/ Section 106	Planning Management	Other Local Plan/ SPD/Regeneration Framework
			✓	✓	✓

Why we have taken this approach and how the policy will be applied

2.34 The green infrastructure of the city is an important part of our landscape and townscape - enhancing quality of the environment, human well-being and can positively affect the value of local property and attract investment. Policy TP7 Green Infrastructure in the BDP, and other supporting policies, set out how the green infrastructure network will be maintained and enhanced, with the role of landscape and trees clearly recognised.

2.35 New development has a clear role in supporting the city's approach to green infrastructure, and can contribute to and enhance the landscape, provide biodiversity net gain and help to reduce the impact of climate change. Each development site will be able to contribute to the green infrastructure network in appropriate ways reflecting the site context and location. The ecological network is currently described in the Birmingham and Black Country Nature Improvement Area Ecological Strategy 2017-2022, which identifies opportunities for habitat creation, restoration and enhancement within Core Ecological Areas, Ecological Linking Areas and Ecological Opportunity Areas. This strategy, and subsequent revisions, should be referenced to ensure new development is in keeping with the surrounding landscape and supports the maintenance of a resilient and coherent ecological

network.

2.36 Protected trees, woodland and hedgerows should be retained as an integral part of the design of development except where their long-term survival would be compromised by their age or physical condition or there are exceptional circumstances such as, where the tree is considered to be imminently dangerous or its loss is significantly outweighed by the benefits of the proposed scheme and there are no viable development alternatives. Sufficient consideration must be given to retained trees and the proposed new use of the land around them, especially in respect of their long term viability, beneficial or adverse shade to buildings, perceived threat and building distances.

2.37 Trees of quality classified in line with BS5837 as being of categories A or B in quality and woodland and/or hedgerows of visual or nature conservation value should be considered as worthy of protection and development proposals should seek to avoid their loss and minimise risk of harm.

2.38 All development proposals that impact on trees are required to follow the process outlined in the latest British Standard (BS 5837 2012 or subsequent updated version) and provide an up-to-date AIA. This should be undertaken by suitably qualified and experienced professionals, including arboricultural consultants and tree surgeons.

2.39 Where development would result in the loss of (BS5837) category A, B or C tree(s), adequate replacement planting will be assessed against the existing value of the tree(s) removed, calculated using the Capital Asset Value for Amenity Trees (CAVAT) methodology (or other future equivalent). Reasonable deductions will be permitted based on the value of any replacement planting works and the individual circumstances of the proposal.

The Council will provide detailed guidance in a Tree Strategy.

2.40 New trees, including trees on the highways should be provided with sufficient above and below ground planting space requirements (soil volumes, water supply and drainage) to allow for healthy growth to maturity without creating conflicts with buildings, pavements and utility infrastructure. Where appropriate, the maintenance of a Landscape Management Plan will be required through a planning condition. Planting should be maintained in accordance with the plan and follow Secured by Design principles.

Policy links
Birmingham Development Plan
- PG3 Place making.
- TP7 Green infrastructure network.
- TP8 Biodiversity and geodiversity.

DM5 Light pollution

Introduction

2.41 Creative and appropriate lighting can provide a valuable contribution to making Birmingham successful, safe and connected. Given the built up nature of the area, the city needs to ensure that lighting makes a positive impact on the built and natural environment. This policy seeks to ensure that impact of light pollution from new development will be minimised and mitigated.

Why we have taken this approach and how the policy will be applied

2.42 Well-designed lighting can make a positive contribution to the urban environment, providing safe environments for a range of activities, creating landmarks out of existing buildings and developing way-finding opportunities through the city. It can also improve safety by lighting dark places and enhance the visual appearance of buildings and townscapes. Through careful planning and design, adverse impacts of light pollution, including glare, light spill and sky glow can be avoided.

2.43 In applying the policy the Council will seek to limit the impact of artificial lighting on local amenity and nature conservation (including ecological networks and blue and green infrastructure).

2.44 BDP policy TP11 Sports facilities provides policy on sports facilities lighting. Advice and guidance is provided by and should be sought from Sport England on sports lighting proposals.

2.45 Proposals involving or adjacent to designated and non-designated heritage assets, must apply a lighting design appropriate to the asset, considering the architecture of the building to be illuminated and the impact this may have on the character of its surroundings.

2.46 Where appropriate, the Council will require applicants to submit a Lighting Assessment Report/ Strategy (as set out in the Local Validation Requirements) to detail the measures which will be implemented to minimise and control the level of illumination, glare, and spillage of light and retain dark landscapes to protect wildlife. Planning conditions may be imposed to restrict lighting levels and hours of use or require measures to be taken to minimise adverse effects.

2.47 Lighting associated with new developments should be designed in accordance with established industry standard guidance which is currently set out by the Institute of Lighting Professionals. In particular, the use of low energy light sources will be encouraged. Detailed guidance on the design of lighting proposals will be included in the Birmingham Design Guide. The Planning Practice Guidance on Light Pollution also provides detailed guidance on how light pollution should be managed.

Policy links
Birmingham Development Plan
- TP8 Biodiversity and geodiversity.
- TP11 Sports facilities.
- TP12 Historic Environment
- TP37 Health.

POLICY DM5 Light pollution

1. Development incorporating external lighting should make a positive contribution to the environment of the city and must seek to avoid or mitigate any potential adverse impacts from such lighting on amenity and public safety.

2. Proposals for external lighting will need to demonstrate that the lighting is:
   a. Appropriate for its purpose in its setting.
   b. Designed to avoid or limit its impact on the privacy or amenity of its occupiers, nearby residents and other light sensitive uses/ areas, intrinsically dark landscapes, and nature conservation.
   c. Designed to preserve or enhance the character or appearance of any heritage assets which are affected.
   d. Designed to a high standard and well integrated into the proposal.
   e. Energy efficient.

Implementation

Local/ National Funding	Partnerships	CPO	CIL/ Section 106	Planning Management	Other Local Plan/ SPD/Regeneration Framework
				✓	✓

environment and sustainability / development management in birmingham
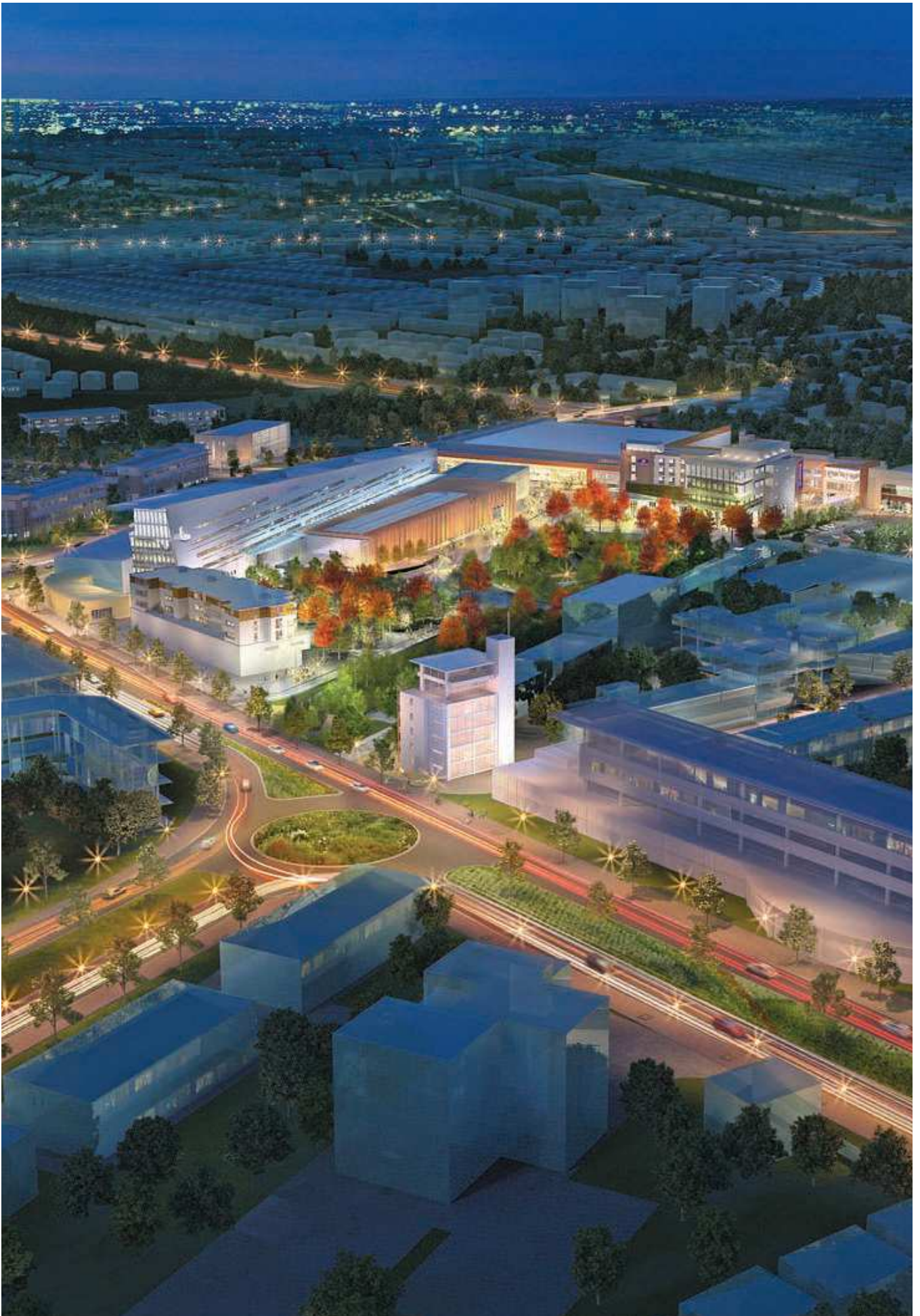
DM6 Noise and vibration

Introduction

2.48 Noise is an inherent part of everyday life and contributes to the character of different places. Ensuring that noise and vibration are considered in development proposals and managed appropriately brings benefit to the quality of the living and working environments. This policy seeks to mitigate the impact of new noise and vibration generating development and to ensure that noise sensitive uses are located and designed in a way to protect them from major sources of noise.

Why we have taken this approach and how the policy will be applied

2.49 The growth of Birmingham over the centuries has led to a dynamic and attractive environment with its busy commercial areas in close proximity to residential areas. Noise and vibration needs to be considered where new developments may create additional noise and/ or vibration, or when they would be sensitive to existing or planned sources of noise and/or vibration.

2.50 Proposals for noise sensitive developments in areas of existing and/or planned sources of major noise will be subject to a case by case analysis with reference to expert advice from the Council's Environmental Health Team. As far as is practicable, noise sensitive developments should be located away from major sources of existing and/or planned sources of noise unless an appropriate and robust scheme of mitigation is provided and the benefits of the proposal in terms of regeneration are considered to outweigh the impacts on amenity and biodiversity. 'Planned' sources of noise mean sites in the nearby vicinity that are under construction; sites with extant consents; sites that have planning consent which are not yet started; and sites which are allocated in the development plan.

2.51 New development should be sited and designed so that it can be integrated effectively with existing businesses, cultural, entertainment and community facilities (such as places of worship, pubs, music venues, and sport clubs). Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') is required to provide suitable mitigation.

2.52 In all cases, the assessment will be based on an understanding of the existing and predicted levels of environmental noise at both the development site and nearby receptors and the measures needed to bring noise down to acceptable levels for the existing or proposed noise-sensitive development. A noise assessment and scheme of mitigation will be required as part of the planning application. The determination of noise impact will be based on the Noise Policy Statement for England and the Planning Practice Guidance on Noise. Although not a Supplementary Planning Document, the Council also has a detailed guidance note on Noise and Vibration maintained by Environmental Health.

POLICY DM6 Noise and vibration

1. Development should be designed, managed and operated to reduce exposure to noise and vibration. The following will be taken into account when assessing development proposals:

    a. The location, design, layout and materials.
    b. Positioning of building services and circulation spaces.
    c. Measures to reduce or contain generated noise (e.g. sound insulation).
    d. Existing levels of background noise.
    e. Hours of operation and servicing.
    f. the need to maintain adequate levels of natural light and ventilation to habitable areas of the development.

2. Applications for noise and/or vibration-generating development must, where relevant, be accompanied by an assessment of the potential impact of any noise and/or vibration generated by the development on the amenity of its occupiers, nearby residents and other noise sensitive uses/areas, including nature conservation. Where potential adverse impact is identified, the development proposal shall include details on how the adverse impact will be reduced and/or mitigated.

3. Applications for noise-sensitive development (such as residential uses, hospitals and schools) must be accompanied, where relevant, by an assessment of the impact of any existing and/or planned sources of noise and vibration in the vicinity of the proposed development including transport infrastructure, entertainment/ cultural/community facilities and commercial activity. Where potential adverse impact is identified, the development proposal shall include details on how the adverse impact will be reduced and/or mitigated.

Implementation

Local/ National Funding	Partnerships	CPO	CIL/ Section 106	Planning Management	Other Local Plan/ SPD/Regeneration Framework
				✓	✓

2.53 The design of mitigation measures should have regard to the need to provide a satisfactory environment for future occupiers and take account of other material planning considerations such as urban design.

2.54 Noise and vibration can have a significant impact on amenity and on wildlife and habitats. For large or prolonged development, consideration should also be given to the potential noise and vibration impacts during construction as well as the post development phase.

2.55 Sources of vibration include transportation (especially railways) and industrial processes. Where the proposed works will include piling, vibro-compaction or blasting (demolition) the applicant shall assess the impact of vibration on any structure in the vicinity of works. Where an adverse impact is predicted development proposals shall include details of any vibration monitoring and precautions to prevent damage to any structure.

Environmental Health can advise where a vibration assessment will be required.

2.56 Good design of developments, along with other actions, can help to mitigate any noise or vibration impacts. These include:

- Reduction and/or containment of the source of impact, and/or protection of surrounding sensitive buildings.

- Layout to provide adequate distance between the source and sensitive buildings or areas, and/or screening/buffers.

- Limiting operating times or activities of sources allowed on the site, and/or specifying acceptable limits.

Policy links
Birmingham Development Plan
- PG3 Placemaking
- TP37 Health.

3 Economy and network of centres

3.1 Ensuring that Birmingham has a successful and prosperous economy requires the provision of a wide range of employment opportunities and services to meet the needs of the city's growing population. The BDP provides the strategic approach to ensuring provision for a wide range of businesses and jobs in the city. This section sets out detailed policies for specific types of development to support economic success.

DM7 Advertisements

Introduction
3.2 Commercial advertising is a component of modern day life but must integrate effectively into the city's environment through appropriate siting and design.

The aim of this policy is to ensure that advertisements are well designed and relate well in scale and character to a building or surrounding area.

Why we have taken this approach and how the policy will be applied
3.3 The Council aims to ensure that advertisements, including hoardings, are designed to a high standard and contribute to a safe and attractive environment. Poorly placed or designed advertisements can have a negative impact on the appearance of both the built and natural environment, and impact on amenity, public safety and movement. At the same time, sensitive areas need to be protected from any adverse impacts from advertisements.

3.4 The display of advertisements is subject to a separate planning consent process as set out in The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended). Through the planning system, advertisements are subject to the consideration of impacts in the interests of amenity and public safety. The Planning Practice Guidance: Advertisement explains the control of the advertisement regime and provides detail in relation to consideration affecting public safety and amenity.

3.5 Policy DM7 applies to all types of advertisements, including hoardings, freestanding signs, those attached to buildings, telecommunication assets, totems and other signs. It also applies to internally and externally illuminated signs, and digital signs.

POLICY DM7 Advertisements

1. Proposals for advertisements should be designed to a high standard and meet the following criteria:
   a. Suitably located, sited and designed having no detrimental impact on public safety or amenity, taking into account cumulative impact.
   b. Sympathetic to the character and appearance of their location, adjacent buildings and the building on which they are displayed having regard to their size, materials, construction, location and level of illumination.
   c. Avoid proliferation or clutter of signage on the building and in the public realm.
   d. Not obscure architectural features of a building or extend beyond the edges or the roofline of buildings and respect the building's proportions and symmetry.
   e. Not create a dominant skyline feature when viewed against the immediate surroundings.
   f. Designed to preserve or enhance the character or appearance of any heritage assets which are affected.

2. Illuminated advertisements and signs should seek to avoid or mitigate any potential adverse impact on uses/ areas sensitive to light such as nearby residential properties and other light sensitive uses/ areas, intrinsically dark landscapes, and nature conservation.

3. The siting of advertisement hoardings will be resisted where visible from the M6 motorway or A38 Aston Expressway and purposefully designed to be read from the roadway and where the attention of drivers is likely to be distracted.

Implementation

Local/ National Funding	Partnerships	CPO	CIL/ Section 106	Planning Management	Other Local Plan/ SPD/Regeneration Framework
				✓	✓

3.6 Detailed guidance on the design of advertisements, signs and shop fronts will be updated and included in the emerging Birmingham Design Guide SPD.

Policy links
Birmingham Development Plan
• PG3 Place making.
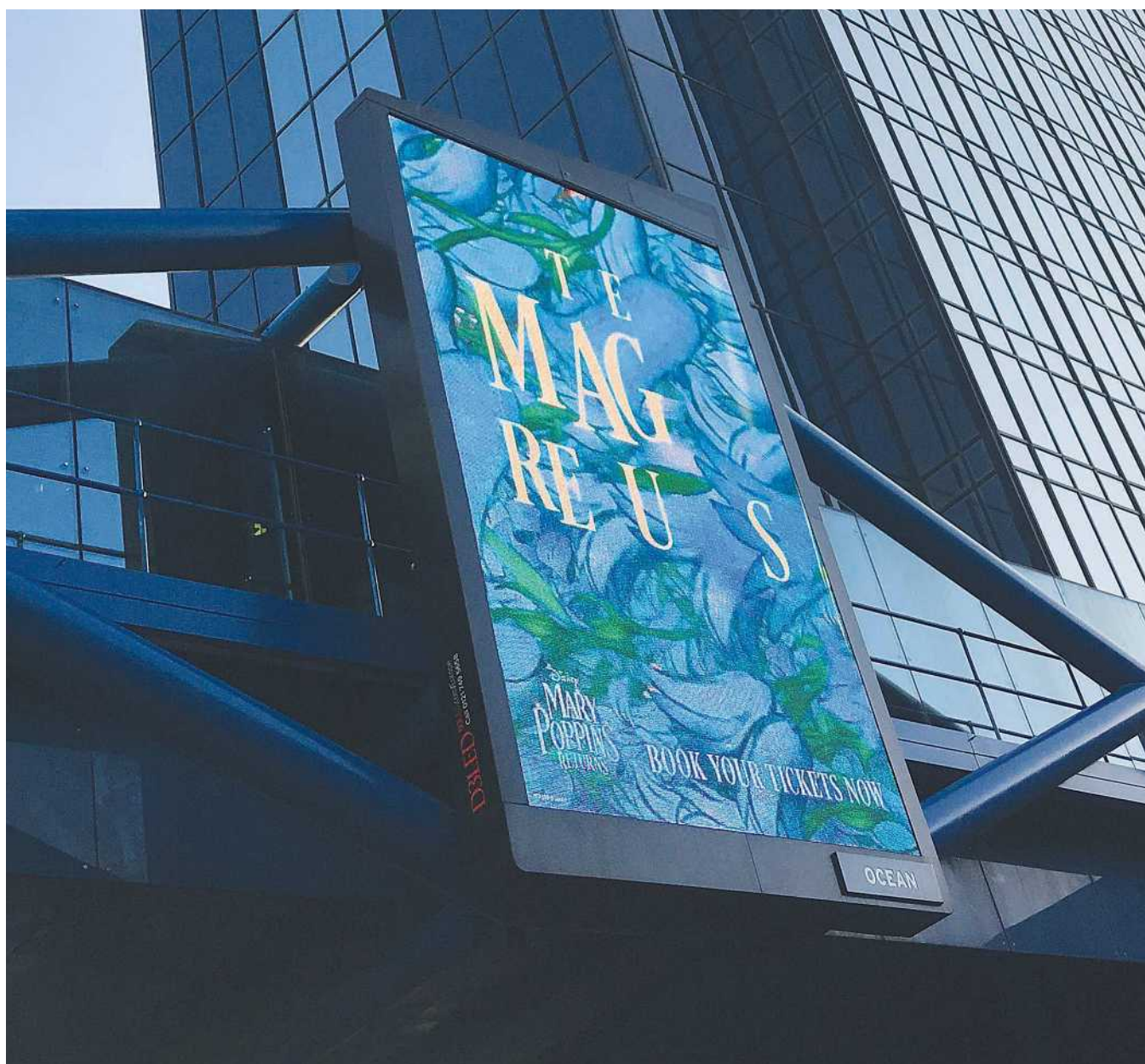
DM8 Places of worship and faith related community uses

Introduction

3.7 Birmingham's population is increasingly diverse with a broad range of faiths and a growing demand for faith premises. Places of worship are an important part of the infrastructure, culture and identity of the city. The aim of this policy is to ensure such facilities are appropriately located, designed and managed to benefit users and protect local neighbourhoods.

Why we have taken this approach and how the policy will be applied

3.8 Places of worship are places where groups of people gather to perform acts of religious praise, honour, or devotion. In addition to this main function, they can also include facilities that provide religious or faith-related training, accommodation, and social welfare, as well as community and educational facilities. This policy also relates to faith related community and educational uses which do not physically form part of a place of worship.

3.9 The Council recognises the important and valuable contribution of places of worship to communities across the city and wishes to ensure that the needs of faith communities in Birmingham are appropriately met in the context of a growing and increasingly diverse population.

3.10 The preferred locations for places of worship and faith related community uses is in the network of centres as is defined in Policy TP21 of the BDP and as part of any specific allocations in the Local Plan. These are the most sustainable locations in terms of transport accessibility and parking. Other locations will be considered favourably where the criteria outlined in the policy can be satisfactorily met. Proposals for places of worship and faith related community uses should also comply with other relevant local plan policies and guidance.

3.11 Development should be designed, managed and operated to reduce and/ or mitigate any potential adverse impact from noise on nearby residents. Consideration will be given to attaching conditions to any

planning permission granted, which would help to reduce or eliminate such problems.

3.12 Proposals will need to include travel plans where appropriate and management plans to reduce the risk of vehicles parking inappropriately and causing an obstruction or having a detrimental impact on highway safety.

3.13 Additional ancillary activities such as weddings, funerals, and other special occasions are likely to lead to higher volumes of people and increased noise levels, traffic movements and parking demand. These can have an adverse impact on local amenity and public safety and will need to be carefully considered having regard to their frequency and the number of additional people that would be attracted to the premises. A travel plan and/or management plan will be required to address such issues.

3.14 Good design can help to mitigate noise and promote sustainable development. Good design can also ensure that places of worship respect the local context and character of an area and contribute to a high quality environment.

3.15 The information to be submitted in support of a planning application for a place of worship or faith related community use is set out in the Local Validation Requirements for planning applications.

Policy links
Birmingham Development Plan
- PG3 Place making.
- TP21 The network and hierarchy of centres.

POLICY DM8 Places of worship and faith related community uses

1. Except for any specific allocation in the Local Plan, the Council's preferred locations for the development of places of worship and faith related community uses are in the network of centres as defined in Policy TP21 of the Birmingham Development Plan. Proposals for development outside of these locations will be considered favourably where:

   a. It is well located to the population the premises is to serve by means of walking, cycling and public transport.
   b. It will not have an unacceptable adverse impact on local amenity, parking, public and highway safety.
   c. It does not conflict with any other policies in the Local Plan.

Implementation

Local/ National Funding	Partnerships	CPO	CIL/ Section 106	Planning Management	Other Local Plan/ SPD/Regeneration Framework
				✓	

DM9 Day nurseries and early years provision

Introduction

3.16 The Council recognises the value and importance of provision of suitable day care facilities for preschool children. Demand for a range of such facilities, operated either from dwellings or other premises, is likely to increase over the plan period. To ensure that basic standards are maintained, the Council will seek to ensure that all facilities are appropriately located, in particular to protect the amenity of the neighbouring properties and the wider area.

Why we have taken this approach and how the policy will be applied

3.17 Increasing living costs, coupled with a need for both parents to work have resulted in increasing demand for pre-school nurseries. Although some schools have sought to provide nursery places, private companies provide the majority of pre-school nursery places. This is often provided through the conversion of existing buildings and sometimes through the development of purpose built facilities.

3.18 Early years facilities bring benefits to the community by reducing barriers to work for parents and carers and can provide an environment conducive to the development of the children who attend. Investment in the expansion and improvement of educational facilities is supported, in accordance with the BDP (Policy TP36 Education). However, such facilities must be provided in appropriate locations and suitable premises to ensure high standards of provision and prevent harm to the amenity of neighbours. The network of centres as defined by Policy TP21 of the Birmingham Development Plan and as part of any specific allocations in the Local Plan, are considered the preferred locations for such uses, but other locations will be considered appropriate where the policy criteria are met. Where nurseries are proposed in residential areas it is important to ensure that they would not give rise to unacceptable adverse impacts on local amenity. In these cases it may be necessary to ensure that there is sufficient distance between buildings and/or that mitigation measures will be put in place to minimise the impact from noise and disturbance.

3.19 If you are using your home (dwellinghouse) for childcare provision and more than seven children are minded, not including your own children, this will be considered as a day nursery and planning consent would be required .

3.20 There is normally a need for parents to drop off their children in the morning and pick them up in the afternoon or evening. It is therefore important that sufficient safe parking is provided, following the guidance set out in the Council's Parking Guidelines and Car Park Design Guide Supplementary Planning Documents and any subsequent revision.

3.21 The Council will expect all planning applications for day nurseries and child care facilities in residential buildings and other non-residential buildings to outline: the numbers of staff and other visitors expected to attend the facility; the days of the week and the hours when the facility will operate; the nature of the activity; parking provision and transport patterns, including servicing of the use; disabled access; steps taken to minimise the noise impact of such uses; and a travel plan and noise mitigation measures where appropriate.

Policy links
Birmingham Development Plan
- PG3 Place making.
- TP21 The network and hierarchy of centres
- TP36 Education.

POLICY DM9 Day nurseries and early years provision

1. Except for any specific allocation in the Local Plan, the Council's preferred locations for the development of day nurseries and facilities for the care, recreation and education of children are in the network of centres as defined in Policy TP21 of the Birmingham Development Plan. Proposals for development outside these locations will be considered favourably where:

   a. It is well served by means of walking, cycling and public transport.
   b. It will not have an unacceptable adverse impact on local amenity, parking, public and highway safety.
   c. Sufficient useable outdoor play space to meet the needs of the children is provided.
   d. The property can accommodate satisfactorily the number of children proposed.
   e. It does not conflict with any other policies in the Local Plan.

Implementation

Local/ National Funding	Partnerships	CPO	CIL/ Section 106	Planning Management	Other Local Plan/ SPD/Regeneration Framework
				✓	

economy and network of centres / development management in birmingham

4 Homes and neighbourhoods

4.1 The provision of the right amount and right type of housing in the right location is essential to supporting the city's growing population and creation of sustainable neighbourhoods. The BDP sets out the overall approach to developing new homes and promoting sustainable communities in the city. The policies in this section offers an approach to ensure the delivery of a good standard of housing and addressing the impacts and issues of certain forms of housing.

DM10 Standards for residential development

Introduction
4.2 Birmingham residents should be able to enjoy good levels of amenity and have accommodation that meets every day needs for indoor and outdoor space, privacy, daylight and outlook. This policy sets out how to achieve high quality residential environments to protect the health and well-being of residents of existing and new dwellings.

Why we have taken this approach and how the policy will be applied
4.3 In delivering Policy PG3 Place making, amenity is an important consideration as it contributes to peoples' physical and mental health and well-being. Homes should meet occupiers' needs in terms of the size and layout of internal and external spaces.

4.4 The Government's Technical Housing Standards - Nationally Described Space Standards (March 2015 as updated) applies to new residential development in Birmingham. This will ensure that all homes are highly functional, meeting occupiers' typical day to day needs at a given level of occupation. It is based on being able to accommodate a basic set of furniture, fittings, storage, activity and circulation space appropriate to the design and occupancy level of the dwelling. When Government amends these standards, the City Council will prepare technical notes to demonstrate how the update is applied within Birmingham.

POLICY DM10 Standards for residential development

1. All residential development will be required to meet the minimum Nationally Described Space Standards (Appendix 1). This does not include specialist accommodation covered by Policy DM12 and defined in paragraph 4.28 of this document.

2. Housing developments of 15 or more dwellings, should 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.

3. Separation distances* between buildings and surrounding uses should protect residents' privacy and outlook, ensure appropriate levels of daylight to internal and external living spaces and prevent undue enclosure, overshadowing, noise and disturbance.

4. All new residential development must provide sufficient private useable outdoor amenity space appropriate to the scale, function and character of the development and adequate provision for recycling/refuse storage and collection*.

5. Development will need to ensure adequate outlook and daylight to dwellings, in line with the approach of the '45 degree code'. This includes potential impacts on existing houses, where development should not cross the line from an angle of 45 degrees from the nearest window providing the main source of natural light to a 'habitable room' of dwellings that could be affected.

6. Exceptions to the above will only be considered where it can be robustly demonstrated with appropriate evidence that to deliver innovative high quality design, deal with site specific issues or respond to local character, adhering to the standards is not feasible due to physical constraints or financial viability issues. Any reduction in standards as a result must demonstrate that residential amenity will not be significantly diminished.

* Guidelines are set out in Places for Living SPD which will be replaced by the Birmingham Design Guide.

Implementation

Local/ National Funding	Partnerships	CPO	CIL/ Section 106	Planning Management	Other Local Plan/ SPD/Regeneration Framework
				✓	✓

4.5 Where space standards are to be met, applicants must submit appropriate supporting documentation alongside the planning application to ensure that compliance with the standards can be verified, including completion of an internal space compliance statement. The Policy will not apply to applications that are already registered prior to the date of adoption of the DMB.

4.6 All new development, including extensions of properties within residential areas has the potential to affect adjoining dwellings. Daylight and outlook are important to create pleasant spaces and support everyday activities.

4.7 The '45 Degree Code' is a well-established approach in Birmingham to protect daylight levels and outlook for occupiers, particularly for existing houses. In applying the code the main considerations include:
- If the extension/building is single storey, the line is drawn from the midpoint of the nearest habitable room ground floor window of the adjoining premises.

- If the extension/building is two storey or taller, the measurement is taken from the quarter point of the nearest habitable room ground floor window.

- If the neighbouring property has already been extended, the measurement is normally taken from the nearest habitable room window of that extension.

- If the neighbouring property has an extension which is made mainly of glass, the policy is applied to the original window opening in the wall where the extension has been added.

Existing guidance on the 45 degree code will be merged into the forthcoming Birmingham Design Guide SPD.

4.8 Amenity will also be considered in terms of adequate separation from surrounding uses (existing and proposed) to ensure that satisfactory living standards can be achieved through suitable and careful design.

4.9 Outdoor private space is highly valued and it is important for both children and adults to have access to some private outdoor space for play and relaxation as well as more practical requirements such as for garden tools/ furniture, drying clothes and outdoor toys. The amount and type of outdoor space should relate to the potential occupancy of the dwelling and should be useable, with consideration from a number of factors, including shape, orientation, landform and shading. Outdoor amenity spaces should receive sunlight for at least part of the day, with garden sizes increased where necessary to take account of overshadowing. Any proposal affecting an existing dwelling will also need to ensure that private external open spaces are retained in accordance with the standards set out in the policy.

4.10 Existing guidance on outdoor amenity space and separation distances is set out in Places for Living SPD, which will be updated through the forthcoming Birmingham Design Guide SPD.

4.11 'Physical constraints', as described in Part 6 of the policy, may include (but are not limited to) site specific constraints such as topography, flood risk, ground conditions, location of services or heritage and character considerations.

Policy links
Birmingham Development Plan
- PG3 Place making.
- TP27 Sustainable neighbourhoods.
- TP28 Location of new housing
- TP30 The type, size and density of new housing.
- TP37 Health.

DM11 Houses in multiple occupation (HMO)

Introduction

4.12 With the city's growing population, there is a need to ensure that new development supports successful communities by ensuring the right mix of housing types in an area, securing appropriate design and supporting well managed properties. HMOs provide an important contribution to people's housing choice. The policy aims to ensure that such development also preserves the residential amenity and character of an area and that harmful concentrations do not arise.

Why we have taken this approach and how the policy will be applied

4.13 A House in Multiple Occupation, commonly known as a HMO, is defined as a property rented to at least three people who are not from one 'household' (e.g. a family) but share facilities such as a bathroom and kitchen. Planning use classes distinguish between 'small' HMOs of up to six people (C4 use class), and 'large' HMOs of seven of more occupants which are Sui Generis.

4.14 The BDP recognises that different types of residential accommodation are important to meeting the wide ranging housing needs of people in the city. All developments should achieve a high quality design contributing to a strong sense of place (BDP Policy PG3), and new homes should contribute towards achieving mixed and balanced communities (BDP policy TP30). The City Council will seek to prevent the loss to other uses of housing which is in good condition (BDP Policy TP35).

4.15 The conversion and reuse of existing buildings for housing can help to meet the changing housing needs of the city. There has been a significant trend for this form of housing in the private rented market in Birmingham in recent years. This trend has emerged in part due to the accommodation needs of the city's substantial student population, but also to cater for transient populations and to address a general need for low cost accommodation for young professionals unable to afford home ownership.

4.16 It is important that such proposals take account of effects on the surrounding area. Over-concentrations of certain types of accommodation can have a number of negative impacts on the local communities, including the loss of family housing, effects to the

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POLICY DM11 Houses in multiple occupation (HMO)

1. Proposals for the conversion of existing dwellinghouses or the construction of new buildings to be used as Houses in Multiple Occupation (HMO) should protect the residential amenity and character of the area and will be permitted where they:
   a. Would not result in this type of accommodation forming over 10% of the number of residential properties* within a 100 metre radius of the application site**.
   b. Would not result in a C3 family dwellinghouse being sandwiched between two HMOs or other non-family residential uses***.
   c. Would not lead to a continuous frontage of three or more HMOs or non-family residential uses***.
   d. It would not result in the loss of an existing use that makes an important contribution to other Council objectives, strategies and policies.
   e. Would not give rise to unacceptable adverse cumulative impacts on amenity, character, appearance, highway safety and parking.
   f. Provide high quality accommodation with adequate living space including:
      • Bedrooms of at least 7.5 sq.m. (single) and 11.5 sq.m. (double).
      • Communal living space comprising lounge, kitchen and dining space either as distinct rooms or in an open plan format.
      • Washing facilities.
      • Outdoor amenity space.
      • Recycling/ refuse storage.

2. Where a) and c) has already been breached, planning permission will only be granted in exceptional circumstances****.

3. Proposals for the intensification or expansion of an existing HMO should comply with (e) and (f) above, having regard to the size and character of the property.

   *   Paragraph 4.22 sets out the residential properties identified for the purposes of calculating the percentage concentration of HMOs and the data sources for the purposes of identifying HMOs.
   **   Measured from the centre point of the property
   *** For the purposes of this policy a non-family residential use is defined as a HMO, student accommodation, residential accommodation within C1 and C2 Use and self-contained flats.
   **** Exceptional circumstances are set out in paragraph 4.25.

Implementation

Local/ National Funding	Partnerships	CPO	CIL/ Section 106	Planning Management	Other Local Plan/ SPD/Regeneration Framework
				✓	

residential character, appearance, and amenity of an area as a result of excessive noise and disturbance to residents and inreased parking pressures.

4.17 The cumulative effect of incremental intensification in an area caused by numerous changes of use from small HMO to large HMOs or the extension of existing HMOs can be also significant. For these reasons applications for such changes will be assessed using criteria three of the policy.

4.18 A planning policy for the Article 4 Direction Area of Selly Oak, Harborne and Edgbaston was adopted in November 2014. This will be replaced by Policy DM11 Houses in Multiple Occupation in the DMB when adopted.

4.19 Where additional bedrooms are created in both new build HMOs and conversions of existing buildings, these will be expected to meet the internal space standards set out in the policy. Appropriately sized, proportioned and equipped communal areas and adequate bathroom and cooking facilities should be provided, relative to the expected number of occupants in accordance with the Council's adopted guidance on Property and Management Standards applicable to Private Rented Properties including HMOs. Communal living space should be provided within the main structure of the building and not within conservatories due to the inferior noise insulation and consequent effect on amenity of neighbours. Insufficient communal areas increase the time occupants must spend in their individual bedrooms and can therefore hinder social cohesion within the property. The size of the bedrooms and the extent of their ability to function as social areas will be taken into account in determining whether communal space provision is sufficient. Planning applications must be supported by a full set of floor plans that includes details showing the internal measurements for each room; for bedrooms

indicating if they are intended to be single or double; and any areas of reduced ceiling heights.

4.20 The City Council, local residents, universities, private landlords and other partners will continue to work together to support the best management, maintenance and provision of residential accommodation, and to ensure that a good standard of amenity is maintained.

4.21 In the right location, good design of development and its future operation can help to limit any negative impacts. This includes ensuring the proposal can be delivered in line with best practice and Government guidance.

4.22 The Council will calculate the number of HMOs in the relevant area for each individual planning application based on the following method.

Stage 1
Identifying residential properties
The residential properties identified are those located within 100m of the application site (measured from the centre point of the

property). For the purposes of assessing applications for HMO development, dwelling houses and HMOS that are located within blocks of flats or subdivided properties are counted as one property. Residential institutions, care homes, hostels and purpose built student accommodation and other specialist housing are also counted as one property per block. This will ensure that calculations of HMO concentration are not skewed.

Stage 2
Count HMOs
HMOs are identified from the following sources:
- Properties licensed as a HMO
- Properties with C4 or Sui Generis HMO planning consent or issued with a Certificate of Lawful Development
- Declared C4 HMOs recorded in the 12 month notice period for the city-wide Article 4 Direction 2019
- Council tax records – student exemptions for council tax excluding purpose built student accommodation and private flats

Stage 3
Calculate concentration
The concentration of HMOs surrounding the application site is calculated as a percentage of the total estimated number of existing HMO units against the total number of residential properties. It is accepted that although the HMO sources listed above provide the most robust approach to identifying the numbers and locations of HMOs in an area, it will not identify all HMOs.

4.23 Additional HMOs can also impact on residential amenity where they lead to concentrations in the immediate vicinity of an application site, as well as creating other impacts where they proliferate at a broader neighbourhood level. Planning permission would not be granted where the introduction of a new HMO would result in an existing C3 dwelling being 'sandwiched' by any adjoining HMOs or non-family residential uses on both sides. This would not apply where the properties are separated by an intersecting road or where properties have a back to back relationship in different streets. Planning permission would not be granted where it would result in a continuous frontage of 3 or more HMOs or non-family residential uses. In situations where properties are not traditional houses situated along a street frontage, the policy can be applied flexibly depending on the individual circumstances of the proposal.

4.24 The Council's Strategic Housing Market Assessment (SHMA) (2013) indicates a need for accommodation of all sizes but it also shows that the highest net change in the number of homes needed is for 3 and 4 or more bedroom homes. Where there are particular shortages of large family accommodation, the City Council will be sensitive to any such need when considering proposals for HMOs which would result in the loss of such housing.

Exceptional circumstances
4.25 The concentration of HMOs in an area may be at such a point where the introduction of any new HMO would not change the character of the area. This is because the vast majority of properties are already in HMO use. In these circumstances the retention of the property as a family dwelling will have little effect on the balance and mix of households in a community which is already over dominated by the proportion of existing HMO households. Therefore, the conversion of the remaining buildings to a HMO would not further harm the character of the area.

Policy links
Birmingham Development Plan
• PG3 Place making.
• TP27 Sustainable neighbourhoods.
• TP28 The location of new housing.
• TP30 The type, size and density of new housing.
• TP35 The existing housing stock.

homes and neighbourhoods / development management in birmingham

DM12 Residential conversions and Specialist accommodation

Introduction

4.26 The development of any new type of housing should help contribute to creating sustainable neighbourhoods and provide good quality accommodation to meet the needs of people in the city. This policy seeks to ensure that such development is well located, achieves a high standard of design, protects local character and achieves good levels of amenity.

Why we have taken this approach and how the policy will be applied

4.27 The BDP (Policies TP27 and 30) seeks to ensure that hew housing provision is made in the context of creating sustainable communities which contain a wide mix of housing. New housing should add to the choice of accommodation available to people, whatever their circumstances. A strong and sustainable community responds to the needs of all residents, including those who are considered to be most vulnerable and requiring access to housing that meets their specific needs.

4.28 Specialist residential accommodation is a generic description used to describe housing that meets the needs of specific groups of people. This can comprise of hostels, shared housing, care homes and supported accommodation for older people and people with mental health, learning disabilities, dementia, physical and sensory impairment, ex-offenders and drugs and alcohol dependency. It does not include age-restricted general market housing, retirement living or sheltered housing.

4.29 It remains a priority for the Council to provide safe environments which facilitate independent living for vulnerable residents and older people in Birmingham. All applications for specialist housing including extensions to existing facilities should have regard to the Council's latest housing needs strategies.

4.30 The Council will resist proposals for residential conversion and specialist accommodation where it would result in an over-concentration of similar uses in the immediate area, if it is considered that the proposal will cause demonstrable harm to the character and function of an area, and/or local amenity. Planning permission may be refused on grounds that further development of such uses will have a harmful impact on local character, appearance, amenity and sustainable communities.

4.31 Specialist accommodation is normally most appropriately located in large detached properties set in their own grounds. The development of such uses in smaller detached or large semi-detached or terraced houses will not be acceptable, unless the amenity of adjoining occupiers can be safeguarded. Proposals should include within the site boundary adequate outdoor amenity space to provide a satisfactory living environment for residents. The amount and location of such space should be related to the proposed number of residents and their particular needs. This should normally be a minimum of 16 sq.m. of space per resident. Details of the management arrangements of such developments should be submitted with an application.

4.32 Conversions are a useful way of maximising the efficient use of the existing housing stock and land. It may also enable many large, old properties to be retained which are important to the character of many residential areas.

4.33 However, it is important that development is carefully managed in order not to detract from the character of the area and/or amenity of nearby residents; and

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POLICY DM12 Residential conversions and Specialist accommodation

1. This policy applies to the subdivision or conversion of properties into self-contained dwelling units and the development of specialist accommodation*. Such development will be supported where:

   a. It will not lead to an unacceptable adverse impact on the amenity, character, appearance, parking, public and highway safety of the area, taking into account the cumulative effects of similar uses in the area.

   b. The accommodation and facilities, including outdoor amenity space and provision for safety and security, is suitable for the intended occupiers.

   c. It is accessible to local shops, services, public transport and facilities appropriate to meet the needs of its intended occupiers.

   d. The scale and intensity of the proposed use is appropriate to the size of the building.

   e. It will not result in the loss of an existing use that makes an important contribution to the Council's objectives, strategies and policies.

   * Specialist accommodation is defined in para 4.28

Implementation

Local/ National Funding	Partnerships	CPO	CIL/ Section 106	Planning Management	Other Local Plan/ SPD/Regeneration Framework
✓				✓	

that the size of the property or site is suitable and can provide a good living environment for occupants. The conversion of a single dwelling house into several separate units may result in an increased intensity of use and possible adverse effects on the adjacent properties, including increased amount of traffic, on-street parking and poor waste management. This should be fully assessed and adequate mitigation measures will be required to address any adverse impacts.

4.34 Generally, detached properties are most appropriate for flat conversions. Semi-detached and terraced properties may be considered but the potential effect on adjoining occupiers will be assessed particularly carefully. Properties should be of sufficient size to permit the creation of individual dwelling units of a satisfactory size and layout. Favourable consideration will not normally be given to the sub-division of single dwellinghouses with 3 or less bedrooms into smaller dwelling units.

4.35 The Council's Strategic Housing Market Assessment (SHMA) (2013) indicates a need for accommodation of all sizes, but it also shows that the highest net change in the number of homes needed to 2031 is for 3 and 4 or more bedroom homes. Where there are particular shortages of large family accommodation, the City Council will be sensitive to any such need when considering proposals for flat conversions and the specialist accommodation.

Policy links
Birmingham Development Plan
- PG3 Place making.
- TP27 Sustainable neighbourhoods.
- TP28 the location of new housing
- TP30 The type, size and density of new housing.
- TP31 Affordable housing.
- TP32 Housing regeneration.
- TP35 The existing housing stock.

DM13 Self and custom build housing

Introduction

4.36 Self and custom build housing can be an additional source of supply to conventional housing and further housing choice. The Council will seek to support individuals or groups of individuals that wish to build their own homes as a more affordable means by which to access home ownership.

Why we have taken this approach and how the policy will be applied

4.37 Self-build and custom build housing can be defined as homes built or commissioned by individuals or groups of individuals for their own use. There is a strong push at a national level to increase self-build activity and a number of requirements have been placed on local councils, including keeping a register of those seeking to acquire a plot for self-building and having regard to the register in carrying out their planning, housing, land disposal and regeneration functions.

4.38 The National Planning Policy Framework requires local planning authorities to clearly understand need and plan for a mix of housing, including for people wishing to build their own homes.

4.39 The Self-Build and Custom Housebuilding Act 2015 places a duty on local authorities to keep a register of those seeking to acquire a plot for self-build and to have regard to the register in carrying out their planning, housing, land disposal and regeneration functions.

4.40 The Housing and Planning Act introduced a duty on local authorities to "give suitable development permission in respect of enough serviced plots of land to meet the demand for self-build and custom housebuilding in the authority's area arising in each base period". The Act defines 'demand' as evidenced by the number of entries added to the register during the relevant period.

4.41 The Council has been operating its self-build register since November 2014 and the number of entries on the register is increasing. The number of new homes granted exemptions from the Community Infrastructure Levy due to their self/custom build status also indicates that there is considerable self-build activity in the city.

4.42 The Council will encourage and facilitate self and custom build housing, including promotion of the self-build register, further engagement with local self-build groups and consideration of Council owned land opportunities. The Council welcomes engagement with local residents or community groups wishing to build their own home, and pre-application planning discussion is recommended.

4.43 The Council's Housing Development Team is also working to make permissioned plots available to support this type of house building. This development management policy will therefore form just one part of a wider package of measures intended to promote and facilitate self-build and custom build housing development in the city.

4.44 While the Council is generally supportive of proposals for self or custom build units, it is important that applications for self or custom build do not compromise the strategy of the BDP. Planning applications for this type of housing will still need to comply with other relevant policies in the Local Plan.

Policy links
Birmingham Development Plan
- PG3 Place making.
- TP27 Sustainable neighbourhoods.
- TP30 The type, size and density of new housing.

POLICY DM13 Self and custom build housing

1. The Council will actively support the development of self and custom-build homes in suitable locations where they support the delivery of the Birmingham Development Plan and do not conflict with other policies in the Local Plan.

2. The Council will encourage developers to consider incorporating an element of self-build plots into development schemes as part of the housing mix. The Council's self-build register will be used as a source of evidence of the demand for self-build and custom build housing locally, and the level of demand will be a material consideration in determining proposals.

3. Affordable self-build plots will be considered and encouraged as a suitable product within the affordable housing mix provided on larger sites (200 dwellings or more) where it is demonstrated to meet an identified need and is not substituted for needed social rented and affordable rented housing.

Implementation

Local/ National Funding	Partnerships	CPO	CIL/ Section 106	Planning Management	Other Local Plan/ SPD/Regeneration Framework
✓				✓	

homes and neighbourhoods / development management in birmingham

5 Connectivity

5.1 Connectivity is key to the successful future growth of Birmingham and the wellbeing of its residents. The core principles in regard to how we use our streets, create places and link people and businesses to opportunities are covered by the BDP. The development management policies in this section set out the detailed transport and traffic considerations relevant to individual development proposals. It also sets out the policy on telecommunications.

DM14 Transport access and safety

Introduction
5.2 Transport from individual developments can have an impact on the efficiency, safety and sustainability of the city's transport system. This policy will be used to determine whether or not a proposed development would have an impact on the existing highway network and, therefore, whether the proposal would be considered appropriate in transport terms. It also provides guidelines on the provision of adequate access and servicing for development.

Why we have taken this approach and how the policy will be applied
5.3 New developments make an important contribution towards an efficient, comprehensive and sustainable transport system in Birmingham. At the same time this network is an enabler for economic growth across the city ensuring that businesses can operate successfully and people have a choice of sustainable transport modes for their journeys.

5.4 Highway safety is fundamental to the design of the highway network and no development should have a negative impact on highway safety. The Road Safety Strategy for Birmingham adopts a 'Safe System' approach which acknowledges the risk of human error and places significant responsibility on design of the transport network to ensure that collisions do not result in serious injury. Effective traffic management is essential to the safe and free flow of movement on the highway

POLICY DM14 Transport access and safety

1. Development must ensure that the safety of highway users is properly taken into consideration and that any new development would not have an unacceptable adverse impact on highway safety.

2. Development must ensure that safe, convenient and appropriate access arrangements are in place for all users, including the needs of people with disabilities and reduced mobility within the development and onto the highway network, both during the construction and operation stages of the development. Priority shall be given to the needs of sustainable transport modes.

3. Developments should provide for the efficient delivery of goods and access by service and emergency service vehicles. Where it is demonstrated that this is not feasible, an appropriate alternative solution must be agreed with the City Council and secured.

4. Development proposals that will generate significant amounts of traffic should be accompanied by a Transport Assessment and should be located where the need to travel will be minimised, and is in a location that is readily accessible by sustainable transport modes. Development proposals that generate significant amounts of traffic will be required to provide, implement and monitor a Travel Plan that sets out the means by which the developer will encourage users to adopt more sustainable modes of travel.

5. On Birmingham's strategic highway network, development must seek opportunities to remove unnecessary access points. New direct vehicular accesses will be supported where specified in a local plan or where there are no practical alternatives (including consideration of impacts on public transport, walking and cycling routes and road safety).

6. All new vehicle access points (including private driveways) will be supported where it would not result in:
   a. Reduction in pedestrian or highway safety.
   b. Detrimental impact on public transport, cycling and walking routes;
   c. Adverse impact on the quality of the street scene and local character of the area.
   d. The loss of important landscape features, including street trees and significant areas of green verge which cannot be appropriately replaced, or their loss mitigated.
   e. The prevention or restriction of the implementation of necessary or future transport improvements.

Implementation

Local/ National Funding	Partnerships	CPO	CIL/ Section 106	Planning Management	Other Local Plan/ SPD/Regeneration Framework
	✓		✓	✓	

network. It can improve accessibility and potentially reduce congestion by understanding flows of traffic at peak and non-peak periods. Where it is necessary for the developer to undertake improvements to the highway network to facilitate the safe and smooth movement of traffic, or incorporate pedestrian, cycle or public transport improvements, these works will be secured through the use of appropriate planning conditions and legal agreements.

5.5 Development proposals that will generate significant amounts of traffic should be accompanied by a Transport Assessment or Statement and will be required to provide a Travel Plan. Applications for development with significant transport implications should demonstrate the measures they are taking to minimise the impact of the development on highway users. The Council's thresholds for Transport Assessments/ Statements and Travel Plans are set out in the Council's Local Validation Requirements for Planning Applications. Further guidance on the preparation of TAs and TSs can be found in national policies and guidance.

5.6 Detailed guidance on Travel Plans is provided on the Birmingham Connected Business Travel Network website with requirements for uploading and maintaining travel plans through STARSfor. For schools refer to information on Modeshift STARS. Where Travel Plans are to be submitted alongside a planning application, they should be worked up in consultation with the local authority using the STARSfor

connectivity / development management in birmingham

online system. They should have measurable outputs, which might relate to targets in the local transport plan, and should set out the arrangements for monitoring the progress of the plan, as well as the arrangements for enforcement, in the event that agreed objectives are not met. This is likely to be addressed through a legal agreement between the relevant parties and the Council under a Section 106 Agreement.

5.7 Travel Plans must include clear, viable proposals for monitoring of travel patterns post occupation. Where a Travel Plan is required to mitigate significant impacts on the highway, the agreed measures and targets of the Travel Plan may be secured with a sanction to ensure that any failure to deliver agreed measures and/or outcomes can be remedied. The sanction would be used, if required, to address the travel impact of the scheme to the benefit of all parties.

5.8 Where construction activity is likely to have an impact on the highway network (physical highway occupation or increased traffic due to site construction or servicing) a Construction Traffic Management Plan (CTMP) will be required. This should meet the Council's CTMP guidance notes and ensure safe and efficient operation of the highway. This should include consideration of communications in relation to travel impact, in liaison with the Transportation Demand Management Team. It is the developer's responsibility to ensure the impact on the highway network is reduced as far as reasonably possible and any necessary Highways Act licenses are obtained before construction takes place.

5.9 With all development, the existing network and proposed access points to the site will need to be suitable for future traffic levels. The main parts of the highway network within Birmingham, including the strategic highway network and the West Midlands key route network, are more sensitive to traffic impacts

from development. Any new or amended access arrangements need to be carefully considered to ensure the efficient, effective and safe operation of the highway infrastructure across the City.

5.10 In relation to criteria 6.e.of the policy, 'necessary or future transport improvements' are defined as those included in policies, strategies and programmes published by Birmingham City Council, West Midlands Combined Authority, West Midlands Rail Executive, Network Rail, Highways England, National Government and other relevant public sector organisations.

Policy links
Birmingham Development Plan
- PG3 Place making.
- TP38 A sustainable transport network.
- TP39 Walking.
- TP40 Cycling.
- TP41 Public transport.
- TP42 Freight.
- TP43 Low emission vehicles.
- TP44 Traffic and congestion management.
- TP45 Accessibility standards for new development.

connectivity / development management in birmingham

DM15 Parking and servicing

Introduction

5.11 Managing parking in the right way can play a crucial role in creating a balanced, efficient and sustainable transport network. The Council recognises that a flexible and balanced approach is needed to prevent excessive car parking provision and not increasing parking pressure on existing streets.

Why we have taken this approach and how the policy will be applied

5.12 It is estimated that the growth in the city's population will result in 1.2 million additional daily trips across the network by 2031 (by all transport modes). It is not possible or indeed desirable to accommodate all these by private car due to existing constraints on our highway capacity and because of the significant detrimental impact of traffic on our environment.

5.13 In order to ensure that development is sustainable, local parking policies, alongside other planning and transport measures, should act to promote sustainable transport choices and reduce reliance on the private car for work and other journeys. Careful and appropriate management of parking is a key element of Birmingham's transport strategy.

5.14 The Council's parking standards currently set out in the Car Parking Guidelines Supplementary Planning Document (2012) will be replaced by updated standards in the Parking Supplementary Planning Document . It provides revised parking standards for all new developments in the city to reflect the National Planning Policy Framework. The approach to the provision of parking aims to promote sustainable transport, reduce congestion, improve road safety and reduce pollution. The Parking SPD will be used as a guide in the determination of planning applications. The City Council will take account of whether there are any circumstances, related either to the site or the operation of the development, which may support an alternative level of parking provision. The Parking SPD will also set out how the city will manage on-street (public highway) and off-street parking provision across the city.

5.15 The Council will support and promote the provision of on-street and off-street charging points for ultra-low emission vehicles and car clubs. The availability of car club vehicles has been shown to reduce the level of car ownership and usage. The Council considers this would contribute to sustainable development in the City. Car club bays should ideally be placed on-site if they would be accessible to the public as well as for the occupants of the site, or on the public highway close to the development.

5.16 Garages will only be accepted as contributing towards parking provision for development if they have adequate functional space. Guidance on this is contained within the Parking SPD. This will help ensure that parking of cars in garages contributes to parking needs and residential amenity by creating a more secure environment, and reducing the potential for unsocial parking and visual impacts.

POLICY DM15 Parking and servicing

1. Parking and servicing should contribute to the delivery of an efficient, comprehensive and sustainable transport system. Development should promote sustainable travel, reduce congestion, and make efficient use of land.

2. New development will need to ensure that the operational needs of the development are met in terms of parking provision, including parking for people with disabilities, cycle parking and infrastructure to support the use of low emission vehicles and car clubs.

3. Proposals for parking and servicing shall avoid highway safety problems and protect the local amenity and character of the area. Parking and servicing should be designed to be secure and accessible to its users and adhere to the principles of relevant Supplementary Planning Documents.

4. Proposals for standalone parking facilities must demonstrate that there is a deficit in local publicly available off-street parking, or that it will help to relieve on-street parking problems.

Implementation

Local/ National Funding	Partnerships	CPO	CIL/ Section 106	Planning Management	Other Local Plan/ SPD/Regeneration Framework
	✓		✓	✓	

5.17 It is essential that a design led approach is adopted to ensure parking functions satisfactorily for all users including disabled drivers, pedestrians, cyclists and service vehicles and does not impact negatively on the surrounding streetscape. Well planned and designed parking can have a determining influence on the streetscape, can influence development density and is important to the success of all developments. The existing Car Park Design Guide will be replaced by the forthcoming Birmingham Design Guide SPD, providing detailed guidance on parking design.

Policy links
Birmingham Development Plan
- PG3 Place making.
- TP38 A sustainable transport network.
- TP39 Walking.
- TP40 Cycling.
- TP41 Public transport.
- TP42 Freight.
- TP43 Low emission vehicles.
- TP44 Traffic and congestion management.
- TP45 Accessibility standards for new development.

connectivity / development management in birmingham

DM16 Telecommunications

Introduction

5.18 The Council recognises the importance of advanced high quality communications infrastructure to serve local business and communities and their crucial role in the national and local economy. This includes the development of high speed broadband technology and other communication networks for which there is a growing demand. The objective of this policy is to ensure the right balance is struck between providing essential telecommunications infrastructure and protecting the environment and local amenity.

Why we have taken this approach and how the policy will be applied

5.19 Whilst there are significant economic and social benefits associated with the development of telecommunications infrastructure, the development of masts, antennae and other associated infrastructure can give rise to significant levels of concern relating to visual intrusion and impact on the surrounding area in which it is located. Operators and local authorities work to the 'Code of best practice on mobile network development' in England, which has been produced in accordance with a working group including English Heritage, the Mobile Operators Association, National Parks England, and the Planning Officers Society.

5.20 Proposals for new telecommunications equipment require either planning permission or prior notification from the City Council, although some small installations are not required to seek this approval.

5.21 The necessary evidence to justify the proposed development should support applications for telecommunications development. This should include the outcome of consultations with organisations with an interest in the proposed development. When adding to an existing mast or base station, a statement that self-certifies the cumulative exposure will not exceed the International Commission on Non-Ionising Radiation Protection Guidelines is needed, or evidence that the applicant has explored the possibility for erecting antennas on an existing building, mast or other structure and a statement certifying International Commission guidelines will need to be met.

5.22 Relating to the visual intrusion of masts, careful consideration into the design should be carried out to minimise the visual impact of the development. Such design solutions may relate to the form of structure, to colour and to materials, for example masts can be designed to look like trees or street furniture or can be designed into the fabric of a building.

5.23 When freestanding masts outside of the built up area are being developed, it is essential to ensure that they, as far as possible, blend in with the natural landscape. This includes the associated equipment such as underground cable, service routes and means of enclosure. Development should be designed such that there is minimal loss or damage to trees and other natural vegetation. Additional planting of trees and vegetation is a means to screen such development. In accordance with the policy no unacceptable harm should arise to the natural environment as a result of such applications.

POLICY DM16 Telecommunications

1. The Council will promote the development of advanced, high quality communications infrastructure to support economic growth and more accessible, inclusive communities. This will be achieved by requiring new development proposals to:

    a. Demonstrate opportunities have been explored for sharing of masts or sites. Such evidence should accompany any application made to the local planning authority.

    b. Demonstrate that there are no suitable alternative sites for telecommunications development available in the locality including the erection of antennae on existing buildings or other suitable structures.

    c. Be sited and designed in order to minimise impact on the visual and residential amenity, character and appearance of the surrounding areas.

    d. If on a building, apparatus and associated structures to be sited and designed in order to minimise impact to the external appearance of the building.

    e. Not have unacceptable harm on areas of ecological interest, areas of landscape importance, or heritage assets and their setting.

    f. Conform to the International Commission on Non-Ionising Radiation Protection (ICNIRP) guidelines, taking account where appropriate of the cumulative impact of all operators' equipment located on the mast/site.

Implementation

Local/ National Funding	Partnerships	CPO	CIL/ Section 106	Planning Management	Other Local Plan/ SPD/Regeneration Framework
				✓	

5.24 Further guidance is contained in paragraphs 42-46 of the NPPF, and the Telecommunications Development: Mobile Phone Infrastructure SPD.

Policy links
Birmingham Development Plan
- PG3 Place making.
- TP46 Digital communications.

connectivity / development management in birmingham

6 Implementation and monitoring

6.1 The DMB will be implemented through the development management process. Its policies along with other Birmingham Local Plan policies and the National Planning Policy Framework will be the primary means by which the Council will make decisions on planning applications.

6.2 The Birmingham Authority Monitoring Report (AMR) will monitor the effectiveness of the Development Management policies. Updates of the AMR will normally be published annually.

6.3 The Development Management policies support the delivery of the BDP. Each Development Management policy identifies links to BDP policies. The effectiveness of the Development Management policies will be monitored using indicators set out in Appendix 2 of this document, many of which link with BDP monitoring indicators.

6.4 Once the Development Management in Birmingham DPD is adopted, a review of the document will be undertaken at least every five years.

implementation and monitoring / development management in birmingham

7 Appendices

Appendix 1: Technical Housing Standards - Nationally Described Space Standard (March 2015 as updated)

Table 1 - Minimum Gross Internal floor Areas (GIA) and Storage

Number of bedrooms	Number of bedspaces (people)	1 storey dwelling (sq.m)	2 storey dwelling (sq.m)	3 storey dwelling (sq.m)	Built in storage* (sq.m)
1b	1	39(37)**	-	-	1
	2	50	58	-	1.5
2b	3	61	70	-	2
	4	70	79	-	
3b	4	74	84	90	2.5
	5	86	93	99	
	6	95	102	108	
4b	5	90	97	103	3
	6	99	106	112	
	7	108	115	121	
	8	117	124	130	
5b	6	103	110	116	3.5
	7	112	119	125	
	8	121	128	134	
6b	7	116	123	129	4
	8	125	132	138	

*   The built-in storage figures are included within the GIAs (i.e. are not additional).

** Where a studio has a shower room instead of a bathroom, the floor area may be reduced from 39m2 to 37m2, as shown bracketed.

The Standard requires that:

a. the dwelling provides at least the GIA and built-in storage area set out in Table 1.

b. a dwelling with two or more bedspaces has at least one double (or twin) bedroom.

c. in order to provide one bedspace, a single bedroom has a floor area of at least 7.5 sq.m and is at least 2.15m wide.

d. in order to provide two bedspaces, a double (or twin) bedroom has a floor area of at least 11.5 sq.m.

e. one double (or twin) bedroom is at least 2.75m wide and every other double (or twin) bedroom is at least 2.55m wide.

f. any area with a headroom of less than 1.5m is not counted within the GIA unless used solely for storage (if the area under the stairs is to be used for storage, assume general floor area of 1sq.m within the GIA).

g. any other area that is used solely for storage and has a headroom of 900-1500mm (such as under eaves) is counted at 50% of its floor area, and any area lower than 900mm is not counted at all.

h. a built-in wardrobe counts towards the GIA and bedroom floor area requirements, but should not reduce the effective width of the room below the minimum widths set out above. The built-in area in excess of 0.72 sq.m in a double bedroom and 0.36sq.m in a single bedroom counts towards the built-in storage requirement.

i. the minimum floor to ceiling height is 2.3m for at least 75% of the GIA.

Compliance

All areas are to be denoted in square metres (sq.m) and all linear dimensions in metres (m). Developers are to provide a schedule of dwelling types indicating their overall GIA and in-built storage areas.

Developers will be able to achieve 'type approval' for standardised designs. (Note that internal floor plans will still normally need to be submitted in order to assess amenity impacts and to demonstrate compliance with design principles such as active frontages, natural surveillance and the 45 degree code). For dwellings without type approval, drawings will need to be submitted at a scale of no greater than 1:100 showing room dimensions and heights for plan checking purposes

The City Council will accept type approval of plans where this is confirmed by a building control body (which can be either a Local Authority Building Control Body, or a Government Approved Inspector) providing that the information used to assess compliance is also submitted, to enable checking by the City Council.

If the proposed development does not comply with the Standard, room floor plans with indicative furniture layouts will be required to demonstrate the functionality of internal spaces.

Appendix 2: Monitoring Framework

Policy	Monitoring indicator	Target	Trigger
Policy DM1 Air Quality	Number of applications approved contrary to the policy. Number of applications refused on air quality grounds and successfully defended at appeal.	• All relevant applications meet the policy requirements. • All relevant appeal decisions uphold air quality impact as valid reason for refusal.	• 10% of applications approved contrary to policy. • 10% of appeals where inspector rejected air quality as a reason for refusal.
Policy DM2 Amenity	Number of applications approved contrary to the policy. Number of applications refused on amenity grounds and successfully defended at appeal.	• All relevant applications meet the policy requirements • All relevant appeal decisions uphold loss of amenity as valid reason for refusal.	• 10% of applications approved contrary to policy. • 10% of appeals where inspector rejected amenity as reason for refusal.
Policy DM3 Land affected by Contamination and Hazardous substances	Number of applications approved contrary to the policy. Number of applications refused on contamination grounds and successfully defended at appeal.	• All relevant applications meet the policy requirements • All relevant appeal decisions uphold risk of contamination as a valid reason for refusal.	• 10% of applications approved contrary to policy. • 10% of appeals where inspector rejected contamination as reason for refusal.
Policy DM4 Landscaping and Trees	Ha/sq.m. in loss of ancient woodland. Number of applications approved without tree replacement provision (where relevant).	• No loss of ancient trees/woodland. • No applications approved.ithout tree replacement provision (where relevant).	• 10% loss of ancient trees/woodland. • 10% of applications approved without tree replacement provision (where relevant).
Policy DM5 Light Pollution	Number of applications approved contrary to the policy. Number of applications refused on light pollution grounds and successfully defended at appeal.	• All relevant applications meet the policy requirements. • All relevant appeal decisions uphold light pollution as a valid reason for refusal.	• 10% of applications approved contrary to policy. • 10% of appeals where inspector rejected light pollution as reason for refusal.
Policy DM6 Noise and Vibration	Number of applications approved contrary to the policy. Number of applications refused on noise impact grounds and successfully defended at appeal.	• All relevant applications meet the policy requirements. • All relevant appeal decisions uphold noise impact as a valid reason for refusal.	• 10% of applications approved contrary to policy. • 10% of appeals where inspector rejected noise impact as reason for refusal.
Policy DM7 Advertisements	Number of applications approved contrary to the policy. Number of applications refused on this policy and successfully defended at appeal.	• All relevant applications meet the policy requirements. • All relevant appeal decisions uphold the reason(s) for refusal related to the policy.	• 10% of applications approved contrary to policy. • 10% of appeals where inspector rejected the reason(s) for refusal related to the policy.
Policy DM8 Places of Worship	Number of applications approved contrary to the policy. Percentage of applications refused on this policy and successfully defended at appeal.	• All relevant. applications meet the policy requirements. • All relevant appeal decisions.phold the reason(s) for refusal related to the policy.	• 10% of applications approved contrary to policy. • 10% of appeals where inspector rejected the reason(s) for refusal related to the policy.

Policy	Monitoring indicator	Target	Trigger
Policy DM9 Day nurseries and early years provision	Number of applications approved contrary to the policy. Percentage of applications refused on this policy and successfully defended at appeal.	• All relevant applications meet the policy requirements. • All relevant appeal decisions uphold the reason(s) for refusal related to the policy.	• 10% of applications approved contrary to policy. • 10% of appeals where inspector rejected the reason(s) for refusal related to the policy.
Policy DM10 Standards for Residential Development	Number of dwellings meeting NDSS. Number of dwellings provided as accessible and adaptable. Number of applications refused on 45 Degree Code successfully defended at appeal.	• 100% of dwellings meet NDSS. • 100% of development of 15 or more dwellings provide 30% accessible homes. • All relevant appeals on 45 Degree Code policy successfully defended.	• Provision of NDSS compliant homes falls below 80%. • Provision of accessible and adaptable homes falls below 80% • 10% of appeals where inspector rejected 45 Degree Code policy as reason for refusal.
Policy DM11 House in multiple occupation	New areas with over 10% concentration of HMOs.	• No new areas with over 10% concentration of HMOs.	• Increase in areas with over 10% concentration of HMOs.
Policy DM12 Residential conversions and specialist accommodation	Number of applications approved contrary to policy.	• All relevant applications to meet the policy requirements.	• 10% of applications approved contrary to the policy.
Policy DM13 Self and custom build housing	Numbers of plots made available for self and custom build each year.	• No specific target.	• No specific trigger.
Policy DM14 Transport access and safety	Number of applications approved contrary to the policy.	• All relevant applications meet the policy requirements.	• 10% of applications approved contrary to the policy.
Policy DM15 Parking and servicing	Number of applications approved contrary to the policy. Number of applications refused on this policy successfully defended at appeal.	• All relevant applications meet the policy requirements.	• 10% of applications approved contrary to the policy.
Policy DM16 Tele-communications	Number of applications approved contrary to the policy.	• All relevant applications meet the policy requirements.	• 10% of applications approved contrary to the policy.

appendices / development management in birmingham

Appendix 3: Glossary of Terms

45 Degree Code: a well-established approach in Birmingham applied to house extension proposals in order to protect daylight levels and outlook for occupiers, particularly of existing houses.

Accessibility: ability of people or goods and services to reach places and facilities.

Active frontages: street frontages where there is an active visual engagement between those in the street and those on the ground floors of buildings. This quality is assisted where the front facade of buildings, including the main entrance, faces and opens towards the street. This is not the same as attractive frontages, such as art walls, green walls or display boxes. Active frontages are often taken to mean continuous rows of highly-glazed Shopfronts with frequent entries and cafes.

Affordable Housing: housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers).

Air Quality Action Plan (AQAP): Air Quality Action Plans are produced by local authorities (in collaboration with national agencies and others) to state their intentions and objectives towards achieving air quality targets through the use of the powers they have available.

Air Quality Management Area (AQMA): areas designated by local authorities because they are not likely to achieve national air quality objectives by the relevant deadlines.

Ancient or veteran tree: a tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value. All ancient trees are veteran trees. Not all veteran trees are old enough to be ancient, but are old relative to other trees of the same species. Very few trees of any species reach the ancient life-stage.

Ancient woodland: An area that has been wooded continuously since at least 1600 AD. It includes ancient semi-natural woodland and plantations on ancient woodland sites.

Arboricultural Impact Assessment (AIA): a study to assess the impacts to trees caused by any development.

Area Action Plan (AAP): Development Plan Documents used to provide a planning framework for areas of change (e.g. major regeneration) and areas of conservation.

Article 4 Direction: a power available under the 1995 General Development Order allowing the Council, in certain instances, to restrict permitted development rights.

Authority Monitoring Report (AMR): a report published by the Council which provides updates on the preparation of the Council's Local Plan and other planning documents and assesses performance of adopted planning policies.

Biodiversity: encompasses the whole variety of life on earth (including on or under water) including all species of plants and animals and the variety of habitats within which they live. It also includes the genetic variation within each species.

Birmingham Connected: Birmingham's long-term transport strategy for the city.

Birmingham Connected Business Travel Network: a framework for the range of transport information, resources, services and activities that businesses and other organisations can access. This includes general advice around encouraging sustainable travel along with specific elements relating to road safety, air quality, freight and smarter working.

Birmingham Design Guide: a Supplementary Planning Document being prepared by the Council as the primary planning guidance used to assess and guide the design of all new development across the city.

Birmingham Development Plan (BDP): adopted by the Council in January 2017, it sets out a spatial vision and strategic policies for the sustainable growth of Birmingham for the period 2011 to 2031.

Brownfield Land: previously developed land which is or has been occupied by a permanent structure.

Capital Asset Value for Amenity Trees (CAVAT): a tool for measuring the value of trees as public assets developed in 2008 and now used widely by local authorities across the UK.

Car Clubs: schemes which facilitate vehicle sharing.

Clean Air Zone (CAZ): an area where targeted action is taken to improve air quality, in particular by discouraging the most polluting vehicles from entering the zone. No vehicle is banned in the zone, but those which do not have clean enough engines will have to pay a daily charge if they travel within the area.

Community Infrastructure Levy (CIL): a per square metre tariff on new development seeking to raise revenue to fund new infrastructure.

Compulsory Purchase Order (CPO): an order which enables a statutory authority to purchase an area of land compulsory for an approved project.

Conservation (for heritage policy): the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

Conservation Area: area designated by the Council under the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990 as possessing special architectural or historic interest.

Development Plan Documents (DPD): statutory planning documents that form part of the Local Plan including the Strategic Policies, Development Management Policies and Site Allocations Documents.

Environmental Protection Act 1990: deals with issues relating to waste on land, defining all aspects of waste management and places a duty on local authorities to collect waste.

Geodiversity: the range of rocks, minerals, fossils, soils and landforms.

Green Infrastructure: a network of connected, high quality, multi-functional open spaces, corridors and the links in between that provide multiple benefits for people and wildlife.

Groundwater: water held underground in the soil or in pores and crevices in rock.

Habitats Regulations Assessment Screening: assesses whether a plan or a planning proposal will impact upon a European protected ecological site such as Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites which are afforded strict protection under the Conservation of Habitats and Species Regulations 2017.

Heritage asset: a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

Historic environment: All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.

Historic Parks and Gardens: Parks and gardens containing historic features dating from 1939 or earlier registered by English Heritage. These parks and gardens are graded I, II or II* in the same way as Listed Buildings.

Houses in Multiple Occupation (HMOs): a property rented out by at least 3 people who are not from one 'household' (for example a family) but share facilities like the bathroom and kitchen. (Housing Act 2004).

International Commission on Non-Ionising Radiation Protection (ICNIRP): Organisation providing scientific advice and guidance on the health and environmental effects of non-ionizing radiation (NIR) to protect people and the environment from detrimental exposure. Activities include determining exposure limits for electromagnetic fields used by devices such as cellular phones.

Landmarks: buildings and structures which are visually or culturally prominent

Landscape: The character and appearance of land, including its shape, form, ecology, natural features, colours and elements and the way these elements combine.

Listed Buildings: Locally listed buildings are those which satisfy one or more of the following criteria: historic interest, architectural interest or environmental significance. Statutory listed buildings are buildings of special architectural or historic interest, they are graded as I, II* or with grade I being the highest. English Heritage is responsible for designating buildings for statutory listing in England.

Local Plan: a plan for the future development of a local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. A local plan can consist of either strategic or non-strategic policies, or a combination of the two.

Local Validation Requirements: document which sets out the information that Birmingham City Council will require to be able to register, assess and determine planning applications.

Major development: For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m2 or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Major hazard sites, installations and pipelines: Sites and infrastructure, including licensed explosive sites and nuclear installations, around which Health and Safety Executive (and Office for Nuclear Regulation) consultation distances to mitigate the consequences to public safety of major accidents may apply.

Market Housing: private housing for rent or for sale, where the price is set in the open market.

National Planning Policy Framework (NPPF): sets out the Government's planning policies for England and how they are expected to be applied.

Noise-sensitive Development: development which increases noise exposure or may have a detrimental impact for residents or users.

Non-strategic policies: Policies contained in a neighbourhood plan, or those policies in a local plan that are not strategic policies.

Open Space: all open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.

Planning condition: A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order.

Planning obligation: A legal agreement entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal.

Public realm: the space between and within buildings that is publicly accessible, including streets, squares, forecourts, parks and open spaces.

Regeneration: the economic, social and environmental renewal and improvement of a rural or urban area.

Remediation strategy: to manage environmental liabilities – specifically land and water contamination risks in order for land to be brought forward for development.

Renewable and low carbon energy: Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).

Road to Zero: UK Government strategy which sets out measures to clean up road transport and lead the world in the developing, manufacturing and using zero emission road vehicles.

Section 106 Agreement (S106)/Planning Obligations: These agreements confer planning obligations on persons with an interest in land in order to achieve the implementation of relevant planning policies as authorised by Section 106 of the Town and Country Planning Act 1990.

Secured by Design: The planning and design of street layouts, open space, and buildings so as to reduce the likelihood of crime, fear of crime, and anti-social behaviour.

Self-build and Custom-build housing: Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing. A legal definition, for the purpose of applying the Self-build and Custom Housebuilding Act 2015 (as amended), is contained in section 1(A1) and (A2) of that Act.

Modeshift STARS: an Accreditation system run by Birmingham City Council to encourage schools to review their travel plans to reduce congestion and encourage more active travel to and from school.

Statement of Community Involvement (SCI): the Council's policy for involving the community in the preparation, review and alteration of LDDs and planning applications. It includes who should be involved and the methods to be used.

Sui Generis: A term used to categorise buildings that do not fall within any particular use class for the purposes of planning permission. The different use classes are set out in the Town and Country Planning (Use Classes) Order 1987.

Supplementary Planning Documents (SPD): documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.

Sustainability Appraisal (SA): a systematic and continuous assessment of the social, environmental and economic effects of strategies and policies contained in the DPDs, which complies with the EU Directive for Strategic Environmental Assessment.

Sustainable transport modes: Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra low emission vehicles, car sharing and public transport.

The National Planning Practice Guidance: Government guidance to accompany the National Planning Policy Framework.

Transport Assessment (TAs): a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies measures required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport, and measures that will be needed deal with the anticipated transport impacts of the development.

Transport Statement (TSs): a simplified version of a transport assessment where it is agreed the transport issues arising from development proposals are limited and a full transport assessment is not required.

Travel Plan: a long-term management strategy for an organisation or site that seeks to deliver sustainable transport objectives and is regularly reviewed.

Tree Preservation Order (TPO): made under the Town and Country Planning Act 1990 by the local planning authority to protect trees of importance for amenity, landscape and nature conservation.

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Birmingham City Council

Sustainability Appraisal of the Development Management Development Plan Document

Publication Version (Regulation 19)

Sustainability Report

009059/2021

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Management systems

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Non-Technical summary

Introduction

This Non-Technical Summary (NTS) provides an overview of the Sustainability Appraisal (SA) Report produced as part of the SA of the Development Management DPD (DM DPD) that is currently being prepared by Birmingham City Council (the Council). The SA is being carried out on behalf of the Council by Wood[1] to help integrate sustainable development into the emerging DPD. This iteration of the SA report concerns the Publication Draft DM DPD.

The following sections of this NTS:

- ▶ provide an overview of the DM DPD;

- ▶ describe the approach to undertaking the SA of the DM DPD;

- ▶ summarise the findings of the SA of the DM DPD; and

- ▶ set out the next steps in the SA of the DM DPD including how to respond to the consultation on this SA Report.

What is the Development Management DPD?

The Development Management DPD provides detailed policy guidance on a range of planning matters, covering environmental, social and economic topics, and will be a material consideration in the determination of planning applications. The DPD will be applicable to any location in the City, helping to deliver the BDP vision of Birmingham as *"an enterprising, innovative and green City that has delivered sustainable growth meeting the needs of its population"*, with an emphasis on supporting growth and creating high quality places. The objectives of the DPD mirror those of the BDP. The policies within the Development Management DPD reflect, and are in accordance with, the policies and guidance set out within the National Planning Policy Framework (NPPF) and the strategic spatial objectives and policies in the BDP. There are 16 proposed policies under the following themes:

Environment and Sustainability

- ▶ DM1 Air quality

- ▶ DM2 Amenity

- ▶ DM3 Land affected by contamination, instability and hazardous substances

- ▶ DM4 Landscaping and trees

- ▶ DM5 Light pollution

- ▶ DM6 Noise and vibration

Economy and network of centres

- ▶ DM7 Advertisements

- ▶ DM8 Places of worship and other faith related community facilities

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[1] Formerly Amec Foster Wheeler, which was acquired in October 2017 by Wood Group.

▶ DM9 Day nurseries and early years provision

Homes and Neighbourhoods

▶ DM10 Standards for residential development

▶ DM11 Houses in multiple occupation (HMO)

▶ DM12 Residential conversions and specialist accommodation

▶ DM13 Self and custom build housing

Connectivity

▶ DM14 Highway safety and access

▶ DM15 Parking and servicing

▶ DM16 Telecommunications

What is Sustainability Appraisal?

National planning policy[2] states that local plans should be prepared with the objective of contributing to the achievement of sustainable development. Sustainable development is that which seeks to secure net gains across economic, environmental and social objectives to meet the needs of the present without compromising the ability of future generations to meet their own needs.

The DM DPD should contribute to a sustainable future for the plan area. To support this objective, the Council is required to carry out a SA of the DPD[3]. SA is a means of ensuring that the likely social, economic and environmental effects of the DPD are identified, described and appraised and also incorporates a process set out under a European Directive[4] and related UK regulations[5] called Strategic Environmental Assessment (SEA). Where negative effects are identified, measures are proposed to avoid, minimise or mitigate such effects. Where any positive effects are identified, measures are considered that could enhance such effects. SA is therefore an integral part of the preparation of the DM DPD.

How has the Development Management DPD been appraised?

Table NTS 1 presents the range of SA Objectives that were developed in light of the baseline data, key sustainability issues identified for the City and with reference to the sustainability objectives developed for the SA/SEA of the Birmingham Development Plan and the SEA topic areas. These have been used to appraise the effects of DM DPD and to consider whether the Plan objectives, policies and proposals are sustainable.

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[2] See paragraph 16 of the National Planning Policy Framework (Ministry for Housing, Communities and Local Government, 2019).
[3] The requirement for SA of local plans is set out under section 19(5) of the Planning and Compulsory Purchase Act 2004.
[4] Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment.
[5] Environmental Assessment of Plans and Programmes Regulations 2004 (statutory instrument 2004 No. 1633).

Table NTS 1   Sustainability Appraisal Objectives

SEA Directive Topic Area(s)	DM DPD Sustainability Appraisal Objectives
Material assets, soil	1. ENV1 Encourage development that optimises the use of previously developed land and buildings
Material assets	2. ENV2 To promote the application of high standards of design, construction and maintenance of buildings
Material assets, air quality, human health	3. ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel
Cultural heritage, landscape, biodiversity, flora and fauna	4. ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage, including resilient ecological networks able to meet the demands of current and future pressures.
Climatic Factors	5. ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly floodrisk management and reduction
Water, air quality, human health, material assets	6. ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management
Population and human health	7. ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all
Population and human health	8. ECON2 To help promote the vitality of local centres
Population and human health	9. ECON3 To promote the regeneration of areas across the City through appropriate development
Population and human health	10. ECON4 To encourage investment in learning and skills development
Population and human health	11. SOC1 To help ensure equitable access to community services and facilities
Population and human health	12. SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs
Population and human health	13. SOC3 To encourage development which promotes health and well-being
Population and human health	14. SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour
Population and human health	15. SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life

The DPD Objectives have been assessed for their compatibility with the SA Objectives.

The policies have been appraised against the SA Objectives using matrices to identify likely significant effects on the SA objectives. A qualitative scoring system has been adopted which is set out in **Table NTS 2**.

Table NTS 2   Scoring System Used in the Appraisal of the Draft DPD

Score	Description	Symbol
Significant Positive Effect	The proposed option/policy contributes significantly to the achievement of the objective.	++
Minor Positive Effect	The proposed option/policy contributes to the achievement of the objective but not significantly.	+
Neutral	The proposed option/policy does not have any effect on the achievement of the objective	0
Minor Negative Effect	The proposed option/policy detracts from the achievement of the objective but not significantly.	-
Significant Negative Effect	The proposed option/policy detracts significantly from the achievement of the objective.	--
No Relationship	There is no clear relationship between the proposed option/policy and the achievement of the objective or the relationship is negligible.	~

Score	Description	Symbol
Uncertain	The proposed option/policy has an uncertain relationship to the objective or the relationship is dependent on the way in which the aspect is managed. In addition, insufficient information may be available to enable an appraisal to be made.	?

NB: where more than one symbol/colour is presented in a box it indicates that the appraisal has identified both positive and negative effects. Where a box is coloured but also contains a '?', this indicates uncertainty over whether the effect could be a minor or significant effect although a professional judgement is expressed in the colour used. A conclusion of uncertainty arises where there is insufficient evidence for expert judgement to conclude an effect.

What are the likely significant effects of the Development Management DPD?

The results of the SA of the DM policies indicate that there are likely to be largely positive or significantly positive effects resulting from implementation of the policies. This reflects the positive intent of the policies and the need to deal systematically and objectively with planning issues arising day-to-day across the City, as well as the experience accumulated through their ongoing implementation in the past through the UDP. More generally, the Development Management policies represent the lowest tier in a hierarchy of planning policies, adding local detail to implement the broader principles of policies within the NPPF and the BDP. As such they specifically address local issues and are designed to mitigate potential adverse effects associated with development.

No significant negative effects, either associated with specific sustainability objectives or cumulatively, have been identified. This contrasts with the scores attributed to the absence of a policy which are typically significantly negative, reflecting the clear need to systematically control development and the likely consequences of the absence of such a policy framework which is to the benefit of applicants, residents and the City as a whole.

Some policies have been identified as holding some uncertainty as to their precise effects in respect of meeting sustainability objectives. These apply principally to whether significant positive effects are likely to be fully realised in respect of matters such as sustainable travel and construction, or enhanced access by local communities to skills enhancement from the construction of education facilities, reflecting the case-by-case nature of individual developments and their particular circumstances. Nevertheless, the potential for the realisation of significant positive or positive effects exists.

Proposed mitigation measures

No suggestions were made as to the specific wording of policies reflecting their positive intention. This reflects the positive scores, the absence of negative effects and the intention to use the policies in combination with the policies of the BDP, which for each policy are cross-referenced.

However, the following suggestions are made in respect of the presentation of the policies in order to make clearer how the policies will be implemented:

▶ Ensure that, wherever possible, the specific criteria against which the policy will be implemented and monitored are included.

▶ For each DM policy, provide further detail against the cited BDP policies on how these will work together.

▶ Set out more clearly in paragraph 1.10 of the DPD which matters are covered by the BDP, such as the control of various forms of retail development.

In Summary

The SA of the DM DPD has scrutinised the basis for, content and likely effects of the proposed suite of policies. The SA has ensured that there has been consideration of the likely environmental effects of various options associated with each policy, demonstrating how the performance of the proposed policy is likely to lead to positive outcomes for the location of proposed developments and for the City as a whole.

Comments

This Sustainability Appraisal Report which accompanies the Publication DM DPD is subject to consultation between Monday 11th November 2019 and Monday 23rd December 2019. Comments on this Report should be sent to:

Planning Policy
Birmingham City Council
Planning and Development
1 Lancaster Circus
Queensway
Birmingham
B1 1TU

www.birmingham.gov.uk/DMB

Next Steps

Following consultation and an analysis of the responses, the Council will produce a Submission Development Management DPD for scrutiny at an Examination in Public.

wood.

Contents

1. Background

1.1 Introduction

1.1.1   The Birmingham Development Plan[6] (BDP) was adopted by Birmingham City Council (the Council) in 2017. The BDP provides the strategic planning policies for over 51,100 new homes and substantial amounts of employment land, retail and office development to be delivered by 2031. The Council has also been preparing the Development Management Development Plan Document (DM DPD). It will provide detailed planning policies for specific types of development and support the implementation of the BDP.

1.1.2   The Council issued an initial draft Development Management DPD in March 2015[7]. Following an analysis of the consultation responses and the adoption of the BDP, the Council prepared a Draft Development Management DPD, consulted on as Preferred Options version in January – February 2019 and now as a Publication version.

1.1.3   Wood Environment and Infrastructure Solutions Ltd. (Wood) was been commissioned by the Council to undertake a Sustainability Appraisal (SA) of the Development Management DPD. The SA appraises the environmental, social and economic performance of the Development Management DPD and any reasonable alternatives.

1.1.4   This report presents the findings of the SA of the Publication Draft Development Management DPD. It sets out the results of the appraisal of the DPD's sustainability performance using a SA framework developed in the Scoping Report[8].

1.1.5   This Sustainability Appraisal Report accompanies the Publication Draft Development Management DPD and is subject to consultation between Monday 11th November 2019 and Monday 23rd December 2019. Comments on this Report should be sent to:

Planning Policy
Birmingham City Council
Planning and Development
1 Lancaster Circus
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B1 1TU

www.birmingham.gov.uk/DMB

1.2 What is Sustainability Appraisal?

1.2.1   Sustainability Appraisal (SA) is a process whereby the environmental, social and economic aspects of a proposed plan, policy or programme (and any reasonable alternatives) are systematically identified, described and evaluated. In doing so, it will help to inform the selection of options and identify measures to avoid, minimise or mitigate any potential negative effects that may arise from

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[6] Birmingham City Council (January 2017) *Birmingham Development Plan: Part of Birmingham's Local Plan, Planning for sustainable growth.*

[7] Birmingham City Council (June 2015) *Regulation 18 Consultation on Development Management DPD*

[8] Birmingham City Council (2018) *Sustainability Appraisal of the Development Management DPD: Scoping Report*

the plan, policy or programme's implementation as well as opportunities to improve the contribution towards sustainability.

Legislation

1.2.2 Under Section 19(5) of the Planning and Compulsory Purchase Act (PCPA) 2004, a local planning authority (LPA) is required to:

a) carry out an appraisal of the sustainability of the proposals in each development plan document;

b) prepare a report of the findings of the appraisal.

1.2.3 The development plan documents referred to in Section 19 (5a) include Local Plans.

1.2.4 In developing the DPDs, LPAs must also address the requirements of European Union Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment, referred to as the SEA Directive, and its transposing regulations.[9] In the case of the Development Management DPD, following screening against the requirements of the SEA Directive, the Council considered that it was likely to have significant effects, and in consequence, this SA includes meeting the requirements of the SEA Directive and implementing regulations.

1.2.5 Section 39 of the PCPA requires that the authority preparing a DPD must do so "with the objective of contributing to the achievement of sustainable development". On this, it echoes Article 1 of the SEA Directive, which states that the objective of SEA is:

"*to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development*".

National Planning Policy Framework and Guidance

1.2.6 At paragraph 16, the National Planning Policy Framework (NPPF) (2019)[10] sets out that local plans should be prepared with the objective of contributing to the achievement of sustainable development.[11] In this context, paragraph 32 of the NPPF reiterates the requirement for SA/SEA as it relates to local plan preparation:

"*Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements.[12] This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).''*

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[9] Environmental Assessment of Plans and Programmes Regulations 2004 (the 'Strategic Environmental Assessment Regulations'), which implement the requirements of the European Directive 2001/42/EC (the 'Strategic Environmental Assessment Directive')

[10] Ministry of Housing, Communities and Local Government (2019) *National Planning Policy Framework* https://www.gov.uk/government/publications/national-planning-policy-framework--2

[11] This is a legal requirement of local planning authorities exercising their plan-making functions (section 39(2) of the Planning and Compulsory Purchase Act, 2004)

[12] The reference to relevant legal requirements in the NPPF relates to Strategic Environmental Assessment.

1.2.7 The Planning Practice Guidance (Plan-making paragraph 03713) also makes clear that SA plays an important role in demonstrating that a local plan reflects sustainability objectives and has considered reasonable alternatives. In this regard, SA will help to ensure that a local plan is *"justified"*, a key test of soundness that concerns the extent to which the plan provides an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. The PPG also states[14] that "*The development and appraisal of proposals in plans needs to be an iterative process, with the proposals being revised to take account of the appraisal findings*" and leads to a series of SA Reports being completed to accompany each stage of the plan preparation.

1.2.8 Therefore current legislation, planning policy and guidance all make clear that compliance with requirements of the SEA Directive through the completion of an integrated SA is critical to ensuring that a plan is found sound at Examination and can then be formally adopted.

1.3   Purpose of this SA Report

1.3.1 Specifically, this SA Report sets out:

▶ an overview of the Publication Draft Development Management DPD;

▶ a review of relevant international, national, regional, sub-regional and local plans, policies and programmes;

▶ baseline information for the DPD area across key sustainability topics;

▶ key economic, social and environmental issues relevant to the appraisal of the Publication Draft Development Management DPD;

▶ the approach to undertaking the appraisal of the Publication Draft Development Management DPD;

▶ the findings of the appraisal of the Publication Draft Development Management DPD; and

▶ conclusions and an overview of the next steps in the SA process.

1.4   The Development Management DPD

1.4.1 The Development Management DPD provides detailed policy guidance on a range of planning matters, covering environmental, social and economic topics, and will be a material consideration in the determination of planning applications. The DPD will be applicable to any location in the City, helping to deliver the BDP vision of Birmingham as *"an enterprising, innovative and green City that has delivered sustainable growth meeting the needs of its population"*, with an emphasis on supporting growth and creating high quality places. The DPD will support the delivery of the BDP objectives, namely:

▶ To develop Birmingham as a City of sustainable neighbourhoods that are safe, diverse and inclusive with locally distinctive character.

▶ To make provision for a significant increase in the City's population.

▶ To create a prosperous, successful and enterprising economy with benefits felt by all.

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[13] Planning Practice Guidance, Reference ID 61-037-20190315 (Revision date: 15/03/2019)
[14] Planning Practice Guidance, Strategic environmental assessment and sustainability appraisal, Paragraph: 018 Reference ID: 11-018-20140306 (Revision date: 06 03 2014)

▸ To promote Birmingham's national and international role.

▸ To provide high quality connections throughout the City and with other places including encouraging the increased use of public transport, walking and cycling.

▸ To create a more sustainable City that minimises its carbon footprint and waste and promotes brownfield regeneration while allowing the City to grow.

▸ To strengthen Birmingham's quality institutions and role as a learning City and extend the education infrastructure securing significant school places.

▸ To encourage better health and well-being through the provision of new and existing recreation, sport and leisure facilities linked to good quality public open space.

▸ To protect and enhance the City's heritage assets and historic environment.

▸ To conserve and enhance Birmingham's natural environments, allowing biodiversity and wildlife to flourish.

▸ To ensure that the City has the infrastructure in place to support its future growth and prosperity.

Evolution of the Development Management DPD

1.4.2   The DM DPD has been subject to an extensive process of consultation that has played an important role in helping to shape the policies in the plan. The Council has undertaken two key consultation exercises prior to publication of the Council's Publication version DM DPD in October 2019.

Stage 1 - Initial Consultation Document (June 2015)

Stage 2 - Preferred Options Consultation Document (January 2019)

Stage 3 - Publication version Consultation (October 2019 - this stage)

1.4.3   The first two stages of consultations are considered to be work undertaken as 'preparation of a local plan' under Regulation 18 of the Regulations. The reason for the large time gap between the first consultation in 2015 and the second consultation in 2019 was due delays around the adoption of the Birmingham Development Plan (BDP). The BDP Inspector issued his final report in March 2016. The Government placed a holding direction on the adoption of the BDP until November 2016. After the holding direction was lifted the Birmingham City Council sought to adopt the BDP as soon as practicable, which was at its Council meeting of January 2017.

1.4.4   Consultation on the Issues and Options version of the DM DPD (Regulation 18 Stage) took place in Summer 2015. In total, 26 respondents provided a total of 91 responses, which have been taken into consideration as the policies in the DPD were prepared. Relevant responses are summarised in **Appendix E**.

1.4.5   In light of the consultation and re-appraisal of the relationship between the emerging DM DPD and the adopted BDP, various policies have been deleted and others merged (**Table 1.1**).

Table 1.1 Changes to the Suite of Policies from the Regulation 18 Document to the Preferred Options Document

Proposed policy in October 2015 Consultation	How this was dealt with in the Preferred Options Draft Document
Hot food Takeaways (DM01)	Covered by DM2 Amenity, DM6 Noise and Vibration, DM13 Highway safety and access, DM14 Parking and Servicing
Sheesha Lounges (DM02)	Covered by DM2 Amenity, DM6 Noise and Vibration, Highway safety and access, DM14 Parking and Servicing
Restaurants/ Cafes/ Pubs (DM03)	Covered by DM2 Amenity, DM6 Noise and Vibration, Highway safety and access, DM14 Parking and Servicing
Private Hire and Taxi Booking Offices (DM08)	Covered by DM2 Amenity, DM6 Noise and Vibration, Highway safety and access, DM14 Parking and Servicing
Education Facilities – Use of Dwellings Houses (DM09)	Covered by DM9 Places of worship and faith related community uses, DM10 Day nurseries and early years provision, BDP Policy TP36 Education
Education Facilities Non-Residential Properties (DM10)	Covered by DM9 Places of worship and faith related community uses, DM10 Day nurseries and early years provision, BDP Policy TP36 Education
Hotels and Guest Houses (DM11)	Not considered necessary. Majority of impacts covered by DM2 Amenity, DM6 Noise and Vibration, DM13 Highway safety and access, DM14 Parking and Servicing
Flat Conversions (DM14)	Not considered necessary. Majority of impacts covered by DM2 Amenity, DM6 Noise and Vibration, DM13 Highway safety and access, DM14 Parking and Servicing
Hostels and Residential Homes (DM15)	Not considered necessary. Majority of impacts covered by DM2 Amenity, DM6 Noise and Vibration, DM13 Highway safety and access, DM14 Parking and Servicing
Planning Obligations (DM17)	Covered by BDP Policy TP47 Developer contributions
Aerodrome Safety (DM19)	Covered by ODPM Circular1/2003
Design (DM23)	Covered by BDP Policy PG Place-making

1.4.6 Consultation on the Preferred Options Draft Development Management DPD took place from 4th February to 29th March 2019. Some 69 individuals/ organisations responded generating 650 separate comments; general Comments regarding Development Management DPD and SA are recorded in **Appendix G** along with where there have been refinements made through amended wording to the proposed policies in response to the comments made. Policies within the Homes and Neighbourhood section have been expanded from three to four as follows:

Preferred Options Plan Homes & Neighbourhoods policies	Publication Plan Homes & Neighbourhoods policies
DM10 Houses in multiple occupation and other residential accommodation	DM10 Standards for residential development
	DM11 Houses in multiple occupation (HMO)
DM11 Standards for Residential development	

| DM12 Self and custom build housing | DM12 Residential conversions and specialist accommodation |
| | DM13 Self and custom build housing |

1.4.7 Changes to the structure of the policies and their content in response to comments have been taken into account in the appraisal.

1.4.8 The only comment on the SA of the Preferred Options document noted the need to include specific reference to the HRA produced for the BDP. This omission has been corrected in this document (see section 1.6)

1.4.9 The proposed policies within the Publication Draft Development Management DPD reflect, and are in accordance with, the policies and guidance set out within the National Planning Policy Framework (NPPF) and the strategic spatial objectives and policies in the BDP. There are 16 proposed policies under the following themes:

Environment and Sustainability

- ▶ DM1 Air quality

- ▶ DM2 Amenity

- ▶ DM3 Land affected by contamination, instability and hazardous substances

- ▶ DM4 Landscaping and trees

- ▶ DM5 Light pollution

- ▶ DM6 Noise and vibration

Economy and network of centres

- ▶ DM7 Advertisements

- ▶ DM8 Places of worship and other faith related community facilities

- ▶ DM9 Day nurseries and early years provision

Homes and Neighbourhoods

- ▶ DM10 Standards for residential development

- ▶ DM11 Houses in multiple occupation (HMO)

- ▶ DM12 Residential conversions and specialist accommodation

- ▶ DM13 Self and custom build housing

Connectivity

- ▶ DM14 Highway safety and access

- ▶ DM15 Parking and servicing

- ▶ DM16 Telecommunications.

1.5   The Sustainability Appraisal process

1.5.1   The appraisal of the DM DPD is an integral part of the plan preparation and has five sequential stages. These are highlighted in **Figure 1.1** below together with links to the development of the DPD.

1.5.2   The first stage (**Stage A**) led to the production of a SA Scoping Report[15]. Informed by a review of other relevant polices, plans and programmes as well as baseline information and the identification of key sustainability issues affecting the City, the Scoping Report set out the proposed framework for the appraisal of the DPD (termed the SA Framework).

1.5.3   Consultation on the Scoping Report ran from Friday 12th December 2014 until Friday 22nd January 2015 and from 21st May and 29th June 2018. Responses were received to the consultation from the statutory SEA consultation bodies (Natural England, Historic England and the Environment Agency). Responses related to various aspects of the Scoping Report and resulted in amendments to the SA Framework. **Appendix D** contains a schedule of the consultation responses received on the Scoping Report, the Council's response and the subsequent action taken.

1.5.4   **Stage B** of the SA process is iterative and involves the development and refinement of the DPD by testing the sustainability strengths and weaknesses of the emerging policy options. An SA of the Issues and Options and Preferred Options versions of the DM DPD (Regulation 18 Stage) were completed and subject to consultation (along with the draft DPD) in summer 2015 and winter 2019 respectively. **Appendix F** and **G** contains a schedule of the consultation responses received.

1.5.5   At **Stage C**, a final SA Report will be prepared to accompany the publication draft DPD. As with this SA Report, it will be available for consultation alongside the DPD itself. In some instances following consultation, further amendments are made to the SA Report prior to submission and consideration by an independent planning inspector (**Stage D**).

1.5.6   Following Examination in Public, and subject to any significant changes to the draft DPD that may require appraisal, the Council will issue a Post Adoption Statement as soon as reasonably practicable after the adoption of the DPD. This will set out the results of the consultation and SA processes and the extent to which the findings of the SA have been accommodated in the adopted DPD. During the period covered by the DPD, the Council will monitor its implementation and any significant social, economic and environmental effects (**Stage E**).

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[15] Birmingham City Council (2018) *Sustainability Appraisal of the Development Management DPD: Scoping Report*

Figure 1.1   The relationship between the SA process and Local Plan preparation
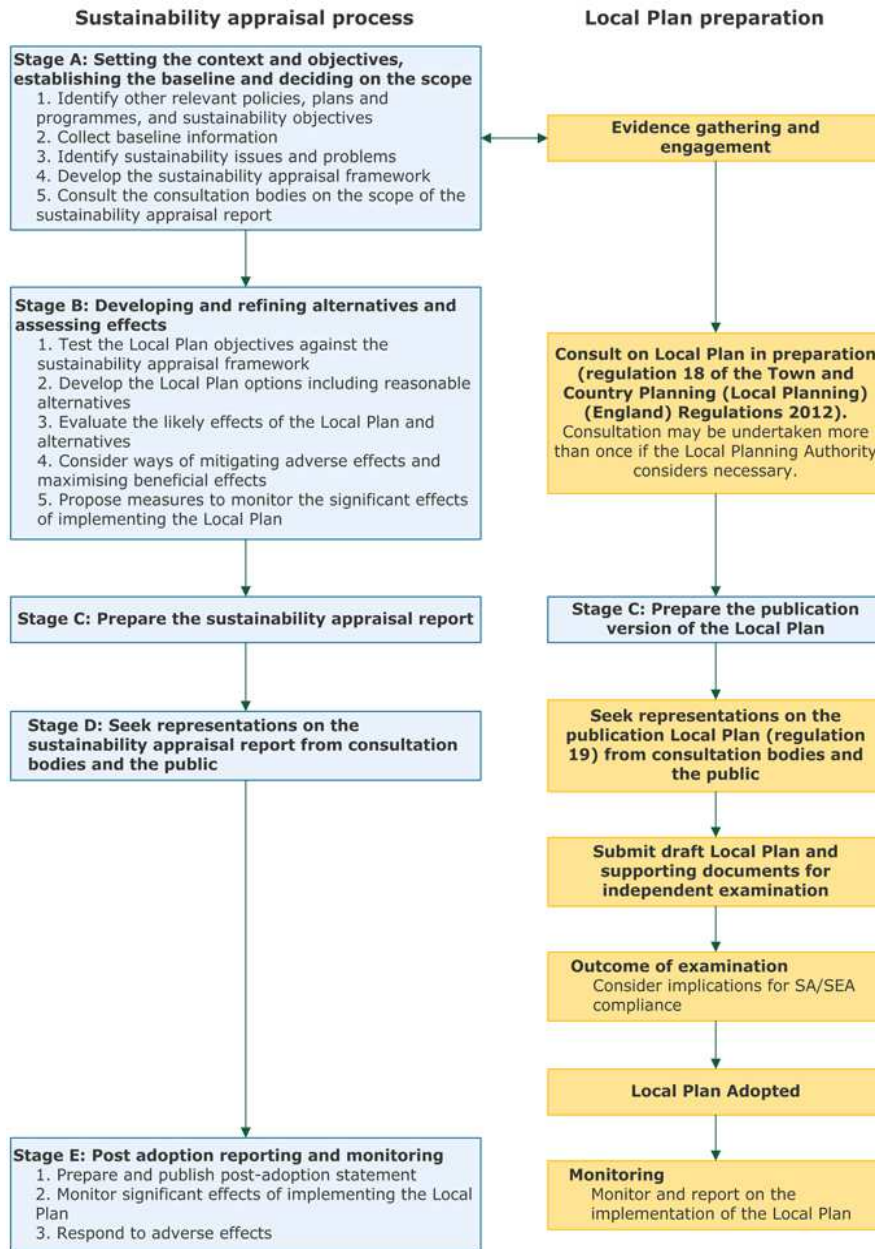
Source: Ministry of Housing, Communities and Local Government (MHCLG) (2019) *Planning Practice Guidance Strategic Environmental Assessment and Sustainability Appraisal* (Paragraph: 013 Reference ID: 11-013-20140306). Available at https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal

1.6   Habitats Regulations Assessment

1.6.1   Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations') requires that competent authorities assess the potential impacts of land use plans on the Natura 2000 network of European protected sites[16] to determine whether there will be any 'likely

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[16] Strictly, 'European sites' are any Special Area of Conservation (SAC) from the point at which the European Commission and the UK Government agree the site as a 'Site of Community Importance' (SCI); any classified Special Protection Area (SPA); any candidate SAC (cSAC); and (exceptionally) any other site or area that the Commission believes should be considered as an SAC but which has not been

significant effects' (LSE) on any European site as a result of the plan's implementation (either alone or 'in combination' with other plans or projects); and, if so, whether these effects will result in any adverse effects on that site's integrity with reference to the site's conservation objectives. The process by which the effects of a plan or programme on European sites are assessed is known as 'Habitats Regulations Assessment' (HRA)[17].

1.6.2   In accordance with the Habitats Regulations, what is commonly referred to as a HRA screening exercise has been undertaken to identify the likely impacts of the emerging Local Plan upon European sites, either alone or 'in combination' with other projects or plans, and to consider whether these effects are likely to be significant. Where the possibility of significant effects could not be excluded, a more detailed Appropriate Assessment[18] (AA) has been carried out to determine whether these effects would adversely affect the integrity of European sites.

1.6.3   The HRA is reported separately from the SA of the DPD (although a summary of the findings is included in **Section 4.4** of this report) but importantly has helped to inform the appraisal process, particularly in respect of the potential effects of proposals on biodiversity.

1.7   Compliance with the SEA Directive/Regulations

1.7.1   This Sustainability Appraisal Report has been compiled with reference to the legal requirements of the SEA Directive and associated Regulations. **Table 1.2** sets out where and how the requirements of the SEA Directive have been addressed in producing this SA Report.

Table 1.2   Compliance with the requirements of the SEA Directive

Annex I, SEA Directive requirement	Where covered in the SA Report
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans.	Sections 1 and 2
b) The relevant aspects of the current states of the environment and the likely evolution thereof without implementation of the plan or programme.	Section 2
c) The environmental characteristics of areas likely to be significantly affected.	Section 2
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance.	Section 2
e) The environmental protection objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	Section 2
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material and archaeological heritage, landscape and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.	Section 4

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identified by the Government. However, the term is also commonly used when referring to potential SPAs (pSPAs), to which the provisions of Article 4(4) of Directive 2009/147/EC (the 'new wild birds directive') are applied; and to possible SACs (pSACs) and listed Ramsar Sites, to which the provisions of the Conservation of Habitats and Species Regulations 2017 are applied a matter of Government policy when considering development proposals that may affect them (NPPF para 176). 'European site' is therefore used in this report in its broadest sense, as an umbrella term for all of the above designated sites.

[17] See: https://www.birmingham.gov.uk/download/downloads/id/1523/sub6_pre-submission_habitat_regulations_assessment_2013.pdf

[18] 'Appropriate Assessment' has been historically used as an umbrella term to describe the process of assessment as a whole. The whole process is now more usually termed 'Habitats Regulations Assessment' (HRA), and 'Appropriate Assessment' is used to indicate a specific stage within the HRA.

g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan.	Section 4
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information.	Section 4
i) A description of measures envisaged concerning monitoring.	Section 5
j) A non-technical summary of the information provided under the above headings.	This Report

2. Review of Contextual Information

2.1 Review of Plans, Policies and Programmes

2.1.1 One of the first steps in undertaking SA is to identify and review other relevant plans and programmes that could influence the DM DPD. The requirement to undertake a plan and programme review and to identify the environmental and wider sustainability objectives relevant to the plan being assessed is set out in the SEA Directive. An 'environmental report' required under the SEA Directive should include: *"An outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes"* to determine *"the environmental protection objectives, established at international (European) community or national level, which are relevant to the plan or programme … and the way those objectives and any environmental considerations have been taken into account during its preparation"* (Annex 1 (a), (e)).

2.1.2 Plans and programmes relevant to the DPD may be those at an international/ European, UK, national, regional, sub-regional or local level, as relevant to the scope of the document. The review of relevant plans and programmes aims to identify the relationships between the DPD and these other documents, i.e. how the DPD could be affected by the other plans' and programmes' aims, objectives and/or targets, or how it could contribute to the achievement of their sustainability objectives. The review also ensures that the relevant environmental protection and sustainability objectives are integrated into the SA. Additionally, reviewing plans and programmes can provide appropriate information on the baseline for the plan area and help identify the key sustainability issues.

2.1.3 The relationship between various policies, plans, programmes and environmental protection objectives may influence the DM DPD. The relationships are analysed to help:

▸ identify any external social, environmental or economic objectives that should be reflected in the SA/SEA process;

▸ identify external factors that may have influenced the preparation of the plan; and

▸ determine whether the policies in other plans and programmes might lead to cumulative or synergistic effects when combined with policies in the plan.

2.1.4 This process enables the DM DPD to take advantage of any potential synergies and to respond to any inconsistencies and constraints. The plans and programmes to be considered include those at the international, national, regional and local scale.

2.1.5 The review aims to identify the relationships between the DM DPD and these other documents i.e. how the DPD could be affected by the other plans' and programmes' aims, objectives and/or targets, or how it could contribute to the achievement of any environmental and sustainability objectives. An understanding of the plans and programmes alongside which the DM DPD sits is important in developing a baseline approach to the assessment. It is also a valuable source of information to support the completion of the social, economic and environmental baseline and aid the determination of the key issues. The completed review of plans and programmes will also be used to provide the policy context for the subsequent assessment process and help to inform the development of objectives that comprise the assessment framework.

2.1.6 The SA Scoping Report (2015 and 2018 update) included a review of plans and programmes, consistent with the requirements of the SEA Directive, and which was used to inform the development of the SA Framework. Table 2.1 lists the plans, programmes and strategies at international, national, regional and local scale reviewed within the Scoping Report, whilst

Appendix B sets out where the content of the plans, programmes and strategies reviewed have been translated into the Sustainability Objectives.

Table 2.1   Plans, Programmes and Strategies Relevant to the SA of the DM DPD

International
Council of Europe (2006) European Landscape Convention
Council of Europe (1985) Convention on the Protection of the Architectural Heritage of Europe
EU (2007) Floods Directive
EU (1991) Urban Waste Water Treatment Directive.
EC (2007) Together for Health: A Strategic Approach for the EU 2008-2013
The Pan-European Biological and Landscape Diversity Strategy (1995)
EU Directive on the Conservation of Wild Birds (79/409/EEC)
EU Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora (92/43/EEC) & Subsequent Amendments
EU Directive on Waste (Directive 75/442/EEC, 2006/12/EC 2008/98/EC as amended)
EU Packaging and Packaging Waste Directive (94/62/EC)
EU (1996) Ambient Air Quality Assessment and Management (96/62/EC, Air Quality Framework Directive).
EU (1998) Aarhus Convention
EU Drinking Water Directive (98/83/EC)
EU Directive on the Landfill of Waste (99/31/EC)
EU (2000) Directive on Establishing a Framework for Community Action in the Field of Water Policy (2000/60/EC, The Water Framework Directive).
EU 2001/42/EC on the Assessment of the Effects of Certain Plans and Programmes on the Environment (SEA Directive)
EU (2005) Clean Air Strategy.
EU (2010) The Industrial Emissions Directive
UNFCCC (1997) Kyoto Protocol to the UN Framework Convention on Climate Change.
UNFCCC (2009) Copenhagen Accord (Climate Change).
National
C**LG (2019)** National Planning Policy Framework (NPPF)
DCLG (2011) The Localism Act
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Birmingham City Council (2017) Local Flood Risk Management Strategy

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Birmingham City Council (2017) Birmingham Cultural Strategy

Birmingham City Council (2017) Birmingham Development Plan

Birmingham City Council (2018) Council Plan and Budget 2018+

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Birmingham City Council (2018) Community Cohesion Strategy (Green Paper)

Birmingham City Council (2018) Air Quality Annual Status Report

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Birmingham City Council (2019) Public Health Green Paper

Birmingham City Council (2019) Birmingham Community Cohesion Strategy

Birmingham City Council (2019) Draft Birmingham Walking and Cycling Strategy and Infrastructure Plan

2.2   Environmental, social and economic baseline and evolution without the Plan

2.2.1   The SEA Regulations require that information is provided on "… the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan." **Appendix C** contains the updated Scoping Report Baseline.

2.2.2   The analysis of the baseline information led to the identification of a number of issues relevant to the Development Management DPD, as set out in **Table 2.2**. These issues are used in combination with the review of plans and programmes and the SA/SEA of the Birmingham Development Plan to inform the development of the Sustainability Objectives and the Assessment Framework as set out in chapter 3.

Table 2.2   Baseline summary and issues relevant to the Development Management DPD

Topic	Summary of Baseline	Issues Arising	Supporting Evidence	Likely evolution without the Plan
Biodiversity and geodiversity	The City has 2 SSSIs and a number of other statutory and non- statutory designated sites which cover approximately 10% of the City. There is one Local Nature Reserve designated in order to protect its geodiversity. The Birmingham and Black Country Nature Improvement Area (NIA) Ecological Strategy provides a landscape-scale framework for action to conserve and enhance biodiversity and geodiversity and to improve ecological networks across the City. The Cannock Chase to Sutton Park Project is another example of landscape-scale action. Biodiversity and Geodiversity is linked to issues related to air quality, water quality, soil quality, health and natural landscape.	Biodiversity and greenspace resources, including locally and nationally important sites, across the City are mapped and managed. Development Management policies will be important in protecting the integrity of biodiversity and geodiversity assets, including designated sites, important habitats and legally protected and notable species both directly and indirectly. For example, continued monitoring of developments on the periphery of designated sites will be important to determine potential indirect and cumulative impacts. Monitoring the potential effects of developments on biodiversity and geodiversity assets more generally is also important because of the potential for these to be influenced by a variety of environmental pathways.	BDP AMR Birmingham and Black Country NIA Ecological Strategy, and BCC and EcoRecord data Birmingham Green Living Spaces Strategy Birmingham and the Black Country Biodiversity Action Plan Birmingham and Black Country Nature Improvement Area Ecological Strategy 2017-2022	In the absence of the DM DPD, there is likely to be less opportunity for the scrutiny of the impacts of specific development in specific locations on biodiversity and geodiversity.
Population and health	Birmingham is the major employment centre for the West Midlands. Birmingham has a high proportion of economically inactive people e.g. students, people caring full-time for relatives. Unemployment is higher than the national average. The economic activity rate for Black and Minority Ethnic residents is far higher than that for white residents.	The population of Birmingham is predicted to grow considerably over the next 20 years and the adopted Birmingham Development Plan is responding to this change through the provision of housing and employment land across the City. The locations of	ONS population estimates BDP Birmingham Health and Wellbeing Strategy	In the absence of the DM DPD, there is likely to be less opportunity for the scrutiny of the impacts of

Topic	Summary of Baseline	Issues Arising	Supporting Evidence	Likely evolution without the Plan
	There is significant disparity in terms of average household income between Birmingham's constituencies. About 40% of Birmingham's residents live in areas that are in the most deprived 10% in England. Concentrations of deprivation are very high in wards to the east, north and west of the City Centre and also in Tyburn and Kingstanding Wards to the north of the M6 motorway. Unemployment rates are above the national average. Economy and equality is linked to issues related to poverty, learning and skills, equality, housing and community involvement. Birmingham faces several issues relating to housing: there are large numbers of homeless people, social housing is in need of updating and relocating, and the number of households is increasing. House prices in Birmingham peaked in January 2008 and sharply declined through to 2010, and now have stabilised. This suggests that the affordability of housing for poorer families and first-time buyers has declined due to other national economic conditions. Housing is linked to issues related to poverty, equality, built and historic environment, natural landscape, sense of place, resource use, energy efficiency and sustainable design, construction and maintenance. The number of residents feeling in poor health is higher than the national average, and people in Birmingham have generally less healthy lifestyles than the English average. Life expectancy in Birmingham is below the England average. Health is linked to issues related to air quality, water quality, biodiversity, natural landscape, culture, sport and recreation, equality and crime. Air quality is an issue as the whole City is designated as an Air Quality Management Area (AQMA); the main source pollutant being nitrogen dioxide as a result of pollution from vehicle emissions. There is a strong correlation between traffic congestion and poor air quality. Given the allocation of an AQMA, and the requirement to maintain an Air Quality Action Plan (AQAP) to direct compliance with national objectives, air quality should improve within the City. In order to deliver compliance, Government has determined the need for Birmingham to introduce a Clean Air Zone (CAZ) to control road transport related emissions particularly Nitrogen Dioxide. A Clean Air Zone feasibility	this development could place greater and different demands on the application of Development Management policies, requiring, for example, that they facilitate development in areas of need and cumulatively do not result in negative effects on specific population groups, areas of the City or key issues such as health through, for example, access to greenspace or reductions in motor transport. Consideration of the wider effects of policy application, such as on health, will also be important through, for example, the control of certain kinds of development in local centres.	Birmingham Air Quality Action Plan Birmingham Air Quality Annual Status Report Birmingham Walking and Cycling Strategy and Infrastructure Plan	specific development in specific locations on the health and well-being of the City's population.

Topic	Summary of Baseline	Issues Arising	Supporting Evidence	Likely evolution without the Plan
	study to determine the type and extent of the zone is underway. Air quality is linked to issues related to biodiversity, health, sustainable transport reducing the need to travel, climate change mitigation and adaptation). Noise pollution is a problem in some parts of the city, with Birmingham airport and traffic being the principal sources. It is anticipated this trend will continue. Noise is linked to issues related to sustainable transport and housing.			
Water resources and quality	New additional water management measures or water resources needed to ensure there is sufficient water for new housing proposed in the Birmingham Plan. New foul drainage infrastructure will also be required to support the proposed level of growth. Resource use is linked to issues related to water quality.	Water resources are under pressure in Birmingham and across the regional generally, with reliance on external sources such as Wales. Development Management policies, in combination with the BDP, should contribute to the protection of water resources and quality through the application of development standards which encourage prudent water resource use and guard against pollution.	Catchment Abstraction Management Strategies (CAMS) Humber River Basin Management Plan Severn Trent Water Resources Management Plan BDP	The BDP contains specific policies on water management measures which development will adhere to.
Climate change	CO_2 emissions and the heat island effect are significant climate related issues which need to be actively managed to avoid their effects becoming more detrimental in the coming decades. Use of the City's Green Infrastructure network will be particularly important in addressing this issue. Reducing carbon emissions and responding to the challenge of climate change is linked to issues related to sustainable transport, reducing the need to travel, air quality, biodiversity health and natural landscape. Recent developments have shown evidence of energy efficiency, but the large number of old properties in the City will need improving to make them more energy efficient, building on current initiatives. Energy efficiency is linked to issues related to renewable energy, sustainable design construction and maintenance, housing and social and environmental responsibility. Although the City has good public transport infrastructure, it needs expanding and upgrading to help minimise the high level of car use in Birmingham. Emphasis will be placed on 'smarter travel', discouraging	Climate change impacts for Birmingham are likely to consist of higher temperatures and more extreme events, including rainfall leading to flooding. Whilst it is challenging for Development Management policies to be specific on climate change adaptation measures, the design of buildings for example will be important, as will the continued encouragement of CO_2 reductions through energy efficiency measures and encouraging pedestrian, cycling and public transport access wherever possible.	UKCP09 predictions Birmingham Climate Change Action Plan 2010, Carbon Roadmap 2013 BDP Birmingham Air Quality Action Plan Birmingham Carbon Roadmap Birmingham Walking and Cycling Strategy and Infrastructure Plan	The BDP contains policies (TP1 – TP4) relating to climate change, although the DM DPD allows for the scrutiny of the impacts of specific development on climate change.

Topic	Summary of Baseline	Issues Arising	Supporting Evidence	Likely evolution without the Plan
	unnecessary journeys and encouraging people to use public transport. Congestion is a significant issue at certain times on both road and rail. Sustainable transport is linked to issues related to air quality, reducing the need to travel, health, climate change mitigation and adaptation. A very small proportion of people who work and live in the city (one tenth) work from home and therefore avoid travelling to work. There is little evidence of people being actively encouraged to work from home. More emphasis needs to be placed on 'smarter travel', discouraging unnecessary journeys, encouraging people to use public transport, and the provision of new/enhanced footways and cycleways. Reducing the need to travel is linked to issues related to sustainable transport, air quality, health, climate change mitigation and adaptation and noise.			
Flood risk, incidences of flooding and flood defences	Birmingham City Council has a good record of taking on board Environment Agency comments in terms of permitting development in flood risk areas. It is recognised by the City Council that measures will need to be put in place to manage and where possible reduce flood risk. Use of the City's Green Infrastructure network will be particularly important in addressing this issue. Managing and reducing flood risk is linked to issues related to health and well-being, biodiversity and infrastructure provision.	Sources of flood risk are from river flooding, surface water flooding, sewer flooding and groundwater flooding. There are around 9,000 properties at risk from fluvial flooding and 30,000 from surface water flooding (1 in 100 year event). These risks will be taken into account as part of the assessment of applications for development.	Birmingham Strategic Flood Risk Assessment BCC records Birmingham Local Flood Risk Management Strategy Birmingham Multi-agency Flood Plan Birmingham Surface Water Management Plan	The BDP contains specific policies on water management measures which development will adhere to.
Material assets (housing, economy, key infrastructure, minerals and waste)	Good use is being made of previously developed land as a very high proportion of new housing and office development has taken place on previously developed land. Multifunctional use of land is also important with the City's Green and Blue Infrastructure network having an important role to play in achieving this. Efficient use of land is linked to issues related to soil quality, flood risk, water quality, natural landscape, built and historic environment, biodiversity culture, sport and recreation and sense of place. Use of renewable energy could be significantly improved.	Development Management policies, in combination with those of the BDP, will be influential in promoting the efficient use of material assets through, for example, attention on energy efficiency standards, the use of recycled aggregates and promotion of waste management. The effects are likely to be cumulative and long term in character, associated with the progressive replacement of the City's	ONS data BDP Green Living Spaces Strategy Municipal Waste Management Strategy	In the absence of the DM DPD, there will be less opportunity to monitor and evaluate the specific effects on material assets of developments, and in turn promote more sustainable

Topic	Summary of Baseline	Issues Arising	Supporting Evidence	Likely evolution without the Plan
	Renewable energy is linked to issues related to climate change mitigation and adaptation. Landfill diversion rates are increasing in the City, and past targets for recycling have been met. The percentage of waste sent to landfill within the City has decline to one third of its level ten years ago, whilst recycling has trebled. Given European and national targets, it is likely these trends will continue. Waste reduction and minimisation is linked to issues related to air quality, soil quality, natural landscape and built and historic environment.	housing stock through renewal and new build. There is high demand for housing in Birmingham and not all of it can be met within Birmingham itself and demand for housing is likely to continue to increase with forecast population growth.		management of these.
Cultural heritage	Birmingham has a large amount of land designated as Conservation Areas, some of which are nationally recognised such as the Jewellery Quarter and Bourneville. The City also has an extensive number of archaeological remains Listed Buildings and Registered Parks & Gardens. Built and historic environment is linked to issues related to sense of place, housing, sustainable design, construction and maintenance, crime and poverty.	Cultural heritage is a diverse, City-wide asset which can be vulnerable to the effects of development, both direct and indirect, short-term and cumulative. Criteria guiding Development Management policies will help to avoid immediate impacts, but monitoring will be required to ensure that here are no unintended consequences for example in relation to the wider setting of cultural heritage assets which can be affected by cumulative development.	BDP Birmingham Regeneration through Conservation SPG Birmingham Archaeology Strategy SPG Protecting the Past – Informing the Present. Birmingham's' Heritage Strategy (2014-2019)	In the absence of the DM DPD, there will be less opportunity to monitor and evaluate the specific effects of development on cultural heritage.
Landscape and townscape	Although much of Birmingham is built up, there is a significant amount of open land within the City including areas of agricultural land to the north east and south west of the City. The City falls within the National Character Areas (NCAs) of Arden to the south and Cannock Chase and Cank Wood to the north. The assessment of these areas for the Countryside Quality Counts project for Natural England indicates that they are subject to a high rate of change. Most of Birmingham is built up, but 15% of the City is designated as Green Belt. Natural landscape is linked to issues related to biodiversity, health, soil quality, sense of place, culture, sport and recreation, climate change mitigation and adaptation, managing and reducing flood risk.	Although much of Birmingham is built up, there is a significant amount of open land within the City. Landscape character is a key contributor to regional and local identity, influencing sense of place, shaping the settings of people's lives and providing a critical stimulus to their engagement with the natural environment. The Development Management DPD, in combination with the BDP, will be influential in helping to retain a sense of character across the City in the context of development pressures.	BDP Birmingham Green Living Spaces Strategy Birmingham Health and Wellbeing Strategy	Whilst the BDP (policy PG3) addresses place-making, in the absence of the DM DPD there will be less opportunity to scrutinise specific matters relating to landscape and trees.

3.   Methodology

3.1   The SA Framework

3.1.1   The SA Framework comprises of 15 objectives and associated guide questions. Broadly, the SA objectives present the preferred environmental, social or economic outcome which typically involves minimising detrimental effects and enhancing positive effects. They have been developed to enable a comprehensive assessment of the likely significant effects of the implementation of the Development Management DPD by covering key environmental, social and economic issues.

3.1.2   The development of the SA objectives has been informed by the review of plans and programmes, the analysis of the baseline evidence the consideration of the key sustainability issues for Birmingham (presented in **Table 2.2**) and the SA Objectives developed for the BDP. In addition, they also reflect comments received during the Regulation 18 consultation of the SA Scoping Report (summarised in **Appendices D and E**), the Issues & Options Consultation (**Appendix F**) and the Preferred Options Consultation (**Appendix G**).

3.1.3   **Table 3.1** sets out the SA Framework for assessing the sustainability performance of the Development Management DPD, specifically evaluating whether there are likely to be any significant effects associated with implementation of the DPD.

Table 3.1   Sustainability Objectives, Guide Questions and Indicators

SEA Directive Topic Area(s)	Sustainability Objectives	Guide Questions	Potential Indicators
Material assets	ENV1 To encourage development that optimises the use of previously developed land and buildings	Will the use of previously developed land be encouraged? Will development densities be maximised?	Proportion of new development on previously developed land Development densities achieved
Material assets	ENV2 To promote the application of high standards of design, construction and maintenance of buildings	Will development be encouraged to meet and where possible exceed standards for energy efficiency?	Proportion of developments meeting energy efficiency standards for design, construction and maintenance
Material assets	ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	Will development be encouraged to incorporate measures which promote sustainable transport? Will development help to reduce the need to travel?	Work place travel plans Measures to promote sustainable transport such as provision for cyclists
Landscape, cultural heritage, biodiversity, flora and fauna	ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	Will development protect and where possible enhance the City's cultural and natural heritage?	Development affecting historic assets Development affecting natural assets including open space
Climatic factors	ENV5 To promote development which anticipates and responds to the challenges associated with	Will development help to reduce flood risk?	Renewable energy installed

SEA Directive Topic Area(s)	Sustainability Objectives	Guide Questions	Potential Indicators
	climate change, particularly managing and reducing flood risk	Will development take into account and actively mitigate climate change impacts?	Other measures installed such as SUDS Flooding events Approvals made contrary to EA advice
Water, air, material assets	ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	Will development incorporate water efficiency measures? Will development actively avoid creating additional pollution burdens?	Water use and technologies Changes in water quality Change to/within Air Quality Management Areas Noise complaints Sustainable waste management
Population and human health	ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	Will development promote growth in key economic sectors? Will development contribute to encouraging a culture of enterprise and innovation?	Employment creation by area and type Business start-ups
Population and human health	ECON2 To help promote the vitality of local centres	Will development contribute to the maintenance and enhancement of the vitality of local centres?	Local centre health checks
Population and human health	ECON3 To promote the regeneration of areas across the City through appropriate development	Will development contribute to regeneration of areas of the City most in need?	Location and type of development
Population and human health	ECON4 To encourage investment in learning and skills development	Will development contribute to investment in learning and skills?	Local initiatives to promote skills development
Population and human health	SOC1 To help ensure equitable access to community services and facilities	Will development help to promote equitable access to services?	Accessibility indices of key facilities
Population and human health	SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	Will development help to promote access to a range of housing types which meet the needs of residents?	Development types and spatial distribution
Population and human health	SOC3 To encourage development which promotes health and well-being	Will development help to promote a healthier, more active population?	Activity levels by area and sector of the population
Population and human health	SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	Will development help to discourage crime?	Crime levels by area and type
Population and human health	SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	Will public participation be encouraged as part of the planning of new development?	Participation in consultations

3.2 Appraisal Methodology

3.2.1 Based on the contents of the Development Management DPD detailed in Section 1.4, the SA Framework has been used to appraise the DPD Objectives and Development Management policies. The approach to the appraisal of each of the elements listed above is set out in the sections that follow.

DPD Objectives

3.2.2 It is important that the Objectives of the DPD (which are those of the BDP) are aligned with the SA objectives. The Objectives contained in the DPD (see **Section 1.4**) have therefore been appraised for their compatibility with the objectives that comprise the SA Framework to help establish whether the proposed general approach to the DPD is in accordance with the principles of sustainability. A compatibility matrix has been used to record the appraisal, as shown in **Table 3.2** below.

Table 3.2   Compatibility matrix

SA Objective	DPD Objective			
	Objective 1	Objective 2	Objective 3	Objective 4
ENV1 To encourage development that optimises the use of previously developed land and buildings	0	0	+	?
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	+	-	+	+
Etc...	+	0	+	?

Key

+	Objectives are potentially compatible	?	Uncertain if Objectives are related	~	No clear relationship between Objectives	-	Objectives are potentially incompatible

DPD Policies

3.2.3 The proposed Development Management policies have been appraised against each of the SA objectives that comprise the SA Framework using an appraisal matrix. The matrix includes:

- The SA objectives;

- A score indicating the nature of the effect for each option on each SA objective;

- A commentary on significant effects (including consideration of the cumulative, synergistic and indirect effects as well as the geography, duration, temporary/permanence and likelihood of any effects) and on any assumptions or uncertainties; and

- Recommendations, including any mitigation or enhancements measures.

3.2.4 The format of the matrix that has been used in the appraisal is shown in **Table 3.3**. A qualitative scoring system has been adopted which is set out in **Table 3.4.** The proposed policies contained in the DPD have been appraised against the SA objectives with a score awarded both for each

wood.

constituent policy and for the cumulative effect of each policy. The policy appraisal matrices are presented at **Appendix A**, including reasonable alternatives, where appropriate. Reasonable alternatives comprise combinations of: no policy, retention of the existing UDP Policy or a policy with differing content. In the majority of instances, however, there are no reasonable alternatives as a policy is required by National Policy in order to interpret the intention and requirements of the NPPF at the local level. In each case, reasons for the proposed policy are given.

Table 3.3 Appraisal matrix

SA Objective	Score	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	-	**Likely Significant Effects** A description of the likely significant effects of the preferred option on the SA objective has been provided here, drawing on baseline information as appropriate. **Mitigation** • Mitigation and enhancement measures are outlined here. **Assumptions** • Any assumptions made in undertaking the appraisal are listed here. **Uncertainties** • Any uncertainties encountered during the appraisal are listed here.
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	+	**Likely Significant Effects** A description of the likely significant effects of the preferred option on the SA objective has been provided here, drawing on baseline information as appropriate. **Mitigation** • Mitigation and enhancement measures are outlined here. **Assumptions** • Any assumptions made in undertaking the appraisal are listed here. **Uncertainties** Any uncertainties encountered during the appraisal are listed here.
Etc.		

Table 3.4 Appraisal Scoring system

Score	Description	Symbol
Significant Positive Effect	The proposed option/policy contributes significantly to the achievement of the objective.	++
Minor Positive Effect	The proposed option/policy contributes to the achievement of the objective but not significantly.	+
Neutral	The proposed option/policy does not have any effect on the achievement of the objective	0
Minor Negative Effect	The proposed option/policy detracts from the achievement of the objective but not significantly.	-
Significant Negative Effect	The proposed option/policy detracts significantly from the achievement of the objective.	--
No Relationship	There is no clear relationship between the proposed option/policy and the achievement of the objective or the relationship is negligible.	~

Score	Description	Symbol
Uncertain	The proposed option/policy has an uncertain relationship to the objective or the relationship is dependent on the way in which the aspect is managed. In addition, insufficient information may be available to enable an appraisal to be made.	**?**

NB: where more than one symbol/colour is presented in a box it indicates that the appraisal has identified both positive and negative effects. Where a box is coloured but also contains a '?', this indicates uncertainty over whether the effect could be a minor or significant effect although a professional judgement is expressed in the colour used. A conclusion of uncertainty arises where there is insufficient evidence for expert judgement to conclude an effect.

3.3   Geographical and temporal scope

3.3.1   The geographical scope of the SA principally relates to administrative area of the City of Birmingham, but also takes into account sub-regional, regional and national impacts where appropriate. Birmingham's position as the principal settlement of the West Midlands means that it's environmental, social and economic role and impact reach far beyond its immediate boundaries, with attendant implications for key sustainability issues such as carbon emissions, housing provision and wealth creation. The assessment considers sustainability issues and effects in relation to the short term (1-5 years), medium term (5-10 years) and longer term, (10-20 years), the latter being the intended lifespan of the Development Management DPD (to 2031).

3.4   Mitigation

3.4.1   Identifying effective mitigation measures will also be an important part of the Environmental Report. **Box 3.1** provides information on types and examples of mitigation measures that might be proposed and includes an overview of the mitigation hierarchy. The mitigation hierarchy is based on the principle that it is preferable to prevent the generation of an impact rather than counteract its effects. It thus suggests that mitigation measures higher up the hierarchy should be considered in preference to those further down the list.

Box 3.1	Mitigation Hierarchy and Example Measures

Mitigation measures should be consistent with the mitigation hierarchy (after DETR 1997[19] and CLG 2006[20]):

- Avoidance - making changes to a design (or potential location) to avoid adverse effects on an environmental feature. This is considered to be the most acceptable form of mitigation.
- Reduction - where avoidance is not possible, adverse effects can be reduced through sensitive environmental treatments/design.
- Compensation - where avoidance or reduction measures are not available, it may be appropriate to provide compensatory measures (e.g. an area of habitat that is unavoidably damaged may be compensated for by recreating similar habitat elsewhere). It should be noted that compensatory measures do not eliminate the original adverse effect, they merely seek to offset it with a comparable positive one.
- Remediation - where adverse effects are unavoidable, management measures can be introduced to limit their influence.
- Enhancement - where there are no negative impacts, but measures are adopted to achieve a positive move towards the sustainability objectives e.g. through innovative design.

Examples of how mitigation measures could be incorporated into DM DPD proposals could include:

- Ensuring that development management decisions are scrutinised for consistency, cumulative impacts and potential unintended consequences at site, neighbourhood and City-wide levels.
- Monitoring the scope the DM DPD and its relationship with the BDP, and where there could be policy gaps.

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[19] Department of the Environment, Transport and the Regions (1997) *Mitigation Measures in Environmental Statements*. London: DETR

[20] Department for Communities and Local Government (2006): *Consultation Document - EIA: A guide to good practice and procedures*. London: CLG

Box 3.1	Mitigation Hierarchy and Example Measures
• Monitoring the impacts of particular policies and their effectiveness, particularly in respect of the criteria used to help define the policy.	

3.5   Who carried out the appraisal

3.5.1   The SA has been undertaken by Wood on behalf of Birmingham City Council.

3.6   Difficulties encountered

3.6.1   The SEA Directive requires the identification of any difficulties (such as technical deficiencies or lack of knowledge) encountered during the appraisal process. These uncertainties and assumptions are detailed in the appraisal matrices. Those uncertainties and assumptions common across the appraisal are outlined below.

Uncertainties

- The case-by-case character of individual development proposals which although of a similar type could yield different sustainability outcomes depending on their location.

- The cumulative sustainability impacts of developments in a particular area.

- The trade-offs which might be required between environmental, social and economic sustainability outcomes in light of the specific character of developments.

- Notwithstanding monitoring of various indicators (as part of the BDP as a whole), the difficulty of precisely measuring the sustainability impacts (positive and negative) of specific developments in particular localities and over time.

Assumptions

- That all development proposals will be consistently judged against the policy requirements of the DM DPD and the BDP more widely, including wider statutory measures relating, for example, to energy efficiency in buildings and air pollution.

- That monitoring of the environmental, social and economic impacts of development will enable judgements to be made on the overall sustainability of development in the City, and in turn feed back into policy evolution.

- That policy will be implemented consistently across the City and the results of DM decisions monitored accordingly.

4. Appraisal of the Publication Development Management DPD and Reasonable Alternatives

4.1 Compatibility between the DPD Objectives and the SA Objectives

4.1.1   A matrix has been completed to assess the compatibility of the objectives contained in the Publication Draft Development Management DPD against the SA objectives. It helps to identify at an early stage where there could be conflict between the two sets of objectives, particularly in respect of economic and social objectives which can sometimes be at odds with environmental objectives.

4.1.2   The following Objectives (repeating those of the BDP) have been set for the emerging Development Management DPD:

1. To develop Birmingham as a City of sustainable neighbourhoods that are safe, diverse and inclusive with locally distinctive character.

2. To make provision for a significant increase in the City's population.

3. To create a prosperous, successful and enterprising economy with benefits felt by all.

4. To promote Birmingham's national and international role.

5. To provide high quality connections throughout the City and with other places including encouraging the increased use of public transport, walking and cycling.

6. To create a more sustainable City that minimises its carbon footprint and waste, and promotes brownfield regeneration while allowing the City to grow.

7. To strengthen Birmingham's quality institutions and role as a learning City and extend the education infrastructure securing significant school places.

8. To encourage better health and well-being through the provision of new and existing recreation, sport and leisure facilities linked to good quality public open space.

9. To protect and enhance the City's heritage assets and historic environment.

10. To conserve and enhance Birmingham's natural environments, allowing biodiversity and wildlife to flourish.

11. To ensure that the City has the infrastructure in place to support its future growth and prosperity.

4.1.3   **Table 4.1** presents an assessment of the compatibility between these Objectives and the SA Objectives.

Table 4.1   Compatibility between the Development Management DPD Objectives and the SA Objectives

Sustainability Objectives	Plan Objectives										
	1. Sustainable Neighbourhoods	2. Population Growth	3. Prosperity	4. National & International Role	5. Connectivity	6. Sustainable City	7. Education	8. Health & Well-being	9. Heritage	10. Natural Environment	11. Infrastructure
ENV1 To encourage development that optimises the use of previously developed land and buildings	+	+	?	?	~	+	~	+	~	?	~
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	+	~	~	+	~	+	~	~	+	~	~
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	+	~	+	?	+	+	~	+	~	~	+
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage, including resilient ecological networks able to meet the demands of current and future pressures	+	?	~	+	+	+	+	+	+	+	
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing flood risk	+	?	?	~	~	+	~	+	?	?	?
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	+	?	?	~	~	+	~	+	~	+	~
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	+	+	+	+	~	+	+	+	?	?	~
ECON2 To help promote the vitality of local centres	+		+	~	~	+	~	~	~	~	~
ECON3 To promote the regeneration of areas across the City through appropriate development	+	+	+	~	+	+	~	+	~	~	+
ECON4 To encourage investment in learning and skills development	~	~	+	~	~	~	+	~	~	~	~
SOC1 To help ensure equitable access to community services and facilities	+	~	+	~	+	+	+	+	~	~	+
SOC2 To help provide decent and affordable housing for all, of the right	+	+	~	~	~	~	~	+	~	~	~

Sustainability Objectives	Plan Objectives										
	1. Sustainable Neighbourhoods	2. Population Growth	3. Prosperity	4. National & International Role	5. Connectivity	6. Sustainable City	7. Education	8. Health & Well-being	9. Heritage	10. Natural Environment	11. Infrastructure
quantity type, tenure and affordability to meet local needs	■	■						■			
SOC3 To encourage development which promotes health and well-being	+	~	~	~	+	+	~	+	~	+	~
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	+	~	~	~	~	~	~	+	~	~	~
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	+	~	~	~	~	~	~	+	~	~	~

+	Objectives are potentially compatible	**?**	Uncertain if Objectives are related	**~**	No clear relationship between Objectives	**-**	Objectives are potentially incompatible

4.1.4 The compatibility analysis in **Table 4.1** reveals that the great majority of SA Objectives and Plan Objectives are either compatible or have no direct relationship with one another. No potential incompatibilities between objectives have been identified, although there are a number of uncertain relationships relating to:

- ▸ Plan Objective 2 (population growth);
- ▸ Plan Objective 3 (prosperity);
- ▸ Plan Objective 4 (national and international role);
- ▸ Plan Objective 9 (heritage);
- ▸ Plan Objective 10 (natural environment); and
- ▸ Plan Objective 11 (infrastructure).

4.1.5 The potential uncertainties principally relate to dilemmas in reconciling the need and demand for development with environmental protection (ENV1, 3, 4, 5 and 6 and ECON 1). In many instances, any potential conflicts arising will have to be determined on a case-by-case basis given the particular character and context of development. These uncertainties are not regarded as barriers to development although particular attention will have to be paid to the application of policy in light of these relationships. These are highlighted as issues which could require monitoring.

4.2 Policies and alternatives

4.2.1 The Development Management DPD proposes 16 policies to manage various aspects of development across the City. The policies have emerged through a process of consultation within

Birmingham City Council and with interested parties. In reaching the proposed policies, options have been considered in most cases. This took account of the following factors:

- the extent to which the policy is required in light of the City Council's corporate objectives and national planning policy;

- the extent to which there is a reasonable need to update the existing policy (which is the most common instance);

- the extent to which a potential alternative approach would ensure efficient and effective management of development to meet local needs and priorities to address the specific issues identified;

- the extent to which a potential alternative could be pursued without placing an unreasonable burden on applicants or the decision making process (such as through requirements for supporting information).

4.2.2   In consequence, alternatives that have been considered have included:

- having no policy;

- reliance on national policy (i.e. the NPPF);

- using the existing UDP policy;

- variations on the proposed policy.

4.2.3   The development of such alternatives have been considered on a case by case basis, to ensure only those that are reasonable, realistic and achievable are subject to appraisal. In comes instances when considering individual policies, no reasonable alternatives have been identified.

4.3   Summary of results and the reasons for selecting/rejecting the alternatives

4.3.1   **Table 4.2** summarises the results of the appraisal of policies, drawn from the analysis in **Appendix A** which appraises the proposed policies against reasonable alternatives.

Table 4.2   Summary of the results of the appraisal of the preferred policy option

Policy	Summary of Appraisal of the Proposed Policy	Alternatives Considered
Environment and Sustainability		
DM1 Air Quality	A policy which clearly address environmental protection issues will help to reinforce existing regulatory regimes. The outcome is likely to be enhanced sustainability performance across most indicators, reflecting greater certainty for developers in respect of both minimum standards and good practice. No likely significant negative effects have been identified. The policy could benefit from the inclusion of examples of measures against	**No alternative** has been identified to this policy - National policy requires planning to contribute towards compliance with relevant limit values or national objectives for pollutants and take into account local AQMA and Clean Air Zones (CAZ). Therefore in order to comply with national policy it is considered necessary to set policy aimed at improving air quality and mitigating the impacts of development on air quality. Having no air quality policy will risk undermining the AQMA and CAZ and failure to deliver relevant actions within the City's Air Quality Action Plan, transport strategy and the objectives

Policy	Summary of Appraisal of the Proposed Policy	Alternatives Considered
	which the policy will be implemented and measured.	of the BDP in promoting sustainable development, and helping to address climate change.
DM2 Amenity	Good design is important to securing sustainable development through balancing a wide variety of considerations. The detailed criteria within DM01 against which developments will be considered serve as a reference point against which specific proposals can be considered, thereby helping to ensure that development takes account of the specific matters which help to make the City and its neighbourhoods attractive and successful places to live. The specific requirements of DM02 complement the overarching principles set out in DM01. There are no suggested changes to the content of the policies arising from the appraisal. The option of developing a new policy to address design issues yields more positive sustainability outcomes than the reasonable alternatives presented.	**No policy** on amenity and rely instead on the NPPF and ad hoc considerations of proposals on a case by case basis. Reason for rejection: The Council believes the preferred approach will provide a more transparent, consistent and fairer basis for considering planning proposals than having no policy. To ensure the successful delivery of the BDP, amenity considerations are considered important. The NPPF is clear that planning should seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.
DM3 Land affected by Contamination, Instability and Hazardous Substances	A policy which clearly addresses environmental protection issues will help to reinforce existing regulatory regimes. The outcome is likely to be enhanced sustainability performance across most indicators, reflecting greater certainty for developers in respect of both minimum standards and good practice. No likely significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal.	**No alternative** to this policy has been identified - Environmental health legislation requires local authorities to identify contaminated land and ensure it is managed in an appropriate manner. The NPPF also stresses the need for policies to ensure that new development is compatible with its location. The NPPF makes clear that developers and landowners are responsible for securing safe development where a site is affected by contamination.
DM4 Landscaping and Trees	Trees and landscaping are fundamental to a high quality and ultimately sustainable environment, contributing aesthetically and functionally to the quality of life across the City. Specification of expectations for design and use of trees and landscaping as part of new development will ensure that, in combination with other policies, high quality design is realised and wider sustainability enhancements are secured. There are no suggested changes to the content of the policy arising from the appraisal, other than cross-referencing Council Strategies relating to Green Infrastructure, for example.	**No alternative** to this policy has been identified - The NPPF and BDP provide strong support for protecting and enhancing valued landscapes. Local planning authorities are advised to set criteria based policies against which proposals for any development on or affecting protected wildlife or landscape areas will be judged.
DM5 Light Pollution	A policy which clearly address environmental protection issues will help to reinforce existing regulatory regimes. The outcome is likely to be enhanced sustainability performance across most indicators, reflecting greater certainty for developers in respect of both minimum	**No alternative** to this policy has been identified - The NPPF is clear that planning policy should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation. The draft policy provides a detailed approach for achieving this.

Policy	Summary of Appraisal of the Proposed Policy	Alternatives Considered
	standards and good practice. No likely significant negative effects have been identified. There are no suggested changes to the content of the policies arising from the appraisal.	
DM6 Noise and Vibration	A policy which clearly address environmental protection issues will help to reinforce existing regulatory regimes. The outcome is likely to be enhanced sustainability performance across most indicators, reflecting greater certainty for developers in respect of both minimum standards and good practice. No likely significant negative effects have been identified. There are no suggested changes to the content of the policies arising from the appraisal.	**No alternative** has been identified to this policy - National planning policy requires development to contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability. In addition, the BDP seeks to create well designed, healthy and safe environments. It is therefore considered necessary to include this policy.
Economy and Network of Centres		
DM7 Advertisements	A specific policy which clearly controls the siting and design of advertisements will provide an important reference point for ensuring that a range of sustainability benefits are secured, focused on enhancing economic development in the City whilst ensuring that residential amenity and City-wide amenity is protected. In all cases, the greater certainty and precision associated with an updated policy is likely to yield positive sustainability effects. No likely significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing a new policy to address siting and design of these uses yields more positive sustainability outcomes than the reasonable alternatives presented.	**No policy** on advertisements Reasons for rejection: Not having a policy and relying upon applications being considered against the National Planning Policy Framework would not be favoured since there would be no safeguard against inappropriate advertisements and signs.
DM8 Places of Worship and other faith related community facilities	Ensuring the appropriate location and design of these uses will help to ensure that sustainable development is promoted, particularly having regard to equitable access through public transport and sensitive design ensuring that impacts on local amenity are minimised. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing a new policy to address siting and design of these uses yields more positive sustainability outcomes than the reasonable alternatives presented.	**Retain the wording of existing policy** in paragraphs 8.31 - 8.35 of the Saved Unitary Development Plan 2005 and Places for Worship and Faith-related Community and Educational Facilities SPD (2011) Reasons for rejection: This policy needs to be updated to reflect Policy TP21 of the BDP which states that the preferred location for community facilities (e.g. health centres, education and social services and religious buildings) is within the network of defined centres. **No policy** on places of worship and faith related community uses. Reasons for rejection: Birmingham has a diverse mix of faiths and cultures. A policy is required to ensure that development for places of worship and faith related

Policy	Summary of Appraisal of the Proposed Policy	Alternatives Considered
		community uses takes place in the appropriate locations and their impacts on the local area are managed.
DM9 Day nurseries and early years provision	A policy which ensures the consistent provision of educational facilities of various kinds across the City will help to ensure that there is equitable access (for example through sustainable locations) and in a fashion which maintains and enhances local amenity. The precise effects of the policy will have to be monitored to determine whether the policy objectives are being realised in practice. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing a new policy to address education-related development issues yields more positive sustainability outcomes than the reasonable alternatives presented.	**Retain existing UDP policy** Reasons for rejection: The policy requires updating as it refers to out of date policies. The existing policy does not reflect the Policy TP21 in the BDP which states that the preferred location for community facilities (e.g. health centres, education and social services and religious buildings) is within the network of defined centres. **No policy** on day nurseries and child care provision Reasons for rejection: Without a policy on the development of day nurseries and childcare provision, development may result in adverse impacts on the vitality of local centres, residential amenity and character of an area.
Homes and Neighbourhoods		
DM10 Standards for Residential Development	This policy will yield a range of sustainability benefits, associated with ensuring that there is high quality residential development throughout the City. No likely significant negative effects have been identified. There are no suggested changes to the content of the policies arising from the appraisal. The option of developing new policy to address residential design matters yields more positive sustainability outcomes than the reasonable alternatives presented.	**Retain existing UDP policy** in paragraph 8.39-8.44 of the Saved Unitary Development Plan regarding house extensions. There is no existing policy on housing technical standards for internal space, outdoor amenity space or accessible and adaptable housing. Reasons for rejection: The policy requires updating to achieve good standards of amenity for the occupiers of new residential buildings and protect the amenity of nearby occupiers and residents. The general thrust of the existing policy regarding residential extensions is taken forward into the new policy. **No minimum space standards or policy** on separation distances, outdoor amenity space and accessible and adaptable housing. Reasons for rejection: Having no such policy would risk developments not achieving a reasonable level of amenity therefore impacting on quality of life. Minimum space standards will help to ensure that there is sufficient space, privacy and storage facilities to ensure the long-term sustainability and usability of homes. DM9 is consistent with the NPPF requires local planning authorities to seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.
DM11 Houses in Multiple Occupation (HMO)	The sustainability effects of a clear policy which seeks to control Houses in Multiple Occupation (HMO) is likely be positive, reflecting the potential issues associated with them. The sustainability effects relate to ensuring that local amenity and design quality is appropriately protected, whilst providing for the needs of those in need. No likely significant negative effects have been identified. There are no suggested changes to	**Retain existing UDP policy** Reasons for rejection: This policy requires updating as it refers to out of date UDP policies, but the main thrust of the policy remains unchanged in DM11. **No policy** on HMO Reasons for rejection: Without a HMO policy, development could result in concentrations of HMOs which can lead to a number of negative impacts on local communities, for example more frequent noise nuisance,

Policy	Summary of Appraisal of the Proposed Policy	Alternatives Considered
	the content of the policy arising from the appraisal. The option of developing a new policy to address siting and design of these uses yields more positive sustainability outcomes than the reasonable alternatives presented.	depopulation of neighbourhoods during academic vacations, and increased pressure on parking due to higher population densities. **Less prescriptive policy** Reasons for rejection: Defining cumulative impact by using a threshold against which applications will be assessed will aid in transparency and consistency in decision-making.
DM12 Residential conversions and specialist accommodation	Promoting sensitive residential conversions and the development of appropriate specialist accommodation is likely to result in significant positive effects through the provision of appropriate accommodation for those in particular need. The option of having no specific policy could result in some minor adverse effects relating to social indicators.	**No policy** on Residential Conversions Reasons for rejection: Without a policy on residential conversions and specialist accommodation there are likely to be a range of negative effects relating to poor quality living environments and negatives impacts on local amenity arising from over-concentrations of such uses.
DM13 Self and Custom-build Housing	Promoting self- and custom-build housing through a specific policy is likely to yield positive sustainability effects City-wide with no adverse effects identified. There are no suggested changes to the content of the policy arising from the appraisal. The option of having no specific policy could result in some minor adverse effects relating to social indicators.	**No policy** on self and custom build housing. Reasons for rejection: The Council wishes to take a proactive approach to supporting individuals or groups of individuals that wish to build their own homes as a more affordable means by which to access home ownership. It is also a duty upon local authorities to have regard to the Self and Custom Build Register in carrying out their planning, housing, land disposal and regeneration functions.
Connectivity		
DM14 Highway Safety and Access	Ensuring that there is a rounded approach to transport planning across the City should yield a broad range of sustainability benefits, notably in respect on enhancing the City's economic performance through ensuring more efficient and effective movement. In turn and more broadly, the well-being of residents is enhanced though the greater opportunities for efficient travel within the City. No likely significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal.	**No alternative** to this policy has been identified - the NPPF requires development to provide for safe and suitable access to the site for all users. It states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
DM15 Parking and Servicing	Ensuring that there is a rounded approach to transport planning across the City should yield a broad range of sustainability benefits, notably in respect on enhancing the City's economic performance through ensuring more efficient and effective movement. In turn and more broadly, the well-being of residents is enhanced though the greater opportunities for efficient travel within the City. No likely	**No policy** Reasons for rejection: National policy makes clear that parking standards should be determined at the local level in response to local circumstances. The proposed policy supports the implementation of the BDP in developing a sustainable, high quality, integrated transport system. It is considered essential that appropriate parking is provided to contribute to traffic

Policy	Summary of Appraisal of the Proposed Policy	Alternatives Considered
	significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing new policy to address siting and design of these uses yields more positive sustainability outcomes than the reasonable alternatives presented.	reduction and ensure safety, inclusive development and manage any impact on amenity.
DM16 Telecommunications	Ensuring that the City has an up-to-date telecommunications infrastructure will ensure sustainability benefits across a range of objectives, notably the contribution to the City's economic performance, creating opportunities for travel reduction and ensuring that all residents have equitable access to high quality services that enable them to fulfil their economic and social potential. No likely significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing new policy to address telecommunications siting matters yields more positive sustainability outcomes than the reasonable alternatives presented.	**No policy** Reasons for rejection: policy supports the implementation of the Policy TP46 Digital Communications of the BDP. The Council supports well-designed and located high quality communications infrastructure and this policy is intended to facilitate provision in line with this aspiration.

4.3.2   **Table 4.3** summarises the scores, by SA Objective, attributed to the preferred policy option and then provides an overall assessment of the cumulative effects of the 15 preferred policies against each SA Objective.

4.3.3   The results set out in Tables 4.2 and 4.3 demonstrate the overwhelming likely positive or significantly positive effects resulting from implementation of the policies. This reflects their positive intent and the need to deal systematically and objectively with planning issues arising day-today across the City, as well as the experience accumulated through implementation of previous Development Management policies through the UDP. More generally, the Development Management policies represent the lowest tier in a hierarchy of planning policies, adding local detail to implement the broader principles of policies within the NPPF and the Birmingham Development Plan. As such they specifically address local issues and are designed to mitigate potential adverse effects associated with development.

4.3.4   No significant negative effects, either associated with specific sustainability objectives or cumulatively have been identified. This contrasts with the scores attributed to the absence of a policy which are typically significantly negative (see **Appendix A**), reflecting the clear need to systematically control development and the likely consequences of the absence of such a local policy framework whose presence is to the benefit of applicants, residents and the City as a whole.

4.3.5   Some policies have been identified as holding some uncertainty as to their precise effects in respect of meeting sustainability objectives. These apply principally to whether significant positive effects are likely to be fully realised in respect of matters such as sustainable travel and construction, or enhanced access by local communities to skills enhancement from the construction of education facilities, reflecting the case-by-case nature of individual developments and their particular circumstances. Nevertheless, the potential for the realisation of significant positive or positive effects exists.

Table 4.3   Summary of scores attributed to the Publication Plan Policies

	DM5 Light Pollution	DM4 Landscaping and trees	DM3 Land affected by contamination, instability and hazardous substances	DM2 Amenity	DM1 Air Quality
ENV1 optimise use of previously developed land	~	~	++	~	~
ENV2 apply high standards of design, construction and maintenance	+	++	~	++	++?
ENV3 encourage sustainable methods of transport and reduce the need to travel	~	~	~	~	+
ENV4 protect and enhance Birmingham's cultural and natural heritage	++	++	~	++	~
ENV5 anticipate and respond to the challenges associated with climate change, particularly managing and reducing flood risk	~	++	~	~	~
ENV6 make best use of water resources, reduce pollution and encourage sustainable waste management	~	++	++?	~	++?
ECON1 improve the performance of the local and City-wide economy to provide opportunity for all	~	++	+	++	+
ECON2 promote the vitality of local centres	+	++	~	++	~
ECON3 promote the regeneration of areas across the City	~	++	+	++	+
ECON4 encourage investment in learning and skills development	~	~	~	~	~
SOC1 ensure equitable access to community services and facilities	~	~	~	~	~
SOC2 provide decent and affordable housing for all meet local needs	~	~	~	~	~
SOC3 promotes health and well-being	~	++	++	++	++
SCO4 reduce crime, the fear of crime and antisocial behaviour	+	++	~	~	~
SOC5 enable communities to influence the decisions that affect their neighbourhoods and quality of life	~	~	~	~	~

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	DM6 Noise and Vibration	DM7 Advertisements	DM8 Places of worship and other faith related community facilities	DM9 Day nurseries and early years provision	DM10 Standards for residential development	DM11 Houses in multiple occupation (HMO)
ENV1 optimise use of previously developed land	?	?	++?	?	?	++?
ENV2 apply high standards of design, construction and maintenance	+?	++?	++?	+	++?	?
ENV3 encourage sustainable methods of transport and reduce the need to travel	?	?	++?	++?	?	?
ENV4 protect and enhance Birmingham's cultural and natural heritage	?	++?	++?	?	?	++?
ENV5 anticipate and respond to the challenges associated with climate change, particularly managing and reducing flood risk	?	?	?	?	?	?
ENV6 make best use of water resources, reduce pollution and encourage sustainable waste management	?	?	?	?	?	?
ECON1 improve the performance of the local and City-wide economy to provide opportunity for all	?	++?	?	+?	++?	?
ECON2 promote the vitality of local centres	?	++?	++?	+	++?	?
ECON3 promote the regeneration of areas across the City	?	?	++?	?	?	?
ECON4 encourage investment in learning and skills development	?	?	?	+?	?	?
SOC1 ensure equitable access to community services and facilities	?	?	++?	+?	?	?
SOC2 provide decent and affordable housing for all meet local needs	?	?	?	?	?	++?
SOC3 promotes health and well-being	++	?	++?	+?	++?	?
SCO4 reduce crime, the fear of crime and antisocial behaviour	?	?	?	?	?	++?
SOC5 enable communities to influence the decisions that affect their neighbourhoods and quality of life	?	+	++?	?	?	++?

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Cumulative Effect of all Policies	DM16 Telecommunications	DM15 Parking	DM14 Highway Safety and Access	DM13 Self and custom-build housing	DM12 Residential conversions and specialist accommodation	
~/+/ ++?	~	~	~	+?	++?	**ENV1 optimise use of previously developed land**
+/++?	+	+	+	+?	++	**ENV2 apply high standards of design, construction and maintenance**
~/+/ ++?	+	++?	++	~	~	**ENV3 encourage sustainable methods of transport and reduce the need to travel**
+/++?	+	+	+	~	++?	**ENV4 protect and enhance Birmingham's cultural and natural heritage**
~/++	~	~	~	~	~	**ENV5 anticipate and respond to the challenges associated with climate change, particularly managing and reducing flood risk**
~/++	~	~	~	~	~	**ENV6 make best use of water resources, reduce pollution and encourage sustainable waste management**
~/+/ ++?	+	~	~	~	~	**ECON1 improve the performance of the local and City-wide economy to provide opportunity for all**
+/++?	+	++	++	~	~	**ECON2 promote the vitality of local centres**
~/+/+ +	+	~	~	+?	~	**ECON3 promote the regeneration of areas across the City**
~/+	+	~	~	++?	~	**ECON4 encourage investment in learning and skills development**
~/+	+	+	+	~	~	**SOC1 ensure equitable access to community services and facilities**
~/+/ ++?	~	~	~	++	++?	**SOC2 provide decent and affordable housing for all meet local needs**
~/+/ +/++?	+	+	+	+?	~	**SOC3 promotes health and well-being**
~/+/ ++?	~	~	~	~	++?	**SCO4 reduce crime, the fear of crime and antisocial behaviour**
~/+/ ++?	+	++	++?	++?	++?	**SOC5 enable communities to influence the decisions that affect their neighbourhoods and quality of life**

wood.

Sustainability Appraisal Scoring

Score Key:	+ + **Significant positive effect**	+ **Minor positive effect**	**0** **No overall effect**	**-** **Minor negative effect**	**- -** **Significant negative effect**	**?** **Score uncertain**	**~** **No clear relationship**
NB: where more than one symbol is presented in a box it indicates that the appraisal has found more than one score for the category. Where a box is coloured but also contains a '?', this indicates uncertainty over whether the effect could be a minor or significant effect although a professional judgement is expressed in the colour used. A conclusion of uncertainty arises where there is insufficient evidence for expert judgement to conclude an effect.							

4.4   Summary of the Habitats Regulations Assessment (HRA)

4.4.1   BCC has reviewed the DM DPD against the requirements of Regulation 105 of the Habitats Regulations; this review has drawn on the evidence gathered by the 2013 HRA[21] undertaken for the Birmingham Development Plan and a technical review, taking into account the scope and content of the Development Management DPD. The 2013 HRA established that there were unlikely to be any significant adverse effects on any European site as follows:

> E1 This HRA report has carefully considered the effects that might be associated with development as part of the Pre-Submission Version of the BDP. Having previously screened the BDP options, this report has revisited assessments made during November 2012 and assessed new content in the latest version of the plan.
>
> E2 There are no European sites in the City of Birmingham. Of those that have been identified from a 20km area of search and others that have been included through hydrological pathways that lie beyond this search zone, none are expected to experience adverse effects from proposals in the BDP. Earlier assessment in November 2012 recommended that the issues of air quality, disturbance from recreation, water supply and treatment be explored as part of further HRA work. These issues have been appraised along with several other identified vulnerabilities of European sites.
>
> E3 The following 14 sites were included in this HRA report:
>
> • Cannock Chase SAC; • Cannock Extension Canal SAC; • Elan Valley Woodlands SAC; • Elenydd SAC; • Elenydd-Mallaen SPA; • Ensor's Pool SAC; • Fens Pools SAC; • Humber Estuary SAC; • Humber Estuary SPA; • Humber Estuary Ramsar; • River Mease SAC; • Severn Estuary SAC; • Severn Estuary SPA; and • Severn Estuary Ramsar.
>
> E4 The Pre-Submission Version of the BDP is not likely to lead to adverse effects on any European sites alone or in-combination with other plans. There is no requirement to prepare an appropriate assessment.

4.4.2   The technical review has determined that the significant effects considered in the 2013 HRA remain relevant, valid and can be relied upon, when considering the effects of the Development Management DPD. It is noted that the Development Management DPD will not introduce any new effect pathways. The review has concluded that the Development Management DPD will have no significant effects on any European sites as a result of its implementation as it is an expansion and clarification of the strategic policies of the BDP, which itself was determined not to have any likely significant effects on European sites, either alone, or in combination with other plans.

4.5   Proposed mitigation measures

4.5.1   When considering planning policies, mitigation can usually be in the form of policy amendments. For the Development Management DPD preferred policies, there are no recommendations for the modification of the range of policies. This reflects the positive scores, the absence of negative effects and the intention to use the policies in combination with the policies of the BDP, which for each policy are cross-referenced.

4.5.2 Whilst there are no recommendations for the amendment of policy wording, the following general points can be made in respect of the presentation of the policies in order to make clearer how they will be implemented:

▶ Ensure that, wherever possible, the specific criteria against which the policy will be implemented and monitored are included.

▶ For each DM policy, provide further detail against the cited BDP policies on how these will work together.

▶ Set out more clearly in paragraph 1.10 of the DPD which matters are covered by the BDP, such as the control of various forms of retail development.

4.6 Uncertainties and risks

4.6.1 The principal uncertainties centre on the implementation of the policies and the inevitable variability associated with case-by-case judgements. However, any unintended sustainability effects are likely to be localised, and monitoring of implementation is an important part of development management. It is through this mechanism that consistency of implementation and unintended consequences (and hence potential effects on sustainability) should be identified. Monitoring activity has been undertaken for policies applied as part of the Unitary Development Plan and lessons learnt in the development of new policies. It can be assumed therefore that the new policies are more sophisticated and should therefore yield more sustainable effects. Nevertheless, many of the scores retain a '?' to indicate that there is uncertainty associated with their effects.

5. Next steps

5.1 Preparation of the Submission Development Management DPD

5.1.1 Following consultation and an analysis of the responses, the Council will revise the Publication Draft Development Management DPD which will be subject to a statutory period of public consultation. Following this, a Submission Development Management DPD will be produced. This will be submitted for consideration by an independent planning inspector.

5.2 Finalising the SA Report and Post Adoption Statement

5.2.1 Following EiP, and subject to any significant changes to the draft DPD that may require appraisal, the Council will issue a Post Adoption Statement (PAS) as soon as reasonably practicable after the adoption of the DPD. The PAS will set out the results of the consultation and SA processes and the extent to which the findings of the SA have been accommodated in the adopted DPD.

5.3 Monitoring Requirements

5.3.1 Following adoption of the Development Management DPD, there will need to be monitoring of any significant effects identified. Monitoring the sustainability effects of implementing the Development Management DPD should be conducted as part of an overall approach to monitoring the sustainability effects of the BDP and various SPDs across the City. An Authority Monitoring Report is already produced for the BDP. This does not currently cover DM-related matters and this could be refined to reflect the content of the Development Management DPD and combined with the monitoring of potential sustainability effects.

5.3.2 **Table 5.1** sets out a number of potential indicators for monitoring the potential significant sustainability effects of implementing the Development Management DPD, drawing on those set out in Table 3.1 above which relate to sustainability objectives. Note that the indicators proposed are included as suggestions at this stage, as it is recognised that many datasets may not be available for monitoring some of the sustainability effects of the Development Management DPD, and that the indicators included may change once the City Council finalises the monitoring framework for the DPD itself. The data used for monitoring could be provided by outside bodies.

Table 5.1   Potential monitoring indicators for the Development Management DPD

Policy	Potential Indicator(s)
DM1 Air Quality	BDP AQ monitoring Change to/within Air Quality Management Areas Effects on human health and biodiversity
DM2 Amenity	Development Management (DM) statistics on applications refused as contrary to policy Development affecting natural assets including open space Effects on heritage assets and biodiversity

Policy	Potential Indicator(s)
DM3 Land affected by contamination, instability and hazardous substances	DM statistics on applications with contamination/stability issues Proportion of new development on previously developed land
DM4 Landscaping and trees	BDP monitoring of city-greening DM statistics on conditions attached to applications
DM5 Light Pollution	DM statistics on applications refused as contrary to policy Effects on heritage assets and biodiversity
DM6 Noise and Vibration	DM statistics on applications refused as contrary to policy Noise complaints Effects on heritage assets and biodiversity
DM7 Advertisements	DM statistics on applications refused as contrary to policy Effects on heritage assets
DM8 Places of worship and other faith related community facilities	DM statistics on applications Accessibility indices of key facilities
DM9 Day nurseries and early years provision	DM statistics on applications refused as contrary to policy Accessibility indices of key facilities
DM10 Standards for residential development	DM statistics on applications refused as contrary to policy
DM11 Houses in Multiple Occupation (HMO)	DM statistics on applications refused as contrary to policy
DM12 Residential conversions and specialist accommodation	DM statistics on applications refused as contrary to policy
DM13 Self and custom-build housing	DM statistics on applications
DM14 Highway Safety and Access	DM statistics on applications refused as contrary to policy
DM15 Parking and Servicing	DM statistics on applications refused as contrary to policy
DM16 Telecommunications	DM statistics on applications Effects on heritage assets and biodiversity

5.4   Quality Assurance Checklist

5.4.1   The Government's Guidance on SEA[22] contains a quality assurance checklist to help ensure that the requirements of the SEA Directive are met. This has been completed for the Development Management DPD in **Table 5.2**.

Table 5.2   Completed Quality Assurance Checklist for the Development Management DPD

Objectives and Context	
● The plan's purpose and objectives are made clear.	Section 1.4
● Sustainability issues, including international and EC objectives, are considered in developing objectives and targets.	Key sustainability issues identified through a review of relevant plans and programmes (see Section 2) and analysis of baseline conditions (see Section 2) have informed the development of the SA Framework presented in Section 3.
● SEA objectives are clearly set out and linked to indicators and targets where appropriate.	Section 3.1 presents the SA objectives and guide questions.
● Links with other related plans, programmes and policies are identified and explained.	A review of related plans and programmes is presented in Section 2 of this SA Report.
Scoping	
● The environmental consultation bodies are consulted in appropriate ways and at appropriate times on the content and scope of the Environmental Report.	The environmental bodies were consulted on the Scoping Report in March 2015 and August 2018.
● The assessment focuses on significant issues.	Sustainability issues have been identified in the baseline analysis contained in Section 2 of this SA Report on a topic-by-topic basis. Section 2.2 summarises the key sustainability issues identified.
● Technical, procedural and other difficulties encountered are discussed; assumptions and uncertainties are made explicit.	Section 3.6 of this SA Report sets out the difficulties, uncertainties and assumptions.
● Reasons are given for eliminating issues from further consideration.	No issues have been knowingly eliminated from this SA Report.
Baseline Information	
● Relevant aspects of the current state of the environment and their likely evolution without the plan are described.	Section 2 and Appendix B of this SA Report presents the baseline analysis of the City's social, economic and environmental characteristics including their likely evolution without the Local Plan.
● Characteristics of areas likely to be significantly affected are described, including areas wider than the physical boundary of the plan area where it is likely to be affected by the plan where practicable.	Throughout Section 2 of this SA Report, reference is made to areas which may be affected by the Local Plan.
● Difficulties such as deficiencies in information or methods are explained.	Section 3.6 of this SA Report sets out the difficulties, uncertainties and assumptions.
Prediction and evaluation of likely significant effects	
● Likely significant social, environmental and economic effects are identified, including those listed in the SEA Directive (biodiversity, population, human health, fauna, flora, soil, water, air, climate factors, material assets, cultural heritage and landscape), as relevant.	Section 4 summarises the appraisal of the sustainability performance of the Pre-Submission Local Plan in terms of the Local Plan Vision and Spatial Principles, preferred development requirements and Spatial Strategy, site allocations and policies. Detailed appraisal matrices are

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[22] (Former) Office of the Deputy Prime Minister (2005) *A Practical Guide to the Strategic Environmental Assessment Directive.*

	set out in Appendix A that have been developed to meet the requirements of the SEA Directive.
• Both positive and negative effects are considered, and where practicable, the duration of effects (short, medium or long-term) is addressed.	Positive and negative effects are considered within the appraisal matrices and within Section 4. Potential effects are identified in the short, medium and long-term.
• Likely secondary, cumulative and synergistic effects are identified where practicable.	The cumulative effects of the Plan are considered in Appendix A and summarised in Section 4 where relevant.
• Inter-relationships between effects are considered where practicable.	Inter-relationships between effects are identified in the assessment commentary, where appropriate.
• Where relevant, the prediction and evaluation of effects makes use of accepted standards, regulations, and thresholds.	These are identified in the commentary, where appropriate.
• Methods used to evaluate the effects are described.	These are described in Section 3.

Mitigation measures

• Measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the plan are indicated.	These are identified within the appraisal matrices.
• Issues to be taken into account in development consents are identified.	These are identified within the appraisal matrices.

The SA Report

• Is clear and concise in its layout and presentation.	The SA Report is clear and concise.
• Uses simple, clear language and avoids or explains technical terms. Uses maps and other illustrations where appropriate.	Maps and tables have been used to present the baseline information in Appendix B where appropriate.
• Explains the methodology used. Explains who was consulted and what methods of consultation were used.	Section 3 presents the proposed methodology to be used for assessment whilst consultation arrangements are discussed in Section 1.
• Identifies sources of information, including expert judgement and matters of opinion.	Information is referenced throughout the SA Report.
• Contains a non-technical summary	Included.

Consultation

• The SEA is consulted on as an integral part of the plan-making process.	This SA Report is being consulted upon along with the Publication Draft Development Management DPD.
• The consultation bodies, other consultees and the public are consulted in ways which give them an early and effective opportunity within appropriate time frames to express their opinions on the draft plan and SA Report.	The emerging Plan and SA have been made available for consultation in line with planning regulations.

Decision-making and information on the decision

• The SA Report and the opinions of those consulted are taken into account in finalising and adopting the plan.	Responses received to this SA Report will inform the preparation of the Submission Draft Development Management DPD. They will also be summarised in the Post Adoption Statement.
• An explanation is given of how they have been taken into account.	This information will be provided in subsequent reports.
• Reasons are given for choices in the adopted plan, in the light of other reasonable options considered.	These will be present in the Post Adoption Statement.

Appendix A
Policy Appraisal

Sustainability Appraisal Scoring

Score Key:	++ Significant positive effect	+ Minor positive effect	0 No overall effect	- Minor negative effect	- - Significant negative effect	? Score uncertain	~ No clear relationship

NB: where more than one symbol is presented in a box it indicates that the appraisal has found more than one score for the category. Where a box is coloured but also contains a '?', this indicates uncertainty over whether the effect could be a minor or significant effect although a professional judgement is expressed in the colour used. A conclusion of uncertainty arises where there is insufficient evidence for expert judgement to conclude an effect.

Potential cumulative, synergistic and temporal effects reflect the likely city-wide application of the policy over the short, medium and longer term (short term (0 - 10 years), medium term (between 10 and 25 years) and long term (>25 years))

Policy	Reasonable Alternatives
DM1 Air Quality	• None – a policy is required by National Policy
DM2 Amenity	• No policy – rely on National Policy
DM3 Land affected by contamination, instability and hazardous substances	• None – a policy is required by Legislation
DM4 Landscaping and Trees	• None – a policy is required by National Policy
DM5 Light Pollution	• None – a policy is required by National Policy
DM6 Noise and Vibration	• None – a policy is required by National Policy

Policy	Reasonable Alternatives
DM7 Advertisements	• No policy
DM8 Places of Worship and Faith-related Community Facilities	• Retain existing UDP policy • No policy
DM9 Day Nurseries and Childcare Provision	• Retain existing UDP policy • No policy
DM10 Standards for Residential Development	• Retain existing UDP policy • No minimum space standards or policy
DM11 Houses in Multiple Occupation	• Retain existing UDP policy • No policy • Less prescriptive policy
DM12 Residential conversions and specialist accommodation	• No policy
DM13 Self and Custom-Build Housing	• No policy
DM14 Highway safety and access	• None – a policy is required by National Policy
DM15 Parking and Servicing	• No policy
DM16 Telecommunications	• No policy

Policy DM1 Air Quality

Policy Content	Options Considered
1. Development proposals will need to contribute to the management of air quality and support the objectives of the local Air Quality Action Plan and Clean Air Zone. Development that would, in isolation or cumulatively, lead to an unacceptable deterioration* in air quality, result in exceedances of nationally or locally set objectives for air quality, particularly for nitrogen dioxide, or increase exposure to unacceptable levels of air pollution, will not be considered favourably. 2. Mitigation measures such as low and zero carbon energy, green infrastructure and sustainable transport can help to reduce and/ or manage air quality impacts and will be proportionate to the background air quality in the vicinity, including Clean Air Zone designations. 3. The development of fuelling stations for low emission and electric vehicles will be supported in principle where they establish a network of facilities to support the City's transport and air quality objectives. New or extended fuelling stations for petrol and diesel vehicles would need to be justified on the basis of addressing clear gaps in existing provision, demonstrate compliance with Part 1 of this policy and provide fuelling for low emission and electric vehicles. * As defined in paragraph 2.7	• None – a policy is required by National Policy

SA Objective	New Policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	~	No clear relationship
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	++?	Consistent application of standards which encourage high environmental quality will help to secure better quality buildings across the city to the benefit of sustainability over the longer term. The speed and depth of this change is uncertain, however.
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	+	Measures to reduce air pollution through the use of Travel Plan will help to promote sustainable transport, contributing sustainability across the City. However, these measures are unlikely to significantly address air quality issues generated by road traffic.
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	~	No clear relationship

SA Objective	New Policy	Commentary
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	No clear relationship
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	++?	Consistent application of standards which encourage high environmental quality will help to secure better quality buildings across the city to the benefit of sustainability over the longer term. The speed and depth of this change is uncertain, however.
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	+	Enhancement of the City's environmental quality will make a contribution to the City's economic success.
ECON2 To help promote the vitality of local centres	~	No clear relationship
ECON3 To promote the regeneration of areas across the City through appropriate development	+	Enhancement of the City's environmental quality will make a contribution to the City's economic success.
ECON4 To encourage investment in learning and skills development	~	No clear relationship
SOC1 To help ensure equitable access to community services and facilities	~	No clear relationship
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~	No clear relationship
SOC3 To encourage development which promotes health and well-being	++	Clear, consistent policies which seek high environmental standards in new development and in turn will contribute to health and well-being.

SA Objective	New Policy	Commentary
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~	No clear relationship
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	~	No clear relationship

Commentary

A policy which clearly address environmental protection issues will help to reinforce existing regulatory regimes and the wider objectives and policies established in the BDP for the enhancement of air quality across the City through various means. The outcome of policy implementation is likely to be enhanced sustainability performance, reflecting greater certainty for developers in respect of both minimum standards and good practice. No likely significant negative effects have been identified. The policy could benefit from the inclusion of examples of measures against which the policy will be implemented and measured. The cumulative and temporal effects of the policy are likely to be City-wide and be determined over the short, medium and longer term, reflecting the consistent and early application of the policy.

BCC Background - DM1 Air Quality:

Government has determined the need for Birmingham to introduce a Clean Air Zone (CAZ) to control road transport related emissions particularly NO2. The Council's Cabinet has approved the preferred measures for a Birmingham Clean Air Zone that will seek to achieve air quality compliance with UK and EU statutory NO2 limits in the shortest time possible, as part of a longer term air quality programme. The positive management of air quality is a priority for the City, and it is imperative that development does not undermine the objectives of the CAZ, specifically that compliance within the CAZ is maintained and that no other areas become subject to requiring the declaration of a CAZ.

The AQAP, BDP and Birmingham Connected (the City Council's transport strategy) provide the framework to improve air quality in the city, including measures to encourage walking, cycling and the use of public transport, together with the support for the uptake of cleaner vehicle technologies through infrastructure provision, fleet transition and travel behaviour changes. New developments have the potential to adversely affect air quality or be affected by air quality. This particularly relates to development that would trigger an Air Quality Assessment (AQA) as set out in the Local Validation Requirements. The assessment and mitigation approach contained within the West Midlands Low Emissions Towns and Cities Programme: Good Practice Air Quality Planning Guidance (2014) (or any subsequent future replacement) should be utilised to assess where relevant exposure may arise, calculate the emission damage costs and identify mitigation. 'Unacceptable' deterioration is defined as where the development would result in exposure to pollutant concentrations close to the limit values.

AQAs must outline the current and predicted future pollutant concentrations at, and in the vicinity of, the development site. The AQA should also consider any potential cumulative impacts on air quality arising from planned development in the vicinity of the development site. The AQA should set out the planned mitigation measures to address any negative impacts. Mitigation measures should be provided on-site, however where this is impractical the AQA should demonstrate that it is possible to include measures in the local area which have equivalent air quality benefits. Mitigation measures may be secured either by planning condition or legal agreement where appropriate. Any impacts upon air quality will be considered in the context of the benefits the development brings to the City.

Mitigation measures will include ensuring that developments are designed to ensure walking and cycling is an obvious choice for short trips and that there is good public transport access to contribute towards the reduction in emissions, particularly nitrogen oxides and particulate matter. Where appropriate, new development should include low emission vehicle charging points as part of their parking provision, and consideration should be given to options to introduce car clubs as an alternative model of car ownership.

Birmingham City Council; Air Quality Annual Status Report (November 2017) (2018 version now also available via the same link)
https://www.birmingham.gov.uk/downloads/download/1488/air_quality_annual_status_report

Birmingham City Council; Clean Air Zone - Full Business Case & Cabinet Report (December 2018)
https://www.birmingham.gov.uk/info/20076/pollution/1763/a_clean_air_zone_for_birmingham/8

Environmental Protection UK & Institute of Air Quality Management; Guidance on land-use planning and development control: Planning for air quality (Jan 2017) https://iaqm.co.uk/guidance/

HM Government; Road to Zero Strategy (July 2018) https://www.gov.uk/government/publications/reducing-emissions-from-road-transport-road-to-zero-strategy

Low Emissions Towns and Cities Programme; Good Practice Air Quality Planning Guidance (May 2014)
https://go.walsall.gov.uk/low_emissions_towns_and_cities_programme

Birmingham City Council, Draft Clean Air Strategy (February 2019)
https://www.birminghambeheard.org.uk/economy/clean-air-strategy-consultation/

Birmingham City Council, Air Quality Action Plan (2011) (pdf)

Department of Chemical Engineering, School of Chemistry, University of Murcia, Spain; Assessing the impact of petrol stations on their immediate surroundings (2010) (pdf)

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Policy DM2 Amenity

Policy Content	Options Considered
All development will need to be appropriate to its location and not result in unacceptable adverse impacts on the amenity of occupiers and neighbours. In assessing the impact of development on amenity, the following will be considered: a. Visual privacy and overlooking; b. Sunlight, daylight, overshadowing; c. Aspect and outlook; d. Access to high quality and useable amenity space; e. Noise, vibration, odour, fumes, dust, air or artificial light pollution; f. Safety considerations, crime, fear for crime and anti-social behaviour; g. Compatibility of adjacent uses; and h. The individual and cumulative impacts of development proposals in the vicinity on amenity.	• No policy – rely on National Policy

SA Objective	No policy	New policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	~	~	No clear relationship
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	-	++	Clear design and environmental quality expectations will help to ensure that there is a strong reference point against which development proposals can be assessed for their quality and contribution to achieving sustainable neighbourhoods and design quality across the City.
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	~	~	No clear relationship
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	-	++	Implicit in the criteria-based approach of the policies is sensitivity towards the context into which new development will be placed.

SA Objective	No policy	New policy	Commentary
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	~	No clear relationship
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~	~	No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	-	++	Attractive and sustainable design will contribute to the City's image as a progressive and responsible place in which to invest.
ECON2 To help promote the vitality of local centres	-	++	Attractive and sustainable design will contribute to the success and rejuvenation of local centres.
ECON3 To promote the regeneration of areas across the City through appropriate development	-	++	Attractive and sustainable design will contribute to the regeneration of the City through helping to produce attractive and successful places.
ECON4 To encourage investment in learning and skills development	~	~	No clear relationship
SOC1 To help ensure equitable access to community services and facilities	~	~	No clear relationship
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~	~	No clear relationship
SOC3 To encourage development which promotes health and well-being	-	++	Good design, by its nature, promotes health and well-being, through the promotion of amenity and local environmental quality.

SA Objective	No policy	New policy	Commentary
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~	~	No clear relationship
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	~	~	No clear relationship

Commentary

Good design is important to securing sustainable development through balancing a wide variety of environmental and social considerations. The detailed criteria within DM2 against which developments will be considered serve to ensure that development takes account of the specific matters which help to make the City and its neighbourhoods attractive and successful places to live. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing a new policy to address design issues yields more positive sustainability outcomes than the reasonable alternative presented. The cumulative and temporal effects of the policy are likely to be City-wide and be determined over the short, medium and longer term, reflecting the consistent and early application of the policy.

BCC Background - DM2 Amenity:

The built-up nature of Birmingham presents opportunities for new uses to address and improve the amenity of the City. This can be achieved by ensuring that all developments are suitably located, well designed, adequately separated from neighbouring uses and operate in an appropriate way for the area in which they are located.

The protection of amenity covers both living and working conditions. This means firstly that new development should provide for adequate day to day living and working conditions for those who will be occupying it. Secondly, it means that development should not have undesirable amenity impacts on the living conditions of neighbouring residents or compromise the continued operation of uses and activities which are already established in the locality. The NPPF is clear (with particular reference to noise) that businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established.

It may be necessary to apply planning conditions to new developments to ensure amenity standards are maintained such as hours of operation, requirements for ventilation equipment to be properly maintained, and delivery times.

Birmingham City Council; Birmingham Design Guide Vision Document (2015) https://www.birminghambeheard.org.uk/economy/birmingham-design-guide-vision/

Birmingham Design Guide SPD (in preparation)

Birmingham City Council, Places for All
https://www.birmingham.gov.uk/directory_record/682/places_for_all

Birmingham City Council, Places for Living
https://www.birmingham.gov.uk/directory_record/683/places_for_living

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Policy DM3 Land affected by contamination, instability and hazardous substances

Policy Content	Options Considered
1. Proposals for new development will need to ensure that risks associated with land contamination and instability are fully investigated and addressed by appropriate measures to minimise or mitigate any harmful effects to human health and the environment within the development and the surrounding area and/ or groundwater. 2. All proposals for new development on land which is known to be, or potentially, contaminated or unstable, will be required to submit a preliminary risk assessment, and where appropriate, a risk management and remediation strategy based on detailed site investigation to remove risks to both the development and the surrounding area and/ or groundwater. 3. Proposals for development of new hazardous installations, or development located within the vicinity of existing hazardous installations, will only be permitted where it is demonstrated that necessary safeguards, in consultation with the Control of Major Accidents Hazards (COMAH) competent authority, are incorporated to ensure the development is safe; and that it supports the spatial delivery of growth as set out in the Birmingham Development Plan.	• None – a policy is required by National Policy

SA Objective	New Policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	++	Redevelopment of brownfield land is a priority of the BDP and environmental quality policies will be an important part of realising this key objective through ensuring that the development process and its outputs are undertaken with reference to clear standards. A specific policy on contamination and stability is particularly important in respect of use the previously developed land.
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	~	No clear relationship
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	~	No clear relationship
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	~	No clear relationship

wood.

SA Objective	New Policy	Commentary
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	No clear relationship
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	++?	Consistent application of standards which encourage high environmental quality will help to secure better quality buildings across the city to the benefit of sustainability over the longer term. The speed and depth of this change is uncertain, however.
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	+	Enhancement of the City's environmental quality will make a contribution to the City's economic success.
ECON2 To help promote the vitality of local centres	~	No clear relationship
ECON3 To promote the regeneration of areas across the City through appropriate development	+	Enhancement of the City's environmental quality will make a contribution to the City's economic success.
ECON4 To encourage investment in learning and skills development	~	No clear relationship
SOC1 To help ensure equitable access to community services and facilities	~	No clear relationship
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~	No clear relationship
SOC3 To encourage development which promotes health and well-being	++	Clear, consistent policies which seek high environmental standards in new development will contribute to health and well-being.

SA Objective	New Policy	Commentary
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~	No clear relationship
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	~	No clear relationship

Commentary

A policy which clearly addresses environmental protection issues will help to reinforce existing regulatory regimes. The outcome is likely to be enhanced sustainability performance, reflecting greater certainty for developers in respect of both minimum standards and good practice. No likely significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal. The cumulative and temporal effects of the policy are likely to be City-wide and be determined over the short, medium and longer term, reflecting the consistent and early application of the policy.

BCC Background - DM3 Land affected by contamination, instability and hazardous substances:

Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner. When development is proposed on or adjacent to land that is known or suspected to be affected by contamination and/ or instability, or where development is proposed that would be sensitive to these risks, proposals for development should be accompanied by an appropriate level of supporting information. Early engagement with the local planning authority and environmental health, particularly if the land is determined as contaminated land under Part 2A of the Environmental Protection Act 1990, will clarify what assessment is needed to support the application and issues that need to be considered in the design of a development.

A preliminary risk assessment will be required to identify the nature and extent of contamination and/or instability. Where the assessment identifies significant harmful risk to human health or the environment, the Council will require a full ground investigation and a risk assessment management and remediation strategy. The Environment Agency will also have an interest in the case of 'special sites' designated under Part 2A of the Environmental Protection Act 1990 and all sites where there is a risk of pollution to controlled waters. Remediation will need to meet their requirements. The developer should also check whether an environmental permit is required before development can start. See also BDP Policy TP6 Management of flood risk and water resources.

Remedial measures will need to be carried out in line with current legislation, guidelines and best practice, including applying the Environment Agency's principles in managing risks to groundwater (the precautionary principle, risk based approach and groundwater protection hierarchy).

Environment Agency; Land Contamination: Technical Guidance (2014, updated 2016) https://www.gov.uk/government/collections/land-contamination-technical-guidance

Health & Safety Executive; Land Use Planning Methodology Guidance http://www.hse.gov.uk/landuseplanning/

MHCLG, Planning Practice Guidance, Land affected by Contamination (July 2019) https://www.gov.uk/guidance/land-affected-by-contamination.

MHCLG, Planning Practice Guidance, Land instability (July 2019) https://www.gov.uk/guidance/land-stability

MHCLG, Planning Practice Guidance, Hazardous substances (March 2019) https://www.gov.uk/guidance/hazardous-substances

Policy DM4 Landscaping and Trees

Policy Content	Options Considered
Landscaping 1. All developments must take opportunities to provide high quality landscapes and townscapes that enhance existing landscape character and the green infrastructure network, contributing to the creation of high quality places and a coherent and resilient ecological network. 2. The composition of the proposed landscape should be appropriate to the setting and the development, as set out in a Landscape Plan*, with opportunities taken to maximise the provision of new trees and other green infrastructure, create or enhance links from the site to adjacent green infrastructure and support objectives for habitat creation and enhancement as set out in the Birmingham and Black Country Nature Improvement Area Ecological Strategy 2017-2022 and subsequent revisions. **Trees, woodland and hedgerow protection** 1. Development proposals must seek to avoid the loss of, and minimise the risk of harm to, existing trees, woodland, and/or hedgerows of visual or nature conservation value, including but not limited to trees or woodland which are subject to a Tree Preservation Order, or which are designated as Ancient Woodland or Ancient/ Veteran Trees. Where trees and/or woodlands are proposed to be lost as a part of development this loss must be justified as a part of an Arboricultural Impact Assessment (AIA) submitted with the application. 2. Where a proposed development retains existing trees or hedgerows on site, or where there is an incursion into a tree root protection area, provision must be made for their protection during the demolition and construction phase of development with monitoring and mitigation measures being put in place to ensure that development works do not have an adverse impact on retained trees, hedgerows and associated wildlife. 3. To ensure that the benefits of proposed development outweigh the harm resulting from the loss of any trees, woodlands or hedgerows, adequate replacement planting will be required to the satisfaction of the Council. Replacement should be provided on-site unless the developer can justify why this is not achievable. Where on-site replacement is not achievable, contributions to off-site tree planting will be sought through a Section 106 Agreement. * see the adopted Local Validation Criteria	• None – a policy is required by National Policy

SA Objective	New Policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	~	No clear relationship

SA Objective	New Policy	Commentary
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	++	Tress and landscaping are very often a critical aspect of good design.
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	~	No clear relationship
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	++	Trees and landscaping can very often be central to achieving high quality development which contributes to its context.
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	++	Trees and landscaping will be increasingly important in ensuring that climate change is managed, such as through shading and part of wider flood risk management for vulnerable locations.
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	++	Trees and landscaping are central to assisting pollution reduction and mitigation through filtration of air and water, for example.
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	++	Trees and landscaping contribute to a high quality environment which is attractive to investors, in turn enhancing prosperity.
ECON2 To help promote the vitality of local centres	++	Trees and landscaping contribute to a high quality environment which is attractive to investors, in turn enhancing prosperity.
ECON3 To promote the regeneration of areas across the City through appropriate development	++	Trees and landscaping contribute to a high quality environment which is attractive to investors, in turn enhancing prosperity.
ECON4 To encourage investment in learning and skills development	~	No clear relationship

SA Objective	New Policy	Commentary
SOC1 To help ensure equitable access to community services and facilities	~	No clear relationship
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~	No clear relationship
SOC3 To encourage development which promotes health and well-being	++	Trees and landscaping contribute to a high quality environment which contributes to health and well-being through aesthetic, pollution control and climate regulation functions.
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	++	Trees and landscaping contribute to a high quality environment in which people can take pride.
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	~	No clear relationship

Commentary

Trees and landscaping are fundamental to a high quality and ultimately sustainable environment, contributing aesthetically and functionally to the quality of life across the City. Specification of expectations for design and use of trees and landscaping as part of new development will ensure that, in combination with other policies, high quality design is realised and wider sustainability enhancements are secured. There are no suggested changes to the content of the policy arising from the appraisal, other than cross-referencing Council Strategies relating to Green Infrastructure, for example. The option of developing a new policy to address trees and landscape issues yields more positive sustainability outcomes than the reasonable alternative presented. The cumulative and temporal effects of the policy are likely to be City-wide and be determined over the short, medium and longer term, reflecting the consistent and early application of the policy.

BCC Background - DM4 Landscaping and Trees:

New development has a clear role in supporting the City's approach to green infrastructure, and can contribute to and enhance the landscape, provide biodiversity net gain and help to reduce the impact of climate change. Each development site will be able to contribute to the green infrastructure network in

appropriate ways reflecting the site context and location. The ecological network is currently described in the Birmingham and Black Country Nature Improvement Area Ecological Strategy 2017-2022, which identifies opportunities for habitat creation, restoration and enhancement within Core Ecological Areas, Ecological Linking Areas and Ecological Opportunity Areas. This strategy, and subsequent revisions, should be referenced to ensure new development is in keeping with the surrounding landscape and supports the maintenance of a resilient and coherent ecological network.

Trees and other vegetation make an important contribution to delivering sustainable development and high quality design. Protected trees, woodland and hedgerows should be retained as an integral part of the design of development except where their long-term survival would be compromised by their age or physical condition or there are exceptional circumstances such as, where the tree is considered to be imminently dangerous or its loss is significantly outweighed by the benefits of the proposed scheme and there are no viable development alternatives. Sufficient consideration must be given to retained trees and the proposed new use of the land around them, especially in respect of their long term viability, beneficial or adverse shade to buildings, perceived threat and building distances.

New trees, including trees on the highways should be provided with sufficient above and below ground planting space requirements (soil volumes, water supply and drainage) to allow for healthy growth to maturity without creating conflicts with buildings, pavements and utility infrastructure. Where appropriate a Landscape Management Plan will be required through a planning condition. Planting should be maintained in accordance with the plan and follow Secured by Design principles.

Birmingham City Council; Guide to Protected Trees (2016) https://www.birmingham.gov.uk/downloads/download/275/a_guide_to_tree_preservation_orders

Natural England; Green Infrastructure Guidance (2009) http://publications.naturalengland.org.uk/publication/35033

Arboricultural Journal, Kerion J. Doick et al, CAVAT (Capital Asset Value for Amenity Trees): valuing amenity trees as public assets (April 2019) https://www.tandfonline.com/doi/full/10.1080/03071375.2018.1454077

Birmingham and Black Country Nature Improvement Area Ecological Strategy 2017-2022 https://www.bbcwildlife.org.uk/sites/default/files/2018-10/NIA%20Ecological%20Strategy%202017-22%20Summary.pdf

Technical Report of the Birmingham and Black Country Nature Improvement Area Ecological Strategy 2017-2022 https://www.bbcwildlife.org.uk/sites/default/files/2018-10/NIA%20Ecological%20Strategy%202017-22%20Technical%20Report.pdf

Birmingham City Council, Green Living Spaces Plan (2013) https://www.birmingham.gov.uk/greenlivingspaces

Birmingham City Council, Sustainable Management of Urban Rivers & Floodplains SPD (2007) https://www.birmingham.gov.uk/downloads/file/1166/sustainable_management_of_urban_rivers_and_floodplains_supplementary_planning_document

Policy DM5 Light Pollution

Development incorporating external lighting should make a positive contribution to the environment of the city and must seek to avoid or mitigate any potential adverse impacts from such lighting on amenity and public safety. Proposals for external lighting will need to demonstrate that the lighting is:

- None – a policy is required by National Policy

1. Appropriate for its purpose in its setting;
2. Designed to avoid or limit its impact on the privacy or amenity of its occupiers, nearby residents and other light sensitive uses/ areas, intrinsically dark landscapes, and nature conservation;
3. Designed to preserve or enhance the character or appearance of any heritage assets which are affected;
4. Designed to a high standard and well integrated into the proposal; and
5. Energy efficient

SA Objective	New Policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	~	No clear relationship
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	+	Well designed, low maintenance lighting will be encouraged as part of this policy.
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	~	No clear relationship
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	++	Sensitively designed lighting should ensure the protection and enhancement of the City's cultural heritage.
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	No clear relationship

SA Objective	New Policy	Commentary
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~	No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	~	No clear relationship
ECON2 To help promote the vitality of local centres	+	Ensuring appropriate lighting design will contribute to the overall character of local centres.
ECON3 To promote the regeneration of areas across the City through appropriate development	~	No clear relationship
ECON4 To encourage investment in learning and skills development	~	No clear relationship
SOC1 To help ensure equitable access to community services and facilities	~	No clear relationship
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~	No clear relationship
SOC3 To encourage development which promotes health and well-being	~	No clear relationship
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	+	Ensuring appropriate lighting design will contribute to crime reduction.

SA Objective	New Policy	Commentary
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	~	No clear relationship

Commentary

A policy which clearly address environmental protection issues will help to reinforce existing regulatory regimes. The outcome is likely to be enhanced sustainability performance of developments reflecting greater certainty for developers in respect of both minimum standards and good practice. No likely significant negative effects have been identified. There are no suggested changes to the content of the policies arising from the appraisal. The cumulative and temporal effects of the policy are likely to be City-wide and be determined over the short, medium and longer term, reflecting the consistent and early application of the policy.

BCC Background - DM5 Light Pollution:

Lighting associated with new developments should be designed in accordance with established industry standard guidance which is currently set out the Institute of Lighting Professionals. In particular, the use of low energy light sources will be encouraged. Detailed guidance on the design of lighting proposals will be included in the Birmingham Design Guide. The Planning Practice Guidance on Light Pollution also provides detailed guidance on how light pollution should be managed.

In applying the policy the Council will seek to limit the impact of artificial lighting on the local amenity and nature conservation (including ecological networks and blue and green infrastructure). Proposals involving or adjacent to designated and undesignated historic assets, must apply a lighting design appropriate to the asset, considering the architecture of the building to be illuminated and the impact this may have on the character of its surroundings.

BDP policy TP11 Sports facilities provides policy on sports facilities lighting. Advice and guidance is provided by and should be sought from Sport England on sports lighting proposals.

A Lighting Assessment Report/ Strategy (as set out in the Local Validation Requirements) could be required to detail the measures which will be implemented to minimise and control the level of illumination, glare, and spillage of light and retain dark landscapes to protect wildlife. Planning conditions may be imposed to restrict lighting levels and hours of use or require measures to be taken to minimise adverse effects.

Birmingham City Council; Lighting Places Strategy (2008)
https://www.birmingham.gov.uk/directory_record/678/lighting_places_a_lighting_strategy_for_the_city_centre_and_local_centres_of_birmingham

Policy DM6 Noise and Vibration

Development should be designed, managed and operated to reduce exposure to noise and vibration. The following will be taken into account when assessing development proposals:

- None – a policy is required by National Policy

  a. The location, design, layout and materials;

  b. Positioning of building services and circulation spaces;

  c. Measures to reduce or contain generated noise (e.g. sound insulation);

  d. Existing levels of background noise;

  e. Hours of operation and servicing; and

  f. the need to maintain adequate levels of natural light and ventilation to habitable areas of the development.

Noise and/or vibration-generating development must be accompanied by an assessment of the potential impact of any noise and/ or vibration generated by the development on the amenity of its occupiers, nearby residents and other noise sensitive uses/ areas, including nature conservation. Where potential adverse impact is identified, the development proposal shall include details on how the adverse impact will be reduced and /or mitigated.

Noise-sensitive development (such as residential uses, hospitals and schools) must be accompanied by an assessment of the impact of any existing and/ or planned sources of noise and vibration in the vicinity of the proposed development including transport infrastructure, entertainment/ cultural/ community facilities and commercial activity. Where potential adverse impact is identified, the development proposal shall include details on how the adverse impact will be reduced and /or mitigated.

SA Objective	New Policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	~	No clear relationship
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	+?	Consistent application of standards which encourage high environmental quality will help to secure better quality buildings across the city to the benefit of sustainability over the longer term. The speed and depth of this change is uncertain, however.

wood.

SA Objective	New Policy	Commentary
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	~	No clear relationship
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	~	No clear relationship
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	No clear relationship
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~	No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	~	No clear relationship
ECON2 To help promote the vitality of local centres	~	No clear relationship
ECON3 To promote the regeneration of areas across the City through appropriate development	~	No clear relationship
ECON4 To encourage investment in learning and skills development	~	No clear relationship
SOC1 To help ensure equitable access to community services and facilities	~	No clear relationship

SA Objective	New Policy	Commentary
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~	No clear relationship
SOC3 To encourage development which promotes health and well-being	+ +	Clear, consistent policies which seek high environmental standards in new development will contribute to health and well-being.
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~	No clear relationship
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	~	No clear relationship

Commentary

A policy which clearly address environmental protection issues will help to reinforce existing regulatory regimes. The outcome is likely to be enhanced sustainability performance of developments reflecting greater certainty for developers in respect of both minimum standards and good practice. No likely significant negative effects have been identified. There are no suggested changes to the content of the policies arising from the appraisal. The cumulative and temporal effects of the policy are likely to be City-wide and be determined over the short, medium and longer term, reflecting the consistent and early application of the policy.

BCC Background - DM6 Noise and Vibration:
Noise and vibration can have a significant impact on amenity of noise sensitive uses and on wildlife and habitats. For large or prolonged development, consideration should also be given to the potential noise and vibration impacts during construction as well as the post development phase.
Sources of vibration include transportation (especially railways) and industrial processes.

As far as is practicable, noise sensitive developments should be located away from major sources of existing and/ or planned sources of noise unless an appropriate and robust scheme of mitigation is provided and the benefits of the proposal in terms of regeneration are considered to outweigh the impacts on

amenity and biodiversity. 'Planned' sources of noise mean sites in the nearby vicinity that are under construction; extant consents; sites that have planning consent which are not yet started; and sites which are allocated in the development plan.

The design of mitigation measures should have regard to the need to provide a satisfactory environment for future occupiers and take account of other material planning considerations such as urban design. Good design of developments, along with other actions, can help to mitigate any noise or vibration impacts. These include:

- Reduction and/or containment of the source of impact, and/ or protection of surrounding sensitive buildings.
- Layout to provide adequate distance between the source and sensitive buildings or areas, and/ or screening/buffers.
- Limiting operating times or activities of sources allowed on the site, and/or specifying acceptable limits.

Department for Environment, Food and Rural Affairs (DEFRA); Noise Policy Statement for England (2010) https://www.gov.uk/government/publications/noise-policy-statement-for-england

Birmingham City Council, Planning Consultation Guidance Note Noise and Vibration (pdf)

Policy DM7 Advertisements

Policy Content	Options Considered
Proposals for advertisements should be designed to a high standard and meet the following criteria: a. Suitably located, sited and designed having no detrimental impact on public safety or amenity, taking into account cumulative impact; b. Sympathetic to the character and appearance of their location, adjacent buildings and the building on which they are displayed having regard to their size, materials, construction, location and level of illumination; and c. Avoid proliferation or clutter of signage on the building and in the public realm. d. Not obscure architectural features of a building or extend beyond the edges or the roofline of buildings and respect the building's proportions and symmetry; e. Not create a dominant skyline feature when viewed against the immediate surroundings; and f. Designed to preserve or enhance the character or appearance of any heritage assets which are affected Illuminated advertisement and signs should seek to avoid or mitigate any potential adverse impact on uses/ areas sensitive to light such as nearby residential properties and other light sensitive uses/ areas, intrinsically dark landscapes, and nature conservation. The siting of advertisements hoardings will be resisted where visible from the M6 motorway or A38 Aston Expressway and purposefully designed to be read from the roadway and where the attention of drivers is likely to be distracted.	• No policy – allow the market to select the location of such uses and use Environmental and Highway Regulations to control any nuisance. • Develop a new policy

SA Objective	No policy	New policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	~	~	No clear relationship
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	-?	++?	Clear specification of locational, siting and design expectations will serve to enhance standards of implementation across the City.
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	~	~	No clear relationship

wood.

SA Objective	No policy	New policy	Commentary
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	-?	++?	Clear specification of locational, siting and design expectations will serve to enhance standards of implementation across the City.
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	~	No clear relationship
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~	~	No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	-?	++?	Well controlled and sited advertising plays an important role in promoting the City's commercial vibrancy and image at local and City-wide scales.
ECON2 To help promote the vitality of local centres	-?	++?	Well controlled and sited advertising plays an important role in promoting the City's commercial vibrancy and image at local and City-wide scales.
ECON3 To promote the regeneration of areas across the City through appropriate development	~	~	No clear relationship
ECON4 To encourage investment in learning and skills development	~	~	No clear relationship
SOC1 To help ensure equitable access to community services and facilities	~	~	No clear relationship

SA Objective	No policy	New policy	Commentary
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~	~	No clear relationship
SOC3 To encourage development which promotes health and well-being	~	~	No clear relationship
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~	~	No clear relationship
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	-	+	An updated policy will provide the reference point for the consideration of likely effects on local amenity.

Commentary

A specific policy which clearly controls the siting and design of advertisements will provide an important reference point for ensuring that a range of sustainability benefits are secured, focused on enhancing economic development in the City whilst ensuring that residential amenity and City-wide amenity is protected. In all cases, the greater certainty and precision associated with an updated policy is likely to yield positive sustainability effects. No likely significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing a new policy to address siting and design of these uses yields more positive sustainability outcomes than the reasonable alternatives presented. The cumulative and temporal effects of the policy are likely to be City-wide and be determined over the short, medium and longer term, reflecting the consistent and early application of the policy.

BCC Background - DM7 Advertisements:

The display of advertisements is subject to a separate planning consent process as set out in The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended). Through the planning system, advertisements are subject to the consideration of impacts in the interests of amenity and public safety. The Planning Practice Guidance: Advertisement explains the control of the advertisement regime and provides detail in relation to

consideration affecting public safety and amenity. Detailed guidance on the design of advertisements, signs and shop fronts will be updated and included in the emerging Birmingham Design Guide SPD.

The Town and Country Planning (Control of Advertisements) (England) Regulations 2007: http://www.legislation.gov.uk/uksi/2007/783/made

MHCLG, Planning Practice Guidance, Advertisements (July 2019): https://www.gov.uk/guidance/advertisements

Policy DM8 Places of Worship and Faith-related Community Facilities

Policy Content	Options Considered
The Council's preferred locations for the development of places of worship and faith related community uses are in the network of centres as defined in Policy TP21 of the Birmingham Development Plan. Proposals for development outside of the network of centres will be considered favourably where: 1. It is well located to the population the premises is to serve or is well served by means of walking, cycling and public transport; 2. It will not have an unacceptable adverse impact on local amenity, parking, public and highway safety; and 3. The site is appropriate for its purpose in its setting, suitable for the scale of the development and number of users proposed. * means suitable for the development proposed.	• Retain existing UDP policy • No policy

SA Objective	Existing Policy	No policy	New policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	+?	-?	++?	There are opportunities to make productive re-use of buildings for these uses and a clear policy establishes the reference point for how this might best be achieved.
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	+?	-?	++?	A clear policy establishes the reference point for how design of these uses might best be achieved.
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	+?	-?	++?	Location of these uses will be considered in respect of their relationship with public transport network, thus encouraging sustainable travel patterns.
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	+?	-?	++?	
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	~	~	No clear relationship

wood.

SA Objective	Existing Policy	No policy	New policy	Commentary
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~	~	~	No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	~	~	~	No clear relationship
ECON2 To help promote the vitality of local centres	+?	-?	++?	Potential beneficial effects on local centres, particularly outside commercial hours.
ECON3 To promote the regeneration of areas across the City through appropriate development	+?	-?	++?	Potential beneficial effect resulting from the re-use of buildings and the creation of a focus of activity.
ECON4 To encourage investment in learning and skills development	~	~	~	No clear relationship
SOC1 To help ensure equitable access to community services and facilities	+?	-?	++?	Having regard to the location of these facilities will help to promote equitable access.
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~	~	~	No clear relationship
SOC3 To encourage development which promotes health and well-being	+?	-?	++?	Part of the creation of a community focus wider beneficial effects.
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~	~	~	No clear relationship

SA Objective	Existing Policy	No policy	New policy	Commentary
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	+?	-?	++?	The policy sets out a clear reference point for how the location of these facilities will be considered.

Commentary

Ensuring the appropriate location and design of these uses will help to ensure that sustainable development is promoted, particularly having regard to equitable access through public transport and sensitive design ensuring that impacts on local amenity are minimised. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing a new policy to address siting and design of these uses yields more positive sustainability outcomes than the reasonable alternatives presented. The cumulative and temporal effects of the policy are likely to be City-wide and be determined over the short, medium and longer term, reflecting the consistent and early application of the policy.

BCC Background - DM8 Places of Worship and Faith-related Community Facilities:

The most appropriate locations for places of worship and faith related community uses is in the network of centres as is defined in Policy TP21 of the BDP. These are the most sustainable locations in terms of transport accessibility and parking. Other locations outside of the network of town centres will be considered favourably where the criteria outlined in the policy can be satisfactorily met. Proposals for places of worship and faith related community uses should also comply with other relevant local plan policies and guidance.

Development should be designed, managed and operated to reduce and/ or mitigate any potential adverse impact from noise on nearby residents. Consideration will be given to attaching conditions to any planning permission granted, which would help to reduce or eliminate such problems.

Proposals will need to include travel plans where appropriate and management plans to reduce the risk of vehicles parking inappropriately and causing an obstruction or having a detrimental impact on highway safety.

Additional ancillary activities such as weddings, funerals, and other special occasions are likely to lead to higher volumes of people and increased noise levels, traffic movements and parking demand. These can have an adverse impact on local amenity and public safety and will need to be carefully considered having regard to their frequency and the number of additional people that would be attracted to the premises. Applications will be expected to be supported by a travel plan and/or management plan where appropriate to address such issues.

Good design can help to mitigate noise and promote sustainable development. Good design can also ensure that places of worship respect the local context and character of an area and contribute to a high quality environment.

Birmingham City Council; Places of Worship and Faith-Related Community and Educational Uses SPD (May 2011): https://www.birmingham.gov.uk/directory_record/73724/places_of_worship

Home Office; Fire safety risk assessment: small and medium places of assembly (2006): https://www.gov.uk/government/publications/fire-safety-risk-assessment-small-and-medium-places-of-assembly

Home Office; Fire safety risk assessment: large places of assembly (2006): https://www.gov.uk/government/publications/fire-safety-risk-assessment-large-places-of-assembly

Monitoring of planning applications for places of worship and faith related community uses (to be prepared)

wood.

Policy DM9 Day Nurseries and Childcare Provision

Policy Content	Options Considered
The Council's preferred locations for the development of day nurseries and facilities for the care, recreation and education of children are in the network of centres as defined in Policy TP21 of the Birmingham Development Plan. Proposals for development outside of the network of centres will only be considered favourably where: 1. It is well served by means of walking, cycling and public transport; 2. It will not have an unacceptable adverse impact on local amenity, parking public and highway safety; 3. The site is appropriate for its purpose in its setting, suitable for the scale of the development and the number of children proposed; and 4. Sufficient useable outdoor play space to meet the needs of the children is provided.	• Retain existing UDP policy • No policy

SA Objective	No change	No policy	New policy	Commentary
ENV1 Encourage development that optimises the use of previously developed land and buildings	~	~	~	No clear relationship
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	+?	-?	+	Complementing wider development management policies which encourage high quality design, these policies will help to ensure that there is consistent application across the City for these particular uses.
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	+?	-?	+ +?	Consideration of the location of these uses should ensure that matters such as catchment areas are considered with attendant positive effects through travel reduction. The extent of the benefits is uncertain however, reflecting parental choice and wider catchment planning issues.
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	~	~	~	No clear relationship

wood.

SA Objective	No change	No policy	New policy	Commentary
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	~	~	No clear relationship
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~	~	~	No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	+?	-?	+?	Provision of consistent policy on the location of such facilities will help to ensure that there is access for all, although the precise effects are uncertain.
ECON2 To help promote the vitality of local centres	+?	-?	+	Control of such uses should be of benefit to local centres, helping to produce balanced property uses which complement one another.
ECON3 To promote the regeneration of areas across the City through appropriate development	~	~	~	No clear relationship
ECON4 To encourage investment in learning and skills development	+?	-?	+?	Provision of consistent policy on the location of such facilities will help to ensure that there is access for all, although the precise effects are uncertain.
SOC1 To help ensure equitable access to community services and facilities	+?	-?	+?	Provision of consistent policy on the location of such facilities will help to ensure that there is access for all, although the precise effects are uncertain.
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~	~	~	No clear relationship
SOC3 To encourage development which promotes health and well-being	+?	-?	+?	Provision of consistent policy on the location of such facilities will help to ensure that there is access for all, although the precise effects are uncertain.

SA Objective	No change	No policy	New policy	Commentary
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~	~	~	No clear relationship
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	~	~	~	No clear relationship

Commentary

A policy which ensures the consistent provision of day nurseries and facilities for the care, recreation and education of children across the City will help to ensure that there is equitable access (for example through sustainable locations) and in a fashion which maintains and enhances local amenity. The precise effects of the policy will have to monitored to determine whether the policy objectives are being realised in practice. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing a new policy to address education-related development issues yields more positive sustainability outcomes than the reasonable alternatives presented. The cumulative and temporal effects of the policy are likely to be City-wide and be determined over the short, medium and longer term, reflecting the consistent and early application of the policy.

BCC Background - DM9 Day Nurseries and Childcare Provision:

Early years facilities bring benefits to the community by reducing barriers to work for parents and carers and can provide an environment conducive to the development of the children who attend. Investment in the expansion and improvement of educational facilities is supported, in accordance with the BDP (Policy TP36 Education). However, such facilities must be provided in appropriate locations and suitable premises to ensure high standards of provision and prevent harm to the amenity of neighbours.

The network of centres as defined by Policy TP21 of the Birmingham Development Plan is considered the most appropriate location, but locations outside of centres will be considered appropriate where the policy criteria are met. Where nurseries are proposed in residential areas it is important to ensure that they would not give rise to unacceptable adverse impacts on local amenity. In these cases it may be necessary to ensure that there is sufficient distance between buildings and/ or that mitigation measures will be put in place to minimise the impact from noise and disturbance.

The Council will expect all planning applications for day nurseries and child care facilities in residential buildings and other non-residential buildings to outline: the numbers of staff and other visitors expected to attend the facility; the days of the week and the hours when the facility will operate; the nature of the activity; car parking and transport patterns, including servicing of the use; disabled access; and steps taken to minimise the noise impact of such uses.

Birmingham City Council, Education Services Delivery and Improvement Plan 2017 – 2018
https://www.birmingham.gov.uk/downloads/file/4340/education_services_delivery_and_improvement_plan_2016_to_2017_v20_26_may_2016

Birmingham City Council, Changing Times Report (2016)
https://www.birmingham.gov.uk/downloads/download/925/changing_times_report

Education Development Plan 2014-19 (2014) (pdf)

Monitoring of planning applications for day nurseries and childcare provision (to be prepared).

wood.

Policy DM10 Standards for Residential Development

Policy Content	Options Considered
• All residential development will be required to meet the minimum Nationally Described Space Standards (Appendix 1). • Proposals for major residential development, should seek to include a proportion of OR 7% on new affordable housing should be accessible and adaptable dwellings in accordance with Building Regulation Part M4 (2) unless demonstrated to be financially unviable. • Separation distances* between buildings and surrounding uses should protect residents' privacy and outlook, ensure appropriate levels of daylight to internal and external living spaces and prevent undue enclosure, overshadowing, noise and disturbance. • All new residential development must provide sufficient private useable outdoor amenity space appropriate to the scale, function and character of the development and adequate provision for recycling/ refuse storage and collection*. • Development will need to ensure adequate outlook and daylight to dwellings, in line with the approach of the '45 degree Code'. This includes potential impacts on existing houses, where development should not cross the line from an angle of 45 degrees from the nearest window providing the main source of natural light to a 'habitable room' of dwellings that could be affected. • Exceptions to the above will only be considered in order to deliver innovative high quality design, deal with exceptional site issues, respond to local character and where it can be demonstrated that residential amenity will not be significantly diminished. * Standards are set out in the Birmingham Design Guide SPD.	• Retain the existing UDP Policy • No policy

SA Objective	Retain UDP Policy	No policy	New Policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	~	~	~	No clear relationship
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	+?	-?	++?	Clear policies for residential design will help to ensure a consistent and progressive approach across the City.
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	~	~	~	No clear relationship

SA Objective	Retain UDP Policy	No policy	New Policy	Commentary
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	~	~	~	No clear relationship
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	~	~	No clear relationship
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~	~	~	No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	+?	-?	++?	A clear policy for residential amenity and design will help to ensure a consistent and progressive approach across the City, contributing to its economic success through the provision of high quality development.
ECON2 To help promote the vitality of local centres	+?	-?	++?	Where residential development is encouraged in local centres, clear policy will help to ensure that it is part of good quality mixed uses.
ECON3 To promote the regeneration of areas across the City through appropriate development	~	~	~	No clear relationship
ECON4 To encourage investment in learning and skills development	~	~	~	No clear relationship
SOC1 To help ensure equitable access to community services and facilities	~	~	~	No clear relationship
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~	~	~	No clear relationship

SA Objective	Retain UDP Policy	No policy	New Policy	Commentary
SOC3 To encourage development which promotes health and well-being	+?	-?	++?	The policy will help to ensure that residential development of whatever kind is well-designed and constructed.
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~	~	~	No clear relationship
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	~	~	~	No clear relationship

Commentary

This policy will yield a range of sustainability benefits, associated with ensuring that there is consistent high quality residential development throughout the City. No likely significant negative effects have been identified. There are no suggested changes to the content of the policies arising from the appraisal. The option of developing a new policy to address residential design matters yields more positive sustainability outcomes than the reasonable alternatives presented. The cumulative and temporal effects of the policy are likely to be City-wide and be determined over the short, medium and longer term, reflecting the consistent and early application of the policy.

BCC Background - DM10 Standards for Residential Development:

The Government's Technical Housing Standards - Nationally Described Space Standards (March 2015 as updated) applies to new residential development in Birmingham. This will ensure that all homes are highly functional, meeting occupiers' typical day to day needs at a given level of occupation. It is based on being able to accommodate a basic set of furniture, fittings, storage, activity and circulation space appropriate to the design and occupancy level of the dwelling. When Government amends these standards, the City Council will prepare technical notes to demonstrate how the update is applied within Birmingham.

All new development, including extensions of properties within residential areas, has the potential to affect adjoining dwellings. Daylight and outlook are important to create pleasant spaces and support everyday activities. The size and layout of windows in new residential development should be maximised and the layout and design of development must consider levels of sunlight reaching residential properties and take opportunities to benefit from passive solar gain whilst preventing overheating of indoor spaces.

The '45 Degree Code' is a well-established approach in Birmingham to protect daylight levels and outlook for occupiers, particularly for existing houses. In applying the code the main considerations include:

- If the extension/building is single storey, the line is drawn from the midpoint of the nearest habitable room ground floor window of the adjoining premises.

- If the extension/building is two storey or taller, the measurement is taken from the quarter point of the nearest habitable room ground floor window.

- If the neighbouring property has already been extended, the measurement is normally taken from the nearest habitable room window of that extension. • If the neighbouring property has an extension which is made mainly of glass, the policy is applied to the original window opening in the wall where the extension has been added.

Outdoor private space is highly valued and it is important for both children and adults to have access to some private outdoor space for play and relaxation. The amount and type of outdoor space should relate to the potential occupancy of the dwelling and should be useable, with consideration from a number of factors, including shape, orientation, landform and shading. Outdoor amenity spaces should receive sunlight for at least part of the day, with garden sizes increased where necessary to take account of overshadowing. Existing guidance on outdoor amenity space and separation distances is set out in Places for Living SPD, which will be updated through the forthcoming Birmingham Design Guide SPD.

Across the UK as a whole, more people are living longer. Birmingham is following that national trend, and it is predicted that the percentage of those aged over 65 within the Birmingham will increase from 12.9% (145,865 people) to 16% (210,906 people) of the population. This represents a 58% increase to 2031 and a 45% increase to 2041 of people within this group. Despite increasing life expectancy, there remains a gap in healthy life expectancy. This in turn presents series of health and care challenges for older people and people with mobility impairments as it means they will be living longer with impairments and life-limiting conditions.

There will be a larger elderly population who will living longer and are likely to be living with disabilities in their later years. A requirement of 30% of new homes to meet the optional building regulation for accessible and adaptable homes is considered appropriate.

- Birmingham's older population makes up 12.9% of the total Birmingham population. Population forecasts show that this will increase to 16% in 2041. (ONS 2016 sub national population projections).

- The number of households headed by those aged 65+ has been increasing in Birmingham and is projected to increase to 28% of total households in the city.

- The Census 2011 shows that 18.4% of people currently report themselves as having a long term health problem or disability (being limited a little and a lot).

- Healthy life expectancy of men and women in Birmingham is much lower than the national average. The gap between healthy life expectancy and life expectancy indicates that the older population will therefore spend more years in poor health.

- In terms of those 65+, there is predicted to be 30.6% increase in people with a limiting long term illness whose day-to-day activities will be limited a little and 31.8% increase in people whose day-to-day activities will be limited a lot by 2035.

Birmingham City Council; 45 Degree Code for Residential Extensions (March 2006):
https://www.birmingham.gov.uk/directory_record/669/45_degree_code_for_residential_extensions

Department for Communities and Local Government; Technical Housing Standards – Nationally Described Space Standard (March 2015):
https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard

Ministry of Housing, Communities and Local Government; Access to and use of buildings: Approved Document M (2016):
https://www.gov.uk/government/publications/access-to-and-use-of-buildings-approved-document-m

Strategic Housing Land Availability Assessment (SHLAA) (2018)

Birmingham City Council, Standards for Residential Development Topic Paper (September 2019)

Policy DM11 Houses in Multiple Occupation (HMO)

Policy Content	Options Considered
Proposals for the conversion of existing dwellinghouses or the construction of new buildings to be used as Houses in Multiple Occupation (HMO) should protect the residential amenity and character of the area and will be permitted where they: a. would not result in this type of accommodation forming over 10% of the number of residential properties* within a 100 metre radius of the application site**; and b. would not result in a family dwellinghouse being sandwiched between two non-family residential uses***; and c. would not lead to a continuous frontage of three or more non-family residential uses***; and d. it would not result in the loss of an existing use that makes an important contribution to other Council objectives, strategies and policies; and e. would not give rise to unacceptable adverse cumulative impacts on amenity, character, appearance, highway safety and parking; and f. provide high quality accommodation with adequate living space including: g. bedrooms of at least 7.5 sq.m. (single) and 11.5 sq.m. (double); and h. communal living space comprising lounge, kitchen and dining space either as distinct rooms or in an open plan format; and i. washing facilities; and j. outdoor amenity space; and k. recycling/ refuse storage. Where a) and c) has already been breached, planning permission will only be granted in exceptional circumstances****. Proposals for the intensification or expansion of an existing HMO should provide high quality accommodation in accordance with (e) and (f) above and have regard to the size and character of the property. * Paragraph 4.17 below sets out the residential properties identified for the purposes of calculating the percentage concentration of HMOs and the data sources for the purposes of identifying HMOs. ** Measured from the centre point of the property *** For the purposes of this policy a non-family residential use is defined as a HMO, student accommodation, residential accommodation within C1 and C2 Use and self-contained flats. ****Exceptional circumstances are set out in paragraph 4.18 below.	• Retain existing UDP policy • No policy • Less prescriptive policy

SA Objective	Existing UDP policy	No policy	Less prescriptive Policy	New Policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	+	-	+	++?	Positive policies on siting and design will help to ensure re-use of buildings is appropriately undertaken.
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	~	~	~	~	No clear relationship
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	~	~	~	~	No clear relationship
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	+	-	+	++?	Positive policies on siting and design will help to ensure re-use of buildings is appropriately undertaken.
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	~	~	~	No clear relationship
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~	~	~	~	No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	~	~	~	~	No clear relationship
ECON2 To help promote the vitality of local centres	~	~	~	~	No clear relationship
ECON3 To promote the regeneration of areas across the City through appropriate development	~	~	~	~	No clear relationship

SA Objective	Existing UDP policy	No policy	Less prescriptive Policy	New Policy	Commentary
ECON4 To encourage investment in learning and skills development	~	~	~	~	No clear relationship
SOC1 To help ensure equitable access to community services and facilities	~	~	~	~	No clear relationship
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	+	-	+	++?	Positive policies on siting and design will help to ensure re-use of buildings is appropriately undertaken.
SOC3 To encourage development which promotes health and well-being	~	~	~	~	No clear relationship
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	+	-	+	++?	Positive policies on siting and design will help to ensure re-use of buildings is appropriately undertaken.
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	+	-	+	++?	Positive policies on siting and design will help to ensure re-use of buildings is appropriately undertaken.

Commentary

The sustainability effects of a clear policy which seeks to control HMOs is likely be positive, reflecting the potentially contentious issues associated with them. The sustainability effects principally relate to ensuring that local amenity and design quality is appropriately protected, whilst meeting demand and need. No likely significant negative effects have been identified although there is uncertainty relating to implementation, the outcomes of which will require monitoring. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing a new policy to address siting and design of these uses yields more positive sustainability outcomes than the reasonable alternatives presented. The cumulative and temporal effects of the policy are likely to be City-wide and be determined over the short, medium and longer term, reflecting the consistent and early application of the policy.

BCC Background - DM11 Houses in Multiple Occupation (HMO):

Public consultation was undertaken on the city-wide Article 4 Direction between 6 June and 18 July 2019. A total of 251 individual comments were received in response to the publicity period. 151 (60%) of these comments expressed support for the city-wide Article 4 Direction, 89 (36%) were opposed to it and 10 (4%) did not express a view. A petition was also received in support of the city-wide Article 4 Direction which was signed by 323 individuals. The main issues raised by those who support the city-wide direction are summarised as follows:

- Low levels of maintenance of HMO properties, resulting in poor quality living environments for occupants and neighbours;

- High amounts of litter and rubbish generated due to people occupying HMO properties;

- Noise generated from HMO properties;

- Incidences of crime and anti-social behaviour associated with some occupants of HMOs;

- Problems caused by parking and subsequent impacts on highway safety;

- Transient population and less community cohesion.

The main issues raised by those who object to the City-wide Direction are summarised as follows:

- The effect it will have on limiting the availability of different types of housing in the city;

- Knock-on effects that it will have on the affordability of housing and potential increases in homelessness as a result;

- That it will discriminate against students and younger age groups, who typically occupy such properties;

- That the case put forward to justify the Article 4 Direction was based on anecdotal and not factual evidence;

- That other mechanisms should be used instead to control the negative impacts associated with HMOs (e.g. Anti-Social Behaviour Orders and enforcing HMO Management Regulations)

More generally, concentrations of HMOs can impact upon residential amenity and can, in some cases, create particular issues with regard to:

- increased levels of crime and the fear of crime;

- poorer standards of property maintenance and repair;

- littering and accumulation of rubbish;

- noises between dwellings at all times and especially at night;

- decreased demand for some local services;

- increased parking pressures; and

- lack of community integration and less commitment to maintain the quality of the local environment.

Wider impacts on infrastructure and services created by a high concentration of HMOs and arising from the changing demography of the neighbourhood include:

- decline in owner occupied stock;

- increased population densities can place a strain on existing services, refuse disposal and street cleansing;

- reduction in demand for some local services;

- the decline of local school enrolment;

- underuse of community facilities; and

- increased demand for other services such as takeaway food, bars.

The BDP recognises that different types of residential accommodation are important to meeting the wide ranging housing needs of people in the City. All developments should achieve a high quality design contributing to a strong sense of place (BDP Policy PG3), and new homes should contribute towards achieving mixed and balanced communities (BDP policy TP30). The City Council will seek to prevent the loss to other uses of housing which is in good condition (BDP Policy TP35).

The conversion and reuse of existing buildings for housing can help to meet the changing housing on the surrounding area. Over-concentrations of certain types of accommodation can have a number of negative impacts on the local communities, including the loss of family housing, effects to the residential character, appearance, and amenity of an area as a result of excessive noise and disturbance to residents and levels of parking. The National HMO lobby and National Organisation of Residents Associations consider a 10% concentration of HMOs, equating to a 20-30% population as the tipping point to an unbalanced community. The Council's Strategic Housing Market Assessment (2013) identifies a need for market accommodation of all sizes but shows that the highest net change in the number of homes needed to 2031 is in the 3 and 4 or more bedroom category. A high proportion of 3 and 4 person households are also inadequately housed.

The cumulative effect of incremental intensification in an area caused by numerous changes of use from small HMO to large HMOs or the extension of existing HMOs can be also significant. In the right location, good design of development and its future operation can help to limit any negative impacts. This includes ensuring the proposal can be delivered in line with best practice and Government guidance, and setting residential institution developments within their own grounds.

Birmingham City Council; Planning Policy Document, Houses in Multiple Occupation in the Article 4 Direction Area of Selly Oak, Edgbaston & Harborne wards (Nov 2014) https://www.birmingham.gov.uk/downloads/file/3232/planning_policy_document_final_17_november_2014

Birmingham City Council, Houses in Multiple Occupation Topic Paper (2019) (in draft)

Birmingham City Council, 45 Degree Code for Residential Extensions (March 2006): https://www.birmingham.gov.uk/directory_record/669/45_degree_code_for_residential_extensions

National HMO Lobby - Balanced Communities and Studentification (2008): http://www.hmolobby.org.uk/lobbybalancedcomms.htm

Planning Inspectorate; Appeal Decision APP/P4605/W/14/3001406 (23/03/2015): https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=3001406

Planning Inspectorate; Appeal Decision APP/P4605/W/15/3024057 (11/08/2015): https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=3024057

Strategic Housing Market Assessment (SHMA) (2013)

Policy DM12 Residential Conversions and Specialist Accommodation

Policy Content

This policy applies to the subdivision or conversion of properties into self-contained dwelling units and the development of specialist accommodation. Proposals will be supported where:
   a.   high quality accommodation is provided that complies with Policy DM10 Standards for Residential Development and other relevant Local Plan policies; and
   b.   it would not result in the loss of an existing use that makes an important contribution to other Council objectives, strategies and policies;
   c.   it will not lead to an adverse impact on the amenity, character and appearance of the area, taking into account the cumulative effects of similar uses in the area;
   d.   the accommodation and facilities, including provision for safety and security, is suitable for the intended occupiers; and
   e.   they have good access to local shops, services, public transport and facilities appropriate to the needs of the intended occupiers.

Options Considered

- No policy
- New policy

SA Objective	No policy	New Policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	**-**	**++?**	Positive policies on siting and design will help to ensure re-use of buildings is appropriately undertaken.
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	~	++	Development will accord with design standards set out in policy DM10.
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	~	~	No clear relationship
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	**-**	**++?**	Positive policies on siting and design will help to ensure re-use of buildings is appropriately undertaken.
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	~	No clear relationship

SA Objective	No policy	New Policy	Commentary
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~	~	No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	~	~	No clear relationship
ECON2 To help promote the vitality of local centres	~	~	No clear relationship
ECON3 To promote the regeneration of areas across the City through appropriate development	~	~	No clear relationship
ECON4 To encourage investment in learning and skills development	~	~	No clear relationship
SOC1 To help ensure equitable access to community services and facilities	~	~	No clear relationship
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	-	++?	The policy is designed to meet the specific housing needs of sectors of the population.
SOC3 To encourage development which promotes health and well-being	~	++?	The policy is designed to meet the specific housing needs of sectors of the population.
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~	~	No clear relationship
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	-	++?	A positive policy will assist with local decision making on appropriate accommodation for specific needs and sectors of the population.

Commentary

Promoting the sensitive conversion of properties for specific needs is likely to result in significant positive effects through the provision of appropriate accommodation for those in particular need. The option of having no specific policy could result in some minor adverse effects relating to social indicators. in particular. No likely significant negative effects have been identified although there is uncertainty relating to implementation, the outcomes of which will require monitoring. The cumulative and temporal effects of the policy are likely to be City-wide and be determined over the short, medium and longer term, reflecting the consistent and early application of the policy.

BCC Background - DM12 Residential Conversions and Specialist Accommodation
Specialist residential accommodation is a generic description used to describe housing that meets the needs of specific groups of people. This can comprise hostels, shared housing, care homes and supported accommodation for older people and people with mental health, learning disabilities, dementia, physical and sensory impairment, ex-offenders and drugs and alcohol dependency. It does not include age-restricted general market housing, retirement living or sheltered housing.

The Council's Strategic Housing Market Assessment (SHMA) (2013) indicates a need for market accommodation of all sizes it also shows that the highest net change in the number of homes needed to 2031 is in the 3 and 4 or more bedroom categories. Increasing the amount of general housing that is suitable for older and less able people (e.g. smaller homes, bungalows and serviced flats), together with more specialist housing, can have the added benefit of freeing up larger homes in communities that are required by families, of which there is a high level of demand for in Birmingham (SHMA 2013).

The recognition of the need and demand for specialist residential accommodation reflects a movement away from institutional care and studio accommodation into the provision of self-contained accommodation respecting individual choice and independence and offering the chance to remain integrated in the community. However, it is difficult to quantify the exact types of development, or numbers of bedspaces that will be required to meet hostel and other supported housing needs which arise as this can vary on a weekly basis.

There is a significant amount of older person's specialist housing in Birmingham at present, the majority of which is within the affordable sector. The vast majority of both the affordable and market supply is sheltered housing. There are relatively small amounts of other types of specialist older person's housing, and this is especially true for the Council's own stock.

The quality as well as the quantity of accommodation is crucial to the ongoing health and wellbeing of older people. While there is specialist housing that meets current best practice and design standards, other dwellings were developed or converted under historic standards and are now unable to meet the expectations of citizens. The conversion of a single dwelling house into several separate units may result in an increased intensity of use and possible adverse effects on the adjacent properties, including increased amount of traffic, on-street parking and poor waste management.

Birmingham City Council, Standards for Residential Development Topic Paper (September 2019)

Policy DM13 Self and Custom Build Housing

Policy Content	Options Considered
1. The Council will actively support the development of self and custom-build homes in suitable locations where they support the delivery of the Birmingham Development Plan and do not conflict with other policies in the Local Plan. 2. The Council will encourage developers to consider whether an element of self-build plots can be incorporated into development schemes as part of the housing mix. The Council's self-build register will be used as a source of evidence of the demand for self-build and custom build housing locally, and the level of demand will be a material consideration in determining proposals. 3. Affordable self-build plots will be considered and encouraged as a suitable product within the affordable housing requirement on larger sites.	• No policy

SA Objective	No policy	New policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	-?	+?	Self-build could be part of land and building re-use where traditional solutions have failed.
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	-?	+?	A policy on self-build should encourage innovation in design standards.
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	~	~	No clear relationship
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	~	~	No clear relationship
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	~	No clear relationship

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SA Objective	No policy	New policy	Commentary
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~	~	No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	~	~	No clear relationship
ECON2 To help promote the vitality of local centres	~	~	No clear relationship
ECON3 To promote the regeneration of areas across the City through appropriate development	-?	+?	Self-build could be part of the wider solution to realising housing development in regeneration areas.
ECON4 To encourage investment in learning and skills development	-?	+ +?	Self-build can be the focus for individual training and skills development.
SOC1 To help ensure equitable access to community services and facilities	~	~	No clear relationship
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	-?	+ +	A proactive approach to self-build should contribute to providing more diverse routes to housing provision which meet individual circumstances.
SOC3 To encourage development which promotes health and well-being	-?	+?	A proactive approach to self-build should contribute to realising individual ambitions and needs.
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~	~	No clear relationship
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	-?	+ +?	A proactive approach to self-build should contribute to helping communities realise aspirations for more diverse housing delivery models.

Commentary

Promoting self- and custom-build housing through a specific policy is likely to yield positive sustainability effects City-wide with no adverse effects identified. No likely significant negative effects have been identified although there is uncertainty relating to implementation, the outcomes of which will require monitoring. There are no suggested changes to the content of the policy arising from the appraisal. The option of having no specific policy could result in some minor adverse effects relating to social indicators. The cumulative and temporal effects of the policy are likely to be City-wide and be determined over the short, medium and longer term, reflecting the consistent and early application of the policy.

BCC Background - DM13 Self and Custom Build Housing:

Councils are required to adopt a proactive and positive approach to encouraging and supporting self-build, in light of:

- The National Planning Policy Framework requires local planning authorities to clearly understand need, and plan for a mix of housing, including for people wishing to build their own homes.

- The Self-Build and Custom Housebuilding Act 2015 places a duty on local authorities to keep a register of those seeking to acquire a plot for self-building and to have regard to the register in carrying out their planning, housing, land disposal and regeneration functions.

- The Housing and Planning Act introduced a duty on local authorities to "give suitable development permission in respect of enough serviced plots of land to meet the demand for self-build and custom housebuilding in the authority's area arising in each base period".

Birmingham City Council has been operating its self-build register since November 2014. The number of entries on the register at present is relatively low but increasing. The number of new homes granted exemptions from the Community Infrastructure Levy due to their self/custom build status also indicates that there is considerable self-build activity in the city. Applications for this type of housing will be judged against the same relevant policies in the Plan, particularly standards for residential development (DM10).

Self-build and Custom Housebuilding Act 2015 https://www.legislation.gov.uk/ukpga/2015/17

Birmingham City Council Self Build Register https://www.birmingham.gov.uk/info/20054/planning_strategies_and_policies/1052/apply_to_be_on_the_self-build_and_custom_housebuilding_register

Birmingham City Council, Standards for Residential Development Topic Paper (September 2019)

Policy DM14 Highway Safety and Access

Policy Content	Options Considered
1. Development must ensure that the safety of highway users is properly taken into consideration and that any new development would not have an adverse impact on highway safety. 2. Development must ensure that safe, convenient and appropriate access arrangements are in place for all users, including the needs of people with disabilities and reduced mobility within the development and onto the highway network, both during the construction and operation stages of the development. Priority shall be given to the needs of sustainable transport modes. 3. Developments should provide for the efficient delivery of goods and access by service and emergency service vehicles. Where it is demonstrated that this is not feasible, an appropriate alternative solution must be agreed with the City Council and secured. 4. Development proposals that will generate significant amounts of traffic should be accompanied by a Transport Assessment and should be located where the need to travel will be minimised, and is in a location that is readily accessible by a variety of transport modes. Development proposals that generate significant amounts of traffic will be required to provide a Travel Plan that sets out the means by which the developer will encourage users to adopt more sustainable modes of travel. 5. Vehicle access points (including private driveways) will be supported where it would not result in: • a reduction in pedestrian or highway safety; • detrimental impact on public transport, cycling and walking routes; • adverse impact on the quality of the street scene and local character of the area; • the loss of important landscape features, including street trees and significant areas of green verge; and • the prevention or restriction of the implementation of necessary or future transport improvements. 5. On Birmingham's strategic highway network, and other principle and main distributor routes, development must seek opportunities to remove unnecessary access points. New direct vehicular accesses will be supported where there are no practical alternatives (including consideration of impacts on public transport, walking and cycling routes). Any new access point must allow for access and egress in a forward gear.	• Retain the existing UDP Policy • No policy

SA Objective	No change	No policy	New policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	~	~	~	No clear relationship
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	+?	-?	+	Attention to the design of transport infrastructure complements that applied to other aspects of the built environment.
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	+?	-?	++	An efficient and effective transport system contributes enhancing sustainable travel, through the requirements for production of Travel Plans, for example.
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	+?	-?	+	Attention to the design of transport infrastructure complements that applied to other aspects of the built environment.
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	~	~	No clear relationship
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~	~	~	No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	~	~	~	No clear relationship
ECON2 To help promote the vitality of local centres	+?	-?	++	An efficient and effective transport system contributes significantly to economic growth and thereby the well-being of residents through job opportunities.
ECON3 To promote the regeneration of areas across the City through appropriate development	~	~	~	No clear relationship

SA Objective	No change	No policy	New policy	Commentary
ECON4 To encourage investment in learning and skills development	~	~	~	No clear relationship
SOC1 To help ensure equitable access to community services and facilities	+?	-?	+	An efficient and effective transport system enables access to services and facilities by residents.
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~	~	~	No clear relationship
SOC3 To encourage development which promotes health and well-being	+?	-?	+	An efficient and effective transport system contributes significantly to economic growth and thereby the well-being of residents through job opportunities.
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~	~	~	No clear relationship
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	+?	-?	++?	The policy could assist local neighbourhoods in realising greater control over highway-related issues.

Commentary

Ensuring that there is a rounded approach to transport planning across the City should yield a broad range of sustainability benefits, notably in respect on enhancing the City's economic performance through ensuring more efficient and effective movement. In turn and more broadly, the well-being of residents is enhanced though the greater opportunities for efficient travel within the City. No likely significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing new policy to address siting and design of these uses yields more positive sustainability outcomes than the reasonable alternatives presented. The cumulative and temporal effects of the policy are likely to be City-wide and be determined over the short, medium and longer term, reflecting the consistent and early application of the policy.

BCC Background - DM14 Highway Safety and Access:

Highway Safety is fundamental to the design of the highway network and no development should have a negative impact on highway safety. Effective traffic management is essential to the safe and free fl ow of movement on the highway network. It can improve accessibility and potentially reduce congestion by understanding flows of traffic at peak and non-peak periods. This is to be secured through:

- Ensuring that development proposals that will generate significant amounts of traffic are accompanied by a Transport Assessment or Statement and will be required to provide a Travel Plan. Applications for development with significant transport implications should demonstrate the measures they are taking to minimise the impact of the development on highway users.

- Travel Plans which have measurable outputs, which might relate to targets in the local transport plan, and set out the arrangements for monitoring the progress of the plan, as well as the arrangements for enforcement, in the event that agreed objectives are not met.

- Travel Plans which include clear, viable proposals for monitoring of travel patterns post occupation.

- Consideration of the existing network and proposed access points to the site will need to be suitable for future traffic levels.

- Any new or amended access arrangements need to be carefully considered to ensure the efficient, effective and safe operation of the highway infrastructure across the City in view of the main parts of the highway network within Birmingham, including the strategic highway network and the West Midlands key route network, which are more sensitive to traffic impacts from development.

These measures complement the Road Safety Strategy for the City (2016) which is part of the Birmingham Connected vision for the future of transport in Birmingham, working towards a safer, healthier, greener city with a reliable integrated transport system which supports the City's growing population and economy, including through:

Safer roads

- Considering all road users and providing for the most vulnerable (pedestrians, cyclists, motorcyclists, 16 to 24 year-olds and children) when maintaining or making changes to our road network.

- Understanding where accidents are happening in the city and seeking to address problems.

- Addressing speeding by reducing speed limits and trialling digital speed cameras.

Safer people

- Providing education, training and campaigns on key road safety issues including walking, cycling, driver behaviour, motorcycle safety and large vehicle/HGV awareness.

- Targeting the delivery of road safety information to the people and places where it is most needed.

The emerging walking and cycling strategy for the City proposes a ten year plan to ensure that walking and cycling become popular choices for short journeys and for recreational activities and to increase opportunities for walking and cycling and reduce dependence on the motor car. Key objectives are to enable, develop and inspire walking and cycling, with proposals for a city-wide cycle route network and walking investment are set out in the Local Cycling and Walking Infrastructure Plan.

Birmingham City Council, Birmingham Connected (2014)
https://www.birmingham.gov.uk/downloads/download/552/birmingham_connected

Birmingham City Council, Draft Birmingham Walking and Cycling Strategy and Infrastructure Plan (June 2019)
https://www.birmingham.gov.uk/info/20013/roads_travel_and_parking/1942/walking_and_cycling_strategy_and_infrastructure_plan

Birmingham City Council; A Road Safety Strategy for Birmingham (October 2016)
https://www.birmingham.gov.uk/info/20163/safer_greener_healthier_travel/361/birmingham_road_safety_strategy

Birmingham City Council; Birmingham Connected Business Travel Network guidance
https://www.birmingham.gov.uk/info/20013/roads_travel_and_parking/1020/business_travel_network

Birmingham City Council; STARSfor guidance https://www.birmingham.gov.uk/info/20013/roads_travel_and_parking/1020/business_travel_network/2

CLG, DfT, Manual for Streets (2007)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/341513/pdfmanforstreets.pdf

Policy DM15 Parking and Servicing

Policy Content	Options Considered
1. All development proposals will be required to follow the standards in the Parking SPD (and any subsequent revisions). This includes provision for people with disabilities, cycle parking and infrastructure to support the use of low emission vehicles. 2. Proposals for parking and servicing shall avoid highway safety problems and protect local amenity and character of the area. 3. For development where no standards exist, parking shall be provided to ensure that the operational needs of the development are adequately met, having regard to the need to points above. 4. Development should include transport infrastructure that improves equality of access to travel and supports the efficient use of space, such as cycle hire and car club schemes. 5. Parking proposals should have regard to the Birmingham Design Guide and be designed to be fully accessible to all users. 6. Proposals for standalone parking facilities must demonstrate that there is a deficit in local publicly available off-street parking, or that it will help to relieve on-street parking problems.	• Retain the existing UDP Policy • No policy

SA Objective	No change	No policy	New policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	~	~	~	No clear relationship
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	+?	-?	+	Attention to the design of transport infrastructure complements that applied to other aspects of the built environment.
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	+?	-?	++?	An efficient and effective transport system contributes enhancing sustainable travel, through provision for cycle parking and infrastructure, for example.

wood.

SA Objective	No change	No policy	New policy	Commentary
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	+?	-?	+	Attention to the design of transport infrastructure complements that applied to other aspects of the built environment.
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	~	~	No clear relationship
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~	~	~	No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	~	~	~	No clear relationship
ECON2 To help promote the vitality of local centres	+?	-?	++	Efficient and effective parking policy can have a significant effect on local centre viability.
ECON3 To promote the regeneration of areas across the City through appropriate development	~	~	~	No clear relationship
ECON4 To encourage investment in learning and skills development	~	~	~	No clear relationship
SOC1 To help ensure equitable access to community services and facilities	+?	-?	+	An efficient and effective transport system enables access to services and facilities by residents.
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~	~	~	No clear relationship

SA Objective	No change	No policy	New policy	Commentary
SOC3 To encourage development which promotes health and well-being	+?	-?	+	An efficient and effective transport system contributes significantly to economic growth and thereby the well-being of residents through job opportunities.
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~	~	~	No clear relationship
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	+?	-?	++	The policy could assist local neighbourhoods in realising greater control over highway-related issues.

Commentary

Ensuring that there is a rounded approach to transport planning across the City should yield a broad range of sustainability benefits, notably in respect of enhancing the City's economic performance through ensuring more efficient and effective movement. In turn and more broadly, the well-being of residents is enhanced though the greater opportunities for efficient travel within the City. No likely significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing new policy to address siting and design of these uses yields more positive sustainability outcomes than the reasonable alternatives presented. The cumulative and temporal effects of the policy are likely to be City-wide and be determined over the short, medium and longer term, reflecting the consistent and early application of the policy.

BCC Background - DM15 Parking and Servicing:
Growth in the city's population will result in 1.2million additional daily trips across the network by 2031 (by all transport modes). It is not possible or indeed desirable to accommodate all these by private car due to existing constraints on our highway capacity and because of the significant detrimental impact of traffic on our environment. Local parking policies, alongside other planning and transport measures, should act to promote sustainable transport choices and reduce reliance on the private car for work and other journeys. Careful and appropriate management of parking is a key element of Birmingham's transport strategy. The Council is currently consulting on a new Parking Supplementary Planning Document (SPD). The approach to the provision of parking aims to promote sustainable transport, reduce congestion, improve road safety and reduce pollution. The Parking SPD will set out how the city will manage on-street (public highway) and off-street parking provision across the city. This will be through:

- Support for and promotion of the provision of charging points for ultra-low emission vehicles and car clubs which would contribute to sustainable development in the City.

- Accepting garages as contributing towards parking provision for development if they have adequate functional space, contributing to parking needs and residential amenity by creating a more secure environment, and reducing the potential for unsocial parking and visual impacts.

- Ensuring a design led approach is adopted to ensure parking functions satisfactorily for all users including disabled drivers, pedestrians, cyclists and service vehicles and does not impact negatively on the surrounding streetscape.

- Encouraging new hotel developments in locations where bike hire schemes are established to provide publicly accessible bike hire facilities on site in liaison with the city bike hire provider.

Birmingham City Council, Birmingham Connected (2014)
https://www.birmingham.gov.uk/downloads/download/552/birmingham_connected

Birmingham City Council; Car Park Design Guide SPD (2012) https://www.birmingham.gov.uk/directory_record/673/car_park_design_guide

Birmingham City Council; Car Parking Guidelines SPD (2012)
https://www.birmingham.gov.uk/directory_record/646/car_parking_guidelines_supplementary_planning_document

Birmingham City Council; Parking of Vehicles at Commercial and Industrial Premises Adjacent to Residential Property Guidance
https://www.birmingham.gov.uk/directory_record/680/parking_of_vehicles_at_commercial_and_industrial_premises_adjacent_to_residential_property

Movement for Growth; West Midlands Strategic Transport Plan
https://www.wmca.org.uk/what-we-do/transport/

Policy DM16 Telecommunications

Policy Content	Options Considered
The Council will promote the development of advanced, high quality communications infrastructure to support economic growth and more accessible, inclusive communities. This will be achieved by requiring new development proposals to: a. Demonstrate opportunities have been explored for sharing of masts or sites. Such evidence should accompany any application made to the local planning authority; b. Demonstrate that there are no suitable alternative sites for telecommunications development available in the locality including the erection of antennae on existing buildings or other suitable structures c. Be sited and designed in order to minimise impact on the visual and residential amenity, character and appearance of the surrounding areas; d. If on a building, apparatus and associated structures to be sited and designed in order to minimise impact to the external appearance of the building; e. Not have unacceptable harm on areas of ecological interest, areas of landscape importance, or heritage assets and their setting; and f. Conform to the International Commission on Non-Ionising Radiation Protection (ICNIRP) guidelines, taking account where appropriate of the cumulative impact of all operators' equipment located on the mast / site.	• Retain the existing UDP Policy • No policy

SA Objective	No change	No policy	New policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	~	~	~	No clear relationship
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	+?	-?	+	The policy should promote the efficient use of shared facilities, for example, and more widely help to realise good design.
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	+?	-?	+	Modern telecommunications infrastructure is an important part of helping to reduce the need to travel through home-working and teleconferencing, for example.

SA Objective	No change	No policy	New policy	Commentary
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	+?	-?	+	Attention to the impacts on cultural and natural heritage will help to protect their interests.
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	~	~	No clear relationship
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~	~	~	No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	+?	-?	+	Modern telecommunications infrastructure is an important part of promoting the City's economic performance.
ECON2 To help promote the vitality of local centres	+?	-?	+	Modern telecommunications infrastructure is an important part of promoting the City's economic performance.
ECON3 To promote the regeneration of areas across the City through appropriate development	+?	-?	+	Modern telecommunications infrastructure is an important part of promoting the City's economic performance.
ECON4 To encourage investment in learning and skills development	+?	-?	+	Modern telecommunications infrastructure is an important part of promoting the City's economic performance.
SOC1 To help ensure equitable access to community services and facilities	+?	-?	+	Modern telecommunications infrastructure is an important part of basic community services.
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~	~	~	No clear relationship

SA Objective	No change	No policy	New policy	Commentary
SOC3 To encourage development which promotes health and well-being	+?	-?	+	Modern telecommunications infrastructure helps to develop economic performance, employment opportunities and thereby the well-being of residents.
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~	~	~	No clear relationship
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	+?	-?	+	Modern telecommunications infrastructure contributes to the development of advances in e-democracy.

Commentary

Ensuring that the City has an up-to-date telecommunications infrastructure will ensure sustainability benefits across a range of objectives, notably the contribution to the City's economic performance, creating opportunities for travel reduction and ensuring that all residents have equitable access to high quality services that enable them to fulfil their economic and social potential. No likely significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing new policy to address telecommunications siting matters yields more positive sustainability outcomes than the reasonable alternatives presented. The cumulative and temporal effects of the policy are likely to be City-wide and be determined over the short, medium and longer term, reflecting the consistent and early application of the policy.

BCC Background - DM16 Telecommunications:
Evidence to justify the proposed development should support applications for telecommunications development and include:

- the outcome of consultations with organisations with an interest in the proposed development.

- a statement that self-certifies the cumulative exposure will not exceed the International Commission on non-ionising radiation protection guidelines is needed, or evidence that the applicant has explored the possibility for erecting antennas on an existing building, mast or other structure and a statement certifying International Commission guidelines will be met.

- consideration of the design which minimises the visual impact of the development which may relate to the form of structure, to colour and to material.

- ensuring that masts, as far as possible, blend in with the natural landscape. This includes the associated equipment such as underground cable, service routes and means of enclosure should be designed such that there is minimal loss or damage to trees and other natural vegetation.

Birmingham City Council; Telecommunications development mobile phone infrastructure SPD (March 2008)
https://www.birmingham.gov.uk/directory_record/690/telecommunications_development_mobile_phone_infrastructure_supplementary_planning_document

Mobile UK; Code of Best Practice on Mobile Network Development in England (2016) https://www.gov.uk/government/publications/code-of-best-practice-on-mobile-phone-network-development

International Commission on Non-Ionizing Radiation Protection; Guidelines for Limiting Exposure to Non-Ionizing Radiation (1998)
https://www.icnirp.org/en/publications/article/icnirp-publications-1992-2004.html

West Midlands Local Industrial Strategy (2019)
https://www.gov.uk/government/publications/west-midlands-local-industrial-strategy

West Midlands Strategic Economic Plan
https://www.wmca.org.uk/what-we-do/strategy/

Appendix B
Review of Plans, Policies and Strategies and their use in the Sustainability Objectives

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
International		
Council of Europe (2006) European Landscape Convention	Aims to promote the protection, management and planning of Europe's landscapes, both rural and urban, and to foster European co-operation on landscape issues.	Incorporated in Sustainability Objective ENV4
Council of Europe (1985) Convention on the Protection of the Architectural Heritage of Europe	This convention commits signatories to protect their architectural heritage by means of identifying monuments, buildings and sites to be protected; preventing the disfigurement, dilapidation or demolition of protected properties; providing financial support by the public authorities for maintaining and restoring the architectural heritage on its territory; and supporting scientific research for identifying and analysing the harmful effects of pollution and for defining ways and means to reduce or eradicate these effects.	Incorporated in Sustainability Objective ENV4
EU (2007) Floods Directive	The Floods Directive aims to provide a consistent approach to managing flood risk across Europe. The approach is based on a 6 year cycle of planning which includes the publication of Preliminary Flood Risk Assessments, hazard and risk maps and flood risk management plans. The Directive is transposed into English law by the Flood Risk Regulations 2009.	Incorporated in Sustainability Objective ENV5
EU (1991) Urban Waste Water Treatment Directive.	The Directive aims to protect the environment from the adverse effects of urban waste water discharges and discharges from certain industrial sectors and concerns the collection, treatment and discharge of: • Domestic Waste Water; • Mixture of Waste Water; and • Waste Water from Certain Industrial Sectors. There are four main principles: planning, regulation, monitoring, and information and reporting.	Incorporated in Sustainability Objective ENV6
EC (2007) Together for Health: A Strategic Approach for the EU 2008-2013	The Strategy aims to provide an overarching strategic framework spanning core issues in health as well as health in all policies and global health issues.	Incorporated in Sustainability Objective SOC3
The Pan-European Biological and Landscape Diversity Strategy (1995)	The strategy aims to address degradation of biological and landscape diversity across Europe reinstating these assets where possible.	Incorporated in Sustainability Objective ENV4
EU Directive on the Conservation of Wild Birds (79/409/EEC)	Identifies 181 endangered species and sub-species for which the Member States are required to designate Special Protection Areas. Makes it a legal requirement that EU countries make provision for the protection of birds. This includes the selection and designation of Special Protection Areas. Target Actions include: • Creation of protected areas; • Upkeep and management; and • Re-establishment of destroyed biotopes.	Incorporated in Sustainability Objective ENV4.
EU Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora	Directive seeks to conserve natural habitats. Conservation of natural habitats requires member states to identify special areas of conservation and to maintain, where necessary landscape features of importance to wildlife and flora.	Incorporated in Sustainability Objective ENV4.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
(92/43/EEC) & Subsequent Amendments	The amendments in 2007: • Simplify the species protection regime to better reflect the Habitats Directive; • Provide a clear legal basis for surveillance and monitoring of European protected species (EPS); • Toughen the regime on trading EPS that are not native to the UK; and • Ensure that the requirement to carry out appropriate assessments on water abstraction consents and land use plans is explicit.	
EU Directive on Waste (Directive 75/442/EEC, 2006/12/EC 2008/98/EC as amended)	Promotes the development of clean technology to process waste, promoting recycling and re-use. The Directive contains a range of provision including: • The setting up of separate collections of waste where technically, environmentally and economically practicable and appropriate to meet the necessary quality standards for the relevant recycling sectors – including by 2015 separate collection for at least paper, metal, plastic and glass. • Household waste recycling target – the preparing for re-use and the recycling of waste materials such as at least paper, metal, plastic and glass from households and possibly other origins as far as these waste streams are similar to waste from households, must be increased to a minimum of 50% by weight by 2020. Construction and demolition waste recovery target – the preparing for re-use, recycling and other material recovery of non-hazardous construction and demolition waste must be increased to a minimum of 70% by weight by 2020.	Incorporated in Sustainability Objective ENV6.
EU Packaging and Packaging Waste Directive (94/62/EC)	This Directive aims to harmonize national measures concerning the management of packaging and packaging waste in order, on the one hand, to prevent any impact thereof on the environment of all Member States as well as of third countries or to reduce such impact, thus providing a high level of environmental protection, and, on the other hand, to ensure the functioning of the internal market and to avoid obstacles to trade and distortion and restriction of competition within the Community. To this end this Directive lays down measures aimed, as a first priority, at preventing the production of packaging waste and, as additional fundamental principles, at reusing packaging, at recycling and other forms of recovering packaging waste and, hence, at reducing the final disposal of such waste. No later than five years from the date by which this Directive must be implemented in national law (1996), between 50 % as a minimum and 65 % as a maximum by weight of the packaging waste will be recovered. Within this general target, and with the same time limit, between 25 % as a minimum and 45 % as a maximum by weight of the totality of packaging materials contained in packaging waste will be recycled with a minimum of 15 % by weight for each packaging material.	Incorporated in Sustainability Objective ENV6.
EU (1996) Ambient Air Quality Assessment and Management (96/62/EC, Air Quality Framework Directive).	The Directive ensures that where pollutants exceed certain limit values, Member States take action to reduce pollution down to the limit values. The list of atmospheric pollutants to be considered includes: sulphur dioxide, nitrogen dioxide, particulate matter, lead, ozone, benzene, carbon monoxide, poly-aromatic hydrocarbons, cadmium, arsenic, nickel and mercury. Objectives: • Obtain adequate information on ambient air quality; and • Maintain ambient air quality where it is good and improve air quality where it is bad.	Incorporated in Sustainability Objective ENV6
EU (1998) Aarhus Convention	The Aarhus Convention establishes a number of rights of the public (individuals and their associations) with regard to the environment. The Parties to the Convention are required to make the necessary provisions so that public authorities (at national, regional or local level) will contribute to these rights to become effective. The Convention provides for: • The right of everyone to receive environmental information that is held by public authorities ("access to environmental information"). This can include information on the state of the environment, but also on policies or measures taken, or on the state of human health and safety where this can be affected by the state of the environment. Applicants are entitled to obtain this information within one month of the request and without having to say why they require it. In addition, public authorities are obliged, under	Incorporated in Sustainability Objective SOC5

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	the Convention, to actively disseminate environmental information in their possession; • The right to participate in environmental decision-making. Arrangements are to be made by public authorities to enable the public affected and environmental non-governmental organisations to comment on, for example, proposals for projects affecting the environment, or plans and programmes relating to the environment, these comments to be taken into due account in decision-making, and information to be provided on the final decisions and the reasons for it ("public participation in environmental decision-making"); • The right to review procedures to challenge public decisions that have been made without respecting the two aforementioned rights or environmental law in general ("access to justice").	
EU Drinking Water Directive (98/83/EC)	Provides for the quality of drinking water. The standards are legally binding.	Incorporated in Sustainability Objective ENV6.
EU Directive on the Landfill of Waste (99/31/EC)	Sets out requirements to ensuring that where landfilling takes place the environmental impacts are understood and mitigated against. By 2006 biodegradable municipal waste going to landfills must be reduced to 75% of the total amount (by weight) of biodegradable municipal waste produced in 1995 or the latest year before 1995 for which standardised Eurostat data is available.	Incorporated in Sustainability Objective ENV6.
EU (2000) Directive on Establishing a Framework for Community Action in the Field of Water Policy (2000/60/EC, The Water Framework Directive).	The Directive establishes an integrated approach to protection, improvements and sustainable use of water bodies, introducing a statutory system of analysis and planning based upon the river basin. The Directive imposes a statutory responsibility on Member States to ensure all water bodies meet certain water quality standards. The four main stages of implementation are: • Environmental and economic assessment ('Characterisation') of river basin districts including identification of pressures and impacts; • Environmental monitoring based on river basin district characterisation; • Setting of environmental objectives; and • Designing and carrying out a programme of measures to achieve these environmental objectives. Targets: All water bodies in all Member States are to reach 'Good Ecological Status' by 2015. Good ecological status applies to natural water bodies and is defined as a slight variation from undisturbed natural conditions. Some water bodies are designated as 'artificial' or 'heavily modified'. This is because they may have been created or modified for a particular use such as water supply, flood protection, navigation or urban infrastructure. By definition, artificial and heavily modified water bodies are not able to achieve natural conditions. Instead the classification and objectives for these water bodies, and the biology they represent, are measured against 'ecological potential' rather than status. For an artificial or heavily modified water body to achieve good ecological potential, its chemistry must be good. In addition, any modifications to the structural or physical nature of the water body that harm biology must only be those essential for its valid use. All other such modifications must have been altered or managed to reduce or remove their adverse impact, so that there is the potential for biology to be as close as possible to that of a similar natural water body.	Incorporated in Sustainability Objectives ENV5 and ENV6
EU 2001/42/EC on the Assessment of the Effects of Certain Plans and Programmes on the Environment (SEA Directive)	The SEA Directive provides the following requirements for consultation: • Authorities which, because of their environmental responsibilities, are likely to be concerned with the effects of implementing the plan or programme, must be consulted on the scope and level of detail of the information to be included in the Environmental Report. These authorities are designated in the SEA Regulations as the Consultation Bodies (Consultation Authorities in Scotland). • The public and the Consultation Bodies must be consulted on the draft plan or programme and the Environmental Report, and must be given an early and effective opportunity within appropriate time frames to express their opinions.	Directive sets the basis for SEA as a whole and therefore Indirectly covers all objectives.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	• Other EU Member States must be consulted if the plan or programme is likely to have significant effects on the environment in their territories.	
EU (2005) Clean Air Strategy.	The strategy aims to extend clean air laws into new sectors - agriculture and transport - that were not covered before, targeting five main pollutants including fine-dust particles which are most harmful to human health.	Incorporated in Sustainability Objective ENV6
EU (2010) The Industrial Emissions Directive	The Johannesburg Declaration on Sustainable Development was adopted at the World Summit on Sustainable Development (WSSD), sometimes referred to as Earth Summit 2002, at which the Plan of Implementation of the World Summit on Sustainable Development was also agreed upon. The Johannesburg Declaration builds on earlier declarations made at the United Nations Conference on the Human Environment at Stockholm in 1972, and the Earth Summit in Rio de Janeiro in 1992. While committing the nations of the world to sustainable development, it also includes substantial mention of multilateralism as the path forward. In terms of the political commitment of parties, the Declaration is a more general statement than the Rio Declaration. It is an agreement to focus particularly on *"the worldwide conditions that pose severe threats to the sustainable development of our people, which include: chronic hunger; malnutrition; foreign occupation; armed conflict; illicit drug problems; organized crime; corruption; natural disasters; illicit arms trafficking; trafficking in persons; terrorism; intolerance and incitement to racial, ethnic, religious and other hatreds; xenophobia; and endemic, communicable and chronic diseases, in particular HIV/AIDS, malaria and tuberculosis."* Johannesburg Declaration	The principles of sustainable development are included in all of the sustainability objectives.
UNFCCC (1997) Kyoto Protocol to the UN Framework Convention on Climate Change.	The protocol shares the Convention's objective (to achieve stabilisation of greenhouse gas concentrations in the atmosphere at safe levels, so that ecosystems can adapt naturally, and food supply is not threatened) but strengthens the convention by committing Countries to legally-binding targets to limit or reduce their greenhouse gas emissions.	Incorporated in Sustainability Objective ENV5
UNFCCC (2009) Copenhagen Accord (Climate Change).	The Copenhagen Accord is a treaty that is to take over from the Kyoto Protocol's targets, as of when it expires in 2012, for curbing the growth in greenhouse gas emissions sufficiently to avoid climate change impacts projected by the IPCC. The Copenhagen Accord commits Countries to legally binding targets including: • To reduce global emissions so as to hold the increase in global temperature below 2˚C; • Commit developed countries to reducing greenhouse gas emissions; • Projects to reduce greenhouse gas emissions in developing countries will be subject to international monitoring if they are internationally funded; • Provide developing countries with financial incentives to preserve forests; and • Implementation of the Accord to be reviewed in 2015 and an assessment to be made on whether the goal of keeping global temperature rise within 2˚C needs to be strengthened to 1.5˚C.	Incorporated in Sustainability Objective ENV5
National		
National Planning Policy Framework (NPPF) (2019)	The 2012 NPPF was the adopted NPPF at the outset of the plan making process. The NPPF was updated in 2018 and the revised NPPF was updated in February 2019. Key points from the updated document are summarised under the sub-headings below. Section 2 of the NPPF states that achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives): a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and	

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	improved productivity; and by identifying and coordinating the provision of infrastructure; b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy. These objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area. The NPPF is supported by National Planning Practice Guidance which expands upon and provides additional guidance in respect of national planning policy. **Biodiversity, Geodiversity & Soil:** • Protecting and enhancing valued landscapes, geological conservation interests and soils; • Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; • Minimising impacts on biodiversity and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures including Nature Recovery Networks (paragraph 174); • Preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and • Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate. • Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in the Framework, take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries. **Landscape:** • Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); • Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;	Incorporated in Sustainability Objectives ENV1, ENV4 and ENV6 Incorporated in Sustainability Objective ENV4

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	• Minimising impacts on and providing net gains in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; • Preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; • Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate. • Plans and decisions should encourage effective use of brownfield sites and take into account the economic benefits of agricultural land when assessing development, seeking to utilise areas of poorer quality land. The NPPF includes strong protections for valued landscapes and townscapes as well as recognising the intrinsic character and beauty of the countryside. Planning policies and decisions are expected to be sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change. The Framework states (at paragraph 130) that: *"Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions".* The Framework has a number of specific requirements relating to planning and landscape including a clear expectation that the planning system should contribute to, and enhance, the natural and local environment by protecting and enhancing valued landscapes. Local planning authorities are expected to set criteria based policies against which proposals for any development on or affecting protected landscape areas will be judged. In doing so, distinctions should be made between the hierarchy of international, national and locally designated sites and *"great weight"* should be given to *"conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty".* It is also expected that the scale of development in these areas will be limited, with planning permission refused for major developments *"other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest"* (paragraph 172). **Historic Environment**: • One of the NPPF's core planning principles for plan and decision making is conserving and enhancing the historic environment. • Local planning authorities are required to set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. • The desirability of sustaining and enhancing the significance of the heritage assets, and putting them to viable uses consistent with their conservation; • The wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; • The desirability of new development making a positive contribution to local character and distinctiveness; and • Opportunities to draw on the contribution made by the historic environment to the character of a place. Paragraph 188 of the NPPF states that Local Planning Authorities should make information about the historic environment, gathered as part of policy-making or development management, publicly accessible.	Incorporated in Sustainability Objective ENV4

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	Paragraph 194 of the NPPF identifies that non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.	
	Water:	
	Among the NPPF's core principles are *'conserving and enhancing the natural environment'* and *'meeting the challenge of climate change, flooding and coastal change'*; In fulfilling these objectives, the planning system should contribute to and enhance the natural and local environment by: preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability.	Incorporated in Sustainability Objectives ENV5 and ENV6
	In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment.	
	Strategic Policies should make sufficient provision for water supply and wastewater.	
	Local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations.	
	Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (where existing or future), Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. Local Plans should be supported by Strategic Flood Risk Assessment and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant flood risk management bodies, such as lead local flood authorities and internal drainage boards. Local Plans should apply a sequential, risk-based approach to the location of development – taking into account the current and future impacts of climate change – so as to avoid where possible flood risk to people and property and manage any residual risk by:	
	• applying the Sequential Test;	
	• if necessary, applying the Exception Test;	
	• safeguarding land from development that is required, or likely to be required for current or future flood management;	
	• using opportunities provided by new development to reduce the causes and impacts of flooding (where appropriate through the use of natural flood management techniques); and	
	• Where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.	
	Climate Change:	
	One of the core principles of the NPPF is meeting the challenge of climate change, flooding and coastal change and encourages the adoption of proactive strategies to mitigate and adapt to climate change in line with the objectives and provisions of the Climate Change Act 2008, taking full consideration of flood risk, coastal change and water supply and demand. The NPPF also supports low carbon future by helping to increase the use of renewable and low carbon sources in line with the National Policy Statement for Renewable Energy Infrastructure It seeks to ensure that all types of flood risk are taken into account over the long term at the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas of highest risk.	Incorporated in Sustainability Objective ENV5
	Plans are expected to take a proactive approach to mitigating and adapting to climate change in light of its long term implications including changes to flood risk and water supply. New development should both avoid increased	

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	vulnerability to the range of impacts arising from climate change and help to reduce greenhouse gas emissions, such as through its location, orientation and design. To help increase the use and supply of renewable and low carbon energy and heat, plans should: • Provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts); • Consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and • Identify opportunities for development to draw its energy supply from decentralized, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.	
	Air Quality: Planning policies and decisions should sustain and contribute towards compliance with relevant limits or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified.	Incorporated in Sustainability Objective ENV6
	Mineral and Waste: One of the core principles of the NPPF is facilitating the sustainable use of minerals. Policy guidance suggests the need to: Identify policies for the extraction of mineral resources of local and national importance, but not identify new sites or extensions to existing sites for peat extraction; so far as practicable take account of contribution secondary and recycled materials and minerals waste would make to the supply of materials before considering extraction of primary materials, whilst aiming to source minerals supplies indigenously; the definition of Mineral Safeguarding Areas so that locations of mineral sources are not sterilised by other developments; set out policies to encourage the prior extraction of minerals, where practicable and environmentally feasible, if it is necessary for non-mineral development to take place; safeguarding of existing and planned mineral infrastructure (rail links, wharfage, storage, processing etc), environmental criteria to ensure there is not an unacceptable environmental impact; when developing noise limits, recognise that some noisy short-term activities, which may otherwise be regarded as unacceptable, are unavoidable to facilitate minerals extraction; and policies for reclaiming land and site aftercare. Minerals planning authorities are expected to provide for the extraction of mineral resources of local and national importance and safeguard mineral resources by defining Mineral Safeguarding Areas; and adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development. The NPPF defines *'mineral resources of local and national importance'* as minerals which are necessary to meet society's needs, including aggregates, brickclay, silica sand, cement raw materials, gypsum, salt, fluorspar, coal, oil and gas (including conventional and unconventional hydrocarbons) tungsten, kaolin, ball clay, potash, polyhalite and local minerals of importance to heritage assets and local distinctiveness.	Incorporated in Sustainability Objective ENV1
	Economy: One of the NPPF's core planning principles for plan and decision making is building a strong competitive economy. The NPPF highlights the Government's commitment to securing economic growth to create jobs and prosperity, ensuring the planning system does everything it can to support sustainable economic growth.	Incorporated in Sustainability Objectives ECON1 – ECON4

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	Local planning authorities are required to proactively meet development needs recognising potential barriers to invest (including infrastructure, housing and services) and regularly review land allocations. Economic growth in rural areas should be supported to create jobs and sustainable new developments, including expansion of all types of businesses, diversification of agriculture, supporting tourism and retention of local services. In drawing up local plans, local authorities should; • Set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration; • Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period; • Seek to address potential barriers to investment, such as inadequate infrastructure, services or housing or a poor environment; and • Be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances. Planning policies should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations. Planning policies should support a prosperous rural economy and should enable: • The sustainable growth of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings; • The development and diversification of agricultural and other land-based rural business; • Sustainable rural tourism and leisure developments which respect the character of the countryside; and • The retention and development of accessible local services and community facilities. **Housing:** To determine the minimum number of homes needed strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site unless: • Off-site provision or an appropriate financial contribution in lieu can be robustly justified; and • The agreed approach contributes to the objective of creating mixed and balanced communities. For major developments involving the provision of housing, planning policies should expect at least 10% of the homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area. Strategic policy making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified	Incorporated in Sustainability Objective SOC2

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	housing ended (and any needs that cannot be met within neighbouring areas) can be met over the plan period.	
	Planning policies should identify a supply of:	
	• Specific, deliverable sites for years 1-5 of plan period; and	
	• Specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.	
	Strategic policy making authorities should identify suitable locations for large scale housing development.	
	Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement.	
	In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.	
	Planning policies should avoid the development of isolated homes in the countryside except in special circumstances.	
	Healthy and Safe Communities:	
	Amongst the planning principles of the NPPF is the promotion of healthy and safe communities.	Incorporated in Sustainability Objective SOC3
	Planning policies should:	
	• Promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other;	
	• Are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion;	
	• Enable and support healthy lifestyles, especially where this would address identified local health and well-being needs.	
	To provide the social, recreational and cultural facilities and services the community needs, planning policies should:	
	• Plan positively for the provision and use of shared spaces, community facilities and other local services to enhance the sustainability of communities and residential environments;	
	• Take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;	
	• Guard against the unnecessary loss of valued facilities and services;	
	• Ensure established shops, facilities and services are able to develop and modernize, and are retained for benefit of the community; and	
	• Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.	
	Open Space and Recreation:	
	The framework sets out open space, sport and recreation considerations for neighbourhood planning bodies which include an assessment of needs and opportunities. Information gained from the assessments should be used to determine what open space, sport and recreation provision is needed, which plans should then seek to accommodate.	Incorporated in Sustainability Objectives SOC2 – SOC5
	Transport & Accessibility:	
	Amongst the planning principles of the NPPF are:	
	• Promoting sustainable transport.	Incorporated in Sustainability Objective ENV3

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	Transport issues should be considered from the earliest stages of plan-making and development proposals, so that: • The potential impacts of development on transport networks can be addressed; • Opportunities from existing or proposed transport infrastructure, and changing transport and usage are realized; • Opportunities to promote walking, cycling and public transport use are identified and pursued; • The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account; and • Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places. Planning policies should: • Support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities; • Be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned; • Identify and protect, where there is robust evidence, sites and routes which could be crucial in developing infrastructure to widen transport choice and realise opportunities for large scale development; • Provide for high quality walking and cycling networks and supporting facilities such as cycle parking; • Provide for any large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy; and • Recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time. Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance.	
DCLG (2011) The Localism Act	The Localism Bill includes five key measures that underpin the Government's approach to decentralisation. • Community rights; • Neighbourhood planning; • Housing; • General power of competence; and • Empowering cities and other local areas.	Incorporated in Sustainability Objectives SOC1 - SOC5
DCLG (2011) The Community Infrastructure Levy Regulations	The Community Infrastructure Levy is a new levy that local authorities in England and Wales can choose to charge on new developments in their area. The money can be used to support development by funding infrastructure that the council, local community and neighbourhoods want - for example new or safer road schemes, park improvements or a new health centre. The system applies to most new buildings and charges are based on the size and type of the new development.	Incorporated in Sustainability Objectives 11 - 15
DCLG (2014) Planning Policy for Traveller Sites (updated August 2015)	This document sets out the Government's planning policy for Traveller sites. It identifies the following aims: • That local planning authorities should make their own assessment of need for the purposes of planning;	Incorporated in Sustainability Objective SOC2.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	• To ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites; • To encourage local planning authorities to plan for sites over a reasonable timescale; • That plan-making and decision-taking should protect Green Belt from inappropriate development; • To promote more private Traveller site provision while recognising that there will always be those Travellers who cannot provide their own sites; • That plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective; • For local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies; • To increase the number of Traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply; • To reduce tensions between settled and Traveller communities in plan making and planning decisions; • To enable provision of suitable accommodation from which Travellers can access education, health, welfare and employment infrastructure; and • For local planning authorities to have due regard to the protection of local amenity and local environment.	
DCLG (2019) Planning Practice Guidance	Planning Practice Guidance is designed to support the NPPF. It reflects the objectives of the NPPF which are not repeated here.	All of the Objectives reflect NPPF and PPG.
DCLG (2014) National Planning Policy for Waste	This document sets out detailed waste planning policies for local authorities. States that planning authorities need to: • Use a proportionate evidence base in preparing Local Plans. • Identify sufficient opportunities to meet the identified needs of their area for the management of waste streams. • Identify suitable sites and areas. The overall objective of the document is to work towards a more sustainable and efficient approach to resource use and management. Planning plays a pivotal role e.g. by ensuring the design and layout of new development and other infrastructure complements sustainable waste management.	Incorporated in Sustainability Objective ENV6
DCLG (2014) Written Statement on Sustainable Drainage Systems	This statement sets out that it is the Government's expectation that sustainable drainage systems will be provided in new developments wherever this is appropriate.	Incorporated in Sustainability Objective ENV6.
DCLG (2017) Fixing Our Broken Housing Market	The White Paper makes the following proposals as 'step 1': • Making sure every part of the country has an up-to-date, sufficiently ambitious plan so that local communities decide where development should go; • Simplifying plan-making and making it more transparent, so it's easier for communities to produce plans and easier for developers to follow them; • Ensuring that plans start from an honest assessment of the need for new homes, and that local authorities work with their neighbours, so that difficult decisions are not ducked; • Clarifying what land is available for new housing, through greater transparency over who owns land and the options held on it; • Making more land available for homes in the right places, by maximising the contribution from brownfield and surplus public land, regenerating estates, releasing more small and medium-sized sites, allowing rural communities to grow and making it easier to build new settlements; • Maintaining existing strong protections for the Green Belt, and clarifying that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements; • Giving communities a stronger voice in the design of new housing to drive up the quality and character of new development, building on the success of neighbourhood planning; and	Incorporated in Sustainability Objective SOC2.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	• Making better use of land for housing by encouraging higher densities, where appropriate, such as in urban locations where there is high housing demand; and by reviewing space standards.	
DECC (2008) UK Climate Change Act 2008.	The 2008 Climate Change Act seeks to manage and respond to climate change in the UK, by: • Setting ambitious, legally binding targets; • Taking powers to help meet those targets; • Strengthening the institutional framework; • Enhancing the UK's ability to adapt to the impact of climate change; and • Establishing clear and regular accountability to the UK Parliament and to the devolved legislatures.	Incorporated in Sustainability Objective ENV5
DCMS (2007) Heritage Protection for the 21st Century.	This White Paper responds to the public call for change, and to this changing policy context. It sets out a vision for a new heritage protection system. The proposals in the White Paper reflect the importance of the heritage protection system in preserving heritage for people to enjoy now and in the future. They are based around three core principles: • Developing a unified approach to the historic environment; • Maximising opportunities for inclusion and involvement; and • Supporting sustainable communities by putting the historic environment at the heart of an effective planning system.	Incorporated in Sustainability Objective ENV4
DCMS (2013) *Scheduled Monuments & Nationally Important but Non-Scheduled Monuments*	This policy statement sets out Government policy on the identification, protection, conservation and investigation of nationally important ancient monuments, under the provisions of the Ancient Monuments and Archaeological Areas Act 1979. It includes principles relating to the selection of scheduled monuments and the determination of applications for scheduled monument consent.	Incorporated in Sustainability Objective 4.
DCMS (2016) The Culture White Paper	The White Paper is structured around four core themes: • Everyone should enjoy the opportunities culture offers, no matter where they start in life; • The riches of our culture should benefit communities across the country; • The power of culture can increase our international standing; and • Cultural investment, resilience and reform.	Incorporated in Sustainability Objective ENV4
DCMS (2017) Heritage Statement	This statement sets out how the government will support the heritage sector and help it to protect and care for our heritage and historic environment in the coming years. There are no formal targets or objectives in this statement.	Incorporated in Sustainability Objective ENV4
Defra (2007) Guidance for Local Authorities on Implementing Biodiversity Duty	The Duty is set out in Section 40 of the Natural Environment and Rural Communities Act (NERC) 2006, and states that: "*Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity*". Particular areas of focus include: Policy, Strategy and Procurement; Management of Public Land and Buildings; Planning, Infrastructure and Development; and Education, Advice and Awareness.	Incorporated in S Sustainability Objective ENV4
Defra (2007) The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (Volume 2).	The Strategy sets out standards and objectives for the 8 main health-threatening air pollutants in the UK. The standards are based on an assessment of the effects of each pollutant on public health. They are based on recommendations by the Expert Panel on Air Quality Standards, The European Union Air Quality Daughter Directive and the World Health Organisation. Local Authorities are responsible for seven of the eight air pollutants under Local Air Quality Management (LAQM). National objectives have also been set for the eighth pollutant, ozone, as well as for nitrogen oxides and sulphur dioxide.	Incorporated in Sustainability Objective ENV6
Defra (2007) The Air Quality Strategy for	The Strategy: • Sets out a way forward for work and planning on air quality issues; • Sets out the air quality standards and objectives to be achieved;	Incorporated in Sustainability

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
England, Scotland, Wales and Northern Ireland	• Introduces a new policy framework for tackling fine particles; and • Identifies potential new national policy measures which modelling indicates could give further health benefits and move closer towards meeting the Strategy's objectives. The Air Quality Strategy sets out objectives for a range of pollutants. As these are quite extensive they have not been reproduced here.	Objectives ENV3 and SOC2.
Defra (2007) Strategy for England's Trees, Woods and Forests	Key aims for government intervention in trees, woods and forests are: • To secure trees and woodlands for future generations; • To ensure resilience to climate change; • To protect and enhance natural resources; • To increase the contribution that trees, woods and forests make to our quality of life; and • To improve the competitiveness of woodland businesses and products. These aims will form the basis on which the Delivery plan will be developed by Natural England and the Forestry Commission England (FCE). The strategy provides a national policy direction, which can be incorporated alongside regional priorities within regional forestry frameworks. Strategy aims to create 2,200 hectares of wet woodland in England by 2010.	Incorporated in Sustainability Objective ENV4.
Defra (2008) Future Water, the Government's Water Strategy for England	Objectives: By 2030 at the latest, we have: • Improved the quality of our water environment and the ecology which it supports, and continued to provide high levels of drinking water quality from our taps; • Sustainably managed risks from flooding and coastal erosion, with greater understanding and more effective management of surface water; • Ensured a sustainable use of water resources, and implemented fair, affordable and cost reflective water charges; • Cut greenhouse gas emissions; and • Embedded continuous adaptation to climate change and other pressures across the water industry and water users. Targets: Key targets are within the objectives above and further a number of sub-targets are included within the document.	Incorporated in Sustainability Objectives ENV5 and ENV6
Defra (2009) Safeguarding our Soils: A Strategy for England	The Soil Strategy for England provides a vision to guide future policy development across a range of areas and sets out the practical steps that are needed to take to prevent further degradation of our soils, enhance, restore and ensure their resilience, and improve understanding of the threats to soil and best practice in responding to them. The Strategy is underpinned by the following vision: By 2030, all England's soils will be managed sustainably and degradation threats tackled successfully. This will improve the quality of England's soils and safeguard their ability to provide essential services for future generations. Achieving this vision will mean that: • Agricultural soils will be better managed and threats to them will be addressed; • Soils will play a greater role in the fight against climate change and in helping us to manage its impacts; • Soils in urban areas will be valued during development, and construction practices will ensure vital soil functions can be maintained; and Pollution of our soils is prevented, and our historic legacy of contaminated land is being dealt with. Key objectives of the strategy include: • Better protection for agricultural soils; • Protecting and enhancing stores of soil carbon; • Building the resilience of soils to a changing climate; • Preventing soil pollution;	Incorporated in Sustainability Objective ENV4.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	• Effective soil protection during construction and development; and • Dealing with the legacy of contaminated land.	
Defra (2011) Natural Environment White Paper; The natural choice: securing the value of nature	The Natural Environment White paper sets out the Government's plans to ensure the natural environment is protected and fully integrated into society and economic growth. The White Paper sets out four key aims: (i) protecting and improving our natural environment; (ii) growing a green economy; (iii) reconnecting people and nature; and (iv) international and EU leadership, specifically to achieve environmentally and socially sustainable economic growth, together with food, water, climate and energy security and to put the EU on a path towards environmentally sustainable, low-carbon and resource-efficient growth, which is resilient to climate change, provides jobs and supports the wellbeing of citizens.	Incorporated in Sustainability Objectives ENV4 and ECON1
Defra (2011) Biodiversity 2020: A strategy for England's wildlife and ecosystem	This biodiversity strategy for England that builds on the Natural Environment White Paper and provides a comprehensive picture of the Government is implementing the international and EU commitments. It sets out the strategic direction for biodiversity policy for the next decade on land (including rivers and lakes) and at sea. The Strategy has as its mission to halt overall biodiversity loss, support healthy well-functioning ecosystems, and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people. The Strategy is designed to help to deliver the Natural Environment White Paper and includes the following priorities: • Creating 200,000 hectares of new wildlife habitats by 2020; • Securing 50% of SSSIs in favourable condition, while maintaining at least 95% in favourable or recovering condition; • Encouraging more people to get involved in conservation by supporting wildlife gardening and outdoor learning programmes; and • Introducing a new designation for local green spaces to enable communities to protect places that are important to them.	Incorporated in Sustainability Objective ENV4
Defra (2011) Review of Waste Policy in England	Building on waste reduction targets established in the 2007 Waste Strategy, the Review sets out a range of commitments relating to: • Sustainable use of materials; • Waste prevention, re-use and recycling; • Regulation and enforcement; • Householders and local authorities working together; • Business waste collection; • Energy recovery; • Landfill; and • Infrastructure and planning.	Incorporated in Sustainability Objective ENV2
Defra & HM Government (2011) Water White Paper; Water for Life	Water for Life describes a vision for future water management in which the water sector is resilient, in which water companies are more efficient and customer focused, and in which water is valued as the precious and finite resource it is.	Incorporated in Sustainability Objective ENV5
Defra & Environment Agency (2001) National Flood and Coastal Erosion Risk	The strategy describes what needs to be done by all organisations involved in flood and coastal erosion risk management. The strategy sets out a statutory framework that will help communities, the public sector and other organisations to work together to manage flood and coastal erosion risk.	Incorporated in Sustainability Objective ENV5

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
Management Strategy for England		
DfT (2008) Delivering a Sustainable Transport System (DaSTS).	Objectives: • To support national economic competitiveness and growth, by delivering reliable and efficient transport networks; • To reduce transport's emissions of carbon dioxide and other greenhouse gases, with the desired outcome of tackling climate change; • To contribute to better safety and health and longer life-expectancy by reducing the risk of death, injury or illness arising from transport and by promoting travel modes that are beneficial to health; • To promote greater equality of opportunity for all citizens, with the desired outcome of achieving a fairer society; and • To improve quality of life for transport users and non-transport users, and to promote a healthy natural environment.	I Incorporated in Sustainability Objectives ENV3, ECON1 – 3, SOC3
English Heritage (2008) Conservation Principles, Policies and Guidance	A framework for the sustainable management of the historic environment based on the following principles: • The historic environment is a shared resource; • Everyone should be able to participate in sustaining the historic environment; • Understanding the significance of places is vital; • Significant places should be managed to sustain their values; • Decisions about change must be reasonable, transparent and consistent; and • Documenting and learning from decisions is essential.	Incorporated in Sustainability Objective ENV3
English Nature (2006) Climate Change Space for Nature	Context for the next 80 years in terms of the likely effects of climate change on biodiversity. Prescribes suggested actions to be taken in preparation for change.	Incorporated in Sustainability Objective ENV3 and ENV5
Environment Agency (2009) Water for people and the environment - Water resources strategy for England and Wales.	Objectives: • Enable habitats and species to adapt better to climate change; • Allow the way we protect the water environment to adjust flexibly to a changing climate; • Reduce pressure on the environment caused by water taken for human use; • Encourage options resilient to climate change to be chosen in the face of uncertainty; • Better protect vital water supply infrastructure; • Reduce greenhouse gas emissions from people using water, considering the whole life-cycle of use; and • Improve understanding of the risks and uncertainties of climate change. Target: In England, the average amount of water used per person in the home is reduced to 130 litres each day by 2030.	Incorporated in Sustainability Objective ENV3 and ENV6
Environment Agency (2011) The National Flood and Coastal Erosion Risk Management Strategy for England	The strategy encourages more effective risk management by enabling people, communities, businesses, infrastructure operators and the public sector to work together to: • Ensure a clear understanding of the risks of flooding and coastal erosion, nationally and locally, so investment risk can be prioritised more effectively; • Set out clear and consistent plans for risk management so that communities and business can make informed decisions about the management of the remaining risk; • Manage flood and coastal erosion risks in an appropriate way, taking account of the needs of communities and the environment;	Incorporated in Sustainability Objective ENV5.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	• Ensure that emergency plans and responses to flood incidents are effective and that communities are able to respond effectively to flood forecasts, warnings and advice; and • Help communities to recover more quickly and effectively after incidents.	
Forestry Commission (2005): Trees and Woodlands Nature's Health Service	An advisory document which provides detailed examples of how the Woodland Sector (trees, woodlands and green spaces) can significantly contribute to people's health, well-being (physical, psychological and social) and quality of life. Increasing levels of physical activity is a particular priority.	Incorporated in Sustainability Objective ENV4 and SOC3
HM Government (1979) Ancient Monuments and Archaeological Areas Act	The Act defines sites that warrant protection as ancient monuments. They can be a Scheduled Ancient Monuments or *"any other monument which in the opinion of the Secretary of State is of public interest by reason of the historic, architectural, traditional, artistic or archaeological interest attaching to it"*. There are no specific targets or objectives identified.	Incorporated in Sustainability Objective ENV4.
HM Government (1981) Wildlife and Countryside Act	The main UK legislation relating to the protection of named animal and plant species includes legislation relating to the UK network of nationally protected wildlife areas: Site of Special Scientific Interest (SSSIs). There are no specific targets or objectives identified.	Incorporated in Sustainability Objective ENV4.
HM Government (1990) Planning (Listed Building and Conservation Areas) Act	The Planning (Listed Buildings and Conservation Areas) Act 1990 provides specific protection for buildings and areas of special architectural or historic interest. There are no specific targets or objectives identified.	Incorporated in Sustainability Objective ENV4.
HM Government (2000) Countryside and Rights of Way Act 2000	This Act: • Gives people greater freedom to explore open country on foot; • Creates a duty for Highway Authorities and National Park Authorities to establish Local Access Forums; • Provides a cut-off date of 1 January 2026 for the recording of certain rights of way on definitive maps and the extinguishment of those not so recorded by that date; • Offers greater protection to wildlife and natural features, better protection for Sites of Special Scientific Interest (SSSIs) and more effective enforcement of wildlife legislation; and • Protects Areas of Outstanding Natural Beauty with legislation similar to that for National Parks. There are no specific objectives or targets in the Act.	Incorporated in Sustainability Objective ENV4.
HM Government (2003) Sustainable Energy Act	The Act aims to promote sustainable energy development and use and report on progress regarding cutting the UK's carbon emissions and reducing the number of people living in fuel poverty. Specific targets are set by the Secretary of State as energy efficiency aims.	Incorporated in Sustainability Objective ENV4.
HM Government (2003) The Water Environment (Water Framework Directive) (England and Wales) Regulations	Requires all inland and coastal waters to reach "good status" by 2015. This is being done by establishing a river basin structure with ecological targets for surface waters.	Incorporated in Sustainability Objective ENV6
HM Government (2004 and revised 2006) Housing Act	Energy efficiency must be at least 20% greater in properties by 2010 than compared with 2000.	Incorporated in Sustainability Objective ENV4.
HM Government (2005) Securing the Future – the UK Sustainable Development Strategy	The Strategy contains a new set of indicators to monitor progress towards sustainable development in the UK. Those most relevant at the local authority level include: • Greenhouse gas emissions • Road freight (CO2 emissions and tonne km, tonnes and GDP) • Household waste (a) arisings (b) recycled or composted • Local environmental quality	Incorporated in Sustainability Objectives ENV1 - 4, and ENV6.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
HM Government (2006) The Natural Environment and Rural Communities Act 2006	The Act is primarily intended to implement key aspects of the Government's Rural Strategy published in July 2004; it also addresses a wider range of issues relating broadly to the natural environment. The Act established an independent body – Natural England – responsible for conserving, enhancing and managing England's natural environment for the benefit of current and future generations. The Act also established the Commission for Rural Communities ("the Commission"). The Commission will be an independent advocate, watchdog and expert adviser for rural England, with a particular focus on people suffering from social disadvantage and areas suffering from economic under-performance. It will provide information, advice, monitoring and reporting to Government and others on issues and policies affecting rural needs. The Act also reconstitutes the Joint Nature Conservation Committee and renames and reconstitutes the Inland Waterways Amenity Advisory Council (which becomes the Inland Waterways Advisory Council). In line with the 2004 Rural Strategy, the Act extends both the Secretary of State's funding powers for functions within Defra's remit, and the ability to authorise other bodies to carry out those functions. Public bodies for which Defra is responsible are given the power to enter agreements to enable various other designated bodies to perform functions on their behalf. These various powers are intended to be used to simplify and devolve delivery arrangements and to improve their effectiveness and efficiency. The Act makes provision in respect of biodiversity, pesticides harmful to wildlife and the protection of birds, and in respect of invasive non-native species. It alters enforcement powers in connection with wildlife protection, and extends time limits for prosecuting certain wildlife offences. It addresses a small number of gaps and uncertainties which have been identified in relation to the law on sites of special scientific interest. It amends the functions and constitution of National Park authorities, the functions of the Broads Authority and the law on rights of way.	Incorporated in Sustainability Objectives ENV4, ECON1 - 3
HM Government (2006) The Natural Environment and Rural Communities (NERC) Act 2006	The Act: • Makes provision about bodies concerned with the natural environment and rural communities; • Makes provision in connection with wildlife, Sites of Special Scientific Interest (SSSIs), National Parks and the Broads; • Amends the law relating to rights of way; • Makes provision as to the Inland Waterways Amenity Advisory Council; and • Provides for flexible administrative arrangements in connection with functions relating to the environment and rural affairs and certain other functions; and for connected purposes. There are no specific objectives or targets in the Act.	Incorporated in Sustainability Objective 4.
HM Government (2008) The Climate Change Act 2008	The Act sets: • Legally binding targets - greenhouse gas emission reductions through action in the UK and abroad of at least 80% by 2050, and reductions in CO2 emissions of at least 26% by 2020, against a 1990 baseline. The 2020 target will be reviewed soon after Royal Assent to reflect the move to all greenhouse gases and the increase in the 2050 target to 80%. Further, the Act provides for a carbon budgeting system which caps emissions over five year periods, with three budgets set at a time, to set out our trajectory to 2050.	Incorporated in Sustainability Objective ENV5.
HM Government (2008) The Planning Act	Introduces a new system for nationally significant infrastructure planning, alongside further reforms to the Town and Country Planning system. A major component of this legislation is the introduction of an independent Infrastructure Planning Commission (IPC), to take decisions on major infrastructure projects (transport, energy, water and waste). To support decision-making, the IPC will refer to the Government's National Policy Statements (NPSs), which will provide a clear long-term strategic direction for nationally significant infrastructure development. There are no specific objectives or targets in the Act.	This act is not specifically relevant to any of the objectives.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
HM Government (2009) The UK Renewable Energy Strategy	A vision is set out in the document whereby by 2020: • More than 30% of our electricity is generated from renewables; • 12% of our heat is generated from renewables; and • 10% of transport energy is generated from renewables.	Incorporated in Sustainability Objective ENV5.
HM Government (2010) The Government's Statement on the Historic Environment for England	The Vision of the Statement is "*that the value of the historic environment is recognised by all who have the power to shape it; that Government gives it proper recognition and that it is managed intelligently and in a way that fully realises its contribution to the economic, social and cultural life of the nation.*" This vision is supported by six aims: 1 Strategic Leadership: Ensure that relevant policy, guidance, and standards across Government emphasize our responsibility to manage England's historic environment for present and future generations. 2 Protective Framework: Ensure that all heritage assets are afforded an appropriate and effective level of protection, while allowing, where appropriate, for well managed and intelligent change. 3 Local Capacity: Encourage structures, skills and systems at a local level which: promote early consideration of the historic environment; ensure that local decision makers have access to the expertise they need; and provide sufficiently skilled people to execute proposed changes to heritage assets sensitively and sympathetically. 4 Public Involvement: Promote opportunities to place people and communities at the centre of the designation and management of their local historic environment and to make use of heritage as a focus for learning and community identity at all levels. 5 Direct Ownership: Ensure all heritage assets in public ownership meet appropriate standards of care and use while allowing, where appropriate, for well managed and intelligent change. 6 Sustainable Future: Seek to promote the role of the historic environment within the Government's response to climate change and as part of its sustainable development agenda. No key targets.	Incorporated in Sustainability Objective ENV4
HM Government (2010) The Air Quality Standards 2010	The Regulations largely implement Directive 2008/50/EC on ambient air quality and cleaner air for Europe.	Incorporated in Sustainability Objective ENV6
HM Government (2010) Flood and Water Management Act	The Act takes forward a number of recommendations from the Pitt Review into the 2007 floods and places new responsibilities on the Environment Agency, local authorities and property developers (among others) to manage the risk of flooding. • The Environment Agency is responsible for developing and applying a flood risk management strategy for England and Wales. Every other agency with a flood risk management function across England and Wales must take account of this strategy. • Local authorities across England and Wales are required to develop, maintain, apply and monitor a strategy for local flood risk management in their areas. These local strategies must include the risk of flooding from surface water, watercourse and groundwater flooding. • Lead local authorities must establish and maintain a register of structures which have an effect on flood risk management in their areas. • The Act introduces a requirement to improve the flood resistance of existing buildings by amending the Building Act 1984. • The Act introduces the provision for residential landlords to be charged the cost of their tenant's unpaid water bills should the landlord fail to pass on the tenants details to the respective water company for the local area. • The Act introduces the requirements for developers of property to construct Sustainable Drainage Systems (SUDS). • Local authorities have a duty to adopt these SUDS once completed. By adoption, the Act means that they become responsible for maintaining the systems.	Incorporated in Sustainability Objective ENV5

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	Those key targets related to water resources, include: • To widen the list of uses of water that water companies can control during periods of water shortage, and enable Government to add to and remove uses from the list. • To encourage the uptake of sustainable drainage systems by removing the automatic right to connect to sewers and providing for unitary and county councils to adopt SUDS for new developments and redevelopments. • To reduce 'bad debt' in the water industry by amending the Water Industry Act 1991 to provide a named customer and clarify who is responsible for paying the water bill. To make it easier for water and sewerage companies to develop and implement social tariffs where companies consider there is a good cause to do so, and in light of guidance that will be issued by the Secretary of State following a full public consultation.	
HM Government (2010) White Paper: Healthy Lives, Healthy People: Strategy for Public Health in England	Aims to create a 'wellness' service (Public Health for England) and to strengthen both national and local leadership. No formal targets or objectives.	Incorporated in Sustainability Objective SOC3.
HM Government (2011) The Localism Act	The Localism Bill includes five key measures that underpin the Government's approach to decentralisation. • Community rights; • Neighbourhood planning; • Housing; • General power of competence; and • Empowering cities and other local areas. No key targets or indicators.	Incorporated in Sustainability Objective SOC5.
HM Government (2011) Water for Life: White Paper	*Water for Life* describes a vision for future water management in which the water sector is resilient, in which water companies are more efficient and customer focused, and in which water is valued as the precious and finite resource it is. *Water for Life* includes several proposals for deregulating and simplifying legislation, to reduce burdens on business and stimulate growth. Ofwat's proposals for reducing its regulatory burdens complement these. No key targets or objectives.	Incorporated in Sustainability Objective ENV6.
HM Government (2011) Carbon Plan: Delivering our Low Carbon Future	This sets out how the UK will achieve decarbonisation within the framework of energy policy: • To make the transition to a low carbon economy while maintaining energy security, and minimising costs to consumers, particularly those in poorer households. There are no formal objectives or targets.	Incorporated in Sustainability Objective ENV5.
HM Government (2013) The Community Infrastructure Levy (Amendment) Regulations 2013	The Community Infrastructure Level (CIL) is a charge which may be applied to new developments by local authorities. The money can be used to support development by funding infrastructure that the council, local community and neighbourhoods want. There are no formal objectives or targets.	Not specifically applicable to any of the objectives.
HM Government (2014) Water Act 2014	The provisions in the Act enable the delivery of Government's aims for a sustainable sector as set out in the Water White Paper in a way that this is workable and clear. This Act aims to makes steps towards reducing regulatory burdens, promoting innovation and investment, giving choice and better service to customers and enabling more efficient use of scarce water resources. There are no formal objectives or targets.	Incorporated in Sustainability Objective ENV6.
HM Government (2015) Water Framework Directive (Standards and Classification) Directions	The regulations implement provisions of the Water Framework Directive (Directive 2000/60/EC), the Environmental Quality Standards Directive (Directive 2008/105/EC) and the priority substances amendment of these directives (Directive 2013/39/EU). This includes directions for the classification	Incorporated in Sustainability Objective ENV6.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
(England and Wales) 2015.	of surface water and groundwater bodies, monitoring requirements, standards for ecological and chemical status of surface waters, and environmental quality standards for priority substances. There are no formal objectives or targets.	
HM Government (2015) Government Response to the Committee on Climate Change.	In June 2015 the Committee on Climate Change and the Adaptation Sub-Committee published the seventh progress report on Government's mitigation activity and the first statutory assessment of the National Adaptation Programme. This included five recommendations and it is those recommendations that are responded to within this response. There are no formal objectives or targets.	Incorporated in Sustainability Objective ENV5.
HM Government (2016) Environmental Permitting (England and Wales) Regulations 2016.	The Regulations provide a consolidated system of environmental permitting in England and Wales, and transpose the provisions of 15 EU Directives. It provides a system for environmental permits and exemptions for industrial activities, mobile plant, waste operations, mining waste operations, water discharge activities, groundwater activities, flood risk activities and radioactive substances activities. It also sets out the powers, functions and duties of the regulators. Certain flood risk activities are now regulated under the Environmental Permitting Regulations, with environmental permits required for some activities. There are slight variations between England and Wales. There are no formal objectives or targets.	Not specifically relevant to any of the objectives.
HM Government (2016) Housing and Planning Act 2016	This Act makes widespread changes to housing policy and the planning system. It introduces legislation to allow the sale of higher value local authority homes, introduce starter homes and "Pay to Stay" and other measures intended to promote home ownership and boost levels of housebuilding. The Act introduces numerous changes to housing law and planning law: • A proposal to abolish secure and assured tenancies for new tenancies, and replace them with fixed term tenancies lasting between two and five years. However, following an amendment, this was later extended to tenancies of up to 10 years with the possibility of for longer tenancies for families with children.[3] The Act requires where there is a succession to the tenancy that unless they are a spouse or civil partner the new tenancy has to be fixed term rather than secure. Housing associations are not affected by this change. • The promotion of self-build and custom build housebuilding. • The building of 200,000 starter homes which will be obtainable to first time buyers between 23 and 40 for sale at 20% below market prices. • The extension of right to buy to include housing association properties. Due to a deal with the National Housing Federation right to buy will be extended to housing association tenants on a voluntary basis with the Government making payments to housing associations to compensate for the discounts on offer. • A policy dubbed "pay to stay" that would see some council tenants pay higher rent. Income of £31,000 or £40,000 in London would see someone hit by "Pay to Stay". Tenants in receipt of housing benefit would not be affected by this change and neither would housing association tenants. • The forced sale of high value empty local authority properties. The stated aim of this policy was to fund right-to-buy for housing associations in order to promote home ownership. The Act states that lost social housing will be replaced with "affordable housing" which could be a starter home. In London two properties will be built for every one sold. • The speeding up of the planning system so as to deliver more housing. A concept called "permission in principle" is being introduced which is "an automatic consent for sites identified in local plans and new brownfield registers subject to further technical details being agreed by authorities". It is hoped that this will speed up house building. • Powers to force local authorities to have a Local Plan where they do not have one. • Changes to banning orders on "rogue landlords" The Act allows a local authority to apply for a banning order when a landlord or letting agent	Incorporated in Sustainability Objective SOC2.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	commits certain offences. The Act also creates a database of rogue landlords that will be maintained by local authorities. • Changes relating to Rent Repayment Orders allowing a local authority to apply for one where a landlord has committed certain offences. • A law allowing recovery of abandoned properties. A private landlord will be allowed to do this without serving a section 21 notice and without serving a court order.	
HM Government (2017) The Conservation of Habitats and Species Regulations 2017	The Conservation of Habitats and Species Regulations 2017 consolidate the Conservation of Habitats and Species Regulations 2010 with subsequent amendments. The Regulations transpose Council Directive 92/43/EEC, on the conservation of natural habitats and of wild fauna and flora (EC Habitats Directive), into national law. They also transpose elements of the EU Wild Birds Directive in England and Wales. The Regulations place a duty on the Secretary of State to propose a list of sites which are important for either habitats or species (listed in Annexes I and II of the Habitats Directive respectively) to the European Commission. Once the Commission and EU Member States have agreed that the sites submitted are worthy of designation, they are identified as Sites of Community Importance (SCIs).	Incorporated in Sustainability Objective ENV4.
HM Government (2006) Climate Change The UK Programme	The Climate Change Programme aims to tackle climate change by setting out policies and priorities for action in the UK and internationally. Aims and Objectives: • To reduce carbon dioxide emissions by 20% below 1990 levels by 2010 (more than is required by the Kyoto Agreement); • Make agreements with other countries as to how they will tackle climate change together; • Report annually to Parliament on UK emissions, future plans and progress on domestic climate change; and • Set out the adaptation plan for the UK, informed by additional research on the impacts of climate change.	Incorporated in Sustainability Objective ENV5
Regional		
Severn Trent Water Resources Management Plan (2019)	Guidance on the approach to water management over the period 2020-2025, focused on achieving and maintaining the level of headroom necessary to ensure we can deliver our target levels of service at least cost to customers, whilst minimizing the impact on the environment. WRMP we forecast a significant deficit will develop between supply and demand for water over the medium term unless we act. One key difference from our previous plans is the need to prevent the risk of future environmental deterioration, which is a fundamental requirement of the Water Framework Directive. This means that, in order to protect our environment for future customers, some of our current sources of water cannot be relied upon in the future and we need to find alternative ways of meeting demand. Our plan aims to respond to this, and other strategic challenges, and ensure that we: • Preserve our current level of resilience against droughts; • Tackle unsustainable abstraction and prevent future environmental deterioration; • Appropriately plan for climate change; • Meet future population growth; • Improve the resilience of customers' supplies; • Meet our customers' and stakeholders' needs and expectations; • Meet our wider regulatory obligations; and • Understand and allow for future uncertainty.	Incorporated in Sustainability Objectives ENV2 and ENV5
Energy Capital (2018) a Regional Approach to Clean Energy Innovation	The report states the main focus of the (Energy Improvement Zones) EIZs will be to integrate low carbon technologies, to develop the business models and infrastructure needed to support new approaches to clean energy as well as overcome the regulatory barriers necessary for them to flourish. They will be	Incorporated in sustainability objective ENV5.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	designed to stimulate local clean energy innovation and drive productivity within the region, exports and growth. The EIZs aim to demonstrate new technologies, and to turn them into fully commercial propositions, breeding regional markets and supply chains that provide a platform for exports and growth. They will also offer a controlled environment in which innovators of all types can trial new services, technologies and business models.	
Environment Agency Humber River Basin Management Plan (2015)	A strategic document summaries key issue by river catchment. For the Tame, Anker and Mease these are to: • Improve sewage treatment works at a number of locations to reduce the levels of phosphate, for the River Trent designation. • Target pollution prevention campaigns around industrial areas in the urban areas, particularly around Birmingham and the Black Country. • Improve sewage treatment works at a number of locations in the River Mease catchment to reduce the levels of phosphate in the SAC site.	Incorporated in Sustainability Objectives ENV5 and ENV6
Environment Agency The Tame, Anker and Mease Management Catchment (2017)	Catchment Vision Our catchment has a sustainable and diverse water environment that is valued for the benefits it brings to people, the economy of the region and the natural environment. It has improved resilience to climate change, flooding and pollution events, and is in good ecological condition. People from many sectors and disciplines across the catchment are committed to caring for the catchment by working together, and using innovation, to capitalise on the opportunities presented and solutions to the challenges faced. Catchment Objectives • To promote the value of rivers, streams and wetlands and to increase their natural capacity to ameliorate the impacts of flooding and pollution. • To create a more sustainable and diverse water environment that is a valued asset for the economy, people and the natural environment • To work with local stakeholders to harness their support and enthusiasm to address the opportunities and challenges faced by the water environment and to optimise the benefits. • To enhance the quality of the natural environment for the benefit of people's health and wellbeing, giving access to aesthetic and enjoyable landscapes which are rich in wildlife.	Incorporated in Sustainability Objectives ENV5 and ENV6
Environment Agency Trent Catchment Flood Management Plan (2010)	A strategic planning document that provides an overview of the main sources of flood risk in the Trent catchment and how these can be managed in a sustainable framework for the next 50 to 100 years. The CFMP covers Birmingham and the Black Country and identifies that Birmingham should "take further action to reduce flood risk".	Incorporated in Sustainability Objective ENV5
Environment Agency (2015) Severn River Basin District River Basin Management Plan	This River Basin Management Plan seeks to protect the River Severn so that is can be enjoyed by different Districts the river runs through without each District affecting the others ability to enjoy the river. It also seeks to conserve and enhance the quality of the River Severn environment and maintain its high water quality and habitats, as the River Severn benefits from having particularly rich and diverse wildlife and habitats.	Incorporated in Sustainability Objective ENV6.
The Greater Birmingham and Solihull Local Enterprise Partnership Strategy (2013)	The Greater Birmingham & Solihull LEP is a partnership of businesses, local authorities and universities which supports private sector growth and job creation. Set up to strengthen local economies, encourage economic development and enterprise, and improve skills across the region. The LEP has set out plans to: • Increase economic output (GVA) in the area by £8.25 billion by 2020; • Create 100,000 private sector jobs by 2020; • Stimulate growth in the business stock and business profitability; • Boost indigenous and inward investment;	Incorporated in Sustainability Objectives ECON1 - 4

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	• Become global leaders in key sectors, including: automotive assembly, low carbon R&D, business and professional services, clinical trials, creative and digital sectors; and • Increase the proportion of adults with appropriate qualifications to meet employment needs.	
Greater Birmingham & Solihull Local Enterprise Partnership (2016) Strategic Economic Plan 2016-2030	This Strategic Economic Plan sets out a mission for the West Midlands Region: *'To create jobs and grow the economy of Greater Birmingham and in so doing raise the quality of life for all of the LEP's population.'* This plan includes the following targets: • Create 250,000 private sector jobs by 2030 and be the leading Core City LEP for private sector job creation; • Increase GVA by £29bn by 2030; • Decrease unemployment to the National Average by 2020 and to have the lowest unemployment amongst the LEP Core Cities by 2030; • GBSLEP to be the leading Core City by 2030 for GVA per head; • Increase % of working age population with NVQ3+ to the National Average by 2025; • Increase productivity rates to the National Average by 2030; and • GBSLEP to be the Leading Core City LEP for Quality of Life by 2030.	Incorporated in Sustainability Objectives ECON1 - 4
Natural England (2012) National Character Area profile no. 67: Cannock Chase and Cank Wood	Cannock Chase and Cank Wood National Character Area (NCA) extends north of the Birmingham and Black Country conurbation and includes a major area of this city. It is situated on higher land consisting of sandstone and the South Staffordshire Coalfield. The NCA principally coincides with the historical hunting forest of Cannock Chase, with major remnants surviving within the Cannock Chase Area of Outstanding Natural Beauty (AONB), which supports internationally important heathland Special Areas of Conservation (SAC) and the Sutton Park National Nature Reserve.	Incorporated in sustainability objective ENV4.
Natural England (2012) National Character Area profile no. 97: Arden	Arden National Character Area (NCA) comprises farmland and former wood-pasture lying to the south and east of Birmingham, including part of the West Midlands conurbation. Traditionally regarded as the land lying between the River Tame and the River Avon in Warwickshire, the Arden landscape also extends into north Worcestershire to abut the Severn and Avon Vales. To the north and northeast it drops down to the open landscape of the Mease/Sence Lowlands. The eastern part of the NCA abuts and surrounds Coventry, with the fringes of Warwick and Stratford-upon-Avon to the south. This NCA has higher ground to the west, the Clent and Lickey Hills and to the east, the Nuneaton ridge.	Incorporated in sustainability objective ENV4.
Transport for West Midlands (2017) 2026 Delivery Plan for Transport	Movement for Growth sits alongside the WMCA Strategic Economic Plan as a complementary critical set of policies and plans - providing the overarching approach to the development a transport system into one which is fit for the challenges of economic & housing growth, social inclusion and environment change. A modern effective, efficient and reliable transport system as envisioned by Movement for Growth forms one of the pillars underpinning the delivery of the WMCA's key objectives, namely closing the GVA gap in the West Midlands and creating 500,000 new jobs. The plan is based on improvements, year in year out, over the long term to an integrated transport system and is made up of four tiers: • National and Regional • Metropolitan (Metropolitan Rail and Rapid Transit Network including Sprint, Key Route Network, Strategic Cycle Network • Local • Smart Mobility To support the delivery of Movement for Growth, the WMCA approved the 2026 Delivery Plan for Transport in September 2017. The plan comprises the Delivery Plan and two supporting sets of documents: • The 2026 Delivery Plan for Transport • 16 Corridor Strategies	Incorporated in Sustainability Objective ENV3

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	• Four Dashboards of Schemes.	
Environment Agency (2009) A Water Resources Strategy Regional Action Plan for the West Midlands Region	The EA Water Resources Strategy for England and Wales, *Water for People and the Environment*, sets out a number of actions that are reflected in the Regional Action Plan. This Plan takes the aims and objectives of the strategy and identifies Regional actions that will enable: • Water to be abstracted, supplied and used efficiently; • The water environment to be restored, protected and improved so that habitats and species can better adapt to climate change; • Supplies to be more resilient to the impact of climate change, including droughts and floods; • Water to be shared more effectively between abstractors; • Improved water efficiency in new and existing buildings; • Water to be valued and used efficiently; • Additional resources to be developed where and when they are needed in the context of a twin-track approach with demand management; • Sustainable, low carbon solutions to be adopted; and • Stronger integration of water resources management with land, energy, food and waste.	Incorporated in Sustainability Objective ENV2
Forestry Commission (2004) West Midlands Regional Forestry Framework	The Framework sets out priorities for activity across the private, public and voluntary sector, and includes priorities and actions based around the following themes: • Tree and Woodland Cover; • Trees Woodland and Forestry Industry; • Wood Energy and Recycling; • Recreation and Tourism; • Health and Wellbeing; • Fostering Social Inclusion; • Enhancing Biodiversity; • Climate Change; and • Green Infrastructure.	Incorporated in Sustainability Objectives ENV4 - 6 and SOC3
Peter Brett Associates LLP (2014) GBSLEP Joint Strategic Housing Study.	This study outlined the oversights of past population projections for the Birmingham area and its surrounding districts/regions. It highlights a need for a considerable amount of housing building needed each year and a need for more housebuilding in the regions and districts surrounding Birmingham. • Preferred scenario 2011-31 – 165,000 dwellings.	Incorporated in Sustainability Objective SOC2.
West Midlands Combined Authority (2017) West Midlands Roadmap to a Sustainable Future in 2020 (Annual Monitoring Report)	This report is an annual monitoring report of the progress the West Midlands Roadmap to Sustainability and includes the following objective: • Reverse the rise in health inequalities for women	Incorporated in Sustainability Objective SOC3.
West Midlands Combined Authority (2017) Thrive West Midlands – An Action Plan to drive better mental health and wellbeing in the West Midlands	This Action Plan forms an agreement between the key organisations of the West Midlands to work together to improve the mental health and wellbeing of the residents of the West Midlands: • Improve the accessibility of jobs for people with mental health issues and their general wellbeing.	Incorporated in Sustainability Objective SOC3.
Local		
Birmingham City Council (1994) Handsworth,	Restricts non-family dwelling house uses in Handsworth, Sandwell and Soho Wards.	Incorporated in Sustainability

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
Sandwell and Soho: Areas of Restraint		Objectives ECON3 and SOC5.
Birmingham City Council (1996) Shopfronts design guide	These guidelines set out the principles of good shopfront design. They help establish the ground rules for the design of shop fronts and advertisements.	Incorporated in sustainability objective ENV2, ECON2 and ECON3.
Birmingham City Council (1999) Location of advertisement hoardings	Guidelines for outdoor advertisement hoardings, including those with mechanically changing displays, ranging from 96 sheet size to smaller 12 sheet panels, and will be used to control the display of existing and proposed hoardings. States that applications must be treated on their own individual merits, with regards to the general characteristics of the locality in which they will be displayed. Also provides specific guidance on location and land use guidelines.	Incorporated in sustainability objectives ENV2 and ECON1.
Birmingham City Council (1999) Wheelwright Road: Area of Restraint	Restricts non-family dwelling house uses in Wheelwright Road.	Incorporated in Sustainability Objectives ECON3 and SOC5
Birmingham City Council (1999) Regeneration through Conservation SPG	Sets out how the historic buildings and townscapes of the City play a central role in prompting sustainable regeneration. The strategy sets out eight priority objectives for securing this aim, including: - Placing conservation at the heart of policies for regeneration - Relating conservation decisions to evolving policies for a sustainable environment - Maximising financial support - Focusing on buildings at risk - Producing Conservation Area appraisals	Incorporated in Sustainability Objective ENV4
Birmingham City Council (2000) Parking of vehicles at commercial and industrial premises adjacent to residential property	These guidelines apply to car parking proposals relating to commercial and industrial premises which could cause noise and disturbance to occupants in adjoining residential accommodation.	Incorporated in sustainability objective ENV2.
Birmingham City Council (2000) Floodlighting of sports facilities, car parks and secure areas	Supplementary planning guidance for the installation of flood lighting. Flood lighting should: • Point downwards. • Minimise the flood of light near to or above the horizontal to reduce potential glare. • The main floodlight beam should, where possible, be directed towards below a 70'arc from a vertical column. • Use asymmetrical beams that permit the front glazing to be kept at or near parallel to the surface being lit.	Not specifically relevant to any single objective but covered in general terms by the majority of the Objectives.

Birmingham City Council (2001) Specific needs residential uses SPG	Guidance relating to the use of land and buildings for residential accommodation, and in certain cases associated care, to people whose housing needs may be termed 'specific'.
	
	Targets:
	1 Parking space per 3 beds.
	    a) Single room used for living/sleeping/cooking – 15.0sq.m.
	    b) Two room letting as living/sleeping room and separate kitchen
	One individual: 12.50sq.m (135 sq.ft.) floor area
	Two individuals: 18.0sq.m (190sq.ft.)
	    c) Two room letting with kitchen/living room and separate bedroom
	One individual bedroom: 6.50.sq.m (70sq.ft.) floor area
		Incorporated in sustainability objectives ENV2 and SOC2.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	One individual kitchen/living area: 11.50sq.m (120sq.ft) floor area	
	Two individual's bedroom: 12.50sq.m. (135 sq.ft.) floor area	
	Two individual's kitchen/living room: 15.0sq.m. (160sq.ft.) floor area	
Birmingham City Council (2001) Places for living	Residential development is the major land use in Birmingham and the majority of new development proposals within the city will continue to be for new homes. It is important that residential areas are desirable, sustainable and enduring. They should provide good quality accommodation in a safe and attractive environment, which people. 1. Places not estates - Successful developments must address wider issues than simply building houses and create distinctive places that offer a choice of housing and complementary activities nearby 2. Moving around easily - Places should be linked up with short, direct public routes overlooked by frontages. 3. Safe places, private spaces - Places must be safe and attractive with a clear division between public and private space 4. Building for the future - Buildings and spaces should be adaptable to enhance their long-term viability and built so they harm the environment as little as possible. 5. Build on local character - Developers must consider the context and exploit and strengthen the characteristics that make an area special.	Incorporated in sustainability objectives ENV2, ENV3, ENV5, ENV6, ECON3 and SOC2.
Birmingham City Council (2001) Places for all	The guide was produced as a response to the lack of general design guidance that relates to all types of development throughout the city. Good design should apply everywhere not just in key locations such as the city centre and conservation areas. The main targets are: 1. Creating diversity - The aim must be to create or build within places that have an accessible choice of closely mixed complementary activities. 2. Moving around easily - Places should be linked up with short, direct public routes overlooked by frontages. 3. Safe places, private spaces - Places must be safe and attractive with a clear division between public and private space. 4. Building for the future - Buildings and spaces should be adaptable to enhance their long-term viability and built so they harm the environment as little as possible. 5. Build on local character - Development must consider the context and exploit and strengthen the characteristics that make an area special.	Incorporated in sustainability objectives ENV2, ENV5, ENV6, ECON3 and SOC3.
Birmingham City Council (2001) Affordable Housing SPG	The purpose of this supplementary planning guidance is to provide an additional, complementary mechanism for securing affordable homes in response to recent government advice.	Incorporated in sustainability objectives ECON2, ECON3 and SOC2.
Birmingham City Council (2003) High Places	This supplementary planning guidance provides policy and design guidance for tall buildings in Birmingham. It provides guidance on the location, form and appearance of tall buildings. It provides information on: • The location of tall buildings. • The design of tall buildings. • Conservation Areas and Listed Buildings where tall buildings are inappropriate • The sustainability of proposals.	Incorporated in sustainability objectives ENV2, ENV5
Birmingham City Council (2004) Archaeology Strategy SPG	Describes Birmingham's archaeological remains and national, regional and local policies on archaeological remains affected by new development. The Strategy explains the process when proposed new development is likely to affect archaeological remains. It stresses the importance of early consultation about the archaeological implications of a proposed development and the	

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	process of assessment and evaluation to inform decision making on requirements for preservation or recording of archaeological remains. The Strategy also describes particular archaeological requirements for different parts of the city.	
Birmingham City Council (2005) Developing Birmingham: An Economic Strategy for the City 2005-2015.	The vision of the Economic Strategy is: "*To build on Birmingham's renaissance and secure a strong and sustainable economy for our people.*" The strategy identifies four key areas to focus on: 1) development and Investment; 2) creating a skilled workforce; 3) fostering business development and diversification; and 4) creating sustainable communities and vibrant urban villages.	Incorporated in Sustainability Objectives ECON7, 8, 9 and 10.
Birmingham City Council (2006) Air Quality Action Plan.	The Action Plan sets out 41 actions which follow the objectives below: • Reducing vehicle emissions; • Improving public transport to reduce traffic volumes; • Improving the road network to reduce congestion; • Using area planning measures to reduce traffic volumes; • Reducing air pollution from industry, commerce and residential areas; and • Changing levels of travel demand/promotion of alternative modes of transport.	Incorporated in Sustainability Objective ENV6.
Birmingham City Council (2006) Municipal Waste Management Strategy.	The Strategy sets out the following vision for delivering its municipal waste management services: "*To run a city that produces the minimum amount of waste that is practicable, and where the remainder is re-used, recycled or recovered to generate energy. The material recovered through composting, recycling, re-use and from the energy recovery process will replace the need for extraction of virgin materials.* *The waste management strategy will be sensitive to local needs and will provide a service to help Birmingham become as clean and green a city as it can be. Birmingham City Council and the Constituency partners will provide a service that citizens are pleased to support, and where there is malpractice or deliberate misuse of the service, that this is dealt with efficiently to maintain a clean, safe and healthy environment.*" The Strategy has the following objectives: • The Council will explore ways of reducing the amount of waste sent to landfill to an absolute minimum, recovering value from waste wherever economically and environmentally practicable through energy recovery and measures to increase re-use, recycling and composting; • The City Council and its partners will raise awareness among the wider community to view waste as a resource and will deliver communications activities and work with relevant stakeholders (such as community groups and schools) to promote the cultural change needed to significantly increase recycling and re-use and reduce the overall quantity of waste requiring treatment or disposal; • The City Council will develop recycling and composting system that meet the targets set out in this strategy through methods that are acceptable and accessible to the residents of Birmingham; • the City Council will explore ways of working with other local authorities and will expand its partnership activities with the private voluntary sectors to assist in delivery of this strategy; and • The City Council will work with its partners and other agencies to provide efficient and effective enforcement of its services to contribute to a clean, green, safe and healthy environment.	Incorporated in Sustainability Objective ENV6.
Birmingham City Council (2006) The Future of Birmingham's Parks and Open Space Strategy	This Strategy is intended to protect and guide the planning, design, management, maintenance and provision of parks and public open spaces in the city over the next 10-15 years. Contains 30 policies around the provision and use of green spaces and parks.	Incorporated in sustainability objectives ENV4, ENV6, ECON2 and SOC3.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
Birmingham City Council (2006) Loss of industrial land SPD	This document provides guidance on the information required by the City Council where a change of use from industrial to an alternative use is being proposed. The SPD applies to all industrial land.	Incorporated in sustainability objectives ENV1 and ECON2.
Birmingham City Council (2006) Access for People with Disabilities SPD	Provides guidance under Part M of the Building Regulations and their obligations under the Disability Discrimination Act around: • Works in the Public Realm • Approaches to buildings and open areas within an application site • Entrances into buildings used by the public • Signage • Access onto upper floors	Incorporated in SOC1, SOC3 and SOC5.
Birmingham City Council (2007) Extending your home: Home extensions guide	A guide to tell the public about the council's policies on good design and explain what we are looking for when we assess planning applications for home extensions. Outlines three main principles: 1. Respect the appearance of the local area and your home. 2. Ensure the extension does not adversely affect your neighbours. 3. Minimise the impact on the environment. Provides detailed guidance on the three principles, as well as specific guidance on types of extensions, for example back extensions and dormers.	Incorporated in sustainability objectives ENV 2, ENV 4 and ECON 3.
Birmingham City Council (2007) Public open space in new residential development SPD	• An amount of open space equivalent pro rata, to 2 ha per 1000 population will be required. • As part of the overall requirement, a children's play area will be required where there is no existing provision within walking distance of the new development (defined as 400m, taking into account barriers such as main roads, railways and canals, which restrict access). • Public open space should be sited where it will be overlooked, safe, useable and accessible to all residents and designed to local authority criteria. It should take into account the needs of people with disabilities and any cultural needs identified in consultation with local residents. • The key aim of large scale redevelopments is to achieve a good quality environment overall coupled with a good housing stock.	Incorporated in sustainability objectives ENV2, ECON2, ECON3, SOC1, SOC3 and SOC4.
Birmingham City Council (2007) Sustainable Management of Urban Rivers and Floodplains SPD	A Supplementary Planning Document which responds to the demands of the Water Framework Directives and sets out policies for development near to river corridors relating to: • Water Quality; • Water Pollution Prevention; • Sustainable Urban Drainage Systems (SUDS) and Surface Water Run-Off; • Character of the River Corridors; • The Floodplain; • Nature Conservation and Landscaping; • The Historic Environment; • Design of Developments; • Access; • Education and Recreation; • Safety and Litter; and • Community Involvement.	Incorporated in Sustainability Objective ENV5.
Birmingham City Council (2008) Sustainable Community Strategy	The document's vision is to make Birmingham the first sustainable global city in modern Britain. It will be a great place to live, learn, work and visit: a global city with a local heart.	Incorporated in Sustainability Objectives ENV2, ENV6, SOC3,

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	Five outcomes Birmingham people will be enabled to: 1. Succeed economically 2. Stay safe in a clean, green city 3. Be healthy 4. Enjoy a high quality of life 5. Make a contribution	ECON2, SOC4, SOC5.
Birmingham City Council (2008) Birmingham Private Sector Housing Strategy 2008+ (updated 2010).	The strategy details priority issues and actions to increase levels of decent homes in owner-occupied and private rented sector housing; promote domestic energy efficiency and affordable warmth; and address the growing demand from elderly and disabled residents for assistance to live independently in their own homes. It also set out how the council will fulfil its regulatory role in the licensing and inspection of Houses in Multiple Occupation (HMOs) as prescribed by the Housing Act (2004) and promote better standards of management within the private rented sector (PRS).	Incorporated in Sustainability Objective SOC 12.
Birmingham City Council (2008) Telecommunications development mobile phone infrastructure SPD	This Supplementary Planning Document (SPD) is intended to provide guidance to the public, licensed telecommunications operators and planners on the process for the control of telecommunications development and for its siting and appearance within Birmingham.	Incorporated in sustainability objective ENV4.
Birmingham City Council (2008) Contaminated Land Inspection Strategy for Birmingham Second Edition	• To identify any contaminated land as defined by the legislation. • To take steps to control any risk from any contaminated land identified using voluntary or enforcement action. • To liaise with the Environment Agency regarding sites that may be polluting controlled waters or other special sites.	Incorporated in Sustainability Objective ENV6.
Birmingham City Council (2008) Lighting Places	A supplementary planning document detailing how Birmingham's city centre should be lit. The objectives are as follows: • To foster multilateral exchange of experience, ideas, creations, technologies and expertise. • To encourage exchange of technical experts. • To organise theme based meetings. • To help public authorities undertake concerted action to promote illumination projects. • To provide a structure for this exchange within the scope of an international network of local public authorities. • To create arenas for research and experimentation and/or operations. • To include lighting issues within a perspective that is both environmentally friendly and in favour of sustainable development. • To enable the cities to develop an identity by means of their artistic or technical choices. • To impose lighting as a tool for promotion of the cities.	Incorporated in sustainability objectives ENV2, ENV6, ECON1 and ECON2.
Birmingham City Council (2008) Mature suburbs	The purpose of these guidelines is to set out the City Council's aspirations for such types of development within the City's mature suburbs and residential areas. It sets out key design issues for housing intensification and what is expected from developers and designers when submitting planning applications. Aims for buildings in mature suburbs to be assessed against: • Plot Size • Building Form and Massing • Building Siting • Landscape and Boundary Treatment • Plot Access • Parking Provision and Traffic Impact • Design Styles • Public Realm • Archaeology, Statutorily Listed and Locally Listed Buildings • Design Out • Renewable Energy and Climate • Cumulative Impact	Incorporated in sustainability objectives ENV6, ECON3, and SOC2.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
Birmingham City Council (2008) Statement of Community Involvement	The Statement of Community Involvement (SCI) sets out how we will encourage more people to participate in decision-making in Planning. The document sets out our minimum standards for consultation on new policies and planning applications. The key objectives are: a) We will consult early in the development process - this will help to ensure that the views of the community, specific consultation bodies, developers and businesses are fed into the process at the outset. Early engagement is one of the government's objectives in reviewing the planning system. b) Use appropriate consultation methods for each document and for each community. c) Use plain English for all documents. d) Be prepared to experiment with a wide range of innovative consultation methods. e) Ensure that everyone, including people from under-rep	Incorporated in Sustainability Objective SOC5.
Birmingham City Council (2008) Large format banner advertisements SPD	A supplementary planning document detailing the policy around large banners. States that: • A large format banner will only normally be permitted where a building is to be scaffolded for building or related work, and that such scaffolding covers an entire elevation. • A commercial advertisement element should occupy no more than 40% of the extent of the scaffolded elevation. No elevation should normally contain an advertisement element greater than 500sq.m in area or 40% of the scaffolded elevation, whichever is the lesser. • Within sensitive areas such as conservation areas, or on, facing or in close proximity to a listed building, the entire scaffolding mesh must be covered by a 1:1 scale image of the building being constructed/refurbished, or other similar appropriate image. The use of 1:1 scale images will be encouraged in other locations. • Scaffolded elevations shall have the whole elevation covered by mesh to a good quality of workmanship, and shall have any commercial element sitting within, and framed by, the mesh. • The scaffold and associated banner advert(s) should be removed as soon as the relevant work, as described in 3.1 above, is complete. The advertisement consent will last no longer than the agreed building programme or one year, whichever is the shorter. Consent for continued display in accordance with this policy would not be unreasonably withheld. • Such adverts will not normally be permitted in predominantly residential areas.	Incorporated in sustainability objective ENV2.
Birmingham City Council (2010) Birmingham Climate change action plan 2010+	• Birmingham becoming a 'Low Carbon Transition' city; • Improving the energy efficiency of the city's **Homes and Buildings';** • Reducing the city's reliance on unsustainable energy through 'Low Carbon Energy Generation'; • Reducing the city's impact on the non-renewable resources through 'Resource Management'; • Reducing the environmental impact of the city's mobility needs through 'Low Carbon Transport'; • Making sure the city is prepared for climate change through 'Climate Change Adaptation'; and • Making sure that this action plan **'**Engages with Birmingham Citizens and Businesses'.	Incorporated in Sustainability Objective ENV5.
Birmingham and Black Country Biodiversity Partnership (2010) Birmingham and the Black Country Biodiversity Action Plan	Objectives are to: • Maintain and increase biodiversity of key sites and landscapes through appropriate protection and management; • Restore degraded habitats and key species populations by restoring key areas; • Link key areas with ecological corridors to reconnect wildlife populations and make them less vulnerable;	Incorporated in Sustainability Objectives ENV4 and5.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	• Promote and support the use of the natural environment to mitigate against, and adapt to the effects of climate change; • Enable the sustainable use of the natural environment to benefit health and wellbeing of residents, workers and visitors as well as improving the local economy.	
Birmingham City Council (2011) Places of worship	The document provides clear and proactive guidance to communities seeking to establish a place of worship and looking to submit applications for planning permission. Its main aim is to ensure a consistent approach to planning applications, not only for places of worship, but also for faith-related community and educational use.	Incorporated in sustainability objectives ENV4 and SOC1.
Birmingham City Council (2011) Multi-agency Flood Plan	A plan outlining flood risk, warnings mechanisms, the actions, roles and responsibilities of those organisations and communities with a key response role in the event, or threat of flooding in the Birmingham local authority area.	I Incorporated in Sustainability Objective ENV5.
Birmingham City Council (2012) Employment Land Review	The Employment Land Review (ELR) provides an analysis of the employment land supply position in Birmingham, recent completions, key conclusions and recommendations for future action. As the supply of best urban employment land has declined over recent years. There is a need to identify new employment land opportunities to ensure that an adequate supply of land is maintained. • The Washwood Heath sites be excluded from the potential best urban supply at present due to the proposed HS2 route safeguarding. • Given that the supply of good urban land is low and the scope for new opportunities is limited, existing good urban employment land be retained in industrial use and new opportunities safeguarded. • That the approach for the Protection of Employment land set out in the Supplementary Planning Document on the 'Loss of Industrial Land to Alternative Uses' be maintained. This aims to protect good quality sites whilst recognising that poor quality and outdated sites should either be upgraded or used for new development where appropriate • Maximise the use of available funding sources to promote the delivery of key employment sites such as the Regional Investment Site at East Aston. • The City Council continues to work proactively with property agents, major companies, landowners and developers to bring sites forward for development. The use of Compulsory Purchase Orders to assemble land to facilitate employment development be considered where necessary. • Where developments involve the loss of employment land an appropriate Section 106 contribution should be secured and utilised to improve other 5 industrial sites. When the Community Infrastructure Levy is adopted a proportion of the monies raised should also be used to improve existing industrial sites. • The Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP) consider the supply of land for strategic sites such as Major Investment Sites and Regional Logistic Sites and the mechanism for delivery.	Incorporated in Sustainability Objectives ECON1 and ECON3.
Birmingham City Council (2012) Shopping and Local Centres SPD	This expands on policies for shopping and local centres in the UDP and to bring Birmingham's polices for shopping and local centres up to date and in line with national planning policy. • Within the Primary Shopping Areas at least 55 % of all ground fl oor units in the Town and District Centres should be retained in retail (Class A1 use) and 50% of all ground fl oor units in the Neighbourhood Centres should be retained in retail (Class A1) use. • Applications for change of use out of A1 will normally be refused if approval would have led to these thresholds being lowered, unless exceptional circumstances can be demonstrated in line with Policy 3. • No more than 10% of units within the centre or frontage shall consist of hot food takeaways. • Applications for new A3, A4 and A5 uses are encouraged within the Centre Boundary of Town, District and Neighbourhood Centres,	Incorporated in sustainability objectives ENV2, ECON1, ECON2 and ECON3.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
	subject to avoiding an over concentration or clustering of these uses that would lead to an adverse impact on residential amenity.	
Birmingham City Council (2012) Car Parking guidelines SPD	A Development Plan Document providing detail on car parking standards. The parking standards guidance is intended to be considered alongside a number of other local policies. Encourages the use of sustainable travel, including electric vehicles, car clubs and cycling.	Incorporated in sustainability objectives ENV2, ENV3 and SOC1.
Birmingham City Council (Jan 2012) Level 1 & 2 Strategic Flood Risk Assessment	Assesses and maps all known sources of flood risk, including fluvial, surface water, sewer, groundwater and impounded water bodies, taking into account future climate change predictions, to allow the Council to use this as an evidence base to locate future development primarily in low flood risk areas. The outputs from the SFRA will also assist in preparing sustainable policies for the long term management of flood risk.	Incorporated in Sustainability Objective ENV5.
Birmingham City Council (2013) Strategic Housing Market Assessment	This evidence based document was commissioned by Birmingham City Council in March 2012 to enable the Council to develop planning and housing policies and take decisions which encourage the provision of the most appropriate mix of housing (in terms of type, size, tenure, and affordability The study bears directly on two areas of Council policy, housing and planning. It should inform affordable housing policies, by assessing both the total need for affordable housing and the profile of that need in terms of household sizes and types. It should also inform planning policies in the emerging Core Strategy, in particular the housing target, showing how much housing development the Council should provide land for in the next 20 years, in both the market and affordable sectors. The study established that for the housing market area (comprising Birmingham, the Black Country, Bromsgrove, Coventry, Lichfield and Solihull), the best available estimate of objectively assessed housing need to 2031 is for some 9,300 net new homes per annum.	Incorporated in Sustainability Objective SOC2.
Birmingham City Council (2013) Health and Well-being Strategy (Updated Priorities 2017)	• Improve the wellbeing of children •Detect and prevent Adverse Childhood Experiences (ACEs). • Improve the independence of adults. • Improve the wellbeing of the most disadvantaged. • Make Birmingham a Healthy City.	Incorporated in Sustainability Objective SOC3.
Birmingham City Council (2013) Employment Land and Office Targets	This evidence based document provides robust evidence in relation to future requirements for industrial land and office space up to the year 2031. The study helped to inform TP17-TP21 in the Birmingham Development Plan.	Incorporated in Sustainability Objectives ECON1, ECON3 and ECON4.
Birmingham City Council (2013) Green Living Spaces Strategy	Includes seven green living spaces principles but no formal objectives or targets.	Incorporated in Sustainability Objectives ENV4 and SOC3.
Birmingham City Council (2013) Birmingham Health and Wellbeing Strategy	Identifies priorities and delivery mechanisms for addressing acute and chronic health and well-being issues across the City, some of which are closely related to spatial planning. These include aspirations to: • Create fair employment and good work for all; • Ensure Healthy Standard of living for all; and • Create and develop healthy sustainable homes and communities	Incorporated in Sustainability Objectives SOC1, SOC2, ECON4
Birmingham City Council (2013) Carbon Roadmap	60% reduction in C02 emissions by 2027.	Incorporated in sustainability objective ENV5.
Birmingham City Council (2014) Gypsy and Traveller Accommodation Assessment	Estimates a need for 4 additional pitches during the period 2014-2031.	Incorporated in Sustainability Objective SOC2.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
Birmingham City Council (2014) Birmingham Connected White Paper	Birmingham Connected is directly linked to the strategies and policies of the BDP. Investing in a radically improved integrated transport system will realise the city's potential to support sustainable economic growth, job creation and linking communities. As well as the above Birmingham Connected covers a number of other agendas. Its vision is to create a transport system which puts the user first and delivers the connectivity that people and businesses require. We will improve people's daily lives by making travel more accessible, more reliable, safer and healthier and using investment in transport as a catalyst to improve the fabric of our city. We also want to use the transport system as a way of reducing inequalities across the city by providing better access to jobs, training, healthcare and education as well as removing barriers to mobility.	Incorporated in Sustainability Objectives ENV 3, ENV6, ECON2, SOC1 and SOC3.
Birmingham City Council (2014) Protecting the Past – Informing the Present. Birmingham's' Heritage Strategy (2014-2019)	The strategy sets a direction for the City's heritage sector for the next 5 years and is a partnership document for the city as a whole, not a Council strategy and reflects the need to attract funding and other kinds of support from a wider constituency of interest and the opportunity to work with partners outside the authority in promoting the city's heritage tourism assets. The strategy contains no formal objectives or targets.	Incorporated in Sustainability Objective ENV4
Birmingham City Council (2015) Birmingham Surface Water Management Plan	A study undertaken in consultation with key local partners who are responsible for surface water management and drainage in their area. Partners work together to understand the causes and effects of surface water flooding and agree the most cost effective way of managing surface water flood risk for the long term. The process of working together as a partnership is designed to encourage the development of innovative solutions and practices.	Incorporated in Sustainability Objective ENV5.
Birmingham City Council (2015) Corporate Emergency Plan	Aim of the plan delivered through the following objectives: • To provide an overview of the civil emergency risks which can give rise to emergencies / major business disruptions requiring activation of this plan; • To outline emergency management and business continuity responsibilities of the Council at a corporate and directorate level, including specialist capabilities, such as emergency welfare provision, information and communication systems; • To provide a summary of equipment and facilities available for corporate emergency response actions; • To clarify wider resilience structures for both planning and response; and • To summarise corporate training and exercises and other assurance processes.	Not specifically relevant to anyone objective but covered in general terms by the majority of the Objectives.
Birmingham City Council (2017) Local Flood Risk Management Strategy	Includes the following objectives: • Identify all stakeholders with a role in flood risk management , set out their responsibilities and work with them to adopt a partnership approach to managing local flood risk; • Develop a clear understanding of flood risk from surface water, groundwater and ordinary watercourses and set out how this information will be communicated and shared; • Outline how flood risk assets are identified, managed and maintained and develop a clear understanding of riparian responsibilities; • Define the criteria and for responding to and investigating flooding incidents, and set out the role of emergency planning, flood action groups and individual property owners; • Define the criteria for how and when flood risk management measures will be promoted to ensure that they provide value for money whilst minimising long-term revenue costs and maximising external funding contributions; • Minimise the impact of development on flood risk by developing guidance, policies and standards that manage flood risk and reduce the risk to existing communities; and • Adapt a sustainable approach to managing local flood risk by ensuring actions deliver wider environmental benefits.	Incorporated in Sustainability objective ENV5.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in the Sustainability Objectives
Birmingham City Council (2017) Birmingham Cultural Strategy	Our strategy 'Imagination, Creativity and Enterprise' represents the cultural fabric of Birmingham. It was developed in partnership with many cultural sector organisations, businesses, educational institutions and individuals. Multiple agencies use it to deliver the agreed actions and outcomes and advocate on behalf of the cultural sector. The strategy has five themes through which the vision will be delivered: 1. Culture on Our Doorstep Becoming a leader in cultural democracy where people come together to co-create, commission, lead and participate in a wide range of locally relevant, pluralistic and community driven cultural ventures. 2. Next Generation Ensuring that all children and young people have opportunities to engage with a diverse range of high quality arts and cultural experiences at every stage of their development and which they value as worth it. 3. A Creative City Supporting and enabling the growth of creative and cultural SMEs and micro-businesses and individuals through business support, skills and talent development and access to finance. 4. Our Cultural Capital Cementing Birmingham's role and reputation as a centre of imagination, innovation and enterprise, with local roots and international reach. 5. Our Cultural Future Adapting our business models to ensure they are capable of sustaining and growing the sector into the future through collaboration, diversification, rebalancing and devolution	Incorporated in Sustainability Objectives ENV4, SOC1, and ECON4 .
Birmingham City Council (2017) Birmingham Development Plan	A Development Plan Document which sets the long-term spatial planning vision and objectives for Birmingham. It contains a set of strategic policies that are required to deliver the vision including the broad approach to development.	Incorporated in all Sustainability Objectives
Birmingham City Council (2018) Council Plan and Budget 2018+	Birmingham City Council's Council Plan and Budget for 2018/19 – 2021/22 setting the objectives, priorities and spending plans of the City Council and the tough decisions that have been made for the 2018/19 financial year ensure a balanced financial position and long-term financial sustainability.	Incorporated in all Sustainability Objectives
Birmingham City Council (2018) SHLAA 2017	The SHLAA is a study of sites within Birmingham that have the potential to accommodate housing development. Its purpose is to provide evidence to support the Local Development Framework, in particular the Birmingham Development Plan. It is a key component of the evidence base to support the delivery of land to meet the need for new homes within the city. It is not a decision making document and it does not allocate land for development.	Incorporated in Sustainability Objective SOC2.
Birmingham City Council (2018) Community Cohesion Strategy (Green Paper)	The Birmingham Community Cohesion Strategy (Green Paper) sets out proposals for a collaborative approach in which the City Council works alongside residents, local organisations and city partners to ensure Birmingham is a place where people from different backgrounds can come together to improve things for themselves and their communities. This is a draft (Green Paper) document at present but is expected to be adopted during 2019. https://www.birminghambeheard.org.uk/economy/community-cohesion-strategy/	Incorporated in Sustainability Objectives ENV4, SOC1, and ECON4 .
Birmingham City Council (n.d.) Car park design guide	A design guide providing detail on the design objectives and components of car park design required by the council. Includes a provision for those with mobility difficulties and takes into account issues around safety and security.	Incorporated in sustainability objectives ENV2, ECON3, SOC1 and SOC4.

Appendix C
Scoping Report Baseline

Birmingham is the United Kingdom's second largest urban conurbation and neighboured by several other large conurbations, such as Solihull, Wolverhampton, and the towns of the Black Country. It is situated just to the west of the geographical centre of England on the Birmingham Plateau - an area of relatively high ground, ranging around 150-300 metres above sea level. With the Clent, Waseley and Lickey Hills towards the south-west of the City, Birmingham slopes gently to the east of the conurbation. Birmingham is at the heart of the West Midlands Region which also contains the city of Coventry and the Black Country city region. It is the major centre for economic activity and is the major contributor to the regional economy. The City has a vibrant city centre, a strong cultural mix and contains many prosperous areas. The continued urban renaissance of Birmingham, as the regional capital, has been crucial to the Region. This period of renaissance has brought about the successful delivery of key infrastructure projects such as the development of extended public transport networks. These have been vital to improving the City's local, regional and national accessibility. The city also has an international airport acting as a key gateway to the region and is well served by the M5, M6 and M40 providing access to a number of key cities across the UK.

Material Assets

Resource Use

There are no active mineral workings in Birmingham, and no extant planning permissions for mineral extraction. This is due to the lack of naturally-occurring minerals in Birmingham for which there is a demand. As a result, Secondary Aggregates are derived from a very wide range of materials that may be used as aggregates. Secondary aggregates include by-product waste, synthetic materials and soft rock used with or without processing. According to the Study[23], in 2003, about 4.29 million tonnes of recycled aggregate and about 0.65 million tonnes of recycled soil were produced in the West Midlands.

Most of Birmingham is in the area served by Severn Trent Water with a small area to north served by the South Staffordshire Water Company. In 2004 domestic water consumption was 137 litres/head/day[24]. This was lower than the national average in 2007/08 of 14 litres/head/day (Audit Commission[25]).

The current Water Resources Plan[26], prepared by Severn Trent Water for the Birmingham Water Resource Zone includes the development of four significant new water resources. These developments mean that the growth identified in the Water Resources Plan can be accommodated without the zone going into deficit. This zone requires new water resource developments to keep the zone in surplus without which the zone will go into a significant deficit by 2030. Abstraction is licensed by the Environment Agency on a catchment basis[27] which set show they will manage water resources in the Tame, Anker and Mease catchments. It provides information on how existing abstraction is regulated and whether water is available for further abstraction. The strategy details delivery commitments under the Water Framework Directive, ensuring no ecological deterioration of rivers. New additional water management measures or water resources will be

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[23] Communities and Local Government (2007) Survey of Arisings and Use of Alternatives to Primary Aggregates in England, 2005: Construction, Demolition and Excavation Waste

[24] http://www.defra.gov.uk/sustainable/government/progress/regional/summaries/16.htm

[25] http://www.defra.gov.uk/sustainable/government/progress/national/16.htm

[26] Severn Trent Water (2013) Water Resources Management Plan

[27] Environment Agency (2013) Tame, Anker and Mease Licensing Strategy at: https://www.gov.uk/government/publications/cams-tame-anker-and-mease-abstraction-licensing-strategy

needed to ensure water is available to meet the needs of new housing. New foul drainage infrastructure will also be required to support the proposed level of growth.

Sustainable Design, Construction and Maintenance

Environmental improvements by the City Council during the late 1980s and early 1990s have improved the overall quality of the environment within the City Centre. There have been notable successes in relation to improving the quality of design and the environment, particularly in the City Centre. This was recognised by the award to the city of the RTPI Silver Jubilee Cup in 2004. Good design continues to be evident in recent and ongoing developments, such as the Birmingham High Performance Centre at the Alexander Stadium, the Attwood Green Area and Brindley Place.

Eastside was conceived as a demonstration of sustainable development principles. In addition to the CHP network, renewable energy technology like wind and solar power will be placed on site along with green roofs and sustainable urban drainage systems. Several large building schemes in Birmingham have achieved high BREEAM Buildings and Ecohomes/Code for Sustainable Homes ratings, exemplifying sustainable building practice. There are currently 39 BREEAM Excellent buildings within Birmingham. There are no BREEAM Outstanding buildings. Commercial buildings include 19 George Road (Excellent), Calthorpe House (Excellent) and Baskerville House (Excellent). The homes at Attwood Green received Excellent Ecohomes standard.

Renewable Energy

Birmingham imports in the region of 22,800GWhr of energy per year costing the City's population and businesses over £1.5bn, with costs predicted to rise along with fuel prices over the coming years.[28] The city currently produces just 1% of the £1.3bn of energy that its residents and businesses purchase and consume each year. This not only represents a significant loss of money from the local economy, more critically, it leaves the city exposed to threats from energy security, low levels of resilience, as well as price fluctuations in global energy trading which affect energy bills, having a significant impact upon fuel poverty. BCC has therefore committed to developing energy activity in the city to bring about a more decentralised energy system, and to improve the social and economic opportunities of its residents by addressing fuel poverty and decarbonisation of energy. BCC has begun to tackle this through a focus on energy, and understanding where and how decentralised energy systems could provide major opportunities for the city to produce, control and distribute heat and power networks.

The Climate Change Strategic Framework[29] identifies that 46% of Birmingham's CO2 emissions come from industry, 33% from domestic energy and 21% from road transport. The Framework outlines that Birmingham has limited scope for large-scale renewable energy projects; however, energy users can support developments elsewhere through their purchasing decisions. Furthermore, it is acknowledged in the Annual Monitoring Report1 that the City Council currently does not monitor the provision of new renewable energy capacity although consideration is being given by the Council to ways of monitoring additional renewable energy capacity installed through new development. Photovoltaic panels are currently fitted to some buildings as part of the 'Birmingham Energy Savers Scheme' BES resulted in the construction of 3,000 (5%) of its planned energy saving measures.

The largest renewable energy scheme currently operating in Birmingham is the Tyseley Energy from Waste Plant facility which produced a total of over 95,030.50 tonnes of ash between April 2010 and March 2011 and generates 25MWh per annum, from the thermal treatment of waste. A total of 80,241.22 tonnes of bottom ash that was produced was sent for recycling in Castle Bromwich where metals are removed and recycled with the remaining material used within the construction industry. This is substantially short of the target for renewable energy to account for 15% of energy produced by 2020 in the Climate Change Strategy and

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[28] Birmingham City Council website 'Renewable Energy'

[29] Birmingham City Council (2009) Cutting CO2 for a Smarter Birmingham Strategic Framework

Action Plan Consultation 2007. The City has a number of operational 'Combined Heat and Power' (CHP) facilities, such as Birmingham Children's Hospital and Aston University which are part of an award-winning CHP scheme, which are able to generate and supply heat and electricity for local consumption. Birmingham District Energy Scheme is a co-joint co-operation between ENGIE and Birmingham City Council. The scheme is the fastest growing in the UK, with the Council House, ICC, Aston University and Birmingham Children's Hospital among the buildings benefitting from more efficient energy. It incorporates three district energy networks, all built and operated by ENGIE through the Birmingham District Energy Company (BDEC):

1. Broad Street – a tri-generation (heat, power and cooling) system;
2. Aston University – CHP (combined heat and power) system; and
3. Birmingham Children's Hospital – CHP system.

The Council signed a 25-year energy supply agreement in 2006. The scheme helps Birmingham to save more than 15,000 tonnes of CO_2 emissions every year. Two residential towers are connected to the District Heat network - Crescent and Cambridge towers, situated at the rear of the ICC. The secondary delivery to these blocks is owned by BCC. The 'total cost of ownership' of access to heat and power infrastructure, servicing, maintenance, as well as heating and power costs are currently estimated at around 5% less per year. Developers have also shown an interest in bringing forward Anaerobic Digestion (AD) energy generating schemes. As set out in the AMR 2013, the Council will work positively with developers to realise the opportunities that AD hold and emphasise the potential of AD technology for use within Birmingham City Centre as it is a technology seen by the Government as a sustainable and viable waste management solution which utilises waste as a valuable resource.

The city also has a number of district heat networks. An energy network feasibility study is currently in progress to help with the development of up to 3 potential energy network opportunities. The Langley Sustainable Urban Extension (SUE) is currently underway and will deliver approximately 6,000 new homes, with a focus on family housing. As stated in the Birmingham Development Plan, adopted January 2017, the new neighbourhood will provide for a mix of housing sizes, types and tenures, including affordable housing in line with the requirements in Policy TP31 (35%). The site is adjacent to a BCC owned site called Peddimore; a large industrial development location; and energy networks are currently being considered in both locations with a potential interconnection at a new junction on the A38. BCC has recently secured feasibility funding from HNDU to further refine this significant network opportunity and consider the potential to deliver affordable and low carbon heat to businesses and residents alike. Selly Oak's large energy demands of the acute care NHS sites in Selly Oak has been under consideration for some time as a potential connection since HNDU funding was secured in 2016. BCC owned housing blocks Thirlmere House and Windemere House are in close proximity to the hospital trust site and are currently heated via electric storage heaters. As this study continues, the potential to convert these buildings to wet heating systems and adopt them onto a local network will be assessed.

Energy Use

There are 100,000 dwellings in the city which are more than 80 years old according to the Birmingham Sustainability Strategy and Action Plan 2000-2005. As a result, the construction form is intrinsically energy-poor. Recent developments, such as the Birmingham High Performance Centre at the Alexander Stadium, have incorporated innovative, energy-efficient design. Although they are not referred to as 100% sustainable energy systems, CHP can be a more efficient energy system generating and supplying heat and electricity for local consumption. Heating is by far the largest domestic use of energy in Birmingham. Space heating accounts for 62% of use, while water heating accounts 22%. This is exacerbated by a large number of homes that do not meet Decent Homes standards, including 49,250 Council-owned homes and an estimated 35,000 private sector dwellings.

Only a very small fraction of Birmingham's building stock is built new each year, so new building standards will take decades to have a significant impact on resource use across the city, making the condition of the existing building stock very important. There are no indicators of the age or quality of the building stock as a whole in Birmingham, but energy use data suggest there are a large number of homes of poor quality that

contribute to high energy usage. The Sustainable Community Strategy sets out a vision for Birmingham in 2026 to become the first sustainable global city in Britain. The strategy envisages that in 2026 Birmingham will lead on Climate Change with local energy generation from CHP and cooling schemes will reduce CO_2 emissions. If Birmingham is to become the first sustainable global city it needs to dramatically increase deployment in low carbon energy generation technologies. The UK has signed up to the European Renewable Energy Directive, which sets a target of 15% of all energy generated to be sourced from renewable sources by 2020.

The Climate Change Framework aims that by 2026 Birmingham will provide an improved quality and choice of housing and 'decent' standard for virtually all housing, with efficient heating systems and insulation in line with the best UK cities.

Sustainable Transport

Rail and Metro

The BDP sets out the transport improvements required to deliver the growth agenda to support development and attract investment. Birmingham Connected provides the long-term strategy for improving the City's transport system. This includes measures challenging the car culture, significant investment in walking and cycling and new high quality public transport routes such as Metro, 'Sprint' (the bus rapid transit system) and heavy rail. This is being supplemented by a number of proposals including the Birmingham Cycle Revolution, 20mph zones and the West Midlands Bus Alliance.

The proposed High Speed 2 (HS2) rail link, initially between Birmingham and London, will bring radically improved rail connections into the City Centre when it opens in 2026, as well as a significant number of new jobs and visitors to the City. This will be supported by the HS2 Connectivity Programme to ensure that the wider region has access to the benefits that HS2 will bring.

Birmingham is at the heart of the rail network and in easy reach of millions of people. The £600m redevelopment of New Street Station was opened in 2016 providing a bright modern transport hub and enhanced facilities. There is also a network of suburban and freight rail services.

The Midland Metro is a light-rail/tram line in the county of West Midlands, England, operating between the cities of Birmingham and Wolverhampton via the towns of West Bromwich and Wednesbury. The Midland Metro extension from Snow Hill to New Street Station was completed in 2016. Upwards of £300 million is being invested in extending the network that will link key city centre destinations - New Street Station with HS2 at Birmingham Curzon, the business district at Snow Hill, the civic areas around Victoria Square and Centenary Square, Digbeth and Birmingham Smithfield.

The line has potential to extend across a wider area running from Birmingham Smithfield to the south of the City to the University of Birmingham, Life Sciences Campus and Queen Elizabeth Hospital. And also from Birmingham through east Birmingham to Birmingham Airport.

Road

Birmingham has a complex road network with around 12 major radial roads and ring roads traversing the city. There are also three busy motorways: the M5, M6 and M42, located towards the west, north and east of the city respectively. Although there has been a recent rise in the use of the car, there has been a reduction in average travel speeds. Much of this is due to outward migration of people, which has in turn led to longer car journeys; there have also been a number of out-of-town developments in recent years which have encouraged additional car journeys to be made. Increased congestion has however resulted in lower average vehicle speeds. Congestion is a significant issue and demand exceeds available capacity at certain times and in some locations, both on road and rail. Congestion has indirect and cumulative effects on the economy, on people's health and well being and on air quality. Congestion can make deliveries less reliable and deter investment. Congestion also affects the wider transport of goods and services via the M5 and M6 and whilst the opening of the M6 Toll has provided an alternative for some trips, there are still significant peak hour demands that require management.

The Highways Agency (HA) Midlands Motorway Box (MMB) Route Management Strategy highlights a number of problems and issues that affect both the HA and the local authority networks. The MMB network caters for a mixture of commuter and long distance strategic traffic, the M5 and M6 form part of the Trans-European Network, with a peak hour period of around 18 hours. The route has a high regularity of junctions, 13 miles of the route is elevated making it difficult to plan and carry out maintenance and the MMB is sensitive to changes in demand and flow when large scale events are held such as those at the National Exhibition Centre (West Midlands Local Transport Plan 2006). Casualties are disproportionately higher in deprived areas. The West Midlands Metropolitan Area is on course to reduce the number of people killed or seriously injured by 2010 by 40%, reduce the number of children killed or seriously injured by 50%. This good progress is reflected in the area's designation as a Centre of Excellence for Integrated Transport specialising in road safety.

Bus and Coach

Approximately 85% of all public transport trips in Birmingham are handled by the city's buses. The bus network is operated by a number of companies, with services along the main radial routes providing good coverage to the City Centre. There are priority measures in place on a number of these routes, such as Digbeth High Street, while others are planned. Pedestrianisation limits bus traffic to a few key corridors in the City Centre, which reduces capacity and creates significant environmental problems along these routes. Coach travel is also important, particularly in providing an inexpensive means of longer distance travel for those on low incomes. The city has a number of on-street coach set down and pick up points around the City Centre. The Brewery Street Lorry and Coach Park has capacity for up to 32 18.5m/14m vehicles.

Travel Behaviour

Birmingham has a relatively high percentage of households without a car – 35.8% compared to the English average of 25.6%[30]. However, despite this fact, just over half of people who both live and work in the City use their car to get to work, only a fifth use the bus, and a tenth walk or work from home[18]. In contrast, over three quarters of people commuting into the city use a car, about a tenth use the train, and a further tenth travel by bus. Table 4.2 shows statistics for people travelling to work in Birmingham.

Table 4.2   Means of Travel to Work in Birmingham, 2001 (Census 2001)

Travel to Work - Method	% of those working		
	Live in Birmingham, works outside	Live and work in Birmingham	Work in Birmingham, live outside
Work at/from home	0	9.5	0
Train	2.9	2.4	10.3
Bus	12.8	22.1	10.2
Car	78.3	52.4	75.5
Walk	2.7	10.4	1.2
Other	3.3	3.2	2.8
Total (100%)	79,000	288,000	162,000

Source: ONS 2001 Census

The picture is different for trips to the city centre with over 60% of trips arriving by non-car modes. According to the Birmingham Cordon Surveys, the total number of car trips entering Birmingham City Centre during the morning peak hours (07:30-09:30 hrs) has decreased in the past ten years. However, the number of bus trips remained relatively constant with a slight decrease since 2005, while the number of rail trips has

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[30] Birmingham City Council (2014) Annual Monitoring Report 2013

increased since 2001. In 2006/7 some 62.7% of bus users in the West Midlands metropolitan areas were satisfied with services which already exceeds the target of 60% by 2009/10 (West Midlands Local Transport Plan Delivery Report 2006-2008). Bus punctuality[31] in 2006/7 was about 65%, marginally below the target. Performance has tended to vary from year to year and from corridor to corridor (West Midland Local Transport Plan Delivery report 2006-2008). In 2011, 8 out of 10 journeys made by public transport were made by bus The Bus Alliance is committed to ensuring that all buses in the region are a minimum of Euro V by 2020 (West Midland Local Transport Plan Delivery Report 2017/18). The Transportation and Street Services Overview and Scrutiny Committee set a target of 83% by 2010/11.Waste Management.

In 2012/13 there was 488,867 tonnes of municipal waste collected of which 70.48% was used to recover heat and power from the Tyseley EfW facility. Municipal waste is a significant part of the waste stream, but only represents a small proportion of the total amount of waste produced in Birmingham (Figure 4.1).

Figure 4.1   Destination of Birmingham's Waste Stream
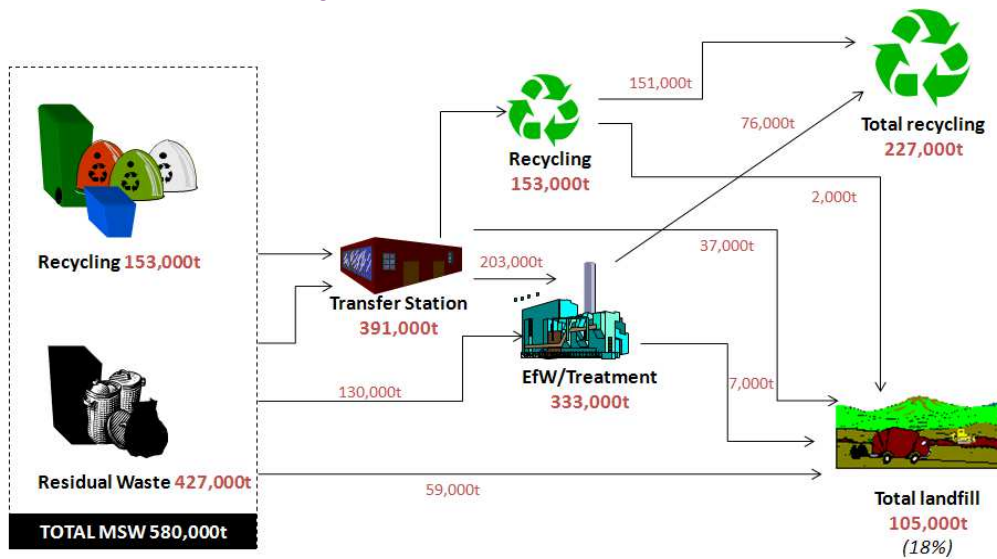
Note: Tonnage figures are rounded to nearest '000 & are based on calendar year 2008 in order to cross match figures with data in the Environment Agency waste data interrogator 2008

Source: http://www.bebirmingham.org.uk/documents/Birmingham_Total_Waste_Strategy_Final_Report_24.11.10.pdf

Birmingham's recycling and composting rates have been improving over the past ten years and the current performance (for 2012/13) is 32%. The percentage of waste sent to landfill is 7.48% for the 2012/13. Both rates represent a significant improvement in performance over the past decade (Table 4.3).

According to the Municipal Waste Management Strategy, the amount of household waste generated per person is lower in Birmingham than in other metropolitan authorities, and its rate of growth has also been lower than the national growth. Birmingham City Council recovers energy from the majority of its 'residual' municipal waste through the Tyseley Energy from Waste Plant (EfW) [32]. This reduces reliance on landfill as a disposal option The Strategy identifies that the City Council has sufficient municipal waste treatment capacity up to 2019.

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[31] Birmingham City Council (2007) Building Bus Use: A Report from Overview & Scrutiny

[32] Birmingham City Council (2006) Municipal Waste Management Strategy 2006-2026

Table 5.3   Municipal Waste Arising in Birmingham and Methods of Management 2002 - 2013

Year	Waste Arising (tonnes)	Waste Recycled/Composted		Waste Recovered EFW		Waste sent to Landfill		% of 2001 level sent to landfill
		Tonnes	%	Tonnes	%	Tonnes	%	
2002/3	536,191	50,519	9.42	352,535	72.80	123,347	23.00	63.08
2003/4	551,691	58,442	10.70	337,491	61.20	126,778	22.97	64.83
2004/5	568,035	69,924	12.30	340,127	59.87	112,726	19.84	57.65
2005/6	557,810	77,744	13.93	338,605	60.70	102,588	18.39	52.46
2006/7	570,591	96,929	18.39	313,775	47.92	101,372	17.76	51.82
2007/8	565,548	123,572	26.43	325,167	51.96	107,699	19.04	55.05
2007/8	543,645	140,541	30.59	335,346	61.68	77,763	14.30	39.75
2008/9	527,207	138,589	31.78	334,409	63.47	64,748	12.28	33.10
2010/11	508,884	131,001	32.00	341,684	67.15	52,800	10.37	26.94
2011/12	484,099	124,537	31.28	348,157	71.92	23,804	4.92	12.18
2012/13	488,867	130,035	32.31	344,526	70.48	36,584	7.48	18,72

Source: BCC AMR 2013

Efficient Use of Land

Since 2002/03, the proportion of new housing developed on previously developed land (PDL) has been high (at over 90%) and generally increasing with the exception of 2008/9 when slightly less housing completions (89%) took place on PDL. No housing completions taking place on greenfield land in 2009/10. The density of new housing completions over the decade to 2011/12 has been 65% for 50+ dwellings per ha, 28% for 30-50 dph and 7% for less than 30 dph. The average density of development over the decade to 2011/12 is 59.6 dph, falling from a peak of 80dph in 2008/09 reflecting the fall in apartment development.

Soil Quality

As most of Birmingham is built-up, there is very little soil of a high quality. There is agricultural land situated to north-east of the City at Sutton Coldfield and a lesser amount is to be found at Woodgate Valley to the south-west. In terms of agricultural land classification, almost the whole of Birmingham is classified as Urban and just a small area in the north and north east are classified as Grade 3 agricultural land (MAGIC website).

There are a number of sites which could be subject to land contamination within Birmingham. This includes a total of 67 former known landfill sites that have been identified in the City since the 1960s although risk and remediation schemes have already been carried out on many of these sites. The majority of identified landfill sites are situated next to housing and some are located on Birmingham's major aquifer. Public open space within the city, except for the 85ha that former landfills, this land is not likely to be affected by contamination[33].

Historically, Birmingham has had a very broad spectrum of manufacturing industries. Many of these have the potential to leave a legacy of land contamination. As with many industrial cities, energy requirements have changed as new technologies have become available. Birmingham is no exception. The production of energy from coal to produce town gas or electricity has obvious contamination issues and there are several areas of Birmingham where historically such activities have been undertaken. At the heart of the United Kingdom's

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[33] Birmingham City Council (2008) Contaminated Land Inspection Strategy for Birmingham Second Edition

road and rail network Birmingham has considerable areas of land which may be contaminated due to transportation activities. These include roads, canals, railways and airports.

Waste disposal activities in Birmingham range from complex waste treatment plants dealing with highly hazardous waste to waste transfer stations handling inert building waste and soil. The potential land contamination issues in respect of landfill sites have been considered previously, but all waste disposal activities will be the subject of assessment.

The Council is required under Section 78R of Part IIA of the Environmental Protection Act 1990 to maintain a Public Register of Contaminated Land of which there are 121 entries.

Influence of the DM DPD on Material Assets

The DM DPD is likely to have a mixed and indirect influence on material assets through the granting of planning permission which will entail additional resource use. However, the requirements for increasingly demanding standards of energy efficiency and waste management in the construction and running of buildings will bring about improved resource use overall as will the maintenance of the preference for the use of previously developed land. Detailed design requirements and conditions associated with the granting of planning permission could also be influential in encouraging more sustainable travel, for example in restricting parking spaces.

Climatic Factors

Climate Change

UK Climate Change Projections (UKCP09)[34] suggest that mean summer temperatures could rise by 2.6°C, summer rainfall could decrease by 17% and winter rainfall could increase by 13% in the West Midlands by the 2050s. These are the central estimates for a medium emissions scenario. By the 2050s central England could have irrigation needs similar to those currently seen in central and southern Europe. Mean monthly river flows could decrease by 50% to 80%. However, by the 2080s, the latest UK climate projections (UKCP09) are that there could be around three times as many days in winter with heavy rainfall (defined as more than 25mm in a day). It is plausible that the amount of rain in extreme storms (with a 1 in 5 annual chance, or rarer) could increase locally by 40%[35]. The impact of wetter winters and more of this rain falling in wet spells may increase river flooding. More intense rainfall causes more surface runoff, increasing localised flooding and erosion. In turn, this may increase pressure on drains, sewers and water quality. Storm intensity in summer could increase even in drier summers.

More generally, according to the UK's Climate Change Risk Assessment[36] the following key impacts associated with climate change are likely:

▶   Flood risk is projected to increase across the UK. Expected annual damages increase from a current baseline of £1 billion to between £1.8 and £5.6 billion by the 2080s for England (not including the effects of projected population growth);

▶   Risk of increased pressure on the country's water resources. The current public water supply surplus of around 900Ml/day on average is projected to turn into a water supply deficit of around 1,250Ml/day by the 2020s and 5,500Ml/day by the 2050s, with large regional variations;

▶   Potential health risks related to hotter summer conditions, but potential benefits from milder winters;

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[34] UKCP09 http://ukclimateprojections.defra.gov.uk/content/view/515/499/
[35] Birmingham City Council (2011) Preliminary Flood Risk Assessment
[36] http://www.sustainabilitywestmidlands.org.uk/media/resources/adaptation_sub-committee_report.pdf

▶ There are projected to be between 580 to 5,900 additional premature deaths per year by the 2050s in hotter summer conditions. Conversely, between 3,900 and 24,000 premature deaths are projected to be avoided per year with milder winters by the 2050s;

▶ Sensitive ecosystems that have already been degraded by human activity may be placed under increasing pressure due to climate change. The main direct impacts relate to changes in the timing of life-cycle events, shifts in species distributions and ranges, and potential changes in hydrological conditions. While some species would benefit from these changes, many more would suffer; and

▶ Some climate changes projected for the UK provide opportunities to improve sustainable food and forestry production. Some agri-businesses may be able to increase yields of certain types of crops and introduce new crops in some parts of the country, as long as pests and diseases are effectively controlled and sustainable supplies of water are available.

The UK is at risk of both water supply deficits (too little water) and greater risk of flooding (too much water). While this can seem counterintuitive, it arises due to changes in the timing and extent of when rain falls. Water supplies (groundwater and reservoirs) need sustained rainfall over a period of time, particularly in winter, to remain at required levels. The intense rain that can lead to flooding from rivers and surface water does not necessarily replenish these large stores, as the water may flow rapidly downstream before it is captured, and not fall in sufficient quantity over a prolonged period.

Birmingham imports in the region of 22,800GWhr of energy per year costing the city's population and businesses over £1.5bn, with costs predicted to rise along with fuel prices over the coming years[37]. The Climate Change Strategic Framework[38] identifies that 46% of Birmingham's CO_2 emissions come from industry, 33% from domestic energy and 21% from road transport. Between 2005 and 2011, there was a 12.5% decrease in per capita carbon emissions (Figure 4.2). The Birmingham Climate Change Framework provides a key target to produce a 60% reduction in carbon dioxide (CO2) emissions produced in the City by 2026. The overall actual and projected reduction in CO2 emissions is illustrated in Figure 4.2 where a halving of emissions over the next ten years is anticipated.[39]

Figure 4.2   CO2 Emissions Progress and Required Reduction Path
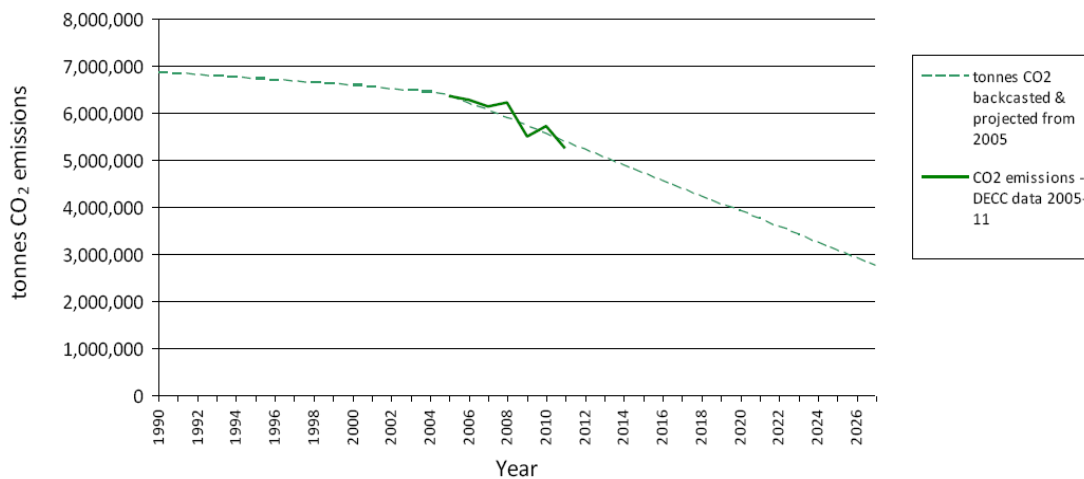
[37] Birmingham City Council website 'Renewable Energy'
[38] Birmingham City Council (2009) Cutting CO_2 for a Smarter Birmingham Strategic Framework
[39] Birmingham's Green Commission (September 2013) Report on Birmingham's Carbon Emissions Progress
http://greencity.birmingham.gov.uk/wp-content/uploads/2013/11/Birminghams-CO2-Emissions-Progress-September-2013.pdf

Birmingham Carbon Emissions 1990 - 2027 with Estimates, Actual Data and Projections
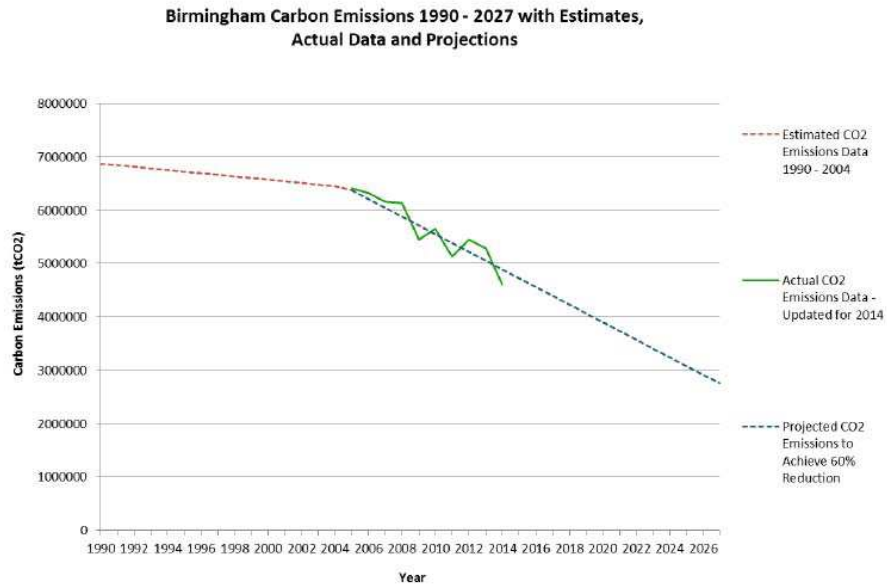
In terms of sectoral emissions (Figure 4.3), the clearest contributions to overall reductions are associated with the industrial and domestic sectors, with transport proving to be more stubborn.

Figure 4.3   Birmingham's CO2 Emissions by Sector 2005 – 2014
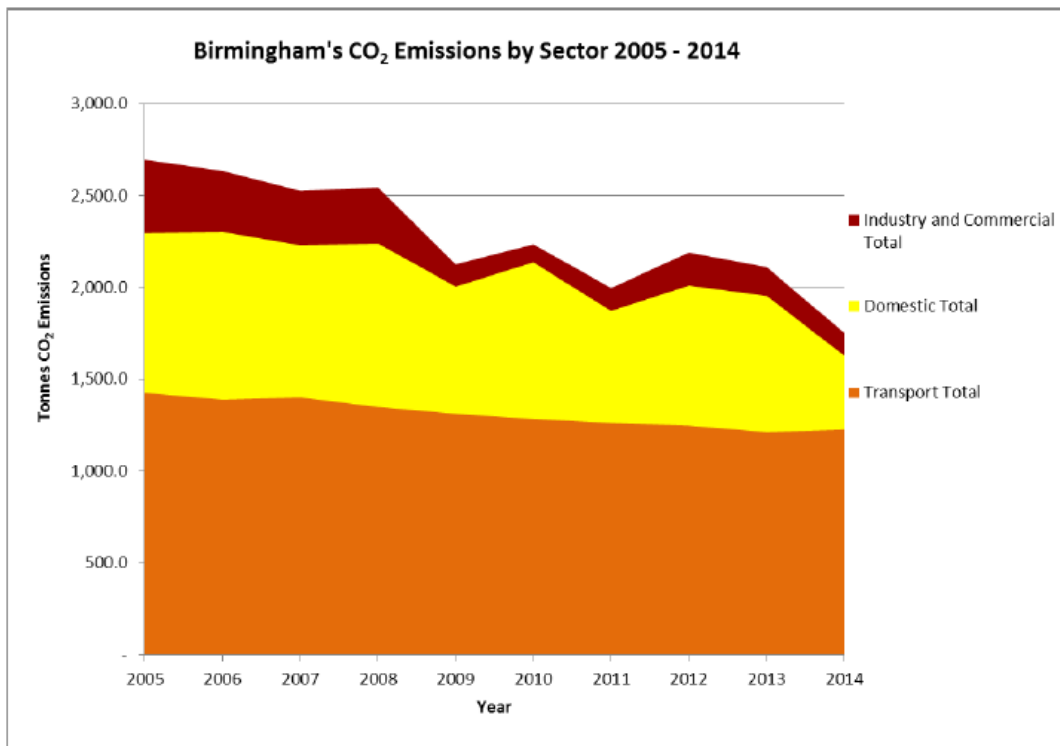
Birmingham's CO2 Framework suggests that the City has limited scope for large-scale renewable energy projects; however, energy users can support developments elsewhere through their purchasing decisions. The largest renewable energy scheme currently operating in Birmingham is probably the Tyseley Energy from Waste Plant facility which produced a total of over 95,030.50 tonnes of ash between April 2010 and March 2011 and generates 25MWh per annum, from the thermal treatment of waste. A total of 80,241.22 tonnes of

bottom ash that was produced was sent for recycling in Castle Bromwich where metals are removed and recycled with the remaining material used within the construction industry. This is substantially short of the target for renewable energy to account for 15% of energy produced by 2020 in the Climate Change Strategy and Action Plan Consultation 2007. The City has a number of operational 'Combined Heat and Power' (CHP) facilities, such as Birmingham Children's Hospital and Aston University which are part of an award-winning CHP scheme, which are able to generate and supply heat and electricity for local consumption. The connection of Birmingham Children's Hospital to the CHP scheme has allowed for the supply of heat to Lancaster Circus.

Whilst it is acknowledged in the Annual Monitoring Report[1] that the Birmingham City Council currently does not monitor the provision of new renewable energy capacity, it is understood that further consideration is being given by Birmingham City Council to ways of monitoring additional renewable energy capacity installed through new development.

There are 100,000 dwellings in the city which are more than 80 years old according to the Birmingham Sustainability Strategy and Action Plan 2000-2005. As a result, the construction form is intrinsically energy-poor. Recent developments, such as the Birmingham High Performance Centre at the Alexander Stadium, have incorporated innovative, energy-efficient design. Although they are not referred to as 100% sustainable energy systems, CHP can be a more efficient energy system generating and supplying heat and electricity for local consumption.

Heating is by far the largest domestic use of energy in Birmingham. Space heating accounts for 62% of use, while water heating accounts 22%. This is exacerbated by a large number of homes that do not meet Decent Homes standards, including 49,250 City Council-owned homes and an estimated 35,000 private sector dwellings. The Climate Change Framework aims that by 2026 Birmingham will provide an improved quality and choice of housing and 'decent' standard for virtually all housing, with efficient heating systems and insulation in line with the best UK cities.

The Sustainable Community Strategy sets out a vision for Birmingham in 2026 to become the first sustainable global city in modern Britain. The strategy envisages that in 2026 Birmingham will lead on Climate Change with local energy generation from CHP and cooling schemes will reduce CO_2 emissions. If Birmingham is to become the first sustainable global city it needs to dramatically increase deployment in low carbon energy generation technologies. The UK has signed up to the European Renewable Energy Directive, which sets a target of 15% of all energy generated to be sourced from renewable sources by 2020.

Managing and Reducing Flood Risk

Many of Birmingham's rivers and streams are susceptible to flooding (whether due to climate change or otherwise) and Birmingham City Council is required to consult the Environment Agency on all planning applications within the floodplain zones defined by the Agency.

Since 2011 the Environment Agency has provided advice on 212 approved planning applications including 97 in 2015/16. All of these applications were approved with no outstanding objection from the Environment Agency. In a number of cases an objection was raised to a proposal as initially submitted but, through amendments and discussions during the consideration of the application, issues were resolved and objections removed prior to the applications being approved.

The Level 1 revised Strategic Flood Risk Assessment was published in January 2012 by the City Council which assesses and maps all known sources of flood risk including fluvial, surface water, sewer, groundwater and impounded water bodies, taking into account future climate change predictions, to be uses as an evidence base to locate future development, primarily in low flood risk areas. The Level 2 Strategic Flood Risk Assessment (April 2012) assesses possible development locations identified in the Strategic Housing Land Assessment in terms of flood zones and the sequential test. The results of the SFRA should be incorporated into the SA process once they become available.

One factor that can help to manage and adapt to the impact if climate change is the development and enhancement of Green Infrastructure (GI) (also including 'blue infrastructure'). GI is the interconnected network of open spaces and natural areas, such as greenways, waterway and waterbodies, parks, forest preserves and native plant vegetation, that can help naturally manage storm water, reduce flooding risk and improve water quality, helping to reduce the City's 'heat island effect'.

Birmingham is at risk of flooding from Main Rivers, ordinary watercourses, surface water, sewer flooding and groundwater. There is also the potential for canal and reservoir breach and overtopping. It is estimated that there are 11,365 at risk of fluvial flooding and 24,600 properties at risk of surface water flooding.

The Level 1 revised Strategic Flood Risk Assessment (SFRA) was published in January 2012 by Birmingham City Council. The SFRA assesses and maps all known sources of flood risk including fluvial, surface water, sewer, groundwater and impounded water bodies, taking into account future climate change predictions, and these are to be used as an evidence base to locate future development, primarily in low flood risk areas. The Level 2 Strategic Flood Risk Assessment (April 2012) assesses possible development locations identified in the Strategic Housing Land Assessment in terms of flood zones and the sequential test. Emerging strategies at the City-wide level to manage flood risk include the Surface Water Management Plan and the Local Flood Risk Management Strategy.

Fluvial Flood Risk

Fluvial flooding occurs when water draining from the surrounding land exceeds the capacity of a watercourse. The Environment Agency produced Flood Zones show the areas potentially at risk of flooding from rivers, ignoring the presence of defences. Figure 4.4 shows the flood zones in Birmingham showing 1 in 100 and 1 in 1,000 year risks associated with Birmingham's rivers and their tributaries.

Figure 4.4   Flood Zones across Birmingham
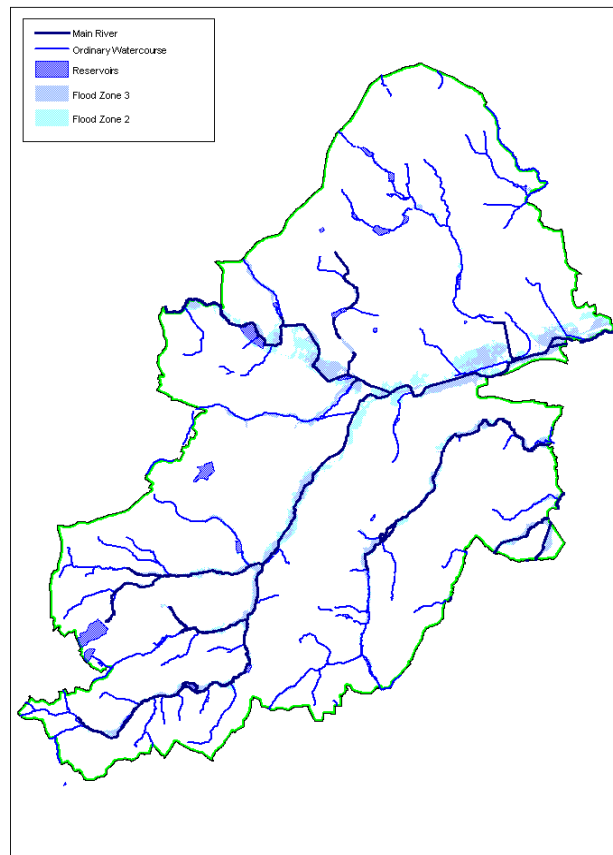
Surface Water Flooding

Surface water flooding describes flooding from sewers, drains, small watercourses and ditches that occurs during heavy rainfall in urban areas. It includes:

▶ Pluvial flooding - flooding as a result of high intensity rainfall when water is ponding or flowing over the ground surface (surface run-off) before it enters the underground drainage network or watercourse, or cannot enter it because the network is full to capacity;

▶ Sewer flooding[40] - flooding which occurs when the capacity of underground systems is exceeded, resulting in flooding inside and outside of buildings. Normal discharge of sewers and drains through outfalls may be impeded by high water levels in receiving waters;

▶ Flooding from small open-channel and culverted urban watercourses[41] which receive most of their flow from inside the urban area; and

▶ Overland flows from the urban/rural fringe entering the built-up area, including overland flows from groundwater springs.

Birmingham City Council has developed a Surface Water Management Plan[42]. The SWMP process is a framework through which key local partners with responsibility for surface water and drainage in their area work together to understand the causes and effects of surface water flooding and agree the most cost-effective way of managing surface water flood risk for the long term. The process of working together as a partnership is designed to encourage the development of innovative solutions and practices. The purpose is to make sustainable urban surface water management decisions that are evidence based, risk based, future proofed and inclusive of stakeholder views and preferences. Figure 4.5 illustrates the areas susceptible to surface water flooding across the City.

Figure 4.5   Areas Susceptible to Surface Water Flooding
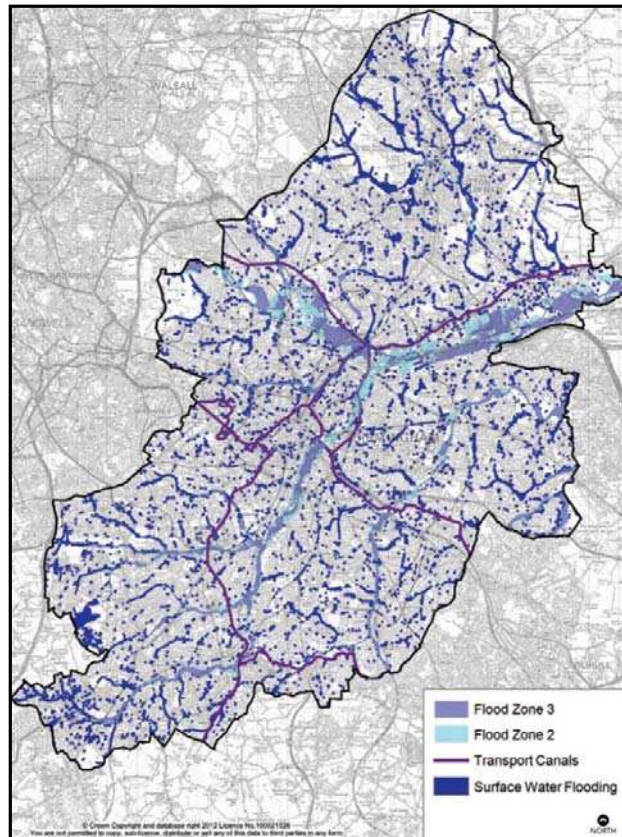
Source: Birmingham City Council (May 2013) Green Spaces Living Plan

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[40] Consideration of sewer flooding in 'dry weather' resulting from blockage, collapse, or pumping station mechanical failure is excluded from SWMPs as this id for the sole concern of the sewerage undertaker

[41] Interactions with larger rivers and tidal waters can be an important mechanisms controlling surface water flooding

[42] https://www.birmingham.gov.uk/downloads/file/2561/surface_water_management_plan_for_birmingham_-_final_report

Groundwater Flood Risk

In response to the need for more information on groundwater flooding, the British Geological Society (BGS) has produced the first national hazard or susceptibility data set of groundwater flooding. The data is based on geological and hydrogeological information and can be used to identify areas where geological conditions could enable groundwater flooding to occur and where groundwater may come close to the ground surface.

Although this is not a risk data set in that it does not provide information about the likelihood of a groundwater flood occurring, it can be used to provide an understanding of groundwater flooding.

Areas susceptible to groundwater flooding are shown Figure 4.6.

Figure 4.6   Areas Susceptible to Groundwater Flooding
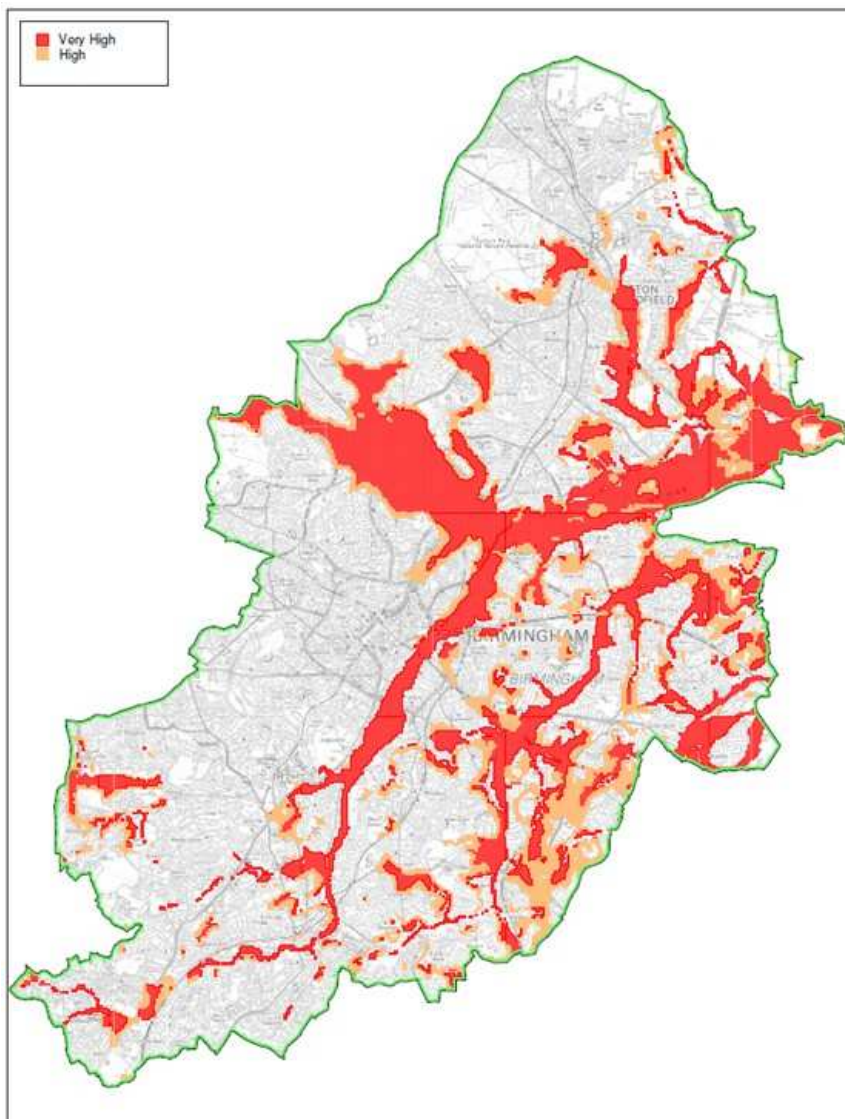
Source: Birmingham City Council (May 2011) Preliminary Flood Risk Assessment

Historic Flood Risk in Birmingham

A number of datasets have been collated to assess the local historic flood risk in Birmingham; this includes flooding from watercourses, surface water and groundwater. However due to the urbanised nature of the Birmingham catchment there are often significant interactions between sources of flooding and it is not always possible to ascertain the source of the flooding.

Historical flooding records provide a source of data that directly indicates both areas and sources of flooding. Recent years have seen a number of flooding events affecting Birmingham (September 1998, April 1999. June 1999, July 2000, June 2005, June 2007, July 2007, September 2008 and more recently in June 2016 and in May 2018), all historical flooding data has been collected from BCC, Severn Trent Water and British Waterways. The PFRA mapped historic flood locations across the City, shown in Figure 4.7.

Figure 4.7   Historic Flood Locations across Birmingham by Flooding Source
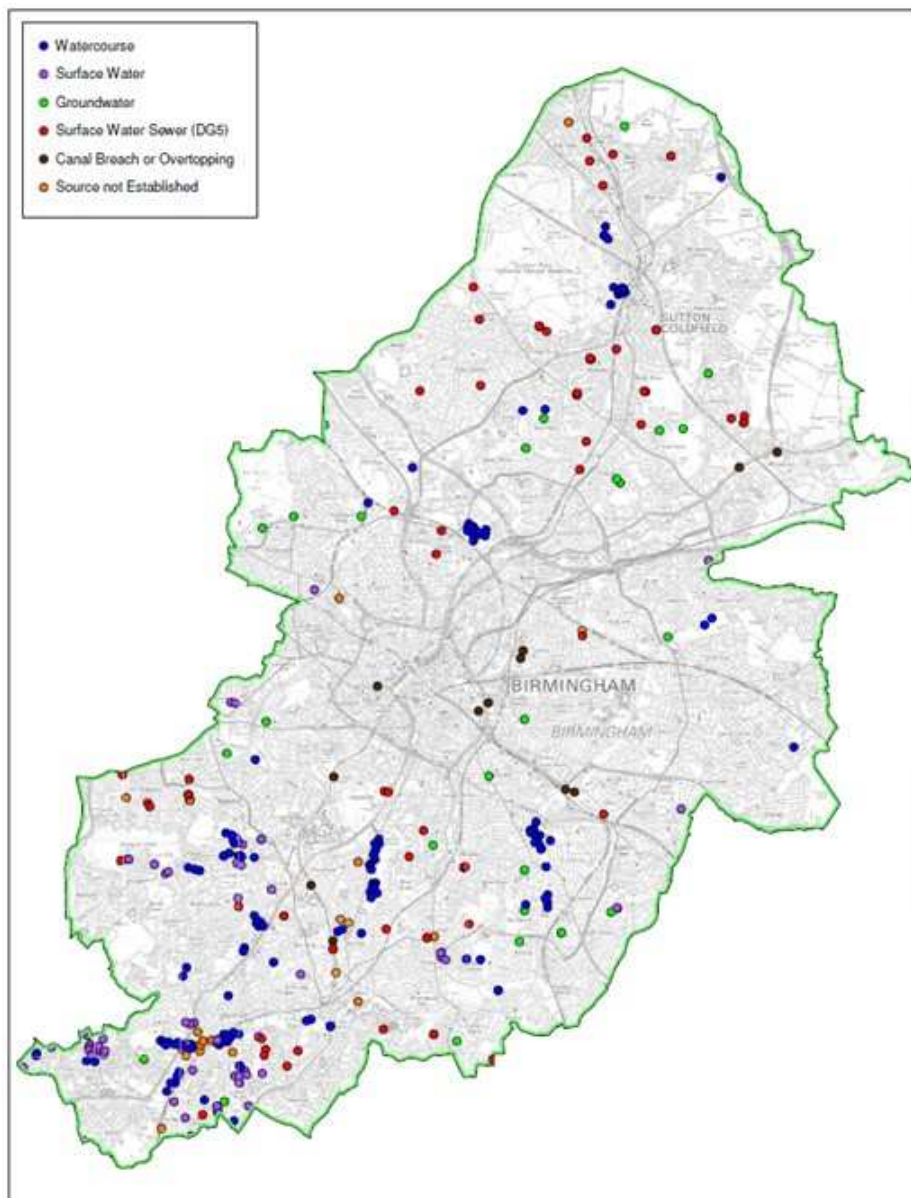
Source: Birmingham City Council (May 2011) Preliminary Flood Risk Assessment

Influence of the DM DPD on Climate Change and Managing and Reducing Flood Risk

There are opportunities to adopt more sustainable approaches to directly address potential increases extreme weather events which may arise through climate change. Scrutiny of building design could include climate-proofing measures such as passive ventilation and opportunities to enhance energy efficiency which will indirectly assist in mitigating climate change. The extension and enhancement of Green Infrastructure across the City will be important in providing necessary resilience against the likely impacts of climate change. The DM DPD will directly influence were development takes place through guiding development away from flood risk areas, requiring appropriate adaptation measures where this is not possible, and enhancing the City's capacity to mitigate and adapt to the likely effects of climate change.

Biodiversity and Geodiversity

The City has a number of areas that are protected for their nature conservation value. The City's nature conservation sites include two Sites of Special Scientific Interest (SSSIs): Sutton Park and Edgbaston Pool. Sutton Park is also designated as a National Nature Reserve (NNR). There are 12 Local Nature Reserves (LNRs), over 50 Sites of Importance for Nature Conservation (SINCs) and over 120 Sites of Local Importance for Nature Conservation (SLINCs) covering various ancient woodlands, grasslands, lakes, streams, and other important wildlife habitats or examples of natural landscape. Within the City Centre there are a number of sites of local importance for nature conservation (SLINCs), essentially the canal network and the River Rea. These areas, as well as the linear corridors along main rail and Metro lines, are key wildlife corridors. Together these form the City's green and blue infrastructure network through a series of corridors and stepping stones which, in accordance with the NPPF (para 109) should be protected and enhanced to increase their resilience to current and future pressures. Table 4.4 shows the total area covered by different types of nature conservation sites, Figure 4.8 maps these assets.

Table 4.4   Birmingham's Designated Nature Conservation Sites

Type of Area	Number of Sites	Total Area (Hectares)	% of City's Area
SSSIs	2	896.59	3.35
NNRs	1	811.73	3.03
LNRs	12	316.73	1.16
SINCs	55	828.03	3.09
SLINCs	121	698.96	2.62

Source: Birmingham City Council, AMR (2013 and 2014)

The 2016-2017 AMR reports only very limited changes to designated sites as a result of planning applications, with one application approved for development within designated sites of national importance (SSSIs or NNRs). Some 43 applications for development were approved for development in or adjacent to SINCs: for these schemes where adverse impacts on sites' nature conservation interests were anticipated, appropriate mitigation and compensation were secured to satisfactorily address these impacts.

wood.

Figure 4.8   Birmingham's Biodiversity Assets

Key:

— Birmingham City boundary
— Wildlife Corridors
▨ Local Nature Reserve
▨ National Nature Reserve
▨ Sites of Importance for Nature Conservation
▨ Sites of Local Importance for Nature Conservation

▨ Sites of Special Scientific Interest
▨ Tree Preservation Order

Biodiversity assets

H:\Projects 36263 Birmingham SA/E Design\Drawings\GIS\MXD_Figures

Based upon the Ordnance Survey Map with the permission of the Controller of Her Majesty's Stationery Office. © Crown Copyright. 100001776

Scale: 1:80,000 @ A3

amec

Green Infrastructure (GI) refers to the living network of green spaces, water and other environmental features in both urban and rural areas. It is often used in an urban context to cover benefits provided by trees, parks, gardens, road verges, allotments, cemeteries, woodlands, rivers and wetlands[43]. GI can provide a number of benefits including:

- ▶ Safeguarding and enhancing natural and historic assets;

- ▶ Increasing contact between people and nature;

- ▶ Protecting and enhancing landscape character and local distinctiveness;

- ▶ Providing for climate change mitigation and adaptation;

- ▶ Creating a focus for social inclusion, education, training, health and well-being;

- ▶ Increasing property and land values; and

- ▶ Attracting and retaining people ensuring stable populations and labour supply.

The Birmingham and Black Country Nature Improvement Area (NIA) Ecological Strategy provides a landscape-scale framework for action to conserve and enhance biodiversity and geodiversity and to improve ecological networks across the City. The approach set out in the Strategy reflects ecological principles set out in *Making Space for Nature* (Lawton *et al* 2010) and national policy and guidance relating to the natural environment and green infrastructure. The Cannock Chase to Sutton Park Project encompasses an area of approximately 670 square km extending from the edge of Birmingham northwards into Staffordshire. The Project area is characterised by two core areas of semi-natural habitat: Cannock Chase and Sutton Park. These areas support significant amounts of lowland heath habitat along with a range of additional habitats including acidic and neutral grasslands, scrub, woodland and wetlands. The City's ecological networks are a fundamental component of Birmingham's Green Infrastructure and in accordance with paragraphs 91, 150 and 171 of the NPPF should inform policy and its implementation to ensure that development that may affects them is compatible with their purpose and can contribute to their enhancement. The Council's Green Living Spaces Plan recognises the essential role of the green infrastructure network in securing a resilient and healthy city and provides a framework for increasing natural capital and the ability of green infrastructure assets to deliver environmental and socio-economic benefits.

Figure 4.9 illustrates the City's GI network

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[43] Defra (2011) The Natural Choice: securing the value of nature.

Figure 4.9   Birmingham's Green Infrastructure Network
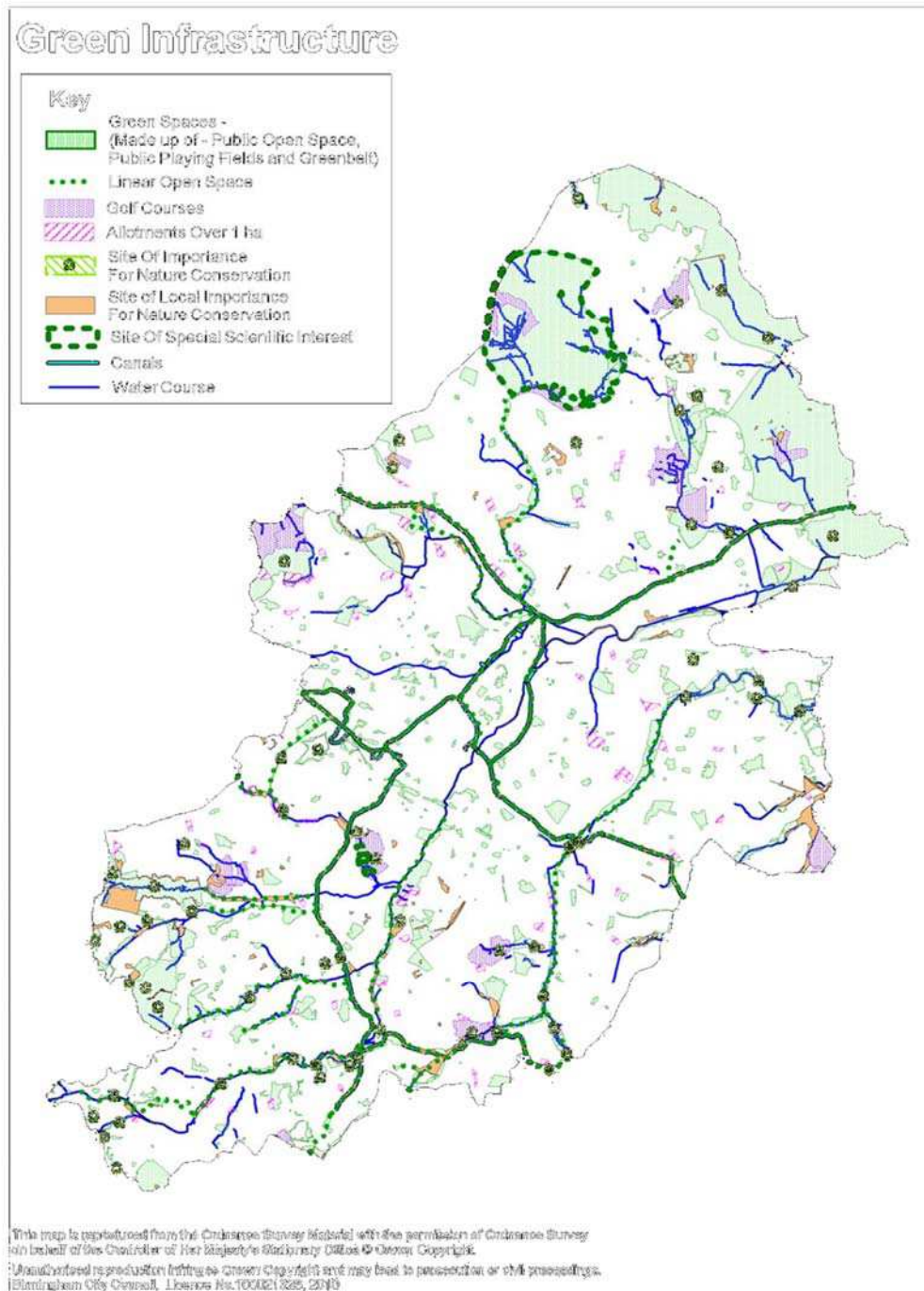
Birmingham is characterised by a large number of well-established parks, many of which were created in the 19th century. The City's greenspace is supplemented by a large linear open space network, which is based primarily on the Rivers Cole and Rea and the City's extensive canal network. The extent of green spaces (excluding areas designated for nature conservation) is show in Table 4.5 and are mapped in Figure 4.10.

Table 4.5   Green Spaces in Birmingham

Open Space Category	Area (ha)	% of City Council Area
Public Open Space	3,069.77	11.46
Public Playing Fields	296.9	1.11
Private Playing Fields	268.11	1.0
Private Open Space	67.19	0.25
Educational Playing Fields	166.33	0.62
Golf Courses	657.78	2.46
Statutory Common Land	11.25	0.04
Allotments	243.8	0.91
Green Belt	4,154.77	15.52

Source: Birmingham City Council, AMR (2015)

Figure 4.10 Green Spaces in Birmingham

Source: http://consult.birmingham.gov.uk/portal/ps/csd/csdraft?pointId=d2670232e7333
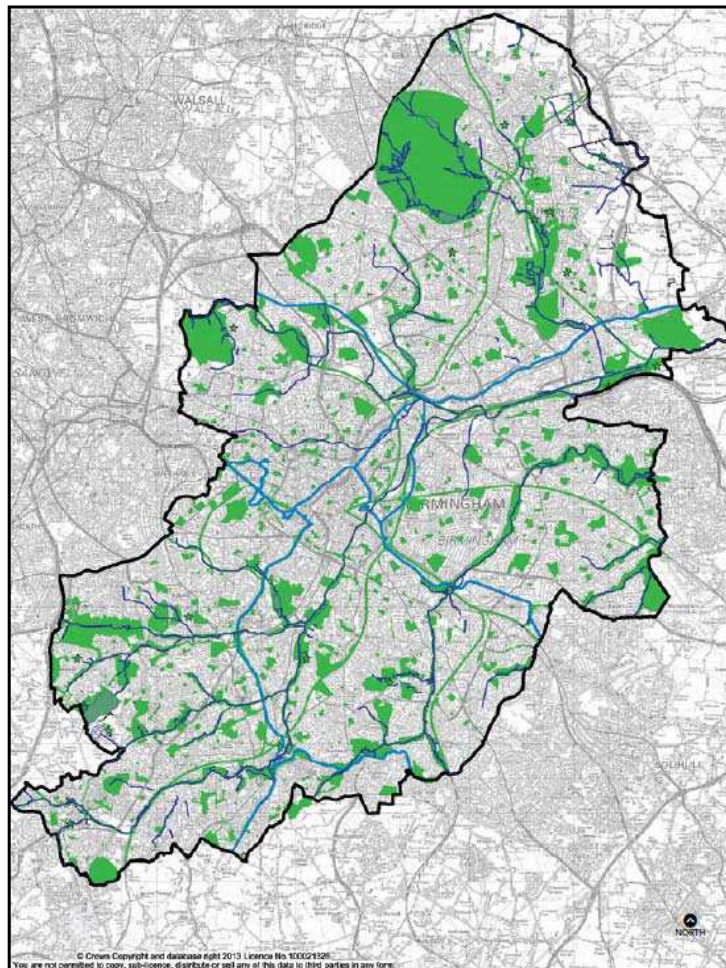
Geodiversity

The term geodiversity incorporates all the variety of rocks, minerals and landforms and the processes which have formed these features throughout geological time. The geology of the West Midlands is dominated by the South Staffordshire Coalfield, the exploitation of which has contributed greatly to the industrial and economic development of the area[44]. Upper Carboniferous Coal Measures underlie the main conurbation of Wolverhampton, Walsall, West Bromwich and Dudley. Surrounding these shales, sandstones and mudstones are Triassic aged rocks which comprise red mudstones and sandstones. These underlie much of Birmingham and form the solid geology up to Sutton Coldfield. Within the main mass of the Coal Measures are a number of isolated outcrops of older Silurian rock. These shallow water limestones and shales contain a wide range of marine fossils and form the famous outcrops at Wren's Nest and Dudley Castle Hill. There are also a number of igneous intrusions into the Coal Measures. Much of the area has been mantled in thick deposits of boulder clay and sands and gravel deposited by ice sheets and meltwaters during the Ice Ages of the last two million years[45].

The geology underlying the City has a significant influence over the use of SuDS which include a variety of techniques including swales and basins, permeable pavements and ponds and wetlands to mimic natural drainage processes and mitigate the impacts that development has on surface water runoff rates and volumes. The SFRA for Birmingham (2011) notes that the geology beneath Birmingham, is essentially divided into two due to a fault, known as the 'Birmingham Fault', running approximately north-east to south-west and consists of Permian and Triassic sandstones and mudstones. To the west of the fault line the rock strata predominantly consists of red and red-orange sandstones and is indicative of high permeability soils (good to very good drainage), and to the east the rock strata predominately consists of red and red-brown mudstones which are inter-bedded by several silt and sandstone bands and are typically representative of low permeability soils (poor drainage to practically impervious). The SFRA encourages that these characteristics should be considered in the development process where large increases in impermeable area for a site could contribute to a significant and resulting increase in surface water runoff peak flows and volumes. In turn this could contribute to an increase in flood risk elsewhere unless adequate SuDS techniques are implemented as part of a development. Additionally, indirect impacts on the water table and source protection zones need to be taken into account.

Influence of the DM DPD on Biodiversity and Geodiversity

Policies and proposals pursued in the DM DPD could include a range of direct and indirect impacts, all having the potential to adversely affect biodiversity. Careful scrutiny of development proposals will be required to ensure that direct impacts are avoided where possible and indirect impacts (such as downstream effects) are anticipated and appropriately mitigated. If well managed, development can benefit wildlife and recreational interests, through habitat improvement or creation using the Green and Blue infrastructure multifunctional network as a starting point. This accords with guidance in the NPPF (para 118) which requires the application of the 'avoid, then mitigate and, (as a last resort) compensate for adverse impacts on biodiversity' principle. Given the need to minimise impacts on biodiversity, DM DPD policies and their application should promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets (in accordance with the NPPF para 117). For geodiversity, there is a need to conserve, interpret and manage geological sites and features in the wider environment, and not just designated sites.

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[44] http://www.naturalengland.org.uk/ourwork/conservation/geodiversity/englands/counties/area_ID38.aspx
[45] http://www.naturalengland.org.uk/ourwork/conservation/geodiversity/englands/counties/area_ID38.aspx

Population and Human Health

Housing

Birmingham's 2017 housing strategy states that: *"Every citizen should have the opportunity to live in a safe and warm home within a neighbourhood they are proud of"*. The strategy outlines the importance of tackling fuel poverty to improve health, well-being and financial inclusion. This is highlighted as a cross-cutting issue within the Council's Vision and Priorities statement. The strategy also makes reference to the well-established "Stay Warm Stay Well" (SWSW) programme that delivers practical solutions to vulnerable people affected by fuel poverty. This programme is delivered through a network of third sector partners. The Council has an ambition to extend an offer of affordable warmth works to private sector households within the areas where ECO-funded improvement works are being carried out on Council-owned homes.

The City covers an area of 26,779ha (267.8km^2), of which 15,200ha is residential. According to the Housing Development Plan[46] Birmingham's residents live in 406,000-410,000 households. The City has about 414,000 self-contained properties. In April 2018, there were about 61,000 Council owned properties and an estimated 37,650 owned by registered social landlords. In addition to this there are also 3,000 shared ownership properties. Since 2001, the City's population has grown after experiencing declines between 1991 and 2001 due to net out-migration. The current population of the City (according to ONS population estimates) is 1,218,100. If recent trends continue the population of Birmingham is projected to grow from 1,101,400 in 2014 to 1,189,600 (+8.0%) in 2024 and to 1,268,100 (+15.1%) in 2034 (sub national population projections)[47]. Substantial growth is expected among pensioners particularly those aged 85 years or more. This age group is expected to increase by almost 25% by 2024. The gains reflect a shift in the overall balance of migration from negative to positive, coupled with greater natural increases. The main reason for this has been the high levels of international immigration in recent years. The growth in the ageing population is reflective of national trends. These statistics have implications for housing provision. Table 4.6 shows that the number of households in the City increased in the period from 2001 to 2011. Despite the above, the rate of increase in households in Birmingham has been less than the national and regional rates.

Table 4.6   Change in Households in Birmingham, the West Midlands Region and England, 2001 and 2011

Area	2001 Households	2011 Households
Birmingham	390,800	410,700
West Midlands Region	2,153,700	2,294,900
England	20,451,400	22,063,400
Index of Change		
Birmingham		+0.95
West Midlands Region		+0.93
England		+0.92

Source: Census of Population, 2001 and 2011, Office of National Statistics

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[46] Source: http://www.birmingham.gov.uk/cs/Satellite?c=Page&childpagename=Housing%2FPageLayout&cid=1223092723273&pagename=BCC%2FCommon%2FWrapper%2FWrapper

[47] Statistics from https://www.birmingham.gov.uk/info/50065/population_and_census/1003/population_in_birmingham/6 [Accessed April 2018]

If recent trends continue the population of Birmingham is projected to grow from 1,101,400 in 2014 to 1,189,600 (+8.0%) in 2024 and to 1,268,100 (+15.1%) in 2034. Substantial growth is expected among pensioners particularly those aged 85 years or more. This age group is expected to increase by almost 25% by 2024.

Forecast organic population growth equates to just under 40,000 new residents over the next five years. Birmingham is forecast to see growth in the number of households from 422,022 in 2014 to 440,529 – a rise of around 18,500 households. This equates to an average annual increase of approximately 3,680[48] households each year. Longer term forecasts[49] show that the number of households will increase by over 100,000 over the next 20 years.

The average household size in Birmingham is greater than the national average and is greatest in the West Midlands Region according to the 2011 Census with an average household size of 2.6 people. Birmingham has relatively high proportions of households containing one person or with five or more people. Average household size reduced from 2.54 in the period 1991 to 2001, largely as a result of growing numbers of one-person households. However, for the period of 2011 to 2011 the average household size (persons) has increased to 2.56[50]. The City has a relatively low proportion of detached housing, and higher proportions of terraced housing and flats.

According to the 2011 Census, Birmingham was the most densely populated local authority within the West Midlands region with 4,000 people per square kilometre. This is an increase on the 2011 population density of 3,677 people per square kilometre which equates to an increase of 0.9%. The average housing density has decreased from over 74 dwellings in 2009/10 to just over 40.6 dwellings per hectare in 2014/15. This could be attributed to factors such as the reluctance of the development industry to commit to apartment schemes at the present time.

In recent years there have been political concerns over high density suburban development. This has manifested itself in a *'Mature Suburbs: Guidelines to Control Residential Intensification - Supplementary Planning Document'* and away from the City Centre this has led to decreasing densities over the past five years.

The mean house price in the City is below the regional average, particularly at the cheaper end of the market. Figure 4.11 indicates that house prices in Birmingham peaked in January 2008 and sharply declined through to 2010, and now have recovered strongly to over one third higher in 2018 than 15 years ago at almost £180,000. Over the same period sales volumes initially declined but have recovered to levels of 15 years previously. Overall, the figures suggest that the affordability of housing for poorer families and first-time buyers has declined. 89,000 new homes are needed from 2011 to 2031. Whilst is not possible to deliver all of this new housing within the city boundary, Birmingham council have ambitious but achievable plans to build at least 51,000 new homes in this period.

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[48] Figures from ONS
[49] ONS 2039 Household Projections
[50] Office for National Statistics 2011 Census: Population and household estimates for England and Wales – supplementary figures Pt 2

Figure 4.11 Average House Prices and Sales Volume in Birmingham 2005-2018[51]
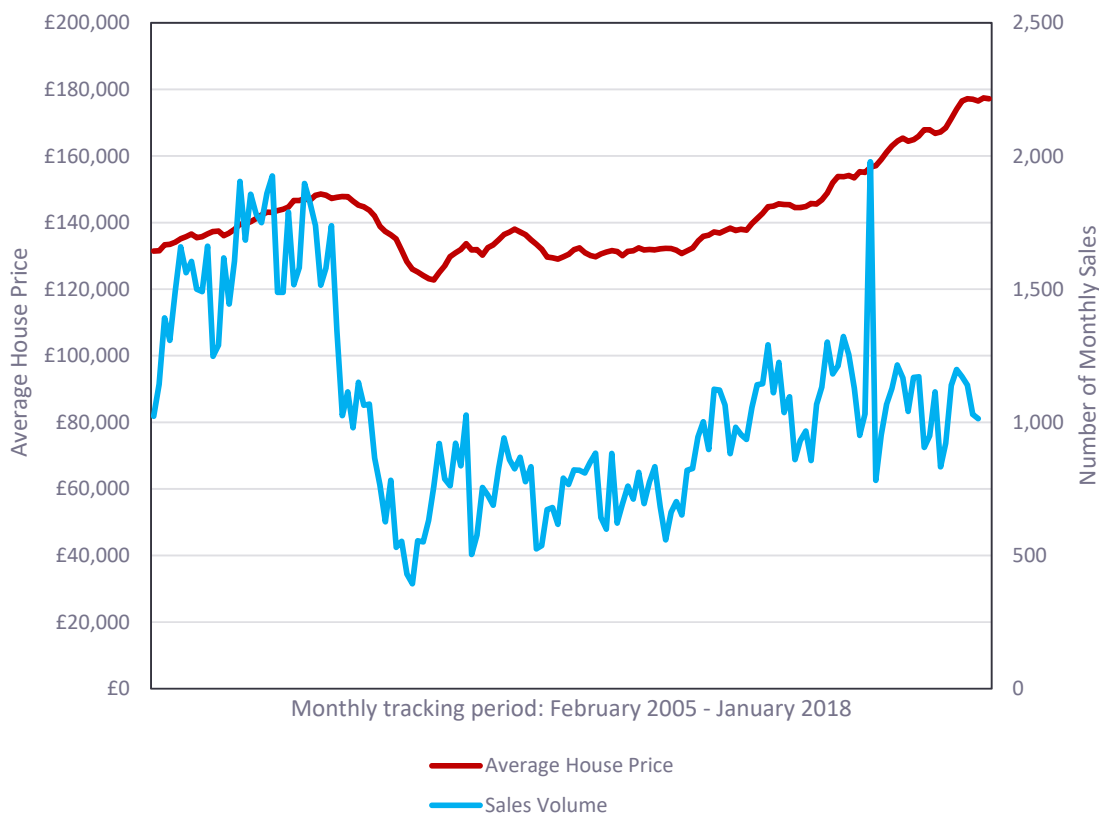
Birmingham has a relatively high proportion of households renting from Birmingham City Council. Statistics from the Housing Strategy Statistical Appendix 2011 show that within Birmingham the number of local authority rented housing is 61,000 and Registered Social Landlord housing is 37,650 which collectively equates to 25.6% of the total housing supply or the local authority.

There is a mismatch between the existing supply of affordable housing and the location of demand. There is continued demand for affordable housing in Birmingham. The most recent City wide Strategic Housing Market Assessment (SHMA)[52] found that approximately 38% of the City's overall housing requirement is for affordable housing. The Birmingham Development Plan will help to address some of this demand.

The Birmingham Housing Plan (2010 Review) identifies that the vast majority of Birmingham's City Council housing meets the Decent Homes standard. In the private sector, Birmingham has a substantial number of older homes that are in need of repair and modernisation. As of April 2018, the new minimum energy efficiency standard (MEES) regulations will come into action. The new standard requires landlords of privately rented domestic (PRS) and non-domestic property in England or Wales to ensure that their properties reach at minimum Energy Performance Certificate (EPC) rating of E before granting a new tenancy to new or existing tenants[53]. If a property does not meet EPC standard E, landlords are obligated to carry out any works under the value of £2,500 to bring the property up to standard. Special exemptions may apply, for example if the building is listed. There are clear links between the condition of housing and human health. For

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[51] Land Registry (2018) http://www.landregistry.gov.uk/public/house-prices-and-sales/search-the-index

[52] Available at https://www.birmingham.gov.uk/downloads/download/359/strategic_housing_market_assessment_2013 [Accessed April 2018]

[53]

example, research[54] undertaken by Birmingham University showed that there is a clear relationship between excess winter deaths, especially of older people, cold housing and low energy efficiency.

Birmingham has benefitted from 1,944 net dwelling completions and 111 vacant dwellings being returned to use in 2016/17 which totalled over 2,000[55] new dwellings being added to the housing stock. This was lower than the 2015/16 period (3,113) but higher than the four preceding years.

Historically, homeless applications in Birmingham have been twice the national average; although they are declining. There were 19,496 applicants for housing on the Local Authority Housing Register as at 01 April 2013. Increasingly, older and disabled people

Birmingham City Council understands that Trading Standards will be leading on the primary delivery and prosecution process associated with MEES. BCC's Private Rented Services Regulation & Enforcement team have a good working relationship with the people who wish to remain in their own homes. This results in strong demand for property adaptations, and an implication of need for to build homes to 'lifetime' standards. There were 1,899 referrals for assistance from Birmingham City Council in 2011/12. Demand for housing still remains strong albeit that there was a fall from over 28,000 households on the register to just over 20,000 in 2015/16. The overall total as at April 2016 stood at 20,292.

Every year, housing partners across the city ensure that thousands of households who are homeless, or at high risk of homelessness, are provided with shelter and a pathway into settled accommodation. For 2015/16 this included 5,578 households assisted through the statutory homeless system as well an additional 7,824 households whose homelessness was prevented or relieved by Council delivered services or commissioned services delivered by partners. In addition, there are many other agencies active in the city who provide advice and assistance to people in housing crisis.

In 2016 Birmingham undertook a homelessness review[56] which included examining the extent, nature and causes of homelessness in the City. One of the key findings from this review is that there are an estimated 20,000 households in Birmingham each year who are homeless. This study also highlighted that there are more than 20,000 households on the BCC housing register (as at April 2016) so there is significant demand for Council housing.

Birmingham still manages its own stock and, notwithstanding Right to Buy, there remain very significant areas of predominantly local authority housing. These areas are however clustered and there are indeed significant pockets of the City (e.g. Edgbaston and Sutton) where affordable housing is in lesser supply and average houses prices are the highest in the City.

Economy

Birmingham's economic prosperity was originally built on manufacturing, but changes in the 1970s and 1980s led to a massive decline in this sector. However, highly-skilled, specialist manufacturing remains important to the city. Birmingham has since developed a substantial business and financial services sector through the transformation and growth of the City Centre and has become a major employment centre drawing in workers from across the West Midlands. It is an economic cluster with a particular focus on the banking, finance and insurance and distribution, hotels and restaurants and public service sectors. Birmingham is now a major centre for business conferences.

Despite declines in manufacturing, Birmingham is still a major employment centre drawing in workers from across the West Midlands region. Table 4.7 shows the number of economically active people within

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[54] https://www.birmingham.ac.uk/Documents/college-social-sciences/social-policy/SPSW/Housing/2016/good-housing-better-health-2016.pdf [Accessed April 2018]

[55] All figures from 2016/17 Authority Monitoring Report [Accessed April 2018]

[56] Birmingham City Council Homelessness Review 2016/17 Available at https://www.birminghambeheard.org.uk/people-1/birmingham-homelessness-prevention-strategy-2017/supporting_documents/Birmingham%20Homelessness%20Review%202016%20FINAL.pdf [Accessed April 2018]

Birmingham, and Table 4.8 shows the number of employed residents in Birmingham by Gender and Ethnic Group.

Table 4.7   Economically Active Residents (2017)[57]

	Birmingham (numbers)	Birmingham (%)	West Midlands (%)	Great Britain (%)
All People				
Economically active	500,900	69.4	76.4	78.4
In employment	458,900	63.6	72.4	74.9
Employees	391,500	54.3	62.4	64.0
Self employed	65,900	9.1	9.7	10.6
Unemployed	42,100	8.4	5.4	4.5
Males				
Economically active	275,000	76.9	82.0	83.4
In employment	250,000	69.9	77.5	79.6
Employees	200,900	56.2	63.9	65.2
Self employed	49,100	13.7	13.4	14.1
Unemployed	25,000	9.1	5.5	4.6
Females				
Economically active	225,900	62.1	70.9	73.4
In employment	208,900	57.4	67.2	70.3
Employees	190,600	52.4	60.9	62.7
Self employed	16,800	4.6	6.0	7.2
Unemployed	17,100	7.6	5.2	4.3

Table 4.8   Employed Residents in Birmingham by Gender and Ethnic Group[58]

	2013		2014		2015		2016		2017	
	Number	Rate	Number	Rate	Number	Rate	Number	Rate	Number	Rate
Male	228,100	66.4	236,000	68.2	240,500	68.8	256,000	72.1	250,000	69.9
Female	179,700	51.6	198,500	55.9	194,500	54.3	197,200	54.8	208,900	57.4
White	261,100	67.4	290,600	67.5	306,200	69.1	272,400	73.1	283,400	71.7
Ethnic Minority	145,300	48.1	143,900	53.4	128,700	48.8	180,800	52.8	174,700	54.0

At 63.6%, Birmingham's employment rate is well below both the corresponding regional (72.4%) and national rate (74.9%). The female employment rate for Birmingham (57.4%) is much lower than the male rate (66.9%)

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[57] ONS Annual Population Survey
[58] ONS Annual Population Survey

and both are lower in Birmingham than the national averages; for women there is a 12.9 point difference from the rate for Great Britain.

Nearly a third (30.6%) of Birmingham's working age population is economically inactive (neither working nor seeking work). This is 9.0 percentage points higher than the national rate. The female economic inactivity rate in the city is 11.3 percentage points higher than the male rate. Table 4.9 summarises economic inactivity for those aged 16-64 in Birmingham. This shows that the highest proportion of economically inactive residents are full time students (39.6%), which is 12.6 percentage points higher than the national average of 27.0%. The non-white economic inactivity rate is 39%, significantly higher than the white rate of 24%. Both rates are above the GB averages of 30% and 20% respectively.

Table 4.9   Economic Inactivity in Birmingham 2017[2]

	Birmingham (level)	Birmingham (%)	West Midlands (%)	Great Britain (%)
Student	87,400	39.6	28.2	27.0
Looking after family/home	61,500	27.9	26.1	24.4
Temporary sick	4,300	2.0	2.3	2.1
Long-term sick	36,800	16.7	20.9	22.1
Discouraged	!	!	0.3	0.4
Retired	11,300	5.1	11.8	13.2
Other	18,500	8.4	10.5	10.8
Total Economically Inactive	**220,600**	**30.6**	**23.6**	**21.6**
Male Economic inactivity	82,700	23.1	16.6	18.0
Female Economic inactivity	137,900	37.9	26.6	29.1
White Economic inactivity	93,900	23.7	20.9	20.2
BME Economic inactivity	125,300	38.8	34.8	29.9

Birmingham has seen persistently higher levels of unemployment over the past decade, compared to the West Midlands and the UK, as can be seen from Figure 4.12.

Figure 4.12 Unemployment Rates in Birmingham, the West Midlands and the UK, 2005-2017
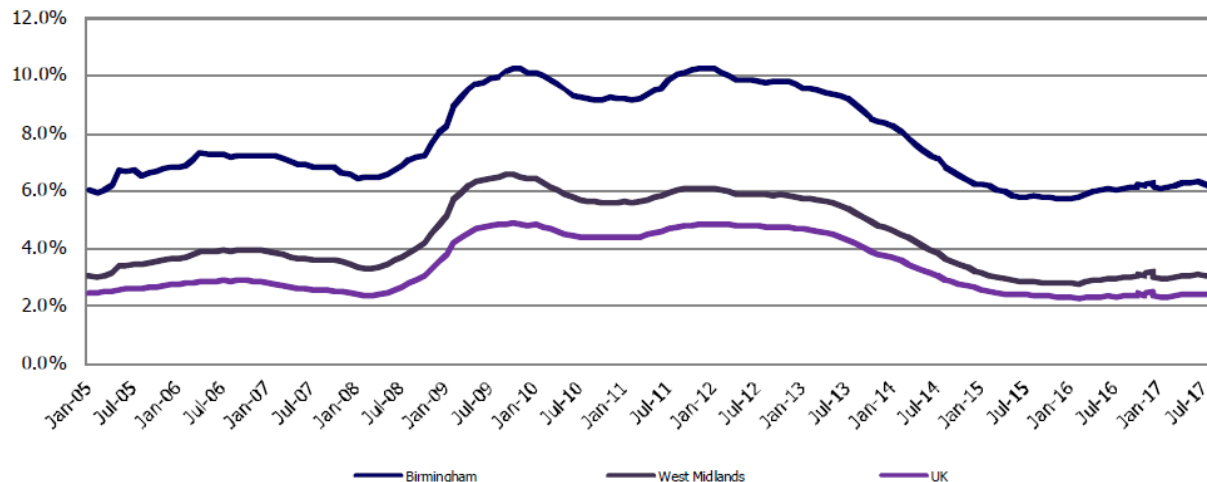
Source: Birmingham Labour Market Update (January 2018)

Employment growth in the city as a whole is set to be relatively subdued over the period 2010-2025 as the economy recovers from the recession and adjusts to a decline in public sector employment. Indeed, the forecast level of employment in the city in 2025 is only just returning to the levels seen prior to the recession.

The Greater Birmingham & Solihull LEP is a partnership of businesses, local authorities and universities which supports private sector growth and job creation. It was set up to strengthen local economies, encourage economic development and enterprise, and improve skills across the region. The City Deal between the Government and the Partnership was announced in July 2012 which consists of a package of measures that are to be implemented to drive economic growth designed to exploit the area's economic assets and address its challenges[59]. The first phase of the City Deal is to focus on the delivery of a range of economic benefits for the Greater Birmingham and Solihull area. These include:

- 10,000 additional direct jobs, building on the 40,000 created by the vanguard Enterprise Zone in Birmingham City Centre;
- Leveraging in over £15bn of private sector investment over 25 years from £1.5bn of public funding;
- A Single Settlement to cover all economic development funding;
- A world-class skills system which meets the needs of employers and fulfils the expectations of employees;
- 3,560 apprenticeships (AGE) grants to be delivered by March 2013;
- Improvements to employers' perceptions of 'work readiness' year-on-year;
- In excess of 2,800 additional new homes through the use of public assets;
- At least 100% capital return on current market value of public assets;
- An Institute of Translational Medicine to respond to national unmet need, unlock growth potential in the NHS and create a portal for SMEs and international pharmaceutical companies;
- £35M of largely private sector clinical trial investment and £50M of free drugs;
- 15,000 homes refurbished delivering savings in domestic energy usage of 26 ktonnes pa of CO_2 and at least 40 public buildings refurbished delivering savings in energy usage of 10 ktonnes pa of CO_2; and
- Retrofitting to the properties of 1,500 people on pension or disability premium and 2,250 people in fuel poverty.

The City Deal comprises five elements: GBS Finance; Skills; Public Assets; Life Sciences and Green Deal, each of which includes specific commitments from the LEP and Government. Progress against these will be monitored to ensure they are delivered.

Median gross weekly pay for workers in Birmingham in 2015 was £488.20. This figure is a 1.9% increase on 2014 but it is below the UK figure of £527.70 which saw a 1.8% increase from 2014. However, people who work in the city earn more than the residents (£538.70 compared to £488.20). Workplace earnings in the city are similar to the figure for the UK. The difference between resident and workplace earnings reflects Birmingham's position as the regional capital and the large numbers of people who commute into the city to work. It also highlights that not all Birmingham residents are able to access the better paid jobs in the city.

Education and Skills

The City has a substantial education sector, from early years and schools through to colleges, universities and adult education. According to the Education Services Delivery and Improvement Plan (2017/18), the City has 445 state-funded schools. In addition, there are five colleges, five universities and a thriving independent school sector. The City Council itself is a major provider of adult and community learning through its Adult Education Service. (Figure 4.13). Birmingham is one of the youngest cities in Europe with around 46% of the population aged under 30. Based on 2014 levels, by 2022 the population aged between 0 to 4 is due to grow by 3.8% to 88,1000 children; the 5 to 9 population is expected to grow by 4.5% to 84,000 but the largest growth rate in Birmingham's children will be the 10 to 14 age group – increasing by 14.6% to 82,600. The demographic makeup of Birmingham's young people has also changed significantly over recent years and is becoming increasingly diverse. For example, according to the 2011 census over 60% of the under 18 population is now from a non-white British background, compared to around 44% in

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[59] http://centreofenterprise.com/about-the-lep/key-projects-and-issue/

2001. Approximately, 43% of Birmingham's school children have a first language that is other than English. This equated to 38,089 pupils, which is 1.3% more than in 2014.

According to the Annual Population Survey (2017), the City has a substantial education sector (Figure 4.13). The pupils and students of the City's schools and colleges have made major improvement in educational achievement, closing the gap on national averages. The percentage of Birmingham's population achieving NVQ Level 3 or above in 2011 was 43.5%, and this has increased to 50.4% in 2017. However, this remains marginally below the Regional average (50.8%) and significantly below the National average (57.2%). The proportion of the population educated to degree level was 31.4% compared to 31.8% regionally and 38.6% nationally. As a result, nearly half the high-skilled jobs in Birmingham are currently taken by people who live outside of the City.

Figure 4.13 Nursery, Primary and Secondary Education Resources across Birmingham

wood.
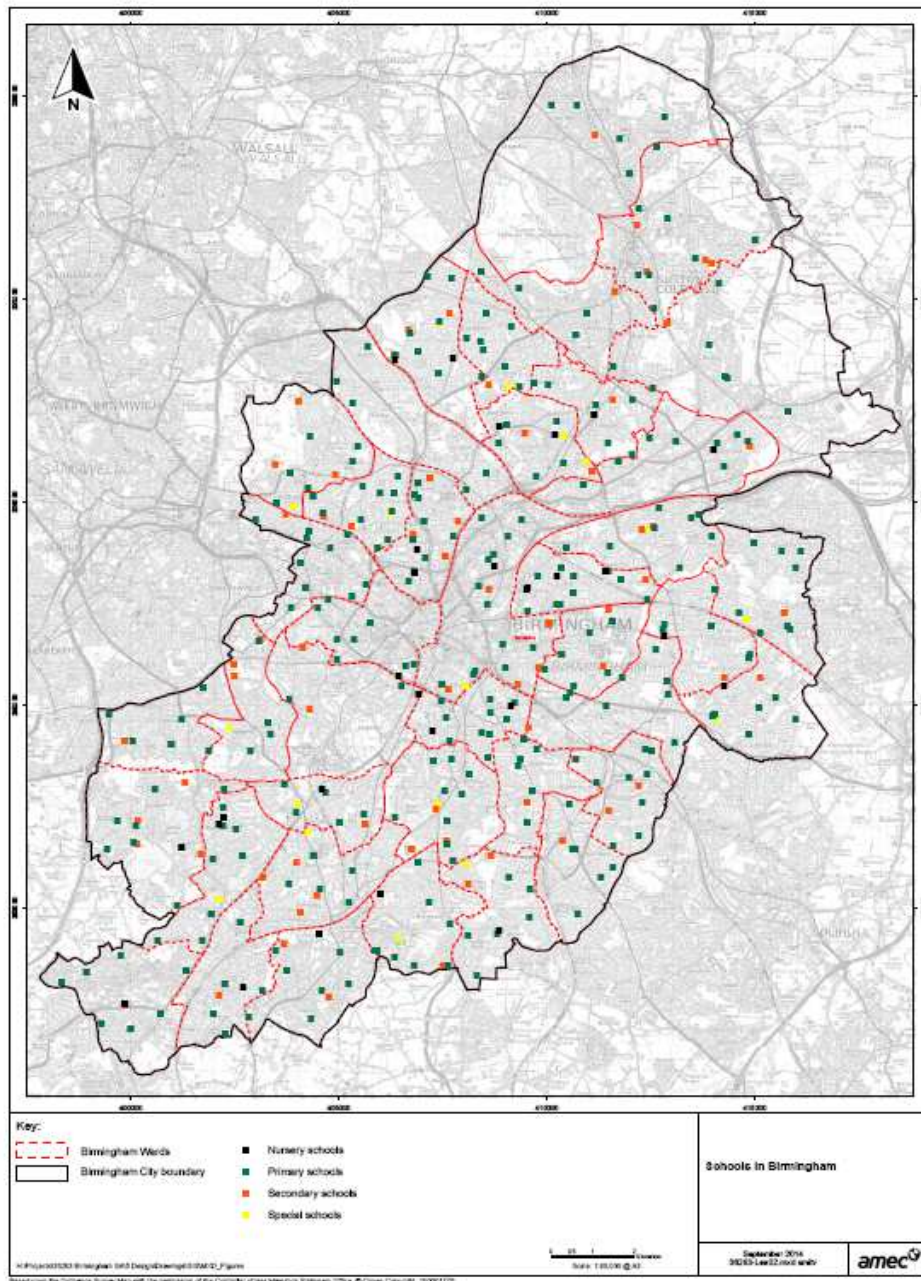
Birmingham's 2016 GCSE results were very positive. 2016 saw the introduction of a new accountability system for schools with the new measure of Progress 8 – "the progress a pupil makes from the end of Key Stage 2 to Key Stage 4, compared with pupils nationally with similar attainment". The national average performance is therefore zero. A positive score indicates out-performing the national average. Birmingham's provisional result is zero, second best out of core cities.

Birmingham Adult Education Service (BAES) runs a number of adult education courses in the City and these can be undertaken in a variety of locations across the city and cover a wide variety of topics to help improve education and skills levels in the city. The Birmingham Education and Development Plan 2015-2020 includes a vision that by 2013 Birmingham will be:

'Renowned as an enterprising, innovative and green city that has delivered sustainable growth meeting the needs of its population and strengthening its global competitiveness.'

To deliver the vision the plan includes a number of objectives including to ensure sufficient school places for young people; that additional places are provided where needed at the right time to meet needs; and to ensure young people participate fully in the school education offer and beyond into further education and training.

Worklessness and long term unemployment is a key issue for Birmingham's residents and can lead to poor economic performance. Table 4.10 shows the total number of residents currently claiming Job Seekers Allowance (JSA). JSA is payable to people who are available for, and actively seeking work. The number of claimants steadily rose to over 50,000 in 2012 but had dropped to 30,685 by 2017. However, the claimant rate of 6.1% was higher than other cities in the UK – Newcastle was the next highest at 5.1%[60].

Table 4.10   Total JSA Claimants 2007 - 2017[61]

	Birmingham (number)	Birmingham (%)	West Midlands (%)	UK
2007	35,058	7.7	3.9	2.7
2008	35,154	7.7	4.0	2.9
2009	49,011	10.7	6.6	4.8
2010	48,074	10.5	6.2	4.7
2011	49,319	10.8	6.2	4.8
2012	50.123	11.0	6.2	5.0
2013	47,278	10.4	5.8	4.6
2014	41,955	5.9	3.7	3.0
2015	31,605	4.4	2.5	2.1
2016	29,030	4.0	2.2	1.8
2017	30,660	4.2	2.3	1.8
2018	31,405	4.3	2.5	2.0

Birmingham's Local Centres

Birmingham's network of 73 local centres provides the focal points for much day-to-day shopping and community activity. Uses of buildings within local centres have been surveyed by Birmingham City Council

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[60] Figures from Birmingham Labour Market Update January 2018

[61] ONS claimant count with rates and proportions and Birmingham Labour Market profile 2018.

wood.

during 2013 and 2014 in order to help track of changes in use which can affect their vitality and require a policy response. Figure 4.14 below maps the local centres across the City.

Figure 4.14 Birmingham's Local Centres
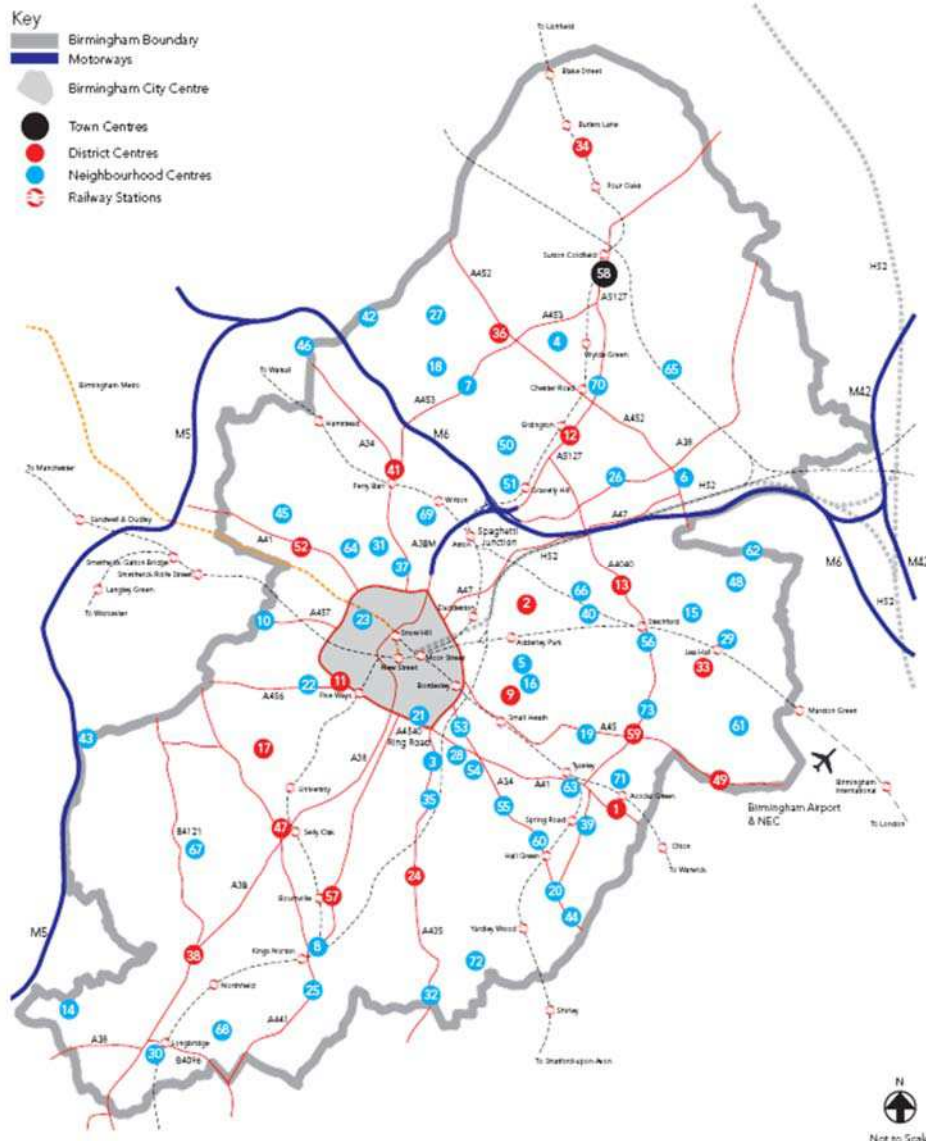
Source: BCC (2012) Shopping and Local Centres SPD

1. Acocks Green	26. Kingsbury	51. Slade Road
2. Alum Rock Road	27. Kingstanding Circle	52. Soho Road
3. Balsall Heath	28. Ladypool Road	53. Sparkbrook
4. Boldmere	29. Lea Village	54. Sparkhill
5. Bordesley Green	30. Longbridge	55. Springfield
6. Castle Vale	31. Lozells	56. Stechford
7. College Road	32. Maypole	57. Stirchley
8. Cotteridge	33. Meadway	58. Sutton Coldfield
9. Coventry Road	34. Mere Green	59. Swan
10. Dudley Road	35. Moseley	60. The Parade, Hall Green
11. Edgbaston	36. New Oscott	61. The Radleys
12. Erdington	37. Newtown	62. Timberley
13. Fox and Goose	38. Northfield	63. Tyseley
14. Frankley	39. Olton Boulevard (Fox Hollies)	64. Villa Road
15. Glebe Farm	40. Pelham	65. Walmley
16. Green Lane	41. Perry Barr	66. Ward End
17. Harborne	42. Queslett	67. Weoley Castle
18. Hawthorn Road	43. Quinton	68. West Heath
19. Hay Mills	44. Robin Hood, Hall Green	69. Witton
20. Highfield Road, Hall Green	45. Rookery Road	70. Wylde Green
21. Highgate	46. Scott Arms	71. Yardley Road
22. Ivy Bush	47. Selly Oak	72. Yardley Wood
23. Jewellery Quarter	48. Shard End	73. Yew Tree
24. Kings Heath	49. Sheldon	
25. Kings Norton Green	50. Short Heath	

Analysis of the proportion of three use classes – A3 (restaurants), A4 (pubs and drinking establishments) and A5 (hot food takeaways) – which are likely to be a particular focus for policy, reveals significant variation across centres, and some disproportionately high occurrences above the mean of 17.34% (Figure 4.15). The significance of some of these relatively high proportions of A3/A4/A5 uses in terms of their relationship to issues such as health is unproven. Section 4.6.8 below explores the spatial pattern of health across Birmingham.

Figure 4.15 Proportion of Use Classes A3, A4 and A5 by centre and total units

Culture/Sport/Recreation

Birmingham is internationally known for sports and exhibitions, with well-known venues including the National Indoor Arena and the National Exhibition Centre. Developments in arts, sports and leisure have played a key part in the City's renaissance over the past twenty years. Birmingham has many strengths including world-class performance, arts, sports and exhibition facilities, and internationally recognised companies of cultural excellence. Many of these facilities are located in the City Centre, including the International Convention Centre; Birmingham Symphony Hall, home of Birmingham Symphony Orchestra, the

National Indoor Arena, a major concert and sporting venue; Birmingham Hippodrome; Birmingham Royal Ballet and Birmingham Museum & Art Gallery. These are complemented by smaller venues such as the IKON Gallery, Jam House and Electric Cinema.

The proportion of leisure development that has taken place in centres has varied considerably year on year, and there appears to be no clear trend or pattern. This is probably in part due to the fact that there are various types of leisure development and some (e.g. sports facilities associated with playing fields or pitches), would not necessarily be expected to be located in centres. The relatively high proportion of out-of-centre leisure development overall since 1991 (61%) is skewed by a small number of very large developments, such as 'Star City' (Nechells), Birmingham Great Park and Longbridge which were committed before the current national planning policy guidance came into effect. There has also been a significant amount of leisure development based around existing sports facilities in out-of-centre locations. During 2010/11 88% was built out-of-centre including an indoor sports arena at the Tenby building, Great King Street (Aston). Also out-of-centre, but under construction, included the erection of a 5,000 seat stand at the Alexander Stadium in Perry Barr. Birmingham will host the 2020 Commonwealth Games which will prompt a significant amount of construction activity.

Investment in new hotels continues e.g. the Radisson and Etap. Other recent leisure developments in the City Centre include Millennium Point and the Five Ways Leisure complex. A significant amount of leisure development that has taken place in Birmingham since 1991 has been tourism related, for example, the National Sea Life Centre and Millennium Point. The number of overseas visitors to the City has increased from 520,000 in 2000, to 713,000 in 2012 and 1,110,000 in 2015[62]. Birmingham is now the fourth most popular destination in the UK among overseas residents after London, Edinburgh and Manchester. Birmingham welcomed the highest number of visitors on record in 2016, with tourist numbers reaching 39 million, and tourism revenue hitting an all-time high of £6.5 billion.

Culture and leisure facilities both attract people to Birmingham and serve local residents. According to the Community Strategy, surveys show that 45% of Birmingham residents had been to the theatre or a concert in the city in the last year, while 36% had visited a museum or gallery.

Community Involvement

Community involvement can be measured by a number of indicators, including election turnout. Table 4.11 shows the election turnout in Birmingham for the 2017 General Election by constituency. It can be seen that the turnout varies between some of the different constituencies.

Table 4.11   General Election Turnout in Birmingham for the 2017 General Election

Constituency	% Turnout
Sutton Coldfield	70.06
Hall Green	69.63
Selly Oak	66.05
Edgbaston	64.21
Perry Barr	63.28
Northfield	61.53
Hodge Hill	61.50
Yardley	61.46
Ladywood	59.21
Erdington	57.37

[62] Source: http://birminghamtoolkit.com/files/downloads/VisitorEconomyHeadlines2016withupdatedSTEAMfigures.pdf

Constituency	% Turnout

Source:
https://www.birmingham.gov.uk/info/20097/elections_and_voting/1273/parliamentary_general_election_results_june_2017/5

Erdington constituency had the lowest turnout, which was the third lowest turnout in the UK. Conversely, Sutton Coldfield had the highest turnout, but this was only the 217th highest turnout in the UK.

One important aspect of community involvement is the extent to which people feel involved in the development of their local area. As part of the Government's Big Society, new legislation has been introduced to encourage local people to have more say in how their area looks. Neighbourhood Planning is a process by which communities can come together and prepare land use plans that will guide the type of developments they would wish to see in their area.

The Sustainable Community Strategy indicates that in 2006, 40% of people agreed that they can influence decisions that affect their local area, an improvement of 22% from 2004. Furthermore, the Birmingham Community Strategy (Strategic Assessment Update November 2006) found over half those asked felt that people together can influence decisions in their constituency (most apparent in areas of Ladywood and Sparkbrook), compared to just over a quarter who felt that people collectively had little or no influence (most apparent in Perry Barr and Selly Oak).

Equality

Birmingham's residents are from a range of national, ethnic and religious backgrounds, as Birmingham is one of the most ethnically diverse cities in Europe. Table 4.12 summarises the proportion of the main ethnic groups present. Almost 10% are Pakistani, with the next largest groups being Indian and Black Caribbean. Between 1991 and 2001, the Black and Minority Ethnic (BME) population increased, particularly the Pakistani and Bangladeshi groups. BME groups are mainly concentrated in the inner parts of the City. BME groups vary in terms of housing, the labour market, health and age structure. Most established BME groups are growing through natural change and immigration. Since 2001 the city has attracted migrants from a widening range of countries, including Eastern Europe, Africa and the Middle East.

Table 4.12   Largest Ethnic Groups in Birmingham and England, 2010

Ethnic Group	% of Population Birmingham	% of Population England
White British	63.3	82.8
Pakistani	9.7	1.9
Indian	5.8	2.7
Black Caribbean	4.0	1.2
White Irish	2.1	1.1
White Other	2.6	3.6
Mixed Groups	3.2	1.8
Bangladeshi	2.5	0.7
All other groups	6.8	4.1

Source: Experimental Estimates, National Statistics, Crown Copyright 2010

Birmingham has a fairly youthful population. Approximately 46% of residents are younger than 30, compared with the national (England) average of 38%[63].

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[63] Source: Mid Year Population Estimates, ONS

Inequalities are reflected in statistics relating to people without a car. Birmingham has a relatively high percentage of households without a car, 38%, compared to the English average of 27% The percentages without a car are high in the inner parts of the city and in some more peripheral areas. About two thirds of those in social-rented housing live in households without a car, as do nearly half of unemployed people and those not working because of long term sickness or disability. Percentages are particularly high among households containing lone pensioners and lone parents. Percentages are also high among Black, Bangladeshi and White Irish households.

Work undertaken for the West Midlands Local Transport Plan showed that there is generally good accessibility in most places at most times for the 33.7% (2001) of households without a car, due to the extensive bus network. However, two particular problems were identified with access for unemployed people to attend job interviews and with access to major NHS hospitals by public transport.

Further detail on equality has been covered in the section on Economy and Equality.

Health

Information on health for Birmingham can be found in the NHS Health Profile for the area 2017[64], which gives a snapshot of health in Birmingham. According to the NHS, life expectancy in Birmingham for males is 77.1 years which is 'significantly worse' when compared to an average across England of 79.5 years. Furthermore, life expectancy for females is 81.9 years compared to an average across England of 83.1 years.

Adults in Birmingham are less likely than average to follow healthy eating guidelines, but the proportion of obese adults is not vastly different to the England average. A survey undertaken by Sport England[65] reveals that there is a low rate of participation in sport and other physical activity in Birmingham compared with other local authorities within the West Midlands. The 2017 health profile reflects this trend with the percentage of physically active adults lower (51.1%) than the national average (57%).

Teenage pregnancy rates are 'significantly worse' for Birmingham (47.4 per 1,000) than the England average (38.1 per 1,000). Binge drinking is lower than the England average; however, hospital stays for alcohol-related harm were 'significantly worse' in Birmingham for 2017 with 6,786 per 100,000 rate of admission episodes for alcohol attributable conditions compared to the national average of 1,163[66]. Rates of sexually transmitted infections are better than the England average. The incidence of malignant melanoma is lower than average (2017). Estimated levels of adult 'healthy eating' and obesity are worse than the England average.

People in routine and manual occupations have poorer health than those in more highly-skilled jobs, and these people are also more likely to smoke. The infant death rate is greater than the England average in this group. Birmingham has a higher than average number of people working in lower grade jobs such as process plant and machine operatives than in the rest of the West Midlands and England.

Local health priorities for Birmingham include childhood obesity, statutory homelessness and reducing the numbers of vulnerable children and adults

Poverty

According to the Index of Deprivation, in 2015 about 40% of Birmingham's residents lived in areas that were in the most deprived 10% in England. Concentrations are very high in wards to the east, north and west of the City Centre and also in the Tyburn and Kingstanding Wards to the north of the M6 motorway (Figure

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[64] Available at http://fingertipsreports.phe.org.uk/health-profiles/2017/e08000025.pdf [Accessed April 2018]

[65] http://www.sportengland.org/research/active_people_survey/active_people_survey_2/regional_results.aspx

[66] Public Health Organisations (2017) Hospital stays for alcohol related harm from 2017 Birmingham Health Profile

4.16). In 2014 (the most recent figures available) the proportion of child living in poor households in Birmingham was 32.9%, compared to 20.3% for England and 20% for the UK.[67]

In Birmingham there are over 100,000 children living in poverty, the equivalent of 37% of all children in the city (after housing costs). Nearly half of Birmingham's children live in the 10% most deprived areas in the country – with nearly 8,000 living in the 1% most deprived areas. Birmingham Ladywood Constituency has the third highest level of child poverty in the UK among parliamentary constituencies with 47% of children living in poverty after housing costs[47].

Figure 4.16 Index of Multiple Deprivation 2015

Data from the Publi[...]ts live in neighbourhoods classed as some of the most deprived (based on IMD classifications) compared to the average for England of 20%. In consequence, less than 10% of residents in Birmingham live in neighbourhoods classed as the least deprived.

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[67] https://www.gov.uk/government/statistics/personal-tax-credits-children-in-low-income-families-local-measure-2014-snapshot-as-at-31-august-2014-30-september-2016
[68] Available from http://fingertipsreports.phe.org.uk/health-profiles/2017/e08000025.pdf [Accessed April 2017]

As noted above, well planned GI can give access to high quality green spaces that will provide opportunities for better health and well-being. Figure 4.17 illustrates the distribution of green spaces, by type, across the City. Further information on health in Birmingham can be found in the Department of Health Birmingham Health Profile 2017[69].

Figure 4.17 Green Spaces Across Birmingham
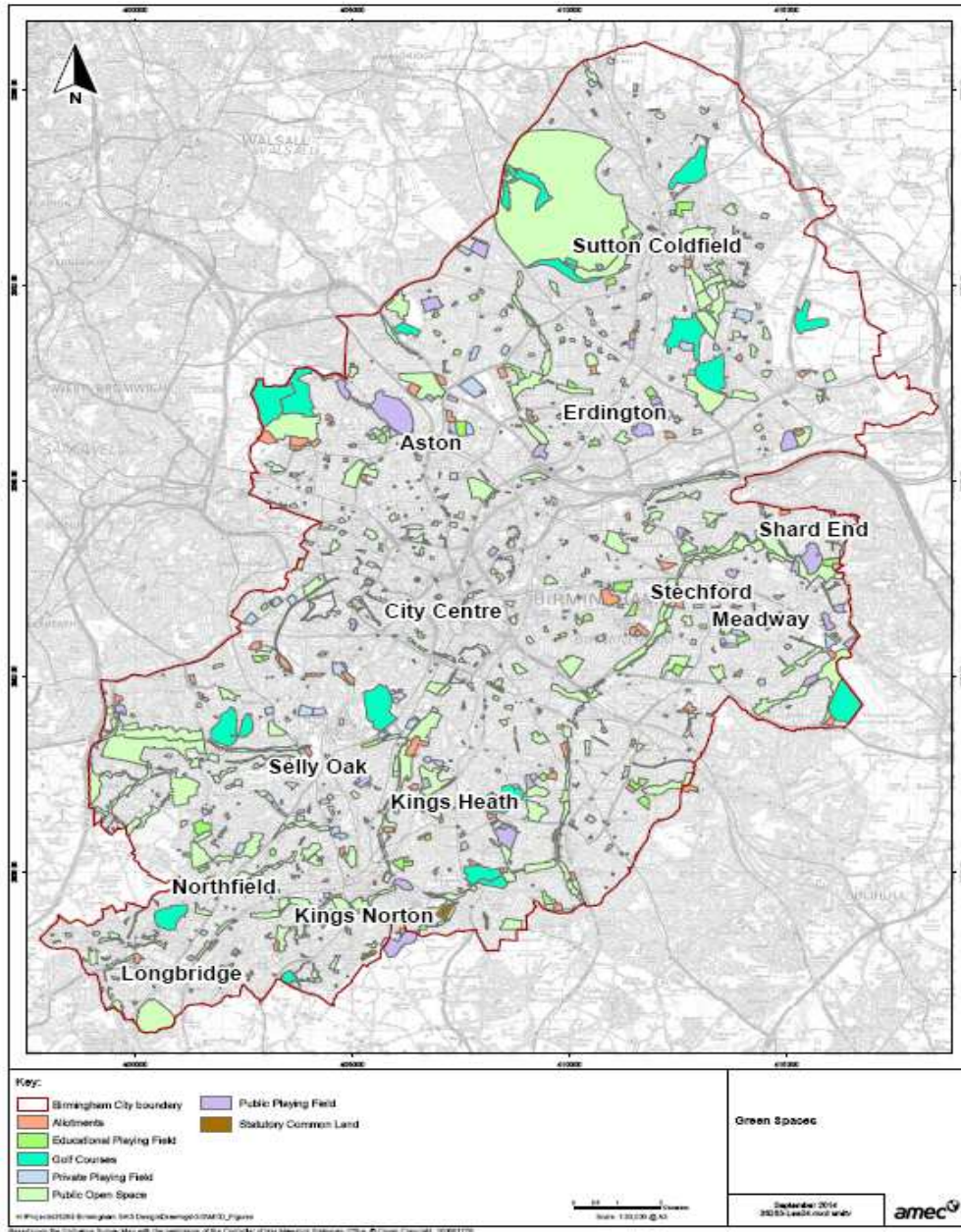
Crime

Burglary crime in Birmingham was declining between 2011 and 2015, however the most recent data from 2016 indicates that crime is on the rise. The total Birmingham crime rate for 2014-2016 is 205 crimes per 1000 people. This is notably much lower than other cities of a similar size: the crime rate in Manchester – the

[69]Department of Health Birmingham Health Profile 2017 http://fingertipsreports.phe.org.uk/health-profiles/2017/e08000025.pdf

next largest UK city after Birmingham – is 87% higher, at 384 crimes per 1000 people. Antisocial is the most reported crime in Birmingham, followed by violent crime, which is 40% higher than the national average. Crime and safety remain a concern of local people, however Birmingham City Council's Performance Plan[70] feedback indicates that 95% of Birmingham residents surveyed say they feel safe during the day. The Birmingham Community Safety Partnership's 2012 annual report reveals that the city is making good progress to reducing serious violence among 10-19 year olds, with a 19.3% reduction.

More recent figures show that Burglary crime whilst fluctuating has increased with 7,625 victims of Burglary reported for the 12 months ending 30th September 2017. Robbery has also increased with 3.647 incidents for the 12 months ending 30th September, compared with 3165 for the equivalent period in 2016. Shoplifting offences fell slightly, whilst violent offences have been steadily increasing, alongside possession of weapons offences. This is also reflected in the total crimes recorded in Birmingham which has been steadily increasing and stood at 96,992[71] for the 12 months ending 30th September 2017. In the month of February 2018, West Mercia police had recorded 10 street crimes in Birmingham and this included 3 violent offences, 1 incident of shoplifting and 2 other thefts.

Vehicle crime is a notably bigger problem in Birmingham than other cities. Although making up just 10% of total crime recorded in Birmingham in 2016 the city had the fourth highest amount of vehicle crime over the period in the country with 22 recorded incidents per 1,000 people which was 145%[72] higher than the national average.

Figures from the Birmingham Community Safety Partnership in 2005 showed that there are certain areas in Birmingham which have higher burglary rates than elsewhere in Birmingham, notably Erdington Ward, Lozells in Perry Barr, Bournbrook Student Area in Selly Oak, Frankley and Rubery in Northfield, and Brandwood and Billesley Ward Boundary in Hall Green. The number of robberies and muggings in Birmingham tends to fluctuate (as demonstrated by the more up to date statistics provided above), but there were higher rates in the following four areas than in other areas in Birmingham: Nechells Parkway in Ladywood District, Soho Road Lozells and Aston in Ladywood and Perry Barr Districts; the city centre; Coventry Road on the Ladywood, Bordesley Green and Yardley Border. Noise

Levels of noise pollution are problems in certain parts of the city according to the Sustainable Community Strategy[73]. Surveys have shown that one in eight residents are concerned about noise, and the Council receives over 3,000 complaints about noise a year. Traffic is one of the principal sources of this noise. Birmingham has pioneered 'noise mapping' to help manage the problem.

Influence of the DM DPD on Population and Human Health

The influence of the DM DPD on population and human health could make a significant difference in respect of certain measures such as changes in the use of buildings in local centres. Here, for example, changes to hot food takeaways could be carefully monitored in order to gauge their potential impact on the character of the locality, health indicators and vulnerable groups such as children. Individual approaches to specific service centres may be required to take account of special circumstances including their size, economic health and proximity to specific receptors such as schools. More widely, the role of Green Infrastructure in promoting health and well-being needs to be recognised and planned for.

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[70] Source: http://www.birmingham.gov.uk/cs/Satellite?c=Page&childpagename=Policy-and-Delivery%2FPageLayout&cid=1223092613434&pagename=BCC%2FCommon%2FWrapper%2FWrapper
[71] All crime statistics from
https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/datasets/recordedcrimedataatcommunitysafetypartnershiplocalauthoritylevel [Accessed April 2018]
[72] https://www.verisure.co.uk/advice-and-help/crime-statistics/birmingham-crime-statistics
[73] https://www.birmingham.gov.uk/downloads/file/1543/strat1_sustainable_community_strategy_birmingham_2026_2008pdf

Water & Air Quality

The State of Birmingham's Rivers

The BCC SPD on sustainable management of rivers and floodplains[74] summarises the key issues relating to the state of the City's rivers:

- ▶ Parts of the river system are in a poor ecological state;
- ▶ Parts of the river system are inaccessible over much of their length and are of poor amenity value to the local community;
- ▶ Fly tipping of domestic and commercial waste;
- ▶ Beneath Birmingham, groundwater is rising, bringing with it contaminants that have previously remained in the ground;
- ▶ Wildlife habitats in the rivers and at the banksides have been badly damaged;
- ▶ During storms pollution flushes into the river, causing a loss of oxygen and killing fish; and
- ▶ There are increasing development pressures on bank-side locations.

Across the Humber River Basin[75] as a whole, despite recent progress, a range of challenges still remain, which will need to be addressed to secure the predicted outcomes. They include:

- ▶ Physical modifications - affecting 42% of water bodies;
- ▶ Pollution from waste water – affecting 38% of water bodies;
- ▶ Pollution from towns, cities and transport - affecting 16% of water bodies;
- ▶ Changes to the natural flow and level of water - affecting 6% of water bodies;
- ▶ Negative effects of invasive non-native species - affecting <1% of water bodies;
- ▶ Pollution from rural areas - affecting 32% of water bodies; and
- ▶ Pollution from abandoned mines - affecting 4% of water bodies.

Reservoirs and Canals

Birmingham has 22 reservoirs as defined under the Reservoir Act 1975 of which 11 large raised reservoirs are the responsibility of Birmingham City Council. The remaining reservoirs are the responsibility of a variety of organisations including Environment Agency (3), Severn Trent Water (5), British Waterways (1) and private companies (2). Of these, two reservoirs are used for drinking water supply and one, a canal feed reservoir at Edgbaston.

Birmingham has an extensive network of canals, the exact length depends on where you draw the city boundaries, but the whole Birmingham Canal Navigations system extends for approximately 160 miles in total. It is one of the most intricate canal networks in the world. These waterways converge in the city centre at Gas Street Basin. The canals within Birmingham include:

- ▶ Birmingham & Fazeley Canal;

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[74]https://www.birmingham.gov.uk/downloads/file/1166/sustainable_management_of_urban_rivers_and_floodplains_supplementary_planning_document

[75] Environment Agency (2016) Humber River Basin Management Plan

- Birmingham Canal Main Line;

- Birmingham Canal Old Main Line;

- Grand Union Canal;

- Tame Valley Canal;

- Worcester and Birmingham Canal; and

- Stratford-upon-Avon Canal.

Air

The whole of Birmingham was declared as an Air Quality Management Area (AQMA) in 2003. The main pollutant is nitrogen dioxide, the primary sources of which are transport and industrial combustion processes.

The transportation sector is a major contributor to the emissions of nitrogen oxides across the city, but there has been a slight decrease in the traffic contribution over the last few years according to the Air Quality Action Plan. The City's principal road network is illustrated in Figure 4.18 and shows the distinct presence of motorways to the north of the City and their influence, along with the City Centre, on NO2 concentrations (Figure 4.19). The overall number of morning rush hour car trips into Birmingham City Centre has declined by around one third over the period 1999 – 2011 (AMR, 2013), replaced by an increase in rail trips by one third (18,987 to 27,674) and a doubling of tram trips (998 to 1,687).

Figure 4.18 Birmingham's Transportation Network
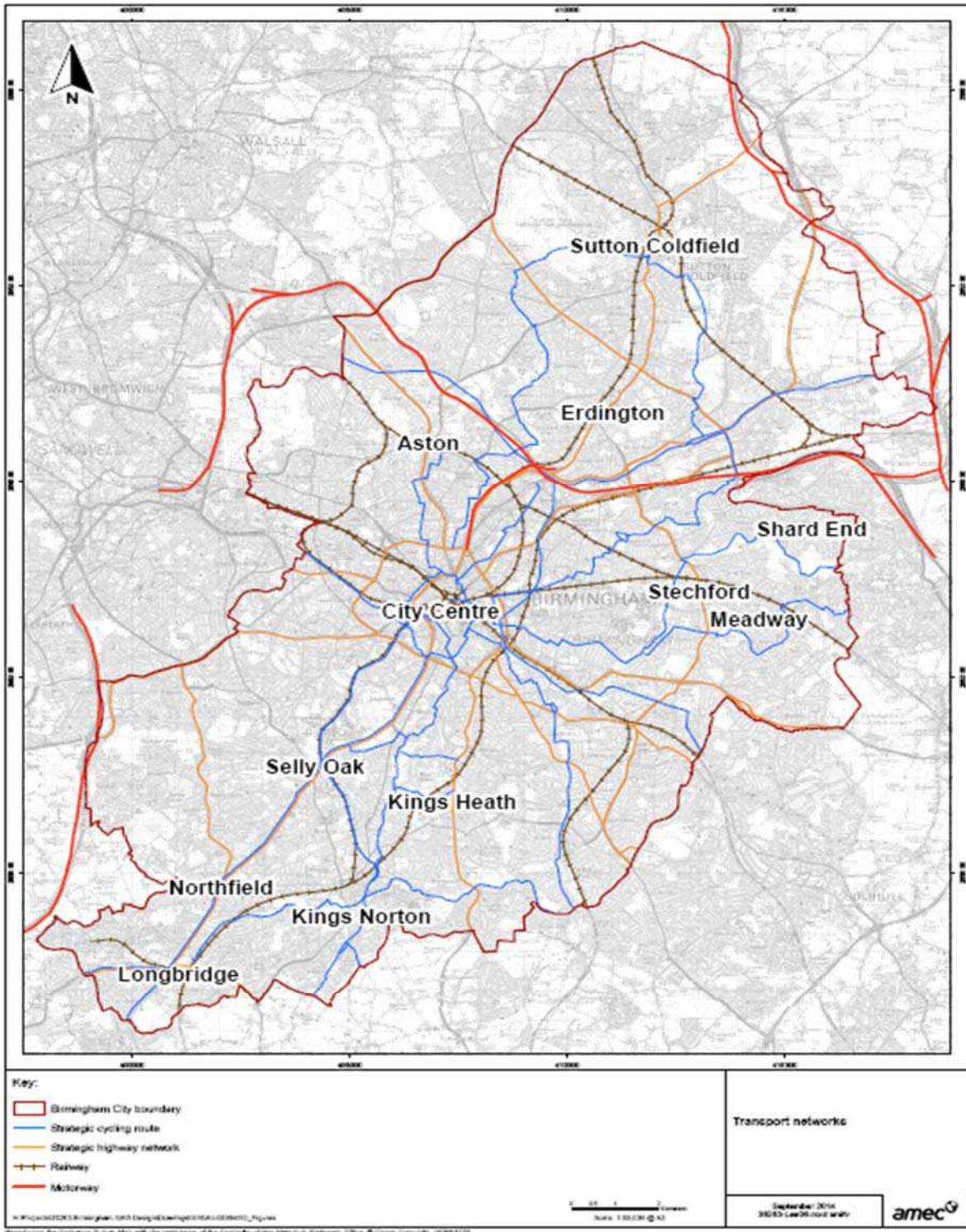
Figure 4.19 Modelled N02 Concentrations across Birmingham 2016[76]
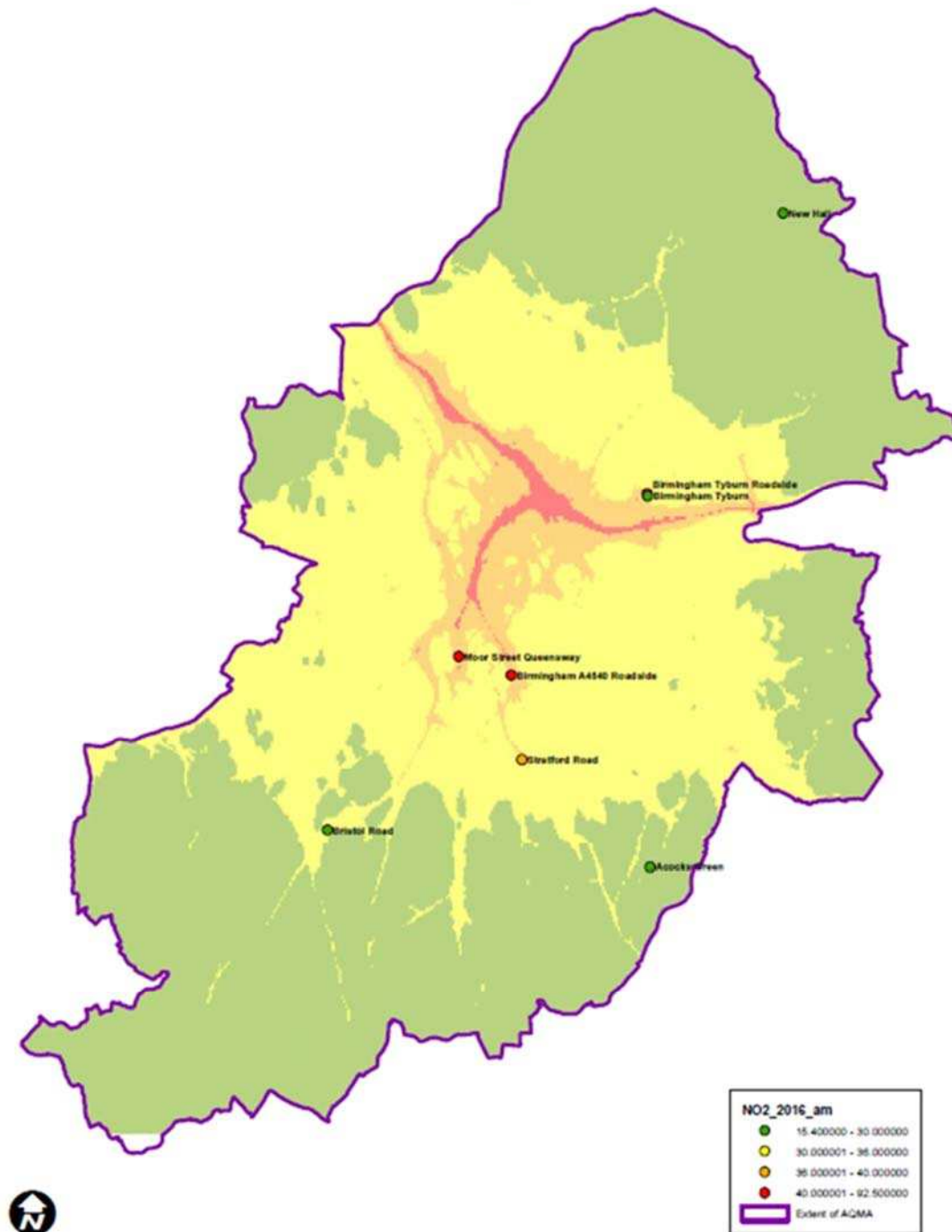
Influence of the DM DPD on Water and Air Quality

The influence of the DM DPD on water and air quality is likely to be both direct and indirect, short and longer term, and potentially cumulative reflecting the impact of multiple developments over a long timescale. Through the application of the supporting criteria to the policies and appropriate conditions, negative effects should be avoided and where appropriate mitigated. However, monitoring of developments will be required to determine net effects. A specific issue relates to the increased volume of waste water and sewage effluent

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[76] Birmingham City Council (2017) 2016 Air Quality Annual Status Report (ASR)

associated with City's growth proposals will need to be treated to a high enough standard to ensure that there is no detriment in the quality of the watercourses receiving this discharge. Given the dispersed nature of the proposed development, it is likely that there will be a requirement for widespread upgrading of the sewerage pipe network throughout the City. Policy will need to ensure that the sewerage system has adequate capacity to manage any additional flows.

Cultural Heritage

Built and Historic Environment

Birmingham has a wide variety of distinctive historic townscapes, buildings and landscapes. The extent of the City's historic resource is summarised in Table 4.13 and mapped in Figure 4.20.

Table 4.13   Birmingham's Historic Built Environment

Heritage Asset	Number	Area (Hectares)
Scheduled Ancient Monuments	14	528.72
Statutorily Listed Buildings	1,486	369.98
Locally Listed Buildings	444	176.06
Conservation Areas	30	1,223.22
Registered Parks and Gardens	14	1,183.44
		Length (Kilometres)
Canals	-	57.4

Source: Birmingham City Council, AMR (2015)

There are currently 30 Conservation Areas in Birmingham, which account for 4% of the land area of the City including five within the City Centre. Some Conservation Areas, such as the Jewellery Quarter and Bourneville, are unique and are nationally recognised. Birmingham also has nearly 1,500 statutorily listed buildings and 14 registered parks and gardens of special historic interest. The City Council applied to the United National, Educational, Scientific and Cultural Organisation for 'World Heritage Site' status in 2011 for the Jewellery Quarter. The City's Listed Buildings range in date from mediaeval churches and houses to important examples of twentieth century architecture. Birmingham also has an extensive network of historic canals, reflecting its key role during the Industrial Revolution in the eighteenth and nineteenth centuries.

The City's archaeological resource is surprisingly varied for such a major urban area. Some remains are recognised as being of national importance, and are protected by scheduling. Known remains range in date from prehistoric earthworks to nineteenth and twentieth century industrial buildings and structures. The Historic Environment Record maintained by the City Council includes details of all known archaeological remains within the City. These now total almost 5,525 records which has increased from 5,445 from 2012. Historic Landscape Characterisation of the City commenced in 2011 with 4,141 polygons captured. Environmental improvements by the City Council during the late 1980s and early 1990s, such as the development of the ICC and Centenary Square, Victoria Square and the pedestrianisation of New Street, have improved the overall quality of the environment within the City Centre. There have been notable successes in relation to improving the quality of design and the environment, particularly in the city centre. This was recognised by the award to the city of the RTPI Silver Jubilee Cup in 2004. Birmingham also won the European City of the Future Award at the European Property Awards in Munich in 2005.

Figure 4.20 Birmingham's Heritage Assets
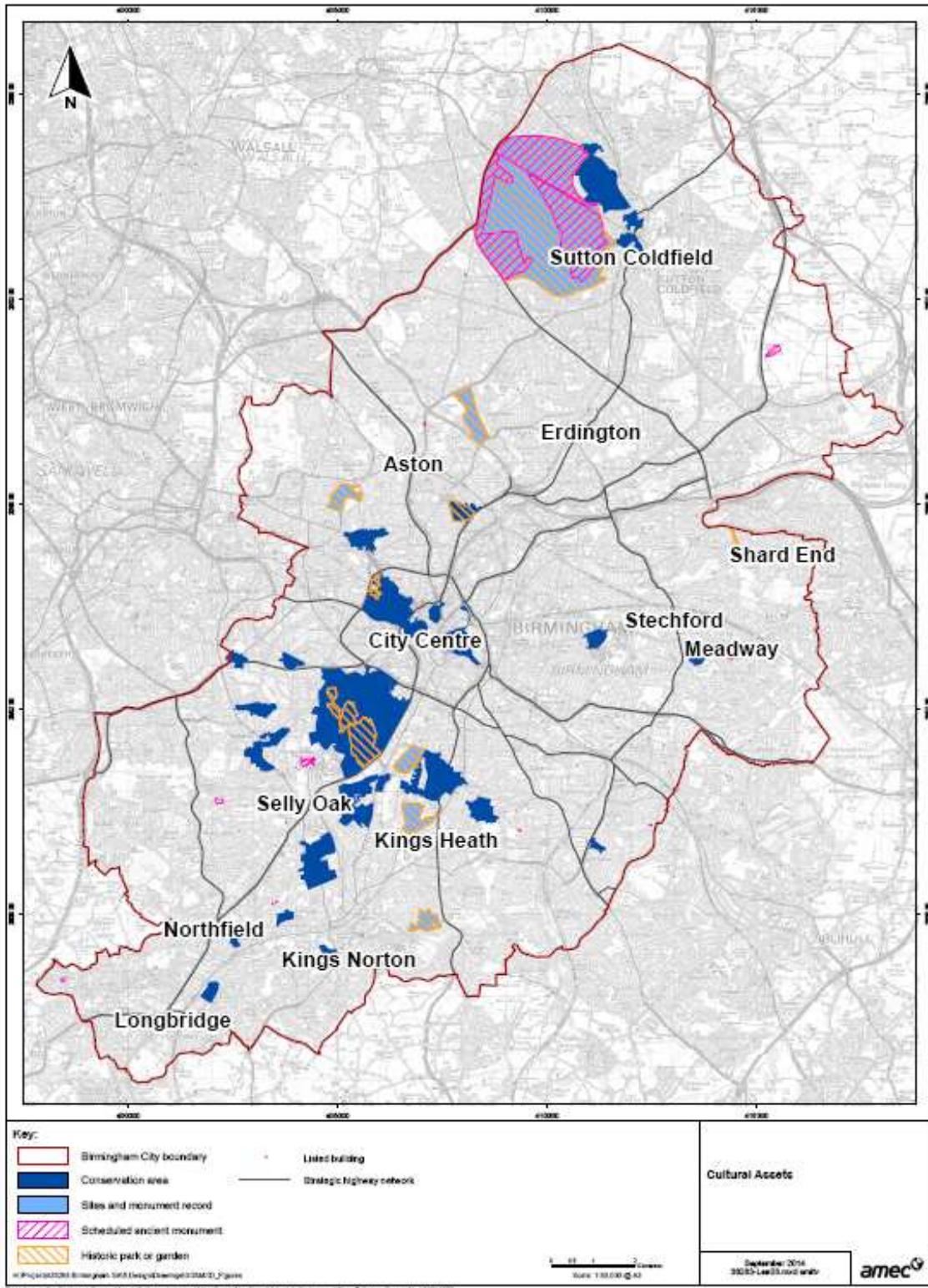
There are a number of challenges and opportunities facing Birmingham's historic environment including the condition of its designated and non-designated heritage assets, the continuing programme of townscape and public realm improvements, pressure on the skyline and its cultural identity and distinctiveness.

There are 26 entries on Historic England's 'at risk' register for Birmingham[77] and these include a number of churches, the Grand Hotel on Colmore Row, the public baths in Moseley, the Red Lion pub on Soho Road, several conservation areas, former school of art on Moseley road, and Perrott's Folly. The condition of these historic assets on the register varies, for example Icknield Street School is classed as category A i.e. at immediate risk of further rapid deterioration, as are the public baths on Moseley Road, the Red Lion pub on Soho pub is category C so in slow decay but not in any immediate risk of rapid deterioration and Austin Village Conservation Area is in very bad condition and is deteriorating significantly. Some of these are in the process of being repaired or have plans in place for repair whilst others are at risk, for example the vacant British Rail goods office.

Birmingham's Heritage Strategy[78] 2014-19 has four key aims:

- ► Preservation – including ensuring heritage is properly considered in the planning process, supporting the Heritage Champion and improving the sustainability of heritage programmes and projects;

- ► Prioritisation – including working with the Heritage Strategy Group to bring forward projects, including in local districts, to co-ordinate bidding for funds and planning for major anniversaries and city events;

- ► People – including participation, engagement volunteering, celebrating local heritage and identity and supporting Districts to engage with heritage in neighbourhoods; and

- ► Promotion – including building a better story around our heritage and improving our marketing of heritage assets.

The strategy notes that given reductions in funding available that partnership working will be important going forward for Birmingham's historic environment. The strategy also notes Community Infrastructure Levy (CIL) will be important for providing funding for the historic environment and also the Heritage Lotter Fund (HLF). HLF has identified a number of priority areas in the city which have received less funding than other parts of the region. These are:

- ► Perry Barr;

- ► Oscott;

- ► Handsworth Wood;

- ► Lozells & East Handsworth;

- ► Aston;

- ► Soho;

- ► Ladywood; and

- ► Nechells.

There is a continuing programme of townscape and public realm improvements in Birmingham which presents opportunities for historic environment improvements. One of the big City Centre development

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[77] https://historicengland.org.uk/advice/heritage-at-risk/search-register/results?q=birmingham&searchtype=har&page=2 [Accessed July 2018]

[78] Birmingham Heritage Strategy 2014-2019 Available at
https://www.birmingham.gov.uk/downloads/file/2008/exam_30_birmingham_heritage_strategy_2014-2019 [Accessed July 2018]

schemes currently ongoing is the paradise area between the museum and art gallery and the library. Paradise is to be transformed into a vibrant mixed use development of commercial, civic, retail, leisure and hotel space, providing major improvements to pedestrian access and greatly enhanced public realm befitting this exemplary historic setting. There are also masterplans for developments in other parts of the City Centre including around Snowhill.

In 2017 Historic England published an updated edition of Streets for all which is a practical guide for anyone involved in planning and implementing highways and public realm works in sensitive historic locations. A supplementary document was then published in the context of the West Midlands[79]. This document explains how historic character adds value to the region's contemporary public realm and summarises some of the priorities and opportunities for further improvements to the West Midland's streetscapes.

This supplementary document notes that through support by the Greater Birmingham and Solihull Local Economic Partnership, Birmingham is now in the top three spenders on public realm nationally. This level of spending has helped to deliver a number of public realm improvements across the City.

Natural Landscape

Although much of Birmingham is built up, there is a significant amount of open land within the City (Table 4.14).

Table 4.14   The Natural Environment and Open Space

Open Space Category	Area (ha)	% of City Council Area
Sites of Special Scientific Interest	896.59	3.35
National Nature Reserves	811.73	3.03
Local Nature Reserves	316.73	1.16
Sites of Importance for Nature Conservation	828.03	3.09
Sites of Local Importance for Nature Conservation	698.98	2.62
Public Open Space	3,069.77	11.46
Public Playing Fields	296.9	1.11
Private Playing Fields	268.11	1.0
Private Open Space	67.19	0.25
Educational Playing Fields	166.33	0.62
Golf Courses	657.78	2.46
Statutory Common Land	11.25	0.04
Allotments	243.8	0.91
Green Belt	4,154.77	15.52

Source: Birmingham City Council, AMR (2015)

Landscape character is a key contributor to regional and local identity, influencing sense of place, shaping the settings of people's lives and providing a critical stimulus to their engagement with the natural environment. The National Character Areas (NCAs) provide a description of landscape character across

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[79] https://content.historicengland.org.uk/images-books/publications/streets-for-all-west-midlands/heag149h-sfa-west-midlands.pdf/

England[80]. These are used by Natural England to provide a context for monitoring landscape change through the Countryside Quality Counts (CQC) project[81]. Birmingham falls within two NCAs, Arden to the south and Cannock Chase and Cank Wood to the north. The part of the City which lies within Arden is almost entirely urbanised. The wider landscape to the south is characterised by a farmed woodland landscape of rolling landform with narrow meandering river valleys.

The National Character Area description relevant to Birmingham states:

"Birmingham has a clearly-defined concentric pattern of development. Much of the landscape is dominated by 19th and 20th century housing, the former in characteristic red brick. Canals, parks, golf courses and the river corridor form the main open spaces, with a substantial parkland area around the University at Edgbaston and some low-density garden suburbs like Bourneville. Enclosed within the urban area are fragments of older landscapes like Castle Bromwich Park[82]."

The change in landscape character in the period 1998-2003 is described in the CQC assessment as:

"...development pressure continues to be evident throughout the area, with evidence of expansion around many major settlements such as Nuneaton, Coventry, Bromsgrove and Redditch, and expansion of major roads such as the M6 toll[9]."

The northern part of the city lies within the Cannock Chase and Cank Wood NCA. Relevant extracts from the JCA are set out below:

"Cannock Chase and Cank Wood is a landscape dominated by its history as a former forest and chase and by the presence at its centre of the South Staffordshire Coalfield. It forms an area of higher ground, with the towns and large villages of the Black Country rising out of the lowlands of Shropshire and Staffordshire to the west. In the south it merges with Birmingham and Arden. 9% of the area is woodland, 45% is urban and 9% lies within Cannock Chase AONB. Part of the area lies within the Forest of Mercia (Community Forest) and the Black Country Urban Forest. To the north of Birmingham and west of West Bromwich there are many more areas of open land, primarily in agricultural use, but with a large historic park at Sutton Park and with fragments of heathland, such as Barr Beacon. There are medium-sized fields, generally with good quality hedgerows, patches of ancient enclosure fields and areas of semi-natural vegetation including acid grassland, pools, fens and fragments of ancient woodland. Narrow, hedged lanes are often present and there is a real feeling of countryside despite the nearness of the built-up area[83]."

The change in landscape character is characterised in the CQC assessment as:

"High rate of change to urban (JCA ranked 11th nationally); 46% of JCA is within greenbelt. Marked expansion of fringe into peri-urban around Cannock, Lichfield, Burntwood and Norton Canes. Also development of M6 Toll has had major impact. Character of the area continues to be transformed."

Approximately 15% of Birmingham's land area is designated as Green Belt which lies within the Cannock Chase and Cank Wood JCA. This includes all the open countryside within the City's boundary, as well as other areas extending into the City, for example along river valleys. There are also areas of open space within the built-up areas of the City, such as parks and playing fields, nature reserves and allotments.

Influence of the DM DPD on Cultural Heritage
Development Management policies potentially have a significant influence over cultural heritage assets, emphasising the importance of clear policy, application of suitable conditions and monitoring of impacts to mitigate potential negative impacts.

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[80] http://publications.naturalengland.org.uk/category/587130

[81] http://www.countryside.gov.uk/LAR/Landscape/CC/cqc.asp

[82] Source: http://www.naturalengland.org.uk/Images/jca097-arden_tcm2-21191_tcm6-5424.pdf

[83] Source: http://www.farmsteadstoolkit.co.uk/downloads/jca/JCA%2067.pdf

Appendix D
Consultation Responses on the Scoping Report update (August 2018) and the Council's Response

Ref	Consultee	Consultee Response Summary	Response/ Action
1	Natural England	**General Comments** We understand that due to the delayed adoption of the Birmingham Development Plan (adopted January 2017), work on this DPD has been put on hold and re-started this year. We also understand that Natural England provided comments on the 2014 SA Scoping Report in correspondence to you dated 22 January 2015.	Comments are noted. No action taken.
		Specifically, we support and welcome the updating of this report in respect of the main changes (as acknowledged by your authority): - Updates to the evidence base (where required); - Updated DPD objectives (which are now the same as the BDP objectives); and - Updated review of policies and programmes.	Comments are noted. No action taken.
	Natural England	**Scope of the Proposed Assessment** We welcome the reference to the need for a Habitat Regulations Assessment and confirm that a HRA will be required to ascertain if any likely significant effects on any European site as a result of the Plan's implementation (either on its own or 'in combination' with other plans or projects) will occur and, if so, whether these effects will result in any adverse effects on the site's integrity.	Comments are noted. No action taken.
		Where the possibility of significant effects cannot be excluded, a more detailed Appropriate Assessment (AA) is carried out to determine whether those effects would adversely affect the integrity of European sites.	Comments are noted. No action taken.
		We welcome the comprehensive list of Plans, Programmes and Strategies relevant to the SA/SEA of the DM DPD at Table 3.1. Natural England has not reviewed the plans listed. However, we advise that the following types of plans relating to the natural environment should be considered where applicable to your plan area: • Green Infrastructure Strategies • Biodiversity Plans • Rights of Way Improvement Plans • Shoreline Management Plans • Coastal Access Plans • River Basin Management Plans • AONB and National Park Management Plans • Relevant Landscape Plans and Strategies.	Comments are noted. No action taken. The plans and programmes listed are considered to be comprehensive.
	Natural England	**Main Issues Identified** We welcome and generally agree with the key sustainability issues for Birmingham as detailed at Table 4.1.	Comments are noted. No action taken.
		<u>Proposed Objectives and Guide Questions</u> NE notes that that only one guide question relates to biodiversity – i.e. *'Will development protect and where possible enhance the City's cultural and natural heritage?'* – In this regard, we recommend the strengthening of the need for restoration or enhancement of biodiversity in line with National Planning Policy Framework.	This comment has been actioned accordingly.
		<u>Table 6.3 – Compatibility between the Sustainability Objectives and the Draft DM DPD Objectives</u> NE advises that effective and inventive application of Policy ENV4 *('To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage')* can also lever in positive benefits towards 'education' and 'sustainable connectivity' Plan	Positive benefits on these objectives have now been noted via positive scores in this table.

Ref	Consultee	Consultee Response Summary	Response/ Action
		Objectives via adoption of a multi-functional green infrastructure approach.	
	Natural England	**Objectives Covering the Breadth of Issues Appropriate for Assessing the Effects** Generally, yes. We welcome in particular the positive correlations made between effective green infrastructure and human health. Ecological connectivity: There is a risk that in some situations, development on land of limited biodiversity value in its own right can lead to the creation of islands of biodiversity, permanently severed from other areas. We thus suggest adding 'Ensure current ecological networks are not compromised, and future improvements in habitat connectivity are not prejudiced'.	Comments are noted. No action taken. Objective ENV4 amended to: *"To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage, including resilient ecological networks able to meet the demands of current and future pressures."*
2	Environment Agency	**Evidence Base** The updated scoping report incorporates our previous comments from 2015. The most up to date evidence base should be used going forward for this assessment. The Birmingham Level 1 & Level 2 SFRA's were completed in 2012 and these should be updated to take into account the most accurate flood risk information and the updated climate change allowances (published in February 2016).	Comments are noted. No action taken. Comments are noted. No action taken – the Council will consider updates to the SFRA's as part of the evidence base work in support of this DPD.
	Environment Agency	**Aims and Objectives** Section 1.3 'Aims and Objectives' does not include any reference to flood risk. The second to last bullet point states to 'enhance Birmingham's natural environment' but there should be a wording to ensure flood risk is not increased and reduced at every possibility.	For continuity, the Aims and Objectives are drawn from the Birmingham Plan. These will be reviewed as part of future plan review.
	Environment Agency	**Flood Risk Baseline** In this section 'Managing and Reducing Flood Risk', the figures used relate to 2012/13 and 2013/14. We consider this section should refer to the most up to date data available which is most likely to be more representative. We assume the 'Historic Flood Risk' section on page 41 includes all flooding events to have occurred in Birmingham? We consider this should be updated with the most recent flooding events as it currently it goes up September 2008 and there have been a number of flooding events since then.	More recent data has now been included in this section. Reference to more recent flooding events has been added in this section.
	Environment Agency	**Groundwater and Contaminated Land** From a Ground Water and Contaminated Land perspective there are no additional detailed comments to make on the updated Scoping Report. However we would re-iterate our comments made in 2014 regarding land contamination issues. Land contamination can be a significant source of water pollution in the environment. In the worst cases pollution plumes can extend many kilometres and can also cause pollution that impacts on boreholes used for Public Water Supply or impact the quality of ecology in linked surface waters. The plan should seek to protect water quality through the various regulatory and advisory mechanisms with respect to land contamination. The aim should strongly encourage voluntary remediation or remediation of land contamination through the planning regime. The plan should encourages the use of sustainable and effective remedial measures to prevent or address water pollution from sites affected by contamination and so provide a better environment and amenity value. This includes the sustainable recycling of water and soils where appropriate. However, these operations must not result in an	Comments are noted. No action taken. Comments are noted. No action taken. Comments are noted. No action taken. Comments are noted. No action taken.

Ref	Consultee	Consultee Response Summary	Response/ Action
		unacceptable release to groundwater and must where necessary have appropriate permits and controls.	Comments are noted. No action taken.
		Sustainable remediation should seek to manage unacceptable risks to human health and the environment (including groundwater), while optimising the environmental, economic and social impacts. Sustainable remediation appraisal requires consideration of a wide range of environmental, social and economic factors, including, for example, climate change impacts such as greenhouse gas emission from the remedial works or the site itself, worker safety and cost.	Comments are noted. No action taken.
		The concept that a site should be 'suitable for use' should underlie the approach to remediation of historic contamination. This means suitable for the environment as a whole, not just for use by people. Protecting surface water and groundwater may mean carrying out work over and above that required to make the land suitable for the proposed development and to protect human health.	Comments are noted. No action taken.
		We would also strongly recommend that strategies promote risk based assessment methodology and good practice promoted through use of the framework, tools and supplementary guidance set out in Model procedures for the management of land contamination (Contaminated land report 11) (Environment Agency and Defra 2004).	Comments are noted. No action taken.
		Management of Contaminated Land by application of the well-established principles and practices outlined above will help both the Local Authorities and the Environment Agency deliver its obligations to reduce diffuse urban pollution required by virtue of the Water Framework Directive.	
3	Historic England	**Executive Summary** In the Executive Summary can you please change reference from English Heritage to Historic England.	This change has been actioned accordingly.
	Historic England	**Section 3 Plans and Programmes Review** You may wish to add: The Government's Heritage Statement, 2017. https://www.gov.uk/government/publications/the-heritage-statement-2017 Protecting the past – informing the present. Birmingham's' Heritage Strategy 2014-2019 https://www.birmingham.gov.uk/downloads/file/2008/exam_30_birmingham_heritage_strategy_2014-2019	These have been added to the plans and programmes review accordingly.
	Historic England	**Section 4 Key Sustainability Issues** At present the Report sets out what the City's designated heritage assets area with a brief commentary but doesn't really set out the challenges and opportunities (the issues) facing Birmingham's historic environment such as the condition of its designated and non-designated heritage assets; the continuing programme of townscape and public realm improvements; the pressure on its skyline and its cultural identity and distinctiveness. Where do the risks lie? Birmingham's Heritage strategy (see above) may be a useful source.	The historic environment section of the baseline has been updated accordingly.

Appendix E
Consultation Responses on the Scoping Report (2014) and the Council's Response

Consultee: English Heritage

"It appears an appropriately focussed proposal, proportionate and streamlined to the role of the Plan and as such I have no concerns. However, you may wish to apply the same or similar indicators as those that will monitor the HE policy in the B'ham Plan and in particular re the city's heritage assets formerly 'at risk'.

For information, EH has prepared specific guidance for the preparation of SA in relation to historic environment. It may be worth referring this to AMEC to consider and apply during work on the SA and the environmental report."

Consultee: Environment Agency

Comment	Response
Executive Summary We support the inclusion of environmental issues identified as Key Sustainability Issues for the city of Birmingham (pages vi-ix).	Noted
We note the issue of water resources is raised in Theme 1; Resource Use, however recommend that another key theme relating to water sustainability is the timely provision of foul drainage infrastructure to support the proposed level of growth. The city's transmission infrastructure is currently undersized to accommodate the increase in loading that will go hand in hand with the level of development proposed and the SA should ensure this is addressed through the DM DPD.	Reference to foul drainage added to Theme 1
We welcome the consideration of both climate change adaption and mitigation (Themes 2, 9 and 10). We question however whether Theme 10 should be relabeled as Flood Risk as this is the only issue identified in relation to the management of climate change. We question whether there are other climate change related issues that should be incorporated under this heading relating to health, wellbeing, biodiversity and infrastructure provision (see section 4.4.1: Climate Change page 23). The issue of flood risk could be separated out under its own heading as it is an issue in its own right as the issues are not wholly resulting from the impacts of climate change.	Flood risk separated out under Theme 10 Links made to other climate change issues.
Theme 8: The efficient use of land should be linked with the issue of flood risk (theme 10) as the flood risk sequential test outlined within national policy steers development to areas at lowest risk of flooding. This can sometimes conflict with the preference for brownfield redevelopment sites. We support the reuse of brownfield land as this can enable the remediation of underlying ground contamination caused by previous land uses, improving ground water quality. This therefore links with Theme 16: water quality and vice versa.	Link made
Theme 16 refers to the chemical and biological quality of rivers and waterways, and observes that Birmingham suffers from low quality against these measures. Water quality in the city is largely influenced by the efficiency of the foul drainage infrastructure – this links to our comments in relation to Theme 1.	Comment added
We note that the 28 sustainability issues identified for this plan are to be addressed by 18 standard objectives which are taken from the Development Plan SA/SEA. It should be ensured that all issues raised within this report are reflected within the proposed objectives – it appears that Issue 1: Resources Uses (water) has not been included within the objectives. We recommend it is added in under ENV5 or ENV6.	Added to ENV6

Comment	Response
We draw your attention towards Sustainability Objectives 16, 17 and 18 on Page x, which appear to be duplicates of Objectives 1, 2 and 3.	Corrected
Plans, Programmes and Strategies Table 3.1 lists the *Severn Trent Water Resources Management Plan (2010)* under the Regional heading. This is updated every 5 years and as such this is not the current version. The SA should refer to the 2014 plan found at http://www.severntrent.com/future/plans-and-strategy/water-resources-management-plan as referenced on page 15 of the report.	Reference added
The SA should also consider the findings of the Environment Agency publication *Tame, Anker and Mease abstraction licensing strategy (February 2013)* which can be found at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/291402/LIT_3306_bc78df.pdf. This relates the availability of water for ground and surface water for abstraction purposes. Information from this strategy should be summarised alongside other water resources issues on page 15.	Reference added
The Environment Agency now has in draft the *Humber Flood Risk Management Plan* which sets out proposals for managing the risk of flooding at a catchment and river basin district scale. These proposals will help inform decisions about where investment and action are targeted in future to best protect people and places from the risk of flooding. For more information about this please see the link at the end of this letter that directs you towards this consultation document. Birmingham City Council also have a number of other water-based evidence documents that should be considered. These include: • *Surface Water Management Plan for Birmingham (2013 emerging draft)* • *Local Flood Risk Management Strategy for Birmingham (2014 outline version). Preliminary Flood Risk Assessment (2011)*	References added
Appendix A reviews the relevant plans and programmes in more detail. Under the Objectives and Targets identified for the Water Framework Directive (WFD) (page A1) it states that all waterbodies are to reach 'Good Ecological Status' by 2015. This is currently correct, however this will change when the next round of River Basin Management Plan (RBMP) is published in December 2015, therefore this will need to be kept up to date. The next statement: *'Exactly what constitutes 'Good Ecological Status' has not yet been defined.'* is incorrect. The following definition is taken from the Humber RBMP (relevant to Birmingham) and should be reflected within the SA: *Good ecological status applies to natural water bodies, and is defined as a slight variation from undisturbed natural conditions.* *Some water bodies are designated as 'artificial' or 'heavily modified'. This is because they may have been created or modified for a particular use such as water supply, flood protection, navigation or urban infrastructure. By definition, artificial and heavily modified water bodies are not able to achieve natural conditions. Instead the classification and objectives for these water bodies, and the biology they represent, are measured against 'ecological potential' rather than status. For an artificial or heavily modified water body to achieve good ecological potential, its chemistry must be good. In addition, any modifications to the structural or physical nature of the water body that harm biology must only be those essential for its valid use. All other such modifications must have been altered or managed to reduce or remove their adverse impact, so that there is the potential for biology to be as close as possible to that of a similar natural water body.*	Noted
The objectives of the Trent Catchment Flood Management Plan *(CFMP)* are very broad and high level and should be summarised in terms relevant to the local distinctiveness of Birmingham as a city. The CFMP considers Birmingham alongside the Black Country, and forms Policy Unit 10. Based on the level of proposed growth, and flooding characteristics of the area, Policy Option 5 has been applied which identifies that Birmingham is to *"take further action to reduce flood risk".* This very specific aim should be reflected within the	ENV5 amended

Comment	Response
SA's issues and objectives, particularly ENV5 i.e. the policies should ensure they do not just *'manage'* flood risk but *'reduce'* flood risk.	
The Humber RBMP (local delivery vehicle for WFD), although listed in Table 3.1 under the Regional subgroup does not appear to be included in Appendix A. This should be rectified with locally-specific objectives summarised and reflected within the SA. Consideration should also be given to the draft plan currently out for consultation.	Amended
We recommend that Birmingham City Council undertake a Water Cycle Study to pull together all the available information on water resource availability and water quality to inform detailed development management policies on development requirements and their impact on the water environment. This should be undertaken in liaison with Severn Trent Water and the Environment Agency with a focus on how development within the city will support objectives set out within the Humber River Basin Management Plan (already referenced within the report).	Noted
Key Sustainability Issues for Birmingham Section 4.4.2 refers to information on planning application consultations and overrulings on flood risk issues from 2011/12. Information is currently available for 2013-14 which is likely to be more representative than the information currently included in this report. Environment Agency records show we responded to 64 consultations in 2013-14, which comprised as follows: • Full 35 • Outline 8 • Change of Use 5 • Conditions 11 • Reserved Matters 2 • Variations 3 Please find attached a dataset for this period detailing applications which we objected to on flood risk grounds. This information should be correlated with Birmingham's records of decisions made to ascertain if there were any overrulings during the period (we are not notified of all planning decisions). This may already be undertaken as part of the annual monitoring process.	Equivalent 2013-14 data not yet available for Birmingham
Section 4.7.1 provides background information to the current state of water and air quality within the city. The Humber RBMP indicates that there are twenty-three surface water bodies which fall within or cross the Birmingham boundary comprising of two lakes, eight canals and thirteen rivers. In the baseline year of 2009 only three out of these twenty-three water bodies achieved the required 'Good Ecological Status' or 'Good Ecological Potential'. We draw your attention towards the WFD Evidence Pack provided by the Environment Agency to support the development of your Development Plan. The Humber RBMP is currently being revised with the new version being published in December 2015. The draft 2015 RBMP is now available as part of the formal consultation process, and any changes to the current plan should be considered within this report. The consultation on the 2015 plan is open until the end of March 2015 (please see details at end of letter).	Noted
The increased volume of waste water and sewage effluent produced by the proposed additional 50,000 dwellings will need to be treated to a high enough standard to ensure that there is no detriment in the quality of the watercourses receiving this discharge. Information currently available indicates that Minworth sewage treatment works should have the capacity to manage this additional capacity however given the dispersed nature of the proposed development, it is likely that there will be a requirement for widespread upgrading of the sewerage pipe network throughout the City. Section 4.7.4 should therefore include a reference to the required upgrading of foul drainage pipework and transmission infrastructure. Cumulative impact is key to this, making it hard to assess which sites and when will trigger the current drainage system to become overloaded and for water quality to become detrimentally impacted by development. It is likely therefore that a blanket policy is required to cover all developments and ensure the sewerage system has adequate capacity to manage any additional flows.	Text updated

Comment	Response
<u>Sustainability Objectives and the SA Framework</u> Table 6.2 shows the proposed objectives, quide questions and indicators. As discussed above, in line with the emerging Birmingham Development Plan and the CFMP evidence base, ENV5 should be amended to reflect the need to REDUCE flood risk not just manage it. A guide question should be added to table 6.2 to ask *'Will development help reduce flood risk?'*	ENV5 amended
We support the inclusion of ENV6 which aims to reduce pollution and ENV1 which will encourage the remediation of brownfield contaminated land. These objectives should help ensure the DM DPD is in line with Humber RBMP's requirements in improving the water quality of the city's rivers, canals and groundwater. The Environment Agency can provide information on water quality objections to planning applications which could be used as a potential indicator to ENV6 (as per flood risk in ENV5).	Noted
<u>Development of Environment Agency publications as part of the evidence base</u> Environment Agency strategies including the draft River Basin Management Plans (RBMPs) and draft Flood Risk Management Plans (FRMPs) are undergoing public consultation at present. The updated plans are due to be published in December 2015 and they will guide us in directing considerable investment and action from 2016 to 2021 and beyond, which will provide benefits to society and the environment. The catchment of interest to Birmingham city is the Humber.	Noted

Consultee: Natural England

Comment	Response
Question 1 - Scope of the proposed SA Natural England is generally supportive of the scope of the proposed SA. We are also supportive of the series of objectives provided at 1.3 to confirm and clarify the Development Management DPD. We particularly welcome the recognised need for development to make a positive contribution to (1) ...health and well being, and (2) environmental considerations.	Noted
We support the proposed SEA Topic Areas as proposed at Table 4.1.	Noted
Paragraph 2.2.1 Habitat Regulation's Assessment (HRA) – we recognise the acknowledgement that a HRA will be required and concur with the need for this.	Noted
Question 2 - Do we agree with the main issues identified? We generally agree with the 28 sustainability themes (and related issues) identified as being particularly important affecting the city (page vi and Table 4.15). Specific comments in relation to the 28 Sustainability Themes (ST) and the related issues are provided below:	Noted
- We would argue that ST6 'Reducing the need to Travel' may be provided for via the provision of new / enhanced footways / cycleways and, by this, this ST may also potentially related to the improvement of health and well-being.	Reference included
- Natural England would also like to see a mention of the benefits of multi-functional green infrastructure (GI) (and blue infrastructure) as a potential consideration in the efficient use of land (ST8).	Reference included
- ST9 and ST10 (Reducing and Managing Climate Change) - relate to the important need for the city to tackle climate change. There are many ways that the natural landscape and GI can be utilised for this purpose.	Reference included
- ST13 (Natural Landscape) – Natural England understands that a large proportion of the open land and green belt land discussed here is being considered for development via the Birmingham Plan. The SA / DM DPD,	BDP not yet approved

Comment	Response
therefore, surely needs to recognise this here in order to be able to provide a truly reflective account. In this way, should Figure 4.9, Table 4.5 and the statistics provided within paragraph 4.8.2 (Natural Landscape) also be updated to reflect the reduction in green belt and public open space area's proposed?	
- ST14 (Biodiversity and Geodiversity) – Incorrect reference to Biodiversity Enhancement Areas (BEAs). This work / project has now ceased. Reference here should instead be made to The Cannock Chase to Sutton Park Project. Reference should also be made here to the Nature Improvement Area (NIA) designation. (see notes re: NIA below).	BEA reference removed NIA reference included
- ST25 (Health) – we support the reference to natural landscape and recreation.	Noted
ST28 (Culture/Sport/Recreation) – we support the reference to health and natural landscape.	Noted
Section 4: Key Sustainability Issues for Birmingham *Managing and Adapting to Climate Change* - Paragraph 4.4.2 – Natural England welcomes the reference made here in respect of the value of GI to helping to mitigate and adapt to climate change. We also recommend a reference to the value of blue infrastructure (e.g. rivers, canals, SuDS) for this purpose.	Reference included
- Paragraph 4.4.4 (Influence of DM DPD on Managing Climate Change) – potential inclusion of need for maximisation of GI as part of development proposals, as appropriate, to help mitigate and adapt to climate change.	Reference included
Biodiversity and Geodiversity - Section 4.5–acknowledge the importance of urban ecological sites and corridors as stepping stones for habitats/species and, in accordance with paragraph 109 of the NPPF, also acknowledge the need to establish improved coherent ecological networks that are more resilient to current and future pressures. We would also recommend inclusion of reference to multi-functional GI (and blue infrastructure) for this purpose.	Reference included
- Acknowledge also the need for the council to ensure net gains are made (to conserve and enhance biodiversity) where possible, from development proposals by applying the '*avoid, then mitigate and, (as a last resort) compensate for adverse impacts on biodiversity*' principle (NPPF para 118). By this, when determining planning applications opportunities to incorporate biodiversity in and around developments should also be encouraged.	Reference included
- Also, given the need to minimise impacts on biodiversity and geodiversity, the SA must ensure the DM DPD policies promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets (NPPF 117).	Reference included
- Page 34 – we support the reference made to the work of the West Midlands Biodiversity Partnership (WMBP) and in particular, The Cannock Chase to Sutton Park Project. References made to the 'BEA', however, are incorrect as this designation / project has now ceased.	BEA reference removed
- Page 34 - This section should also acknowledge the Nature Improvement Area (NIA) designation. NIAs are fundamental to the step-change needed to establish a coherent and resilient ecological network. Where NIAs are in place (in accordance with para's 117 and 157 of the NPPF), Natural England wishes to see Local Plans: identify them on proposals maps; and include policies to ensure that any development affect them is compatible with their purpose and makes a positive contribute to their enhancement (using CIL/S106 agreements/conditions as appropriate).	Reference included
- Page 34 (GI) – neglects to include a reference to climate change mitigation and adaptation benefits.	Reference included
- Page 38 (Geodiversity) – we support the inclusion of geodiversity within the SA. However, we recommend the SA makes an explicit reference to geological conservation and the need to conserve, interpret and manage geological sites and features in the wider environment not just in relation to designated sites	Reference made
- Paragraph 4.5.2 (Biodiversity and Geodiversity) – comments supported.	Noted

Comment	Response
Population and Human Health - Paragraph 4.6.11 – Recommend inclusion of reference to GI benefits upon human health and well-being.	Reference included
Section 5: Issues and Problems Relevant to the DM DPD - Table 5.1 – Generally support.	Noted
- We particularly welcome the reference to the need for continued monitoring of developments on periphery of designated sites to determine potential indirect and cumulative impacts. We would, also, recommend the inclusion of a reference to the need for monitoring of effects upon designated sites which may result from other environmental pathways outside those developments on the immediate periphery.	Noted and reference included
- We also welcome the reference to the importance of greenspace and reductions in motor transport that can have positive impacts upon populations and health.	Noted
- Climate Change – include reference to GI and its benefits.	Reference included
Question 3: Do the objectives cover the breadth of issues appropriate for assessing the effects? Generally, yes. Ensure incorporation of the above.	Noted

Appendix F
Regulation 18 (Issues & Options) Consultation Responses

Development Management DPD: Schedule of Regulation 18 Stage Consultation Responses

Question 1: Do you agree with the Purpose and Aims of the DPD?

Response from:	Support?	Reasons	LPA Response	Action	Ref
Selly Park Property Owners' Association.	Yes	- No comments.	Noted.	None.	006/1
Highways England	Yes	- Highways England is supportive of overall purpose and aims of the DPD and the DPD's complimentary role to the adopted BDP.	Noted.	None.	010/1
Dr Mike Hodder on behalf of Council for British Archaeology, West Midlands	Yes	- No comments.	Noted.	None.	015/1
Primesight	Yes	- No comments.	Noted.	None.	021/1
Susan Fleming on behalf of Clear Channel UK Ltd	Yes	- Aim and purpose understood. - Planning development policy for Birmingham needs to be current and in keeping with the recent development and regeneration.	Noted.	None.	025/1
Alvechurch Parish Council	Yes		Noted.	None.	022/1

Question 2: Please give us your views on the Objectives on page 6 of the Consultation Document

Response from:	Comments	LPA Response	Action	Ref
Selly Park Property Owners' Association.	- No comments	Noted.	None.	006/2

Highways England	-	Highways England supports the Objectives of the DPD.	Noted. The DPD objectives now utilise the same objectives of the BDP and cover all the previous objectives identified in the 2015 Consultation Document.	None.	010/2
Dr Mike Hodder on behalf of Council for British Archaeology, West Midlands	-	Ensure that development responds to local character and history, in accordance with NPPF para 58.	One of the strategic objectives of the Birmingham Development Plan (BDP) is "To protect and enhance the City's heritage and historic environments". BDP Policy PG3 Place making requires all new development to "reinforce or create a positive sense of place and local distinctiveness, with design that responds to site conditions and local area context, including heritage assets and appropriate use of innovation in design."	None.	015/2
Tyler Parkes on behalf of the Police and Crime Commissioner for West Midlands (PCCWM)	-	The PCCWM support the DPD objective 1.	Noted. The DPD objectives now utilise the same objectives of the BDP and cover all the previous objectives identified in the 2015 Consultation Document. The contents of Objective 1 is covered by the following two BDP Objectives "To encourage better health and well-being through the provision of new and existing recreation, sport and leisure facilities linked to good quality public open space" and "To develop Birmingham as a City of sustainable neighbourhoods that are safe, diverse and inclusive with locally distinctive character."	None.	016/1
Turley on behalf of Calthorpe Estates	- - - -	Generally supportive of the six key objectives identified Especially the commitment to the strengthening the vitality and viability of retail centres And the objective to ensure that new development is designed to integrate effectively with its setting and promote local distinctiveness.	Noted. The DPD objectives now utilise the same objectives of the BDP and cover all the previous objectives identified in the 2015 Consultation Document.	None.	019/1
Susan Fleming on behalf of Clear Channel UK Ltd	- -	Agree with the objectives, Point 4 is key. Birmingham must be able to compete internationally and continue to attract investment from abroad.	Noted. The DPD objectives now utilise the same objectives of the BDP and cover all the previous objectives identified in the 2015 Consultation Document.	None.	025/2
Alvechurch Parish Council	-	Should have respect and consideration to adjoining Authorities and areas.	Noted. BCC engages with other local authorities through the Duty to Co-operate and will continue to consult other local authorities at key stages in the preparation of the document.	None.	022/2
Environment Agency	-	The Environment Agency support the Objectives identified on page 6.	Noted. The DPD objectives now utilise the same objectives of the BDP and cover all the previous objectives identified in the 2015 Consultation Document.	None.	012/1
Turley on behalf of Aberdeen Asset Management	- -	Generally supportive of these objectives. Pleased the importance of strengthening the vitality and viability of centres has been recognised. Should be reflected in final drafting.	Noted. The DPD objectives now utilise the same objectives of the BDP and cover all the previous objectives identified in the 2015 Consultation Document.	None.	013/1

Question 3: Please give us your views on the Proposed Policy List on page 8 of the Consultation Document

Response from:	Comments	LPA Response	Action	Ref
Selly Park Property Owners' Association.	- No comments.	Noted.	None.	006/3
Susan Fleming on behalf of Clear Channel UK Ltd	- The Authority has identified those areas where they believe review or greater control is required.	The Consultation Document contains an assessment of existing policy documents and a list of proposed policies.	None.	025/3

Question 4: Please give us your views on proposed Policy DM01 – Hot Food Takeaways

Response from:	Comments	LPA Response	Action	Ref
Alvechurch Parish Council	- This should have no effect unless adjacent to existing Alvechurch parish residential or business buildings.	Noted.	None.	022/3

Question 5: Please give us your views on proposed Policy DM02 – Sheesha Lounges

Response from:	Comments	LPA Response	Action	Ref
Tyler Parkes on behalf of the Police and Crime Commissioner for West Midlands (PCCWM)	- Policy should be written to design out crime, and to introduce, where appropriate, to ensure the community feel safe during an extended business/leisure day (i.e CCTV). - Particularly relevant when drawing Policy DM02 and DM03.	This policy is no longer proposed in the Preferred Options Document. The impacts of Sheesha Lounges are mainly on amenity of nearby residents or occupiers, noise and vibration, highway safety and access, parking and servicing are covered by proposed policies DM 2, DM6, DM13, DM14 in the Preferred Options Document. The requirement for development to create safe environments that design out crime and promote natural surveillance and positive social interaction is already provided through BDP Policy PG3 Place making. Detailed design guidance on creating safe places and anti-terror measures and safe buildings will be set out in the emerging Birmingham Design Guide.	Detailed design guidance on creating safe places and anti-terror measures and safe buildings will be set out in the emerging Birmingham Design Guide.	016/2
Alvechurch Parish Council	- This should have no effect unless adjacent to existing Alvechurch parish residential or business buildings.	Noted.	None.	022/4

Question 6: Please give us your views on proposed Policy DM03 – Restaurants, Cafés and Pubs

Response from:	Comments	LPA Response	Action	Ref
Tyler Parkes on behalf of the Police and Crime Commissioner for West Midlands (PCCWM)	- Request that reference be made to the need to design out crime, as to ensure the community feel safe during an extended business/leisure day (i.e. CCTV).	This policy is no longer proposed in the Preferred Options Document. The impacts of Restaurants, Cafés and Pubs are mainly on amenity of nearby residents or occupiers, noise and vibration, highway safety and access, parking and servicing are covered by proposed policies DM 2, DM6,	Detailed design guidance on creating safe places and anti-terror	016/3

	-	Particularly relevant when drawing Policy DM02 and DM03.	DM13, DM14 in the Preferred Options Document. The requirement for development to create safe environments that design out crime and promote natural surveillance and positive social interaction is already provided through BDP Policy PG3 Place making. Detailed design guidance on creating safe places and anti-terror measures and safe buildings will be set out in the emerging Birmingham Design Guide.	measures and safe buildings will be set out in the emerging Birmingham Design Guide.	
Turley on behalf of Calthorpe Estates	-	Policies DM03 and DM11 should be sufficiently flexible as to ensure that high quality niche offerings are not unduly restricted by broad blanket policies.	Policies specifically for Restaurants/ Cafes/ Pubs and Hotels and Guest Houses are not proposed in the Preferred Options Document. The proposed draft policies are unlikely to restrict niche offerings in any way.	None.	019/2
Alvechurch Parish Council	-	No effect unless adjacent to existing Alvechurch parish residential or business buildings.	Noted.	None.	022/5

Question 7: Please give us your views on proposed Policy DM04 - Environmental Protection – Air Quality

Response from:	Comments		LPA Response	Action	Ref
Highways England	-	Highways England is supportive of the principle of the introduction of an Air Quality policy.	Noted.	None.	010/3
	-	Not clear whether at this stage how (or indeed if) this policy may apply to road improvement schemes.			
	-	Recommendation that the policy should not be worded in such a way that it may be restrictive to the development and delivery of necessary road improvement schemes.			
Alvechurch Parish Council	-	Agree	Noted.	None.	022/6

Question 8: Please give us your views on proposed Policy DM05 - Environmental Protection – Noise and Vibration

Response from:	Comments		LPA Response	Action	Ref
Alvechurch Parish Council	-	Agree	Noted.	None.	022/7

Question 9: Please give us your views on proposed Policy DM06 - Environmental Protection – Light

Response from:	Comments		LPA Response	Action	Ref
Highways England	-	The establishment of this policy is welcomed	Noted. Reference to guidance set out by the Institute Lighting of Professionals is included in the Preferred Options Document.	Comments have been taken into account and incorporated into the supporting text of the	010/4
	-	Recommendation that the policy accords with requirements outlined by the Institution of Lighting Engineers (ILE) with evidence submitted in the form			

	of an external lighting report.		policy.	
Susan Fleming on behalf of Clear Channel UK Ltd	- Consideration has to be given to public safety in specific environments and the ability for individuals and businesses to adequately protect themselves against criminal activity.	Noted. The proposed policy recognises that well-designed lighting can make a positive contribution to the urban environment, providing safe environments for a range of activities.	Comments have been taken into account and incorporated into the supporting text of the policy.	025/4
Alvechurch Parish Council	- Particularly applicable for the rural adjoining parish of Alvechurch.	Noted.	None.	022/8

Question 10: Please give us your views on proposed Policy DM07 - Environmental Protection – Land Contamination

Response from:	Comments	LPA Response	Action	Ref
	- DMO7 is welcomed as it could provide further support for the protection of groundwater resources within the city and build upon BDP Policy TP6. - Land contamination can be a significant source of water pollution in the environment. The following principles are used when assessing the effect on groundwater solutions; The Precautionary principle; Risk-based approach; Groundwater protection hierarchy - We recommend these principles are incorporated into a policy addition to Policy DM07 as to deliver the Water Framework Directive. - Where the potential consequences of a development or activity are serious or irreversible the precautionary principle will be applied to the management and protection of water	Noted. It is recognised that contamination of land can have adverse impacts on human health, wildlife and contribute to the pollution of water bodies. BDP Policy TP6 Management of Flood Risk and Water Resources states that "Proposals should demonstrate compliance with the Humber River Basin Management Plan exploring opportunities to help meet the Water Framework Directive's targets. Development will not be permitted where a proposal would have a negative impact on surface water (rivers, lakes and canals) or groundwater quantity or quality either directly through pollution of groundwater or by the mobilisation of contaminants already in the ground." The supporting text of the policy refers to the Environment Agency's principles in managing risks to groundwater (the precautionary principle, risk based approach and groundwater protection hierarchy).	Comments have been taken into account and incorporated into the supporting text of the policy.	012/2
Alvechurch Parish Council	- Agree	Noted.	None.	022/9

Question 11: Please give us your views on proposed Policy DM08 – Private Hire and Taxi Booking Offices

Response from:	Comments	LPA Response	Action	Ref
Alvechurch Parish Council	- No effect on Alvechurch Parish unless adjacent to existing property.	Noted.	None.	022/10

Question 12: Please give us your views on proposed Policy DM09 – Education Facilities - Use of Dwelling Houses

Response from:	Comments	LPA Response	Action	Ref
Alvechurch Parish Council	- May have an adverse effect through increased traffic if adjacent to existing property.	Noted. Proposed policy on DM13 Highway Safety and Access and DM14 Parking and Servicing addresses these impacts of development. The Preferred Options Document also includes a policy on Day nurseries and early years provision (DM9) and a policy on Places of worship and faith related community uses (D10) which covers proposals for the use of dwelling houses for education facilities.	None. Comments have been taken into account and incorporated into proposed policy.	022/11

Question 13: Please give us your views on proposed Policy DM10 – Education Facilities – Non Residential Properties

Response from:	Comments	LPA Response	Action	Ref
Alvechurch Parish Council	- May have an adverse effect through increased traffic if adjacent to existing property	Noted. Proposed policy on DM13 Highway Safety and Access and DM14 Parking and Servicing addresses these impacts of development. The Preferred Options Document also includes a policy on Day nurseries and early years provision (DM9) and a policy on Places of worship and faith related community uses (D10) which covers proposals for the use of dwelling houses for education facilities.	None. Comments have been taken into account and incorporated into proposed policy.	022/12

Question 14: Please give us your views on proposed Policy DM11 – Hotels and Guest Houses

Response from:	Comments	LPA Response	Action	Ref
Turley on behalf of Calthorpe Estates	- Ensure that policy is sufficiently flexible to ensure that high quality niche offerings are not unduly restricted by broad blanket policies.	Policies specifically for Restaurants/ Cafes/ Pubs and Hotels and Guest Houses are not proposed in the Preferred Options Document. The proposed draft policies are unlikely to restrict niche offerings in any way.	None.	019/3
Alvechurch Parish Council	- Applicable if adjoining property in the rural adjoining parish of Alvechurch.	Noted.	None.	022/13

Question 15: Please give us your views on proposed Policy DM12 – Houses in Multiple Occupation - City-wide

Response from:	Comments	LPA Response	Action	Ref
Selly Park Property Owners' Association.	- Policy should restrict the development of HMOs where they will impact on the standards of residential amenity and character the area - The cumulative effect of HMOs in an area to also be considered.	Noted. Proposed policy DM10 HMOs and other non-family housing and DM2 Amenity address the individual and cumulative impacts of HMOs on residential amenity.	None. Comments have been taken into account and incorporated into proposed policy.	006/4
Summerfield Residents Association	- SRA collectively registers support for the introduction of an Article 4 Direction in parts of Ladywood Ward.	Comments are noted. However, this consultation relates to the Development Management DPD. The process for considering further Article 4 Direction area is separate to the DPD process. Justification for an	The request for an Article 4 Direction for parts of	011/1

	- It would provide control over increasing concentration of Houses in Multiple Occupation (HMOs) in this historic residential area, which is blighted with an over proliferation of such properties (including hostels). - A desire to attract more families to the area as achieved by SRB6 and Housing Market Renewal Initiatives. - Concerned with related ancillary issues associated with HMO's such as parking/anti-social behaviour - Concern on the proliferation of 'To Let' signs and associated negative connotations	Article 4 Direction is based on whether the exercise of permitted development rights would undermine local objectives to create or maintain mixed communities. Government guidance states that the use of Article 4 Directions to remove national permitted development rights should be limited to situations where this is necessary to protect local amenity or the wellbeing of the area. The potential harm that the direction is intended to address should be clearly identified. It is considered that a strategic approach is needed for addressing issues with HMOs. In assessing the need for further Article 4 Directions, a city-wide analysis will be undertaken to assess the locations and concentration of HMOs. A mapping exercise of the licensed HMOs, along with Council Tax N exemptions and planning consents for Sui Generis HMOS is underway. The introduction of the new licensing rules will require many more properties to be licenced resulting in enable a better understanding of the location and numbers of HMOs in the City. Based on analysis of this intelligence, a more robust and strategic approach to the need for consideration for further Article 4 Direction Areas can be taken to ensure that there is a sound basis for an Article Direction to be pursued. This work is underway and will be reported to the Corporate Director for Economy in February 2019. The concern regarding the over-concentration of HMOs is acknowledged. The proposed policy DM10 HMOs and other non-family housing and DM2 Amenity seek to address the individual and cumulative impacts of HMOs on residential amenity. See draft policies in the Preferred Options Document.	Ladywood Ward is noted. A city-wide analysis will be undertaken to consider the need for further Article 4 Direction Areas. This work is underway and will be reported to the Corporate Director for Economy in February 2019.	
Tyler Parkes on behalf of the Police and Crime Commissioner for West Midlands (PCCWM)	- Article 4 Areas should address the need for appropriate crime prevention measures in terms of location, design, layout and other infrastructure to reduce crime and the fear of crime.	Comments are noted. However, this consultation relates to the Development Management DPD. The process for considering further Article 4 Direction area is separate to the DPD process. The requirement for development to create safe environments that design out crime and promote natural surveillance and positive social interaction is already provided through BDP Policy PG3 Place making. Detailed design guidance on creating safe places and anti-terror measures and safe buildings will be set out in the emerging Birmingham Design Guide.	None.	016/4
Alvechurch Parish Council	- Particularly applicable if adjoining property in the rural adjoining parish of Alvechurch.	Noted.	None.	022/14
Ladywood District Committee	- There is very strong support for this approach. - Not every, but many, landlords do not maintain their properties or surroundings; or manage the behaviour of their tenants, leading to deterioration of neighbourhoods and tensions within local communities. - These properties are often occupied by vulnerable individuals; our concern is about landlords who	Noted. The concern regarding the over-concentration of HMOs is acknowledged. The proposed policy DM10 HMOs and other non-family housing and DM2 Amenity seek to address the individual and cumulative impacts of HMOs on residential amenity. See draft policies in the Preferred Options Document. It is also important that adequate living conditions are provided for occupants of HMOs. The licensing of HMOs is a separate regulatory regime to planning and seeks to secure minimum standards of accommodation fit for human habitation such as fire safety standards and	None.	024/1

	seem to feel no responsibility to support these individuals.	access to basic facilities such as a kitchen, bathroom and toilet.		

Question 16: Please give us your views on proposed Policy DM13 – Houses in Multiple Occupation – Article 4 Areas

Response from:	Comments	LPA Response	Action	Ref
Selly Park Property Owners' Association.	- Concern about exclusion of Bournbrook from the Article 4 area. - Supplementary planning guidance should ensure the standards of residential amenity and character of an area are maintained and cumulative impact is taken into account.	Bournbrook was excluded from the Article 4 Direction area as it would be ineffective due to the already high concentration of HMOs. The proposed policy DM10 HMOs and other non-family housing and DM2 Amenity seek to address the individual and cumulative impacts of HMOs on residential amenity. See draft policies in the Preferred Options Document.	None.	006/5
Summerfield Residents Association	- SRA collectively register support for the introduction of an Article 4 Direction in parts of Ladywood Ward. - It would provide control over increasing concentration of Houses in Multiple Occupation (HMOs) in this historic residential area, which is blighted with an over proliferation of such properties (including hostels). - A desire to attract more families to the area as achieved by SRB6 and Housing Market Renewal Initiatives. - Concerned with related ancillary issues associated with HMO's such as parking/anti-social behaviour - Proliferation of 'To Let' signs	See above response to 011/1	See above action to 011/1	011/2
Tyler Parkes on behalf of the Police and Crime Commissioner for West Midlands (PCCWM)	- Policies DM12 Houses in Multiple Occupation and DM13 Houses in Multiple Occupation – Article 4 Areas, address the need for appropriate crime prevention measures - Appropriate measures suggested included location, design, layout and other infrastructure to reduce crime and the fear of crime.	The requirement for development to create safe environments that design out crime and promote natural surveillance and positive social interaction is already provided through BDP Policy PG3 Place making. Detailed design guidance on creating safe places and anti-terror measures and safe buildings will be set out in the emerging Birmingham Design Guide.	Detailed design guidance on creating safe places and anti-terror measures and safe buildings will be set out in the emerging Birmingham Design Guide.	016/5
Alvechurch Parish Council	- Particularly applicable if adjoining property in the rural adjoining parish of Alvechurch.	Noted.	None.	022/15

Question 17: Please give us your views on proposed Policy DM14 – Flat Conversions

Response from:	Comments	LPA Response	Action	Ref

| Selly Park Property Owners' Association. | - Proposals to convert houses into flats should take into account the standards of residential amenity
- Not have an adverse impact on the character of an area.
- The cumulative effect should also be considered.
- The requirement to accommodate parking on site should be given priority. | The proposed policy DM10 HMOs and other non-family housing and DM2 Amenity seek to address the individual and cumulative impacts of HMOs on residential amenity. Impact of development on highway safety and access, parking and servicing are covered by proposed policies DM13 Highway Safety and Access and DM14 Parking and Servicing. See draft policies in the Preferred Options Document. | None. Comments have been taken into account and incorporated into proposed policy. | 006/6 |
| Alvechurch Parish Council | - Particularly applicable if adjoining property in the rural adjoining parish of Alvechurch. | Noted. | None. | 022/16 |

Question 18: Please give us your views on proposed Policy DM15 – Hostels and Residential Homes

Response from:	Comments	LPA Response	Action	Ref
Summerfield Residents Association	- SRA collectively register support for the introduction of an Article 4 Direction in parts of Ladywood Ward. - It would provide control over increasing concentration of Houses in Multiple Occupation (HMOs) in this historic residential area, which is blighted with an over proliferation of such properties (including hostels). - A desire to attract more families to the area as achieved by SRB6 and Housing Market Renewal Initiatives. - Concerned with related ancillary issues associated with HMO's such as parking/anti-social behaviour - Proliferation of 'To Let' signs	See response to 011/1	See response 011/1	011/3
Alvechurch Parish Council	- Particularly applicable if adjoining property in the rural adjoining parish of Alvechurch.	Noted.	None.	022/17

Question 19: Please give us your views on proposed Policy DM16 – 45 Degree Code

Response from:	Comments	LPA Response	Action	Ref
Alvechurch Parish Council	Agree	Noted.	None.	022/18

Question 20: Please give us your views on proposed Policy DM17 – Planning Obligations

Response from:	Comments	LPA Response	Action	Ref

Response from:	Comments	LPA Response	Action	Ref
Highways England	- Highways England supports the updated policy including continued use of Planning Obligations for developments not otherwise considered through the Community Infrastructure Levy (CIL). - In accordance to the response for the BDP, there is requirement for an improvement scheme at M42 Junction 9 following the Langley and Peddimore developments - The above needs, as identified and recorded in the city's Infrastructure Development Plan (IDP), were excluded from the Draft Regulation 123 list which enables these to be delivered via the CIL. Improvements, therefore, associated with these developments would need to be provided through Planning Obligations. - The updated policy should therefore be supportive of the provision of this infrastructure. Needs to be flexible, however, as to address any future infrastructure needs that may threaten the functionality of the SRN.	With regard to the Sustainable Urban Extension (SUE) at Langley and Peddimore, all on site infrastructure requirements will not be funded by CIL and S106 contributions will instead be sought. This is stated within the current Regulation 123 list. This will include improvements to Junction 9 of the M42.	None.	010/5
Tyler Parkes on behalf of the Police and Crime Commissioner for West Midlands (PCCWM)	- Welcomes the inclusion of Policy DM17 Planning Obligations - Request that reference be made, either within the policy or within the supporting justification, to the potential requirement for contributions to be made towards Police infrastructure.	A policy on Planning Obligations is no longer proposed in the Preferred Options Document as it is covered by the BDP Policy on Developer Contributions.	None.	016/6
Alvechurch Parish Council	- Agree	Noted.	None.	022/19

Question 21: Please give us your views on proposed Policy DM18 – Telecommunications				
Response from:	Comments	LPA Response	Action	Ref
Mono Consultants on behalf of Mobile Operators Association	- We consider it important that there is a specific telecommunications policy within the emerging DM DPD is line with national guidance provided in Section 5 of the NPPF. - When considering applications for telecommunications development, the planning authority should consider operational requirements of telecommunications networks and the technical limitations of the technology.- - "Proposals for telecommunications development will be permitted provided that the following criteria are met	Noted. Comments have been taken into account and incorporated into proposed policy.	Comments have been taken into account and incorporated into proposed policy.	014/1

	(i) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area; (ii) if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building; (iii) if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority. (iv) If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest.			
Alvechurch Parish Council	- Masts or other equipment seen from Alvechurch parish or other bordering authority's properties should not be considered.	The provision of advanced high quality communications infrastructure to serve local business and communities plays a crucial role in the national and local economy. The proposed policy for Telecommunications seeks to ensure the right balance is struck between providing essential telecommunications infrastructure and protecting the environment and local amenity.	None.	022/20

Question 22: Please give us your views on proposed Policy DM19 – Aerodrome Safety

Response from:	Comments	LPA Response	Action	Ref
Alvechurch Parish Council	Not applicable to Alvechurch	Noted.	None.	022/21

Question 23: Please give us your views on proposed Policy DM20 – Tree Protection

Response from:	Comments	LPA Response	Action	Ref
Alvechurch Parish Council	Agree.	Noted.	None.	022/22

wood.

Question 24: Please give us your views on proposed Policy DM21 – Advertisements			

Response from:	Comments	LPA Response	Action	Ref
Highways England	- Highways England would be supportive of a policy which provides greater detail and guidance in determining decisions on relevant planning applications for advertisements, in relation to road safety. - Ongoing consultation on the drafting of this policy, to mitigate the potential for any adverse impacts on the safety and functionality of the SRN would be desirable.	Noted. The proposed policy for Advertisement (DM7) seeks to ensure that they are designed to a high standard and are suitably located, sited and designed to have no detrimental impact on public and highway safety or to the amenity of the area.	None. Comments have been taken into account and incorporated into proposed policy.	010/6
Turley on behalf of Aberdeen Asset Management	- Policies of particular interest to AAM are proposed policies DM21 'Advertisements' and DM23 'Design'. - The Council should seek to ensure that there is sufficient flexibility within the policies to ensure that developers are not overly restricted in what they are able to do.	Noted. The proposed policy on Advertisements strikes the right balance between flexibility and protection of the character of buildings and the surrounding area.	None.	013/2
Steve George, Managing Director, Signature Outdoor	- BCC's objective, in our view, has been to develop futuristic iconic displays in city centre locations. - The balance of providing social and commercial opportunities through the network has seen the reduction of overall displays and the eradication of traditional displays must be considered as progress.	Noted.	None.	017/1
Turley on behalf of Calthorpe Estates	- 'Advertisements' should be efficient, effective and simple in concept and operation. - Advertisements which will clearly have an appreciable impact on a building or on their surroundings should be subject to detailed assessment. - Advertisements should be subject to control only in the interests of amenity and public safety.	Noted. As well as public safety and amenity the proposed policy seeks to ensure that advertisements are well designed and relate well in scale and character to a building or surrounding area.	None.	019/4
Primesight	- Care must be taken to ensure that such policies do not conflict with the strict requirements of the 1990 (controlled in the interests of amenity and public safety). - The promotion of innovation in advertising and signage in the interests of amenity and public safety - Recognition of the positive role that advertising can play when appropriately designed and sited. - Recognition of the existing amenity of a site and street scene when assessing the relative impact of a	Noted. As well as public safety and amenity the proposed policy seeks to ensure that advertisements are well designed and relate well in scale and character to the building/ structure it is located on and the surrounding area.	None.	021/2

Response from:	Comments	LPA Response	Action	Ref
	proposed advertisement scheme.			
Susan Fleming on behalf of Clear Channel UK Ltd	- The Development Plan and subsequent policy adopted must not constrain or prevent sensible large format media/digital advertising	The proposed policy will not constrain advertisements but ensure that advertisements are well designed, relate well in scale and character to a building or surrounding area and are suitably located, sited and designed having no detrimental impact on public and highway safety or to the amenity of the area.	None.	025/5
Alvechurch Parish Council	- Masts visible from the Alvechurch Parish or adjoining authority could have a possible negative impact	Noted.	None.	022/23

Question 25: Please give us your views on proposed Policy DM22 – Places of Worship

Response from:	Comments	LPA Response	Action	Ref
None	None			

Question 26: Please give us your views on proposed Policy DM23 – Design

Response from:	Comments	LPA Response	Action	Ref
Environment Agency	- Policy DM23 recommend consideration of how developments will interact with rivers and streams that flow through their boundaries in order to adequately integrate them. - Should build upon and provide further clarity to the requirements of BDP Policy TP6. - This policy should be drafted in consultation with your Lead Local Flood Authority who have responsibility for maintaining Ordinary Watercourses within the city.	Detailed design guidance on how development should be designed to contribute to the green and blue infrastructure in the city will be contained within the emerging Birmingham Design Guide.	Comments to be taken into account in the Birmingham Design Guide.	012/3
Turley on behalf of Aberdeen Asset Management	- Proposed policy DM23 is of particular interest to AAM given the central location of City Centre House in the retail core.	Noted.	None.	013/3
Tyler Parkes on behalf of the Police and Crime Commissioner for West Midlands (PCCWM)	- The PCCWM supports Policy DM23 Design in its consideration of crime and disorder. - Requirements for proposals to meet 'Secured by Design' principles when considering elements such as shop fronts, housing, tall buildings, hard and soft landscaping etc. would be welcomed.	See response to 016/2	See response to 016/2	016/7

Turley on behalf of Calthorpe Estates	- Policy DM23, is of particular interest given the proposals identified in the Edgbaston Planning Framework. - The policies need to be sufficiently flexible as to respond to areas historic character and of retailing.	Noted. A policy for Design is no longer proposed in the Preferred Options Document as it is considered to be covered by BDP Policy PG3 Place-making. Detailed design guidance will be provided through the emerging Birmingham Design Guide.	None. Detailed design guidance will be provided through the emerging Birmingham Design Guide.	019/5
Primesight	- An overarching design policy that is clearly integrated with advertisement policy is welcomed.	Noted. A policy for Design is no longer proposed in the Preferred Options Document as it is considered to be covered by BDP Policy PG3 Place-making. Detailed design guidance will be provided through the emerging Birmingham Design Guide.	None. Detailed design guidance will be provided through the emerging Birmingham Design Guide.	021/3
Alvechurch Parish Council	- Properties close to the Birmingham boundary in Alvechurch Parish or adjoining authority could be thought as having a potential to be negatively affected by design.	Noted.	None.	022/24

Question 27: Please give us your views on proposed Policy DM24 – Residential Amenity and Space Standards

Response from:	Comments	LPA Response	Action	Ref
Alvechurch Parish Council	- Agree.	Noted.	None.	022/25

Question 28: Please give us your views on Enforcement

Response from:	Comments	LPA Response	Action	Ref
Selly Park Property Owners' Association.	- Council should continue to take action to prevent the continuation of development where breaches in planning regulations have occurred. - Where an applicant seeks retrospective consent, development should be prevented until this is approved. - Council to make full use of powers to prevent unauthorised development and curb flagrant abuses as required, considering the merits of each case individually - Local interest groups to be recognised as a good source of information 'on the ground' to 'police' unauthorised developments in an area.	Noted. A policy for Enforcement is no longer proposed in the Preferred Options Document. The Council instead will be preparing a Local Enforcement Plan which will set out its policy and procedure for enforcing planning control and handling planning enforcement issues.	None.	006/7
Alvechurch Parish Council	- Supported, if enforcement is carried out properly on any development that may negatively impact on	Noted.	None.	022/26

Question 29: Do you have any comments about the assessment of existing policies in Appendix 1?

Response from:	Comments	LPA Response	Action	Ref
Dr Mike Hodder on behalf of Council for British Archaeology, West Midlands	- The retention of the Archaeology Strategy SPG and the Regeneration through Conservation SPG is welcomed - The Archaeology Strategy SPG, like the Regeneration through Conservation SPG, should be absorbed within, and superseded by, the Historic Environment SPD when that is produced.	The Archaeology Strategy SPG and the Regeneration through Conservation SPG will be superseded by the Birmingham Design Guide SPD once adopted.	Comments to be taken into account in the Birmingham Design Guide.	015/3
Tony Thapar on behalf of Moseley Regeneration Group	- Concerned with conservation of the Moseley character - Ensure that there is a diverse range of housing tenures in the neighbourhood. - Concerned with revoking area of restraint for Moseley/ Sparkbrook.	Policies in the BDP seek to value, protect, enhance and manage the historic environment. The Moseley SPD, adopted in 2014, sets out a vision for Moseley. One of the objectives is to protect its historical legacy. The Moseley Regeneration Group has led on the preparation of the SPD and the development of detailed guidance in relation to the protecting and enhancing the character of Moseley. BDP policies TP27 and TP30 require development to contribute to creating sustainable neighbourhoods characterised by a wide choice of housing sizes, types and tenures to ensure balanced communities. The Areas of Restraint are very out dated and can only be afforded limited weight. It is considered that the issues which the Areas of Restraint seek to address can be adequately covered by existing BDP policies and the proposed policies in the Preferred Options Document namely BDP Policy TP27, TP30, PG3, DM2, DM10, DM13 and DM14.	None.	027/1
Primesight	- It is proposed to revoke this SPG rather than update it. It is unclear why a different approach has been taken to that of the Large Format Banners SPD, which on the face of it performs a comparable role. We look forward to receiving the consultation on the draft of the section to be retained in the new policy DM21.	The Location of Advertisement Hoardings SPG is regarded as being out-of-date, as it does not address more recent developments such as digital media. Some of the content should be included in the DPD policy.	None.	021/4

Question 30: Do you have any other comments? For example, do you think we have omitted anything, or are there any alternative options?

Response from:	Comments	LPA Response	Action	Ref
North Warwickshire Borough Council	- Possible strategic issues relating to policies DM04/06/09/10/11/07 and implementation arising	Noted	An ongoing dialogue with NWBC will be	001/1

		from the cumulative impact of development to the east of Birmingham.		required.	
Stafford Borough Council	-	Stafford Borough Council do not have any key issues or concerns with the DPD.	Noted.	None.	004/1
The Coal Authority	-	We have no specific comments to make at this stage.	Noted.	None.	005/1
Historic England	-	Historic England welcomes the continued reference and commitment to the preparation of a Historic Environment SPD to enable the effective delivery of Policy TP12 of the BDP.	Detailed design guidance on how development should be designed to value, protect, enhance and manage the historic environment will be contained within the emerging Birmingham Design Guide.	Comments to be taken into account in the Birmingham Design Guide.	003/1
Environment Agency	- - - -	Suggestion of an additional policy entitled 'Environmental Protection – Water' as to build on BDP Policy TP6. Policies should ensure that development does not comprise the ability to meet the required WFD objective of Good Status. To accomplish this we recommend: A Water Cycle Study to pull together all the available information on water resource availability and water quality to inform detailed development management policies. This should be undertaken in liaison with Severn Trent Water and the Environment Agency with reference to the Humber River Basin Management Plan (RBMP). A policy is required regarding foul drainage infrastructure. The increased volume of waste water and sewage effluent produced by the proposed additional 50,000 dwellings will need to be treated to a high enough standard, it is likely that a blanket policy is required to cover all developments and ensure the sewerage system has adequate capacity to manage any additional flows. We suggest the following condition wording to be included within this DPD, as supported by Severn Trent water's Hearing Statement.	BDP Policy TP6 (as modified) provides city-wide strategic policy on flood risk and the water environment. Consequently, an additional policy as suggested is not considered necessary.	None.	012/4
Frankley Parish Council	- -	Brownfield across Greater Birmingham and Solihull LEP and the Black Country Authorities should be utilised prior to Green Belt. Sites within these areas and those within the Authorities identified in the Duty to Co-operate as having capacity for housing should be examined. Deliverable / developable land in the Black Country provides capacity for around 65,000 dwellings,	Comments are noted. However, this repeats comments made in connection with the Birmingham Development Plan Modifications, and does not relate to the content or purpose of the DM DPD.	None.	002/1

	- offering land for employment and housing. - The projected housing numbers should be reviewed to ensure they are accurate. Many of the reports regarding migration are 5 years old. Until the population statistics and housing requirements are justified, the Green Belt should remain untouched.			
Selly Park Property Owners' Association.	- Concerns surrounding the concentration of student development in Selly Oak destroying neighbourhood character. A more balanced approach to land-use would be welcomed - Car parking concerns arising from purpose built student housing developments that have no associated parking facilities.	Noted. The BDP contains a policy in relation to proposals for purpose built student accommodation (Policy TP33 Student accommodation). Development must have an unacceptable impact on the local neighbourhood and residential amenity. As set out in the Preferred Options Document, all should ensure that the operational and parking needs of development are met and avoid highway safety problems and protect the local amenity and character of the area.	None.	006/8
Lichfield District Council	- We have no issues to raise.	Noted.	None.	008/1
Health & Safety Executive	- When consulted on land-use planning matters, HSE where possible will make representations to ensure that compatible development within the consultation zones of major hazard installations and major accident hazard pipelines (MAHPs) is achieved. - Detailed technical advice provided.	Noted. Supporting text to the proposed policy DM3 land affected by contamination and hazardous substances states that decisions will take into account the advice of the HSE, together with guidance in HSE's Land Use Planning Methodology.	Comments taken into account in proposed policy DM3 land affected by contamination and hazardous substances	007/1
Sandwell MBC	- We do not feel this DPD raises any strategic issues.	Noted.	None.	009/1
BCC Transportation	- Addition of a transport policy to address detailed considerations in respect of planning applications, planning conditions, car parks, the Parking Guidelines SPD and potential Travel Plans SPD.	Noted. Comments taken into account in proposed policy DM13 Highway Safety and Access and DM14 Parking and Servicing.	Comments taken into account in proposed policy DM13 Highway Safety and Access and DM14 Parking and Servicing.	Internal
Dr Mike Hodder on behalf of Council for British Archaeology, West Midlands	- Suggest that the DPD contains cross-references to BDP policies and a table, similar to Table 3 in the Appendix of the consultation document, which lists topics that are not included in the Development Management DPD because they are covered by BDP policies.	Cross reference to relevant BDP and other local plan policies and guidance has been included. An appendix in the Preferred Options Document lists the topics that are not included in the Preferred Options Document.	No further action. Comments have been taken into account.	015/4
Natural England	- Natural England does not consider that this Development Management DPD poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation. This does not mean there are no impacts on the natural environment.	Noted.	None. Natural England is a Specific Consultation Body and will continue to be consulted in accordance with the Development Plan	020/1

			Regulations.	
Tyler Parkes on behalf of the Police and Crime Commissioner for West Midlands (PCCWM)	- Additional policies requested (see below) - Development management policies specific to Listed Buildings and Conservation Areas. Consideration could be given to the use of alternative materials and/or artefacts which are less likely to be vulnerable to repeat theft. The policy should suggest the use of 'alternative' materials to replace building materials and artefacts stolen to reduce crime and the fear of crime - Policies requiring a comprehensive maintenance programme to offer sustainability for buildings once they have been constructed, this might include: The regular pruning and trimming of trees and bushes to encourage surveillance and prevent concealment, the removal of graffiti and signs of vandalism, regular litter and waste patrols. - Another recommendation includes the formulation of a policy, SPD, or model conditions that seeks to control the design and location of ATMs. Examples of 'model' conditions include, adequate lighting, defensible space, CCTV, anti-ram barriers, dedicated parking areas.	The requirement for development to create safe environments that design out crime and promote natural surveillance and positive social interaction is already provided through BDP Policy PG3 Place making. Detailed design guidance on creating safe places and anti-terror measures and safe buildings will be set out in the emerging Birmingham Design Guide.	Detailed design guidance on creating safe places and anti-terror measures and safe buildings will be set out in the emerging Birmingham Design Guide.	016/8
Severn Trent Water	- No specific comments to make, but please keep us informed.	Noted.	Consult at next stage of consultation.	018/1
Turley on behalf of Calthorpe Estates	- DM03 and DM11 should be sufficiently flexible to ensure that high quality niche offerings are not unduly restricted by blanket policies intended to deal with more standard / typical developments as to create a vibrant urban village. - The DPD should ensure that there is sufficient flexibility creating a more interesting built environment befitting of a world class city.	The proposed draft policies are unlikely to restrict niche offerings in any way.	None.	019/6
Alvechurch Parish Council	- No Transport policy to consider cross boundary transport integration.	Cross boundary transport integration is a strategic planning consideration which is addressed in the BDP.	None.	022/27
The Moseley Society	- We will be very interested to see the detailed policies when they are published for consultation. - We welcome a new statement on Enforcement and hope that enforcement receives sufficient resources.	Noted. A policy for Enforcement is no longer proposed in the Preferred Options Document. The Council instead will be preparing a Local Enforcement Plan which will set out its policy and procedure for enforcing planning control and handling planning enforcement issues.	None.	023/1
Castle Bromwich Parish Council	- Councillors to reply individually to consultations rather than submit a 'parish council' view.	Noted.	None.	026/1

Appendix G
Regulation 18 (Preferred Options) Consultation Responses

Development Management in Birmingham Preferred Options Consultation: Summary of comments and BCC Response					
General Comments regarding Development Management DPD and SA					
Response from:	**Support Policy Approach?**	**Comments and Main Issues Raised**	**LPA Response**	**Action**	**Ref**
Jane Harding from Birmingham Trees for Life	N/A	- Green infrastructure is a crucial element of high quality urban design and its importance cannot be over-stated. - Ensure that green infrastructure is central to all development in the city, especially the city centre and immediate surrounding areas.	Noted. Policies in the adopted BDP seek to protect and enhance the green infrastructure network and biodiversity and geodiversity in the city (policies TP7 and TP8).	No further action.	008/16
Jonathan Lee	N/A	- It would be better to separate out the HMO section into a separate consultation as residents are passionate about this subject. - I think this very important subject seems to be a little buried in the wider consultation but I wholeheartedly appreciate the opportunity to input into the process and agree with the Council's proposed policies.	Noted. The DMB will provide a single source point for all development management policies which can be read in conjunction with each other. Separating out the HMO policy from the other development management policies would not be considered useful.	No further action.	
Scott Hewer	N/A	- Please make the city more cycle friendly and with MUCH better public transport- that's the only way to lower pollution and create a greener, more inviting and pleasant city for all.	Noted. The city's transport vision is set out in the Birmingham Development Plan (BDP), Birmingham Connected and other documents such as the Walking and Cycling Strategy and Infrastructure Plan. The adopted BDP sets out the key policies in relation to the establishment of a sustainable transport network and promotes public transport (TP41), walking (TP39), cycling (TP40), the use of low emission vehicles (TP43) and the use of technology to help users navigate and explore the city by all modes of transport.	No further action.	014/16
Iris Bertz	N/A	- The limiting of HMO is really important to sustain and improve the quality of live in Birmingham.	Noted.	No further action.	015/16

Susan Lane	N/A	- Focus on new developments leaves an open question about what already exists that may not meet this standard or be creating a public nuisance that could be ameliorated - Enforcement of standards in existing developments may be more critical for quality of life for most people than this plan - No sense of the Council taking initiatives to create change and development in this document - More weight/focus should be given to site around the city that have been neglected or abandoned - There should be discussion of how the Commonwealth Games developments may influence the delivery of this plan - No sense of the complexity and challenge of the city's diversity of needs in the plan - Good aspirations but will be difficult in practice without more neighbourhood engagements. Needs indication of how this might be achieved. - Document is not user friendly. Needs brief summary/conclusions. - More explanation of how the proposals will make the city a better place to live and work in long term/future generations	Noted. Planning enforcement is undertaken in the event of a breach of planning control. As explained in the Introduction to the document the purpose of the DMB is to provide detailed development management policies which are non-strategic and provide detailed often criteria based policies for specific types of development. The policies will give effect to, and support, the strategic policies set out in the Birmingham Development Plan (BDP), adopted in January 2017. Para 1.9 explains the structure of the document. Each policy begins with an introduction setting out the purpose of the policy.	No further action.	019/16
Helena France	N/A	- As your policy says a concentration of more than 10% of properties in a radius of 100 metres is detrimental to the community. Current concentration of HMOs in Selbourne Rd, Handsworth wood Rd, Endwood Court Rd triangle is currently 30% + with a high % of these being Supported Living. This is leading to families moving out of the area - Extra pressure on Police, Health Providers, Refuse Collection - Tensions between residents - Pressure on Parking - Unsuitable levels of support for the Supported Living Residents	Noted. Consideration will be given to how planning applications will be assessed in such scenarios.	No further action.	022/16
Devinder Kumar from Reservoir Residents Association	N/A	- Emerging issues of office-to-residential conversions - Request department engages with their peers in other cities to establish emerging issues and trends an address these in the DMB and BDP - Proposes Birmingham to apply for an Article 4 direction for removing permitted development rights to convert use Class B1[a] to C3, C4 or HMO (sui generis) in areas where there is already a cumulative overconcentration of HMO, class N exempt properties or PBSA development. - Most marked increase to housing stock was in "change of use" with many offices converted to flats. Suggest	Birmingham is part of the Core Cities Group and regularly engages with other Core Cities on a wide range of matters. The City Council's Cabinet took a decision at a Cabinet meeting on 14 May to apply a City-wide Article 4 Direction in relation to small HMOs with the effect of removing permitted development rights from C3 use to C4 use. A non-immediate Article 4 Direction was recommended and accepted by Cabinet in order to negate the risks of compensation claims made to the Council as a result of any	No further action.	025/16

		that this is partly driven by article 4 directions on HMO. - Many conversions of offices into intensive accommodation with boom partly down to new "permitted development rights, resulting in many unfit conversions and overconcentration similar to HMOs. These converted homes under PD do not have to meet minimum floor area standards and do not have to include any affordable housing - Completely support the Council's proposals for a city-wide article 4 direction on HMO, albeit with a few additional conditions/stronger wording and criteria against which applications are considered. - Cumulative effect of class N exemptions, HMO, PBSA and office-to-residential should be used as criteria against which planning application are judged. - Precedence of making a non-immediate Article 4 to remove the permitted development rights for change of use from office to residential. Councils in Hackney and Manchester are currently consulting on this.	loss of expenditure or abortive costs incurred as a result on the Article 4 Direction.		
Michael William Reed	N/A	- Plan seems to focus on the city centre not the whole city with a lack of emphasis on communities and their needs - Plan seems impractical given the current financial and resources position of the council.	The DMB policies are to be applied city wide unless specified otherwise.	No further action.	035/16
Hazel McDowall from Natural England	N/A	- Natural England welcome that many of the comments in their response to the Scoping Report (August 2018) have been taken into account. - However, we note that the Habitats Regulation Assessment (HRA) summary that is referred to in the Sustainability Appraisal paragraph 1.6 does not seem to be at paragraph 5.8 as indicated. The document we are viewing from the web site ends at paragraph 5.4.	Noted. The drafting error will be corrected in the Publication Version of the SA by way of specific reference to the 2013 HRA prepared for the BDP (link below). https://www.birmingham.gov.uk/download/downloads/id/1523/sub6_pre-submission_habitat_regulations_assessment_2013.pdf	The drafting error will be corrected in the Publication Version of the SA by way of specific reference to the 2013 HRA prepared for the BDP (link below). https://www.birmingham.gov.uk/download/downloads/id/1523/sub6_pre-submission_habitat_regulations_assessment_2013.pdf	040/16
Samantha Pritchard from Birmingham and Black Country Local Nature Partnership	N/A	- B&BC LNP are disappointed the documents does not include policies on biodiversity and heritage and sustainable urban drainage arrangements. a) Inclusion of which would protect biodiversity from direct and indirect impacts of new developments and support the incorporation and creation of a robust ecological network within the Birmingham city centre b) LNP wishes to bring attention to the spring statement 2019 published by the Government on 13th March which confirmed that the Government will use the forthcoming Environment Bill to mandate Biodiversity net gain for development in England. As such although full details of the mandate has not yet	Noted. Policy DM4 has been amended to strengthen references to ecological networks and biodiversity net gain. Biodiversity, heritage and sustainable urban drainage are addressed in the BDP in policies TP8, T12 and TP6 respectively Further guidance on these issues will also be included in the emerging Birmingham Design Guide SPD, and is already available in the Council publication *Sustainable Drainage: Guide to Design, Adoption and Maintenance* (June 2015). The need for specific policy/guidance on the Council's approach to biodiversity net gain will	Amend now point 1 and 2 of the policy: 1. All developments must take opportunities to provide high quality landscapes and townscapes that enhance existing landscape character and the green infrastructure network, contributing to the creation of high quality places and a coherent and resilient ecological network. 2. The composition of the proposed landscape should shall be appropriate to	041/16

		been provided. The LNP would encourage the inclusion of a policy covering net biodiversity gain for new developments.	be reviewed when details of mandatory requirements are published as part of the forthcoming Environment Bill.	the setting and the development, as set out in a Landscape Plan*, with opportunities taken to maximise the provision of new trees and other green infrastructure, create or enhance links from the site to adjacent green infrastructure and support objectives for habitat creation and enhancement, as set out in the Birmingham and Black Country Nature Improvement Area Ecological Strategy 2017-2022 and subsequent revisions.	

Amend now paragraph 2.33 to:

Maintaining and expanding the green infrastructure network throughout Birmingham is a key part of the City's growth agenda, and provides net gains for biodiversity. Green landscaping (including trees, hedgerows and woodland) forms a critical part of this network and provide a multitude of benefits, having a positive impact on human health and improving the quality of visual amenity and ecological networks. This policy seeks to ensure that landscaping is an integral part of the overall design of development. It also sets out criteria for how existing landscaping should be considered in development proposals.

Amend now paragraph 2.35 to:

New development has a clear role in supporting the City's approach to green infrastructure, and can contribute to and enhance the landscape, provide biodiversity net gain and help to reduce the impact of climate change. Each development site will be able to contribute to the green infrastructure network in appropriate ways reflecting the site context and location. The ecological network is currently described in the Birmingham and Black Country Nature Improvement Area Ecological Strategy 2017-2022, which identifies opportunities for habitat creation,

				restoration and enhancement within Core Ecological Areas, Ecological Linking Areas and Ecological Opportunity Areas. This strategy, and subsequent revisions, should be referenced to ensure new development is in keeping with the surrounding landscape and supports the maintenance of a resilient and coherent ecological network. TP8 Biodiversity and Geodiversity will be added to the Policy Links.	
Samantha Pritchard from The Wildlife Trust for Birmingham and Black Country	N/A	- Wildlife Trust notes that the document does not include policies on biodiversity, which would be designed to support the protection of biodiversity from both direct and indirect impacts of new developments. - Document should support the incorporation and creation of a robust ecological network within the Birmingham city centre which would retain the existing green infrastructure while supporting the creation of further infrastructure - Wildlife Trust would encourage the inclusion of a policy covering net biodiversity gain for new developments, with reference to spring statement 2019 published by the Government on 13th March which confirmed that the Government will use the forthcoming Environment Bill to mandate Biodiversity net gain for development in England	Noted. Policy DM4 has been amended to strengthen references to ecological networks and biodiversity net gain. Biodiversity is specifically addressed in BDP policy TP8, and further guidance on protecting and enhancing biodiversity will also be included in the emerging Birmingham Design Guide SPD. The need for more specific policy/guidance on the Council's approach to biodiversity net gain will be reviewed when details of mandatory requirements are published as part of the forthcoming Environment Bill.	Amend now point 1 and 2 of the policy: 1. All developments must take opportunities to provide high quality landscapes and townscapes that enhance existing landscape character and the green infrastructure network, contributing to the creation of high quality places and a coherent and resilient ecological network. 2. The composition of the proposed landscape should shall be appropriate to the setting and the development, as set out in a Landscape Plan*, with opportunities taken to maximise the provision of new trees and other green infrastructure, create or enhance links from the site to adjacent green infrastructure and support objectives for habitat creation and enhancement, as set out in the Birmingham and Black Country Nature Improvement Area Ecological Strategy 2017-2022 and subsequent revisions. Amend now paragraph 2.33 to: Maintaining and expanding the green infrastructure network throughout Birmingham is a key part of the City's growth agenda, and provides net gains for biodiversity. Green landscaping (including trees, hedgerows and woodland) forms a critical part of this network and provide a	042/16

				multitude of benefits, having a positive impact on human health and improving the quality of visual amenity and ecological networks. This policy seeks to ensure that landscaping is an integral part of the overall design of development. It also sets out criteria for how existing landscaping should be considered in development proposals.	
				Amend now paragraph 2.35 to:	
				New development has a clear role in supporting the City's approach to green infrastructure, and can contribute to and enhance the landscape, provide biodiversity net gain and help to reduce the impact of climate change. Each development site will be able to contribute to the green infrastructure network in appropriate ways reflecting the site context and location. The ecological network is currently described in the Birmingham and Black Country Nature Improvement Area Ecological Strategy 2017-2022, which identifies opportunities for habitat creation, restoration and enhancement within Core Ecological Areas, Ecological Linking Areas and Ecological Opportunity Areas. This strategy, and subsequent revisions, should be referenced to ensure new development is in keeping with the surrounding landscape and supports the maintenance of a resilient and coherent ecological network.	
				TP8 Biodiversity and Geodiversity will be added to the Policy Links.	
Historic England		- We note the attention to safeguarding cultural heritage in the Sustainability Appraisal and welcome the DMBs consideration of the historic environment in relation to Policy DM5 Light pollution, Policy DM7 Advertisements, and Policy DM15 Telecommunications.	Support noted.	No further action.	050/16
Tyler Parker		- CCWMP welcomes opportunity to become actively	Support noted.	No further action.	051/16

Planning and Architecture – on behalf of Chief Constable of West Midlands Police		involved in the policy formation process. - Supports the objectives/policies that refer in their wording to safety and security, including crime fear of crime and anti-social behaviour - CCWMP objects to the omission of certain policy areas from the saved policies of the 2005 UDP, namely those within Chapter 8 and paragraphs 3.14-3.14D, and without changes the CCWMP considers the document to be unsound. - Lack of reference to a policy referring to restaurants, bars, public houses and hot food takeaways and potential crime is regrettable – a specifically worded policy is required which should also refer to the Council attaching conditions to ensure no demonstrable harm to nearby residents. - Objects to the omission of: Listed Buildings and Conservation Areas; Maintenance following completion of development; Automatic Teller Machines (ATM)	The reasons for the omission of certain policies from the saved policies of the 2005 UDP, namely those within Chapter 8 and paragraphs 3.14-3.14D was set out in the Issues and Options Document and subsequently the reasons for taking forward certain policies proposed in the Issues and Options Document is set out in Appendix 3 of the Preferred Options Document. Policy in relation to the historic environment (including Listed Buildings and Conservation Areas) is contained in the adopted Birmingham Development Plan. The saved 2005 UDP policies did not contain a policy in relation to 'Maintenance' or 'ATMs.		
Conservative Group		- Concerns are raised about policies being dropped and they should not be removed unless legal advice can be provided that doing so will not weaken planning - Strong requirements should be included in main policies - New planning policy should reflect the protection to existing housing stock - Policy on Shisha Loungers should remain as a standalone policy	The reasons for the omission of certain policies from the saved policies of the 2005 UDP, namely those within Chapter 8 and paragraphs 3.14-3.14D was set out in the Issues and Options Document and subsequently the reasons for taking forward certain policies proposed in the Issues and Options Document is set out in Appendix 3 of the Preferred Options Document. Policy in relation to the protection of the existing housing stock is contained in the adopted BDP. (Policy TP35)	No further action.	052/16
Savills on behalf of Langley Sutton Coldfield Consortium		- Consortium considers that the Langley development and other sites with a site-specific SPD should be excluded from the application of policies set out in Development Management DPD - Consortium considers that the rigid application of all proposed new city-wide development management policies to Langley is not appropriate	Disagree, the Langley SPD clearly states that its purpose is to add detail and provide guidance to the Birmingham Development Plan. It states "Alongside other policies and guidance, it is a material consideration when determining planning applications on this site."	No further action.	058/16
Dr Mike Hodder on behalf of Council for British Archaeology		- A list of development management policies within the BDP (including those relating to the historic environment) should be included in an Appendix to Development Management in Birmingham - Sustainability Appraisal interim sustainability report: Table 2.1 Local Plans, Programmes and Strategies should include historic environment documents- Archaeology Strategy SPG and Regeneration through Conservation SPG	All of the thematic policies in the BDP are development management policies. Cross reference to the BDP has been made in the DMB. Noted. The historic environment documents will be included in Table 2.1 of the SA.	The historic environment documents will be included in Table 2.1 of the SA.	059/16

Reservoir Residents Association		- Document should address the emerging issues of office to residential conversions - Reservoir Residents Association proposes that Birmingham automatically applies for an Article 4 direction for removing permitted development rights to convert use Class B1[a] to C3, C4 or HMO (sui generis) in areas where there is already a cumulative overconcentration of HMO, class N exempt properties or PBSA development. - We support completely the Council's proposals for a city-wide article 4 direction on HMO, albeit with a few additional conditions/stronger wording and criteria against which applications are considered	See response to 025/16	See 026/16	060/16
Pegasus Group		- Concern given that almost four years have elapsed since the original consultation during which time both the national and local policy context has changed significantly.	Noted. The DMB is being progressed as quickly as possible.	No further action.	064/16
Curdworth Parish Council		- Essential that as much local Green Belt as possible is retained as a bulwark against urban sprawl. - Curdworth Parish Council shares one of its boundaries with Birmingham and therefore has major concerns about infrastructure relating to the proposed development site within Walmley - There is an increasing number of HGV's using access to the M42 and M6 toll with roads becoming unfit for purpose - More consideration should be given by planning officers in relation to the pressures on local road networks - Full consideration has been given to the appropriate infrastructure required with regard to doctors' surgeries, dental practices, schools and retail facilities, as neighbouring villages find it difficult meeting the needs of their own residents - Council would like to point out that policies should note that it is vital to retain a "green corridor" between the Birmingham conurbation and North Warwickshire.	Comments are noted but do not relate to the Development Management in Birmingham Document which is the subject of this consultation.	No further action.	065/16
Canal and River Trust		- The Trust welcomes the refrence at para 1.7 to encouraging better health and wellbeing. However, rather than just in space/leisure time, additional and amended text should be added at the eighth bullet point to extend into commuting opportunities: "To encourage better health and wellbeing through the	The objectives are taken from the adopted BDP. Promoting sustainable transport is covered by point 5. Para 1.7 will be re-worded to make clear that these are BDP objectives which the DMB seek to support. Updates on emerging and proposed new	Amend para 1.7 to: The DMB will support the delivery of the BDP objectives for the City. Amend policy to:	066/16

| | | provision of new and improved recreation, sport, leisure facilities and sustainable travel modes"
- The objectives at para 1.7 be reviewed as several of them seem to cover matters that are not covered by the proposed DM policies and if referenced in SPDs or existing then this should be made clear.
- Trust asks for an update on any emerging or proposed new SPDs, with clarity around the emergence of other local policy documents being referenced if possible.
- The Trust would like to note that it is important that good waterside places and design do not just relate to residential development but also to other uses and types of development along waterway corridors.

- Comments on Chapter 2 overall – Land stability:
a)   Should ensure that developments do not in situations that could cause leaks, breaches, collapses etc
b)   Should ensure that new developments are appropriate for its location in the context of avoiding unaccpetable risks from land instability
c)   Note inferences towards this in DM3 and DM6 however it would be better dealt with separately to cover concerns.

- Water and Drainage:
a)   Disappointed to note that the document does not address these matters. It is important that the environment is protected.
b)   Ensure that sites are prevented from allowing pollution of the water environement through air bourne pollution or water seepage/spillage/run-off and should be considered in relevant detailed policy
c)   Drainage optionsshould be outlined and chosen to ensure that appropriate management and control mechanisms are put in place.

- Further advice and guidance is needed is regards to heritage. It is possible that canal-related advice is included within a design document and the Trust would like further discussion on this.

- Chapter 3 Overall:
a)   Good design policies should apply to the development of employment uses and it is important that the benefits of locations near the canal and river network are maximised | SPDs can be provided by contacting the Planning Policy Team.
Comment on good waterside places and design is noted.

Comments on land instability are addressed in response proposed changes to the policy.

Policy in relation to the management of flood risk and water resources is contained in the adopted BDP. (Policy TP6)

Policy in relation to the historic environment in contained in the adopted BDP (Policy TP 12)

Comments noted. The emerging Birmingham Design Guide will provide detailed design guidance to assist with the application of policies.

It is considered that existing policies in the BDP adequately promote sustainable transport and cover water borne freight. | **Policy DM3 –Land affected by contamination, instability and hazardous substances**

1.   Proposals for new development will need to ensure that risks associated with land contamination and instability are fully investigated and addressed by appropriate measures to minimise or mitigate any harmful effects to human health and the environment within the development and the surrounding area and/ or groundwater.

2.   All proposals for new development on land which is known to be, or potentially, contaminated or unstable, will be required to submit a preliminary risk assessment, and where appropriate, a risk management and remediation strategy based on detailed site investigation to remove risks to both the development and the surrounding area and/ or groundwater.

Proposals for development of new hazardous installations, or development located within the vicinity of existing hazardous installations, will only be permitted where it is demonstrated that necessary safeguards, in consultation with the HSE, are incorporated to ensure the development is safe; and that it supports the spatial delivery of growth as set out in the Birmingham Development Plan. | |

		b)　　　Policy TP25 refers to strategic matters around tourism and cultural facilities and their detailed design should fall within wider design considerations. - More emphasis and direction should be given relating to alternative transport methods. - The strategies in policies TP38-42 are welcomed but largely are not linked to site specific considerations. - Greater provision should be encouraged to assist in travel across a range of modes and routes - Trust considers a policy should exist that sets out a sequential approach to the assessment of transport and connectivity whilst still acknowledging car/parking need. These should include requirements for suitable storage, maintenacne of cycles and other alternative transportation devices. - Information should be provided to residents of sustainable routes - Trust notes the use of digital technology to assist should be incorporated or required. - Further advice on waterborne freight might be encouraged. - Policies should refer to objectives of para 1.7			
Councillor Lisa Trickett		- Main comment and concern in relation to these documents is in terms of the need to address the risks of catastrophic climate change and bring forward action to make this city a zero carbon city. How has this being addressed in these documents – what conditions and requirements are to be set – where do we need wider regulation etc.	The purpose of this document is to provide detailed development management policies to support the strategic policies set out in the adopted BDP. The BDP contains policies which seek to mitigate and reduce the impacts of climate change (TP1 Reducing the city's carbon footprint), namely polices in relation to the promotion of sustainable transport (TP38-46),adapting to climate change (TP2), Sustainable construction (TP3), Low and zero carbon energy generation (TP4), Low carbon economy (TP5), Management of flood risk and water resources (TP6), Green Infrastructure (TP7) and sustainable management of the city's waste (TP13)	No further action.	069/16

wood.

Item 7

wood.

Technical note:

Birmingham City Council – Development Management Development Plan Document – Addendum to the Sustainability Appraisal

1. Background and Purpose of this Note

1.1.1 The Birmingham Development Plan (BDP) was adopted by Birmingham City Council (the Council) in 2017. The BDP provides the strategic planning policies for over 51,100 new homes and substantial amounts of employment land, retail and office development to be delivered by 2031. The Council has also been preparing the Development Management Development Plan Document (DM DPD). It will provide detailed planning policies for specific types of development and support the implementation of the BDP.

1.1.2 The Council issued an initial draft DM DPD in March 2015. Following an analysis of the consultation responses to the initial draft DPD and the adoption of the BDP, the Council prepared a Draft DM DPD, consulted on as '*Development Management in Birmingham (Development Plan Document) Preferred Options Document*' from the 4th February to the 29th March 2019. Following an analysis of consultation responses and further work, the Council then issued the '*Development Management in Birmingham (Publication Version - Regulation 19) January 2020*' for consultation between 9th January and 21st February 2020.

1.1.3 Following receipt and consideration of the consultation responses on the Publication Version of the DM DPD, the Council has identified a number of proposed minor changes to be included as part of the Submission Version of the DM DPD. The Council considers that these changes are minor and do not materially affect the policies or strategic direction of the DM DPD.

1.1.4 Wood Environment and Infrastructure Solutions Ltd. (Wood) was commissioned by the Council to undertake a Sustainability Appraisal (SA) of the DM DPD. The SA appraises the environmental, social and economic performance of the DM DPD and any reasonable alternatives. SA Reports of the initial draft, Preferred Options and Publication Version of the DM DPD were completed and published for consultation concurrent with each stage of the draft DPD. For the Publication Version of the DM DPD, one comment was received on the SA.

1.1.5 This document is an addendum to the 2019 SA Report (completed for the Publication Version of the DM DPD). It has been prepared in order to update the appraisal where necessary, taking into account the proposed minor modifications. This ensures that all the likely significant effects of the draft DM DPD (as proposed to be modified) have been identified, described and evaluated.

1.1.6 In consequence, this addendum to the SA Report:

- summarises the comment received on the SA Report and sets out the Council's response;

- screens proposed changes to the DM DPD, confirms whether or not they are significant for the SA;

- updates the SA as necessary, including any amendments to specific policy appraisals to reflect either the consultation response or any screened in modifications; and

● sets out the next steps for the Local Plan and SA.

2. Comments on the SA

Comment on SA of Policy DM10

2.1.1 Comments were received from Pegasus Group (on behalf of Countryside Properties) in relation to the SA and appraisal of Policy DM10 'Standards for residential development.' The representation states (paragraph 7.16):

● *"The evidence base which supports the policy including both the Financial Viability Assessment and Residential Standards Topic Paper fail to provide any justification for the introduction of the 15 dwelling threshold and 30% M4(2) compliant dwelling provision. Paragraph 6.26 of the Topic Paper simply sets out that 'a requirement of 30% new homes to meet the optional building regulation M4(2) for accessible and adaptable homes is considered appropriate', with no justification of where the 30% figure has derived from. The threshold of 15 dwellings has also not been justified within the supporting evidence. Overall the Topic Paper provides very generic statements with very little if anything in the way of robust evidence which adequately justifies the provisions of the policy in the context of local need/demand."*

The representation continues (paragraph 7.17):

● *"It is noted that the accompanying Sustainability Appraisal states 'This policy will yield a range of sustainability benefits, associated with ensuring that there is consistent high-quality residential development throughout the City. No likely significant negative effects have been identified. There are no suggested changes to the content of the policies arising from the appraisal. The option of developing new policy to address residential design matters yields more positive sustainability outcomes than the reasonable alternatives presented'. (page 98). However, the only 'reasonable alternatives' cited relate to firstly retaining the existing UDP policy, which is dismissed as it would need updating, or alternatively having no minimum space standards or policy which is rejected on the grounds of amenity and the impact on quality of life. Furthermore, the introduction of the revised thresholds for M4 (2) dwellings within new developments does not appear to be addressed."*

2.1.2 In conclusion the representation states (paragraph 9.5):

● *Countryside Properties objects to Policy DM11 on the grounds that there is no evidence to adequately justify a requirement for all residential development (including extensions) to meet the minimum Nationally Described Space Standards, nor for introducing a requirement for optional Building Regulation Part M4 (2) to be met on 30% of all properties on residential developments of over 15 dwellings. The Sustainability Appraisal does not adequately assess all 'reasonable alternatives' and the option of not adopting such standards should not have been dismissed as it remains a reasonable alternative.*

2.1.3 It is therefore considered that there are three strands to the representation that are relevant to the SA Report:

● The option of not adopting Nationally Described Space Standards (NDSS) should not have been dismissed as it remains a reasonable alternative;

● The SA did not appraise DM10 on the basis of it applying to 15 or more dwellings and the requirement for such development to provide at least 30% of dwellings as accessible and adaptable unless demonstrated to be financially unviable; and

● The SA should have considered alternatives to the provisions of DM10, i.e. applicability to developments of 15 or more dwellings and the provision of at least 30% of dwellings as accessible and adaptable homes.

Council's Response

Reasons for rejecting not adopting the NDSS

2.1.4   The SA Report appraised the option of having no policy (including no reference to the NDSS) as a reasonable alternative at Appendix A of the SA Report. Table 4.2 of the SA Report summarises the results of the SA and provides an outline of the reasons for selecting the preferred option and rejecting the option of having no policy. The SA Report is therefore considered to be compliant with the SEA Directive and associated regulations and guidance.

Appraisal of DM10

2.1.5   The Part M4(2) (accessible and adaptable homes) requirement is part of policy DM10 which states:

"Part 2: "Housing developments of 15 or more dwellings, should seek to provide at least 30% of dwellings as accessible and adaptable homes in accordance with Building Regulations Part M4(2) unless demonstrated to be financially unviable."

2.1.6   Page A38 of the SA does assess Policy DM10 but bullet two refers to:

"Proposals for major residential development, should seek to include a proportion of OR 7% on new affordable housing should be accessible and adaptable in accordance with Building Regulations Part M4(2) unless demonstrated to be financially unviable."

2.1.7   The SA refers to an earlier internal draft of the DM DPD provided by officers and the SA should be updated to reflect the wording of DM10 as consulted on in the publication version of the Local Plan. **Appendix A** of this addendum presents an update to page A38 of the SA Report. Instances where text is deleted are presented as ~~strikethrough~~ text and additions are presented as <u>underlined</u> text.

2.1.8   From a review of the previous SA of the earlier draft of DM10, whilst it is not considered necessary to amend the appraisal findings (in terms of likely significant effects identified), additional text has been added in the commentary to take account of the DM DPD viability assessment, which confirms that any impact on scheme viability would be de-minimis (see **Appendix A**). The viability assessment provides assurance that the significant positive effects identified for SA Objective SOC3 'To encourage development which promotes health and well-being' would occur (rather than development and the anticipated positive effects being prevented by an unreasonable requirement in the DM DPD which would render development unviable). It is also noted that the requirement for housing developments of 15 or more dwellings, to provide at least 30% of dwellings as accessible and adaptable homes in accordance with Building Regulations Part M4(2) is subject to viability assessment on relevant projects.

Additional alternatives

2.1.9   The SA considers three options in relation Policy DM10 – the proposed policy, retaining the existing Unitary Development Plan (UDP) Policy and no policy. Pegasus Group suggest that the SA should have considered alternatives to the requirement for the policy to apply to developments of over 15 or more dwellings, e.g. a higher or lower threshold and alternatives to the requirement for 30% of dwellings to be accessible and adaptable.

2.1.10 It is the Council's view that the justification for 30% of homes on developments of 15 or more dwellings to be accessible and adaptable homes is set out in the Standards for Residential Development Topic Paper (October 2019) which has been updated to include further justification for the proportion required in proposed policy DM10. Given the evidence available and the additional flexibility provided by the modification, and taking into account the need to take a proportionate approach to the SA (so noting that in reflecting SEA regulations 12 (2) that reasonable alternatives apply at the plan level, taking into account the objectives of the plan and its geographic scope), and the outcome of relevant case law, for this policy no further alternatives have been identified or considered.

2.1.11 It is also noted that the Council has proposed a change to part 6 of DM10 to allow for exceptions to the policy, including physical constraints or viability issues in response to this and other representations on the DM DPD.

3. Screening Proposed Changes

Determining the Significance for the SA of the Proposed Changes

3.1.1 This section sets out the approach to determining the significance of the proposed changes to the DM DPD. National Planning Practice Guidance states (Strategic Environmental Assessment and Sustainability Appraisal, Paragraph: 021 Reference ID: 11-021-20140306, Revision date: 06 03 2014) states:

"The sustainability appraisal report will not necessarily have to be amended if the plan is modified following responses to consultations. Modifications to the sustainability appraisal should be considered only where appropriate and proportionate to the level of change being made to the plan. A change is likely to be significant if it substantially alters the plan and/ or is likely to give rise to significant effects.

Further assessment may be required if the changes have not previously been assessed and are likely to give rise to significant effects. A further round of consultation on the sustainability appraisal may also be required in such circumstances but this should only be undertaken where necessary. Changes to the plan that are not significant will not require further sustainability appraisal work."

3.1.2 The Council provided a draft version of the changes to the Local Plan to Wood on 6th[th] May 2020. These were reviewed to determine whether or not they were significant and whether or not there was a need for any consequential changes to the previous appraisal work. The proposed changes to the DM DPD are reviewed in **Appendix B** of this report. The final column of the table indicates, for each modification, whether or not it was considered significant for the purposes of the SA and why.

1.1.1.1 There is no detailed guidance on how to determine the significance of changes. The following text sets out how screening of changes was undertaken in the context of the proposed changes to the DM DPD. It draws on an approach and examples of previous work undertaken by Wood. The examples are not necessarily specifically relevant to the DM DPD, rather they are used to illustrate what a significant change might look like.

1.1.1.2 The National Planning Policy Framework (NPPF) requires that Local Plans are positively prepared. This means that policies must be positively worded, for example:[1]

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[1] The NPPF was first published in 2012 and revised in 2019. Paragraph 16 sets out the requirements for a plan. Item (b) states that plans should *"be prepared positively, in a way that is aspirational but deliverable"*.

'Planning permission will be granted provided that...' and *'development will be encouraged where it...'*

rather than

'We will not allow development unless...'.

1.1.1.3   Changes of this nature would not necessarily be considered significant for the purposes of the appraisal because they involve re-wording a policy to ensure that it complies with national planning policy. The intent of policies that are modified in this way remains the same, but they are cast in a positive manner as outlined above. Such changes are therefore not considered to affect the previous results of the appraisal of the policy against the SA objectives and are not considered to be significant for the purposes of the SA. One change to the DM DPD falls into this category.

1.1.1.4   Changes may also be required to make a policy compliant with the NPPF and/or associated Planning Guidance. One change to the DM DPD falls into this category.

1.1.1.5   Another category of proposed changes are those that make the wording and/or intent of policies clearer. Such changes are often made in response to representations received during the consultation period. Such changes are reviewed to confirm whether or not they affect the appraisal results but relevant text in the SA might also need amending so that the SA uses terminology that is consistent with the DM DPD. This is the most common form of change identified in the review of the DM DPD.

1.1.1.6   Changes to supporting text clarifying how policies will be implemented and/or to provide justification for them are not necessarily considered to be significant in terms of the conclusions of the SA but again may mean that the SA needs updating to reflect the wording in the revised DM DPD.

1.1.1.7   Where changes involve the deletion of text from a policy, the revised wording is considered to see if it has any implications for the SA, both in terms of the conclusions of the SA or the commentary accompanying relevant parts of the appraisal.

1.1.1.8   Where a change to a policy introduces an additional criterion, a judgement is made as to whether or not the change would affect the previous appraisal and/or should be acknowledged in the appraisal. In such instances, significance is determined on a case by case basis and a comment made in the relevant appendix on whether or not the previous appraisal has been amended and which SA objectives are affected. The proposed changes to the DM DPD do not include any changes that fall into this category.

Results of the Screening Exercise

3.1.3   The results of the screening exercise are set out at **Appendix B** and changes that are considered significant for the SA from the screening exercise are summarised in **Table 3.1** below. All of the changes identified in the table are significant to the SA because of the need to update the commentary in the SA Report to reflect the revised wording of the DM DPD. However, whilst there is a need to ensure consistency between the SA and the revised policy wording, the screening has not identified any implications for the appraisal (in terms of the identification of effects) of the policies or the conclusions of the SA in relation to them.

Table 3.1   Summary of changes to the DM DPD that are considered significant to the SA

Change Reference	Policy/ Paragraph/Page	Proposed Change	Why this change is considered significant for the SA
8	Para 2.45	"Proposals involving or adjacent to designated and ~~un-designated historic~~	The SA uses the term 'undesignated' and this should be amended. This is in

Change Reference	Policy/ Paragraph/Page	Proposed Change	Why this change is considered significant for the SA
		~~assets~~ **non-designated heritage assets**…"	the background text accompanying the SA of the policy at page A21 of the report and does not affect the appraisal of the policy.
11	Para 3.10	"The **preferred** ~~most appropriate~~ locations for places of worship and faith related community uses is in the network of centres as is defined in Policy TP21 of the BDP **and as part of any specific allocations in the Local Plan.** These are the most sustainable locations in terms of transport accessibility and parking. Other locations ~~outside of the network of town centres~~ will be considered favourably where the criteria outlined in the policy can be satisfactorily met. Proposals for places of worship and faith related community uses should also comply with other relevant local plan policies and guidance".	The SA uses the term 'most appropriate locations' in this context – although this is in the background text accompanying the SA of the policy at page A32 of the report and does not affect the appraisal of the policy.
13	Policy DM9	"1. **Except for any specific allocation in the Local Plan**, the Council's preferred locations for the development of day nurseries and facilities for the care, recreation and education of children are in the network of centres as defined in Policy TP21 of the Birmingham Development Plan. Proposals for development outside ~~of the network of centres~~ **these locations** will ~~only~~ be considered favourably where…"	Amend summary of the policy to recognise that specific allocations in the local plan and the network of centres are the preferred locations. This does not affect the assessment of the policy as the SA presents a high-level appraisal of the policy.
16	DM11	1.d. "…~~would not result in the loss of an existing use that makes an important contribution to other Council objectives, strategies and policies~~" **It does not conflict with any other policies in the Local Plan".**	Amend summary of the policy to recognise the change to the wording. This does not affect the assessment of the policy as the SA presents a high-level appraisal of the policy.
17	DM12	~~e. It will not result in the loss of an existing use that makes an important contribution to the Council's objectives, strategies and policies~~ **It does not conflict with any other policies in the Local Plan".**	Amend summary of the policy to recognise the change to the wording. This does not affect the assessment of the policy as the SA presents a high-level appraisal of the policy.
19	DM14	"1. Development must ensure that the safety of highway users is properly taken in consideration and that any new development would not have an **unacceptable** adverse impact on highway safety."	Amend summary of the policy to recognise the change to the wording. This does not affect the assessment of the policy as the SA presents a high-level appraisal of the policy.

Change Reference	Policy/ Paragraph/Page	Proposed Change	Why this change is considered significant for the SA
20	Policy DM14, Part 5	"5. On Birmingham's strategic highway network, ~~and other principle and main distributor routes,~~ development must seek opportunities to remove unnecessary access points. New direct vehicular accesses will be supported where specified in a local plan or where there are no practical alternatives (including consideration of impacts on public transport, walking and cycling routes and road safety)."	Amend summary of the policy to recognise the change to the wording. This does not affect the assessment of the policy as the SA presents a high-level appraisal of the policy.
21	DM14 Part 6 point e)	"e) the prevention or restriction of the implementation of necessary or future transport improvements, **unless there are no practical viable alternatives**."	Yes - amend summary of the policy to recognise the change to the wording. This does not affect the assessment of the policy as the SA presents a high-level appraisal of the policy.

4.   Updates to the SA

4.1.1   This section confirms how the SA Report should be updated, based on the information set out in **Table 3.1**. Deleted text is shown as ~~strikethrough~~ and new text is underlined.

DM5 Light Pollution

4.1.2   Consistent with change reference no. 8, replace the term 'undesignated historic assets' with 'non-designated historic assets in the third paragraph of the commentary at page A21, with the commentary amended to read:

"In applying the policy the Council will seek to limit the impact of artificial lighting on the local amenity and nature conservation (including ecological networks and blue and green infrastructure). Proposals involving or adjacent to designated and ~~undesignated~~ non-designated historic assets, must apply a lighting design appropriate to the asset, considering the architecture of the building to be illuminated and the impact this may have on the character of its surroundings. "

DM8 Places of worship and faith related community uses

4.1.3   Consistent with change reference no. 11, the second paragraph of the commentary for the appraisal of Policy DM8 at page A32 of the SA Report should be amended to read:

"The preferred ~~most appropriate~~ locations for places of worship and faith related community uses is in the network of centres as is defined in Policy TP21 of the BDP and as part of any specific allocations in the Local Plan. These are the most sustainable locations in terms of transport accessibility and parking. Other locations ~~outside of the network of town centres~~ will be considered favourably where the criteria outlined in the policy can be satisfactorily met. Proposals for places of worship and faith related community uses should also comply with other relevant local plan policies and guidance."

Policy DM9 Day Nurseries and Childcare Provision

4.1.4   Consistent with change reference no. 13 amend the summary of the policy content of the SA Report (page A34) to read:

Except for any specific allocation in the Local Plan, ~~T~~*the Council's preferred locations for the development of day nurseries and facilities for the care, recreation and education of children are in the network of centres as defined in Policy TP21 of the Birmingham Development Plan. Proposals for development outside of* <u>*these locations*</u> ~~*the network of centres*~~ *will* ~~*only*~~ *be considered favourably where:*

1.   It is well served by means of walking, cycling and public transport;

2.   It will not have an unacceptable adverse impact on local amenity, parking public and highway safety;

3.   The site is appropriate for its purpose in its setting, suitable for the scale of the development and the number of children proposed; and

4.   Sufficient useable outdoor play space to meet the needs of the children is provided.

Policy DM11 Houses in multiple occupation (HMO)

4.1.5   Consistent with change reference no. 16, amend summary of the policy at page A43 of the SA Report to recognise the change to the policy wording:

Proposals for the conversion of existing dwellinghouses or the construction of new buildings to be used as Houses in Multiple Occupation (HMO) should protect the residential amenity and character of the area and will be permitted where they:

a.   would not result in this type of accommodation forming over 10% of the number of residential properties* within a 100 metre radius of the application site**; and

b.   would not result in a family dwellinghouse being sandwiched between two non-family residential uses***; and

c.   would not lead to a continuous frontage of three or more non-family residential uses***; and

d.   <u>It does not conflict with any other policies in the Local Plan</u> ~~it would not result in the loss of an existing use that makes an important contribution to other Council objectives, strategies and policies~~;."

DM12 Residential conversions and Specialist accommodation

4.1.6   Consistent with change reference no. 17, amend summary of the policy at page A49 of the SA Report to reflect the change to the policy wording:

"This policy applies to the subdivision or conversion of properties into self-contained dwelling units and the development of specialist accommodation. Proposals will be supported where:

a. It will not lead to an unacceptable adverse impact on the amenity, character, appearance, parking, public and highway safety of the area, taking into account the cumulative effects of similar uses in the area;

b. The accommodation and facilities, including outdoor amenity space and provision for safety and security, is suitable for the intended occupiers;

c. It is accessible to local shops, services, public transport and facilities appropriate to meet the needs of it's intended occupiers;

d. The scale and intensity of the proposed use is appropriate to the size of the building;

e. ~~It will not result in the loss of an existing use that makes an important contribution to the Council's objectives, strategies and policies~~ It does not conflict with any other policies in the Local Plan ."

Policy DM14 Highway safety and access

4.1.7   Consistent with changes reference nos. 19, 20 and 21, amend summary of the policy at page A55 of the SA Report to reflect the change to the policy wording:

"1.   Development must ensure that the safety of highway users is properly taken into consideration and that any new development would not have an <u>unacceptable</u> adverse impact on highway safety.

2.   Development must ensure that safe, convenient and appropriate access arrangements are in place for all users, including the needs of people with disabilities and reduced mobility within the development and onto the highway network, both during the construction and operation stages of the development. Priority shall be given to the needs of sustainable transport modes.

3.   Developments should provide for the efficient delivery of goods and access by service and emergency service vehicles. Where it is demonstrated that this is not feasible, an appropriate alternative solution must be agreed with the City Council and secured.

4.   Development proposals that will generate significant amounts of traffic should be accompanied by a Transport Assessment and should be located where the need to travel will be minimised, and is in a location that is readily accessible by a variety of transport modes. Development proposals that generate significant amounts of traffic will be required to provide a Travel Plan that sets out the means by which the developer will encourage users to adopt more sustainable modes of travel.

5.   ~~Vehicle access points (including private driveways) will be supported where it would not result in:~~

•   ~~a reduction in pedestrian or highway safety;~~

•   ~~detrimental impact on public transport, cycling and walking routes;~~

•   ~~adverse impact on the quality of the street scene and local character of the area;~~

•   ~~the loss of important landscape features, including street trees and significant areas of green verge; and~~

•   ~~the prevention or restriction of the implementation of necessary or future transport improvements~~.[Note this amendment to the SA is not as a result of a proposed change but to ensure that the SA reflects the content of the policy – the text has moved to criterion 6 below, which includes a proposed change]

5.   On Birmingham's strategic highway network, ~~and other principle and main distributor routes,~~ development must seek opportunities to remove unnecessary access points. New direct vehicular accesses will be supported where there are no practical alternatives (including consideration of impacts on public transport, walking and cycling routes <u>and road safety</u>). ~~Any new access point must~~

allow for access and egress in a forward gear.[note this is not a proposed change to the local plan but an update to the SA to reflect the latest wording in the plan.]

6. All new vehicle access points (including private driveways) will be supported where it would not result in:

a. reduction in pedestrian or highway safety;

b. detrimental impact on public transport, cycling and walking routes;

c. adverse impact on the quality of the street scene and local character of the area;

d. the loss of important landscape features, including street trees and significant areas of green verge which cannot be appropriately replaced, or their loss mitigated; and

e. the prevention or restriction of the implementation of necessary or future transport improvements, unless there are no practical viable alternatives."

5.   Conclusions and next steps

5.1.1   This SA Addendum has considered the representation made on the SA Report accompanying the Publication Version of the DM DPD and provides a response that updates the relevant text of the SA accordingly. This Addendum has also considered proposed changes made by the Council to the DM DPD following consultation on the Publication version. The SA Report has been updated to reflect the changes but there are no impacts on the findings of the SA.

5.1.2   The Publication Version of the DM DPD and the proposed changes will be submitted, alongside the consultation responses received, directly to the Minister of Housing Communities and Local Government who will appoint a Planning Inspector to carry out a public examination to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. The SA Report and this addendum will also be submitted as part of the evidence base for the DM DPD.

5.1.3   As part of the examination the Inspector(s) may identify any main modifications that they consider necessary to make the plan sound. These will be screened as part of the SA process (in the same way that the proposed changes have been) and the SA updated as appropriate. If necessary, the main modifications and revised SA will be consulted on.

Following adoption of the DM DPD, the Council will issue a Post Adoption Statement (PAS) as soon as reasonably practicable. The PAS will set out the results of the consultation and SA processes and the extent to which the findings of the SA have been accommodated in the adopted DM DPD.

Issued by	Approved by
S. Nichson	*P. D. Davis*
....	....
Sean Nicholson	**Pete Davis**

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Appendix A: Update to SA of Policy DM10

Policy DM10 Standards for Residential Development

Policy Content	Options Considered
• All residential development will be required to meet the minimum Nationally Described Space Standards (Appendix 1). • ~~Proposals for major residential development, should seek to include a proportion of OR 7% on new affordable housing should be accessible and adaptable dwellings in accordance with Building Regulation Part M4 (2) unless demonstrated to be financially unviable.~~ • <u>Housing developments of 15 or more dwellings, should seek to provide at least 30% of dwellings as accessible and adaptable homes in accordance with Building Regulations Part M4(2) unless demonstrated to be financially unviable</u> • Separation distances* between buildings and surrounding uses should protect residents' privacy and outlook, ensure appropriate levels of daylight to internal and external living spaces and prevent undue enclosure, overshadowing, noise and disturbance. • All new residential development must provide sufficient private useable outdoor amenity space appropriate to the scale, function and character of the development and adequate provision for recycling/ refuse storage and collection*. • Development will need to ensure adequate outlook and daylight to dwellings, in line with the approach of the '45 degree Code'. This includes potential impacts on existing houses, where development should not cross the line from an angle of 45 degrees from the nearest window providing the main source of natural light to a 'habitable room' of dwellings that could be affected. • Exceptions to the above will only be considered in order to deliver innovative high quality design, deal with exceptional site issues, respond to local character and where it can be demonstrated that residential amenity will not be significantly diminished. * Standards are set out in the Birmingham Design Guide SPD.	• Retain the existing UDP Policy • No policy

SA Objective	Retain UDP Policy	No policy	New Policy	Commentary
1. **ENV1 To encourage development that optimises the use of previously developed land and buildings**	~	~	~	No clear relationship
2. **ENV2 To promote the application of high standards of design, construction and maintenance of buildings**	+?	-?	++?	Clear policies for residential design will help to ensure a consistent and progressive approach across the City.
3. **ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel**	~	~	~	No clear relationship
4. **ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage**	~	~	~	No clear relationship
5. **ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk**	~	~	~	No clear relationship
6. **ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management**	~	~	~	No clear relationship
7. **ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all**	+?	-?	++?	A clear policy for residential amenity and design will help to ensure a consistent and progressive approach across the City, contributing to its economic success through the provision of high quality development.
8. **ECON2 To help promote the vitality of local centres**	+?	-?	++?	Where residential development is encouraged in local centres, clear policy will help to ensure that it is part of good quality mixed uses.

SA Objective	Retain UDP Policy	No policy	New Policy	Commentary
9. ECON3 To promote the regeneration of areas across the City through appropriate development	~	~	~	No clear relationship
10. ECON4 To encourage investment in learning and skills development	~	~	~	No clear relationship
11. SOC1 To help ensure equitable access to community services and facilities	~	~	~	No clear relationship
12. SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~	~	~	No clear relationship
13. SOC3 To encourage development which promotes health and well-being	+?	-?	++?	The policy will help to ensure that residential development of whatever kind is well-designed and constructed.
14. SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~	~	~	No clear relationship
15. SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	~	~	~	No clear relationship

Commentary

This policy will yield a range of sustainability benefits, associated with ensuring that there is consistent high quality residential development throughout the City. No likely significant negative effects have been identified. There are no suggested changes to the content of the policies arising from the appraisal. The option of developing a new policy to address residential design matters yields more positive sustainability outcomes than the reasonable alternatives presented. The cumulative and temporal effects of the policy are likely to be City-wide and be determined over the short, medium and longer term, reflecting the consistent and early application of the policy.

Policy DM10 seeks to apply MHCLG 's Nationally Described Space Standards, which are reflective of typical sizes of units built in the City. In most cases, these standards are already being applied by developers to meet market demand. The accessibility requirements in policy DM10 are applied 'subject to viability' and the viability assessment of the DM DPD indicates that the impact on viability is typically deminimis.

BCC Background - DM10 Standards for Residential Development:

The Government's Technical Housing Standards - Nationally Described Space Standards (March 2015 as updated) applies to new residential development in Birmingham. This will ensure that all homes are highly functional, meeting occupiers' typical day to day needs at a given level of occupation. It is based on being able to accommodate a basic set of furniture, fittings, storage, activity and circulation space appropriate to the design and occupancy level of the dwelling. When Government amends these standards, the City Council will prepare technical notes to demonstrate how the update is applied within Birmingham.

All new development, including extensions of properties within residential areas, has the potential to affect adjoining dwellings. Daylight and outlook are important to create pleasant spaces and support everyday activities. The size and layout of windows in new residential development should be maximised and the layout and design of development must consider levels of sunlight reaching residential properties and take opportunities to benefit from passive solar gain whilst preventing overheating of indoor spaces.

The '45 Degree Code' is a well-established approach in Birmingham to protect daylight levels and outlook for occupiers, particularly for existing houses. In applying the code the main considerations include:

- If the extension/building is single storey, the line is drawn from the midpoint of the nearest habitable room ground floor window of the adjoining premises.

- If the extension/building is two storey or taller, the measurement is taken from the quarter point of the nearest habitable room ground floor window.

- If the neighbouring property has already been extended, the measurement is normally taken from the nearest habitable room window of that extension. • If the neighbouring property has an extension which is made mainly of glass, the policy is applied to the original window opening in the wall where the extension has been added.

Outdoor private space is highly valued and it is important for both children and adults to have access to some private outdoor space for play and relaxation. The amount and type of outdoor space should relate to the potential occupancy of the dwelling and should be useable, with consideration from a number of factors, including shape, orientation, landform and shading. Outdoor amenity spaces should receive sunlight for at least part of the day, with garden sizes increased where necessary to take account of overshadowing. Existing guidance on outdoor amenity space and separation distances is set out in Places for Living SPD, which will be updated through the forthcoming Birmingham Design Guide SPD.

Across the UK as a whole, more people are living longer. Birmingham is following that national trend, and it is predicted that the percentage of those aged over 65 within the Birmingham will increase from 12.9% (145,865 people) to 16% (210,906 people) of the population. This represents a 58% increase to 2031 and a 45% increase to 2041 of people within this group. Despite increasing life expectancy, there remains a gap in healthy life expectancy. This in turn

presents series of health and care challenges for older people and people with mobility impairments as it means they will be living longer with impairments and life-limiting conditions.

There will be a larger elderly population who will living longer and are likely to be living with disabilities in their later years. A requirement of 30% of new homes to meet the optional building regulation for accessible and adaptable homes is considered appropriate.

- Birmingham's older population makes up 12.9% of the total Birmingham population. Population forecasts show that this will increase to 16% in 2041. (ONS 2016 sub national population projections).

- The number of households headed by those aged 65+ has been increasing in Birmingham and is projected to increase to 28% of total households in the city.

- The Census 2011 shows that 18.4% of people currently report themselves as having a long term health problem or disability (being limited a little and a lot).

- Healthy life expectancy of men and women in Birmingham is much lower than the national average. The gap between healthy life expectancy and life expectancy indicates that the older population will therefore spend more years in poor health.

- In terms of those 65+, there is predicted to be 30.6% increase in people with a limiting long term illness whose day-to-day activities will be limited a little and 31.8% increase in people whose day-to-day activities will be limited a lot by 2035.

Birmingham City Council; 45 Degree Code for Residential Extensions (March 2006):
https://www.birmingham.gov.uk/directory_record/669/45_degree_code_for_residential_extensions

Department for Communities and Local Government; Technical Housing Standards – Nationally Described Space Standard (March 2015):
https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard

Ministry of Housing, Communities and Local Government; Access to and use of buildings: Approved Document M (2016):
https://www.gov.uk/government/publications/access-to-and-use-of-buildings-approved-document-m

Strategic Housing Land Availability Assessment (SHLAA) (2018)

Birmingham City Council, Standards for Residential Development Topic Paper (September 2019):
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/540330/BR_PDF_AD_M1_2015_with_2016_amendments_V3.pdf

BNP Parabis Real Estate for Birmingham City Council Development Management in Birmingham: Development Plan Document - Financial Viability Assessment (November 2019):
https://www.birminghambeheard.org.uk/economy/dmb/supporting_documents/Birmingham%20DMB%20Viability%20Assessment.pdf

Appendix B   Screening of Proposed Changes

Ref	Policy/ para	Proposed change Deleted text is ~~struck through~~; new text is in **bold.**	Reason	Are there implications for the SA arising from the proposed change?
Policy DM1 Air quality				
1	Para. 2.8	'Unacceptable deterioration' **and 'unacceptable levels'** ~~is~~ **are** defined as where ~~the~~ development **in isolation or cumulatively**, would result in exposure to pollutant concentrations ~~close to the limit values~~ **within 5% of the nationally or locally set objectives at the development site and/ or other relevant receptors, and where development would result in further exceedances where pollutant concentrations are already over the limit values.**'	Clarification in response to representors	No - this is a change to supporting text explaining how Policy DM1 will be implemented.
2	Policy DM1, Part 1	1. Development proposals will need to contribute to the management of air quality and support the objectives of the local Air Quality Action Plan and Clean Air Zone, **particularly for nitrogen dioxide and particulate matter**. Development that would, in isolation or cumulatively, lead to an unacceptable deterioration* in air quality, result in exceedances of nationally or locally set objectives for air quality, ~~particularly for nitrogen dioxide and particulate matter~~, or increase exposure **at the development site or other relevant receptors** to unacceptable levels of air pollution will not be considered favourably.	Clarification in response to representors	No - the SA provides a high-level appraisal of the policy and the proposed change is not considered significant for the purposes of the SA.
Policy DM3 Land affected by contamination, instability and hazardous substances				
3	Policy DM3, Part 2	"2. All proposals for new development on land which is known to be, or potentially, contaminated or unstable, will be required to submit a preliminary risk assessment, and where appropriate, a risk management and remediation strategy based on detailed site investigation to **minimise and mitigate** ~~remove~~ **unacceptable** risks to both the development and the surrounding area and/ or groundwater."	Consistency in response to representors	No - the SA provides a high-level appraisal of the policy and the proposed change is not considered significant for the purposes of the SA.
Policy DM4 Landscaping and Trees				

Ref	Policy/ para	Proposed change Deleted text is struck through; new text is in **bold**.	Reason	Are there implications for the SA arising from the proposed change?
4	Policy DM4, Part 3	"Development proposals must seek to avoid the loss of, and minimise the risk of harm to, existing trees **of quality**, woodland, and/or hedgerows of visual or nature conservation value, including but not limited to trees or woodland which are subject to a Tree Preservation Order, or which are designated as Ancient Woodland or Ancient/ Veteran Trees. Where trees and/or woodlands are proposed to be lost as a part of development, this loss must be justified as a part of an Arboricultural Impact Assessment (AIA) submitted with the application."	Clarification in response to representors	No - the SA provides a high-level appraisal of the policy and the proposed change is not considered significant for the purposes of the SA.
5	Para 2.37	"Trees classified **in line with BS5837** as being of categories A or B in ~~value~~ **quality and woodland and/ or hedgerows of visual or nature conservation value** should be considered as worthy of protection and development proposals should seek to avoid their loss and minimise risk of harm."	Clarification in response to representor	No - this is a change to supporting text explaining how Policy DM4 will be implemented.
6	Policy DM4, last sentence Part 5	"Where on-site replacement is not achievable, contributions to off-site tree planting will be sought through a Section 106 Agreement. **The method of calculating these contributions will be contained within the city's Tree Strategy**."	Clarification in response to representor	No - the SA provides a high-level appraisal of the policy and the proposed change is not considered significant for the purposes of the SA.
7	Para. 2.39	"Where development would result in the loss of a tree(s) ~~and/ or other landscaping~~, adequate replacement planting will be assessed against the existing value of the tree(s) removed, calculated using the Capital Asset Value for Amenity Trees (CAVAT) methodology (or other future equivalent).~~, pre-development canopy cover and biodiversity considerations.~~	Correction	No - this is a change to supporting text explaining how Policy DM4 will be implemented.
Policy DM5 Light pollution				
8	Para 2.45	"Proposals involving or adjacent to designated and ~~un-designated historic assets~~ **non-designated heritage assets**..."	Correction in response to representor	Yes – the SA uses the term 'undesignated' and this should be amended. This is in the background text accompanying the SA of the policy at page A21 of the report and

Ref	Policy/ para	Proposed change Deleted text is ~~struck through~~; new text is in **bold**.	Reason	Are there implications for the SA arising from the proposed change?
				does not affect the appraisal of the policy.
Policy DM6 Noise and vibration				
9	Para. 2.52	"In all cases, the assessment will be based on an understanding of the existing and **predicted** ~~planned~~ levels of environmental noise **at both the development site and nearby receptors** and the measures needed to bring noise down to acceptable levels for the existing or proposed noise- sensitive development."	Clarification in response to representor	No - this is a change to supporting text explaining how Policy DM6 will be implemented.
Policy DM8 Places of worship and faith related community uses				
10	Policy DM8	"1. **Except for any specific allocation in the Local Plan**, the Council's preferred locations for the development of places of worship and faith related community uses are in the network of centres as defined in Policy TP21 of the Birmingham Development Plan. Proposals for development outside ~~of the network of centres~~ **these locations** will be considered favourably where…"	Consistency in response to representor	No - the SA provides a high-level appraisal of the policy and the proposed change is not considered significant for the purposes of the SA.
11	Para. 3.10	"The **preferred** ~~most appropriate~~ locations for places of worship and faith related community uses is in the network of centres as is defined in Policy TP21 of the BDP **and as part of any specific allocations in the Local Plan.** These are the most sustainable locations in terms of transport accessibility and parking. Other locations ~~outside of the network of town centres~~ will be considered favourably where the criteria outlined in the policy can be satisfactorily met. Proposals for places of worship and faith related community uses should also comply with other relevant local plan policies and guidance".	Consistency in response to representor	Yes – the SA uses the term 'most appropriate locations' in this context – although this is in the background text accompanying the SA of the policy at page A32 of the report and does not affect the appraisal of the policy.
Policy DM9 Day nurseries and early years provision				
12	Para 3.20	"…sufficient safe parking is provided, **following the guidance set out in the council's Parking Guidelines and Car Par Design Guide Supplementary Planning Documents and any subsequent revision** ~~in a location that will not endanger other road users or pedestrians~~."	Clarification in response to representor	No - this is a change to supporting text explaining how Policy DM9 will be implemented.

Ref	Policy/ para	Proposed change Deleted text is ~~struck through~~; new text is in **bold**.	Reason	Are there implications for the SA arising from the proposed change?
13	Policy DM9	"1. **Except for any specific allocation in the Local Plan**, the Council's preferred locations for the development of day nurseries and facilities for the care, recreation and education of children are in the network of centres as defined in Policy TP21 of the Birmingham Development Plan. Proposals for development outside ~~of the network of centres~~ **these locations** will ~~only~~ be considered favourably where…"	Consistency in response to representor	Yes – amend summary of the policy to recognise that specific allocations in the local plan and the network of centres are the preferred locations. This does not affect the assessment of the policy as the SA presents a high-level appraisal of the policy. The removal of 'only' from the last part of the policy is an example of a change to make the plan positively prepared.
14	Para. 3.19	"...The network of centres as defined by Policy TP21 of the Birmingham Development Plan **and as part of any specific allocations in the Local Plan are** ~~is~~ considered the ~~most appropriate~~ **preferred** locations **for such uses**, but **other** locations ~~outside of centres~~ will be considered appropriate where the policy criteria are met..."	Consistency in response to representor	See comment above. No additional implications associated with this change to the supporting text.
Policy DM10 Standards for residential development				
15	Policy DM10, Part 6	"6. **Exceptions** to all of the above will only be considered **where it can be robustly demonstrated with appropriate evidence that** to deliver innovative high quality design, deal with ~~exceptional~~ site **specific** issues, **or** respond to local character, **adhering to the standards is not feasible due to physical constraints or financial viability issues. Any reduction in standards as a result must** ~~and where it can be~~ demonstrate~~d~~ that residential amenity will not be significantly diminished."	Clarification in response to representors	No - the SA provides a high-level appraisal of the policy and the proposed change is not considered significant for the purposes of the SA. Page A38 of the SA report provides a high level summary of the policy that references part 6 of the policy, it is considered that the summary as presented in the SA Report stands and there is no need to amend this to reflect the proposed changes to the policy.
Policy DM11 Houses in multiple occupation				

wood.

Ref	Policy/ para	Proposed change Deleted text is struck through; new text is in **bold.**	Reason	Are there implications for the SA arising from the proposed change?
16	Policy DM11, point 1.d.	1.d. "…~~would not result in the loss of an existing use that makes an important contribution to other Council objectives, strategies and policies~~" **It does not conflict with any other policies in the Local Plan".**	Clarification in response to representor	Yes - amend summary of the policy to recognise the change to the wording. This does not affect the assessment of the policy as the SA presents a high-level appraisal of the policy.
Policy DM12 Residential conversions and specialist accommodation				
17	Policy DM12, point 1.e.	e. ~~It will not result in the loss of an existing use that makes an important contribution to the Council's objectives, strategies and policies~~ **It does not conflict with any other policies in the Local Plan".**	Clarification in response to representor	Yes - amend summary of the policy to recognise the change to the wording. This does not affect the assessment of the policy as the SA presents a high-level appraisal of the policy.
Policy DM13 Self and custom build housing				
18	Policy DM13, Part 3	"3. Affordable self-build plots will be considered and encouraged as a suitable product within the affordable housing ~~requirement~~ **mix provided on** larger sites **(200 dwellings) where it is demonstrated to meet an identified need and is not substituted for needed social rented and affordable rented housing**."	Clarification in response to representor	No - the SA provides a high-level appraisal of the policy and the proposed change is not considered significant for the purposes of the SA. Page A52 of the SA report provides a high level summary of the policy that references part 3 of the policy, it is considered that the summary as presented in the SA Report stands and there is no need to amend this to reflect the proposed changes to the policy.
Policy DM14 Highway safety and access				
19	Policy DM14, Part 1	"1. Development must ensure that the safety of highway users is properly taken in consideration and that any new development would not have an **unacceptable** adverse impact on highway safety."	Consistency in response to representor	Yes - amend summary of the policy to recognise the change to the wording. This does not affect the assessment of the policy as the SA presents a high-level appraisal of the policy. The introduction of the term 'unacceptable' reflects Planning

Ref	Policy/ para	Proposed change Deleted text is ~~struck through~~; new text is in **bold.**	Reason	Are there implications for the SA arising from the proposed change?
				Guidance which identifies the need for Transport Assessments or Transport Statements to propose mitigation measures where these are necessary to avoid unacceptable or severe impacts.[2]
20	Policy DM14, Part 5	"5. On Birmingham's strategic highway network, ~~and other principle and main distributor routes,~~ development must seek opportunities to remove unnecessary access points. New direct vehicular accesses will be supported where specified in a local plan or where there are no practical alternatives (including consideration of impacts on public transport, walking and cycling routes and road safety).	Consistency in response to representor	Yes - amend summary of the policy to recognise the change to the wording. This does not affect the assessment of the policy as the SA presents a high-level appraisal of the policy.
21	DM14, Part 6, point e)	"e) the prevention or restriction of the implementation of necessary or future transport improvements, **unless there are no practical viable alternatives**."	Consistency in response to representor	Yes - amend summary of the policy to recognise the change to the wording. This does not affect the assessment of the policy as the SA presents a high-level appraisal of the policy.
Policy DM15 Parking and servicing				
22	Policy DM15, Part 2	"2. New development will **need** ~~be required~~ to ensure that the operational needs of the development are met and parking provision, including parking for people with disabilities, cycle parking and infrastructure to support the use of low emission vehicles and car clubs **aims to meet the guidance contained in** ~~is in accordance with~~ the Council's Parking Supplementary Planning Document."	Clarification and consistency in response to representors	No - the SA provides a high-level appraisal of the policy and the proposed change is not considered significant for the purposes of the SA. Page A60 of the SA report provides a high level summary of the policy, it is considered that the summary as presented in the SA Report stands and there is no need to amend this to reflect the proposed changes to the policy.

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[2] https://www.gov.uk/guidance/travel-plans-transport-assessments-and-statements

Ref	Policy/ para	Proposed change Deleted text is ~~struck through~~; new text is in **bold.**	Reason	Are there implications for the SA arising from the proposed change?
23	Para 5.14	"The Council will support and promote the provision of **on-street and off-street** charging point for ultra-low emission vehicles and car clubs."	Clarification in response to representor	No - this is a change to supporting text explaining how Policy DM15 will be implemented.
23	Para. 5.13	"The Council**'s** parking **standards currently set out in the** ~~is currently consulting on a new Parking Supplementary Planning Document (SPD) which will replace the existing~~ Car Parking Guidelines Supplementary Planning Document (2012) **will be replaced by updated standards in the Parking Supplementary Planning Document** ~~and elements of the Birmingham Parking Policy (2010).~~ It provides revised parking standards for all new developments in the city to reflect the National Planning Policy Framework. The approach to the provision of parking aims to promote sustainable transport, reduce congestion, improve road safety and reduce pollution. **The City Council will take account of whether there are any circumstances, related either to the site or the operation of the development, which may support an alternative level of parking provision.** The Parking SPD will also set out how the city will manage on-street (public highway) and off-street parking provision across the city."	Clarification and consistency in response to representors	No - this is a change to supporting text explaining how Policy DM15 will be implemented.
24	Para 5.15	"Garages will only be accepted as contributing towards parking provision for development if they have adequate functional space **as defined within the Parking SPD.**"	Clarification in response to representor	No - this is a change to supporting text explaining how Policy DM15 will be implemented.
25	Policy DM15, Part 3	"3. Proposals for parking and servicing shall avoid highway safety problems and protect the local amenity and character of the area. Parking **and servicing** should be designed to be secure and ~~fully~~ accessible to **its** ~~all~~ users and adhere to the principles of relevant Supplementary Planning Documents."	Consistency in response to representor	No - the SA provides a high-level appraisal of the policy and the proposed change is not considered significant for the purposes of the SA. Page A60 of the SA report provides a high level summary of the policy, it is considered that the summary as presented in the SA Report stands and there is no need to amend this to reflect the proposed changes to the policy.

APPENDIX 8

Development Management in Birmingham
Development Plan Document

Sustainability Appraisal Post Adoption Statement

December 2021

Birmingham
City Council

009059/2021

1.   Introduction

Background

1.1   The Development Management in Birmingham DPD (DMB) was adopted by the Council on 7 December 2021. This followed its submission to the Government in July 2020 in accordance with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012[1] and the subsequent examination in public (EiP). Following consultation on Main Modifications (MMs)[2] in April 2021, the DMB Plan was found sound by the designated Planning Inspector in her report dated 30 September 2021.[3]

1.2   Wood Environment and Infrastructure Solutions UK Ltd. (Wood), formerly Amec Foster Wheeler, was commissioned by the Council to undertake a Sustainability Appraisal (SA) of the DMB. Wood appraised the environmental, social and economic performance of the emerging DMB policies and proposals and any reasonable alternatives and assembled the SA Reports.

1.3   This Post Adoption Statement (PAS) is the final output of the SA process. It describes the way in which the Council has taken environmental and sustainability considerations and any views of consultees into account in the adopted DMB and fulfils the plan and programme adoption requirements of Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the SEA Directive)[4] and the Environmental Assessment of Plans and Programmes Regulations 2004.[5]

The Development Management in Birmingham DPD (DMB)

1.4   The DMB is part of Birmingham's Local Plan and provides detailed development management policies to support the delivery of the adopted Birmingham Development Plan. The DMB will apply to the whole City and will be a material consideration in the determination of planning applications. It will help deliver the BDP vision of Birmingham as "an enterprising, innovative and green City that has delivered sustainable growth meeting the needs of its population", with an emphasis on supporting growth and creating high quality places. The objectives of the DMB mirror those of the Birmingham Development Plan (BDP). The policies within the DMB reflect, and are in accordance with, the policies and guidance set out within the National Planning Policy Framework (NPPF)[6] and the strategic spatial objectives and policies in the BDP.

1.5   Work on the DMB commenced in 2015 and has been subject to an extensive process of consultation that has played an important role in helping to shape the policies in the plan. The Council has undertaken three key consultation exercises prior to its

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[1] SI 2012 No. 767T he Town and Country Planning (Local Planning) (England) Regulations 2012.
[2] https://www.birmingham.gov.uk/downloads/file/19564/schedule_of_main_modifications
[3] Inspector's Report can be found at www.bimingham.gov.uk/DMB
[4] http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32001L0042&from=EN
[5] SI 2004 No. 1633 The Environmental Assessment of Plans and Programmes Regulations 2004.
[6] https://www.gov.uk/government/publications/national-planning-policy-framework--2

submission to the Minister for Housing Communities and Local Government in July 2020. The SA has been applied to all stages in the preparation of the DPD as set out in Table 1.1 below.

Table 1.1: DMB Stages and SA reports

Plan stage	Title	SA stage	Consultation period
Regulation 18	Development Management DPD (June 2015)	SA Scoping Report (December 2014) SA Scoping Report Update (May 2018)	7 September - October 2015 22 May 2018 – 29 June 2018
Regulation 18	Development Management in Birmingham Preferred Options Document (January 2019)	SA of the Development Management DPD Preferred Options Document (January 2019)	4 February - 29 March 2019
Regulation 19	Development Management in Birmingham Publication Document (October 2019)	Sustainability Appraisal of the Development Management DPD (October 2019)	9 January – 21 February 2020
Regulation 22	Development Management in Birmingham Publication Document (October 2019)	Addendum to the SA (May 2020)	-
Regulation 24 Consultation on main modifications	Main modifications (May 2021)	-	24 March - 5 May 2021

1.6 Following the conclusion of the Main Modifications (MM) and consideration of the final responses, the Council received the Inspector's Report which concluded that, with the recommended MMs, the DMB satisfied the requirements of Section 20(5) of the Planning and Compulsory Purchase 2004 Act and met the criteria for soundness in the NPPF. The DMB was subsequently adopted by the Council on 7 December 2021. Further information on the adopted Local Plan, including the Inspector's Report, is available via the Council's website: www.birmingham.gov.uk/DMB

The Requirement for Sustainability Appraisal and Strategic Environmental Assessment

1.7 Under Section 19(5) of the Planning and Compulsory Purchase Act 2004, the Council is required to carry out a SA of the DMB to help guide the selection and development of policies and proposals in terms of their potential social, environmental and economic effects.

1.8   In undertaking the requirement for SA, local planning authorities must also incorporate the requirements of European Union Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment, referred to as the SEA Directive, and its transposing regulations the Environmental Assessment of Plans and Programmes Regulations 2004 (statutory instrument 2004 No. 1633).

1.9   Paragraph 16 of the NPPF sets out that local plans should be prepared with the objective of contributing to the achievement of sustainable development.[7] In this context, paragraph 32 of the NPPF reiterates the requirement for SA/SEA as it relates to local plan preparation:

1.10   *"Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements.[8] This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)."*

1.11   The SEA and SA processes can be undertaken together as a combined process, one which is advocated in National Planning Practice Guidance, which recommends SA and SEA be undertaken as a combined process. For the purpose of this statement, the integrated appraisal approach will be hereafter referred to as the Sustainability Appraisal (SA).

Habitats Regulations Assessment

1.12   Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations') requires that competent authorities assess the potential impacts of land use plans on the Natura 2000 network of European protected sites[9] to determine whether there will be any 'likely significant effects' (LSE) on any European site as a result of the plan's implementation (either alone or 'in combination' with other plans or projects); and, if so, whether these effects will result in any adverse effects on that site's integrity with reference to the site's conservation

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[7] This is a legal requirement of local planning authorities exercising their plan-making functions (section 39(2) of the Planning and Compulsory Purchase Act, 2004)

[8] The reference to relevant legal requirements in the NPPF relates to Strategic Environmental Assessment

[9] Strictly, 'European sites' are any Special Area of Conservation (SAC) from the point at which the European Commission and the UK Government agree the site as a 'Site of Community Importance' (SCI); any classified Special Protection Area (SPA); any candidate SAC (cSAC); and (exceptionally) any other site or area that the Commission believes should be considered as an SAC but which has not been identified by the Government. However, the term is also commonly used when referring to potential SPAs (pSPAs), to which the provisions of Article 4(4) of Directive 2009/147/EC (the 'new wild birds directive') are applied; and to possible SACs (pSACs) and listed Ramsar Sites, to which the provisions of the Conservation of Habitats and Species Regulations 2017 are applied a matter of Government policy when considering development proposals that may affect them (NPPF para 176). 'European site' is therefore used in this report in its broadest sense, as an umbrella term for all of the above designated sites

objectives. The process by which the effects of a plan or programme on European sites are assessed is known as 'Habitats Regulations Assessment' (HRA).[10]

1.13   In accordance with the Habitats Regulations, what is commonly referred to as a HRA screening exercise was undertaken to identify the likely impacts of the Local Plan upon European sites, either alone or 'in combination' with other projects or plans, and to consider whether these impacts are likely to be significant. Where the possibility of significant effects could not be excluded, a more detailed Appropriate Assessment (AA) has been carried out to determine whether these effects would adversely affect the integrity of European sites.

1.14   The HRA screening exercise was reported separately from the SA of the DMB but importantly helped inform the appraisal process, particularly in respect of the potential effects of proposals on biodiversity.

Purpose of this Post Adoption Statement

1.15   This PAS represents the conclusion of the SA process and fulfils the plan and programme adoption requirements of the SEA Directive and SEA Regulations. In accordance with Regulation 16 (4) of the SEA Regulations, this statement sets out the following:

- how environmental and sustainability considerations have been integrated into the DMB (**Section 2** of this document);
- how the SA Reports have been taken into account (**Section 3**);
- how opinions expressed in response to the consultation on the SA Reports have been taken into account (**Section 4**);
- the reasons for choosing the Local Plan, as adopted, in the light of the other reasonable alternatives dealt with (**Section 5**); and
- the measures that are to be taken to monitor the significant environmental and sustainability effects of the implementation of the Local Plan (**Section 6**).

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[10] 'Appropriate Assessment' has been historically used as an umbrella term to describe the process of assessment as a whole. The whole process is now more usually termed 'Habitats Regulations Assessment' (HRA), and 'Appropriate Assessment' is used to indicate a specific stage within the HRA.

2. How Environmental and Sustainability Considerations Have Been Integrated into the DMB

Environmental and Sustainability Considerations in the Local Plan

2.1 Environmental and wider sustainability considerations have been integral to the key decisions made in respect of the policies and proposals of the DMB. The integration of these considerations into the plan making process has principally been achieved through:

- the development of a comprehensive evidence base on topics including, *inter alia*, housing, employment, transport, green infrastructure, communities, and viability;
- continuous engagement with key stakeholders and the public on the emerging DMB and related environmental and sustainability matters;
- the consideration of national planning policy and the objectives of other plans and programmes;
- fulfilment of the Council's Duty to Cooperate; and
- ongoing assessment through SA (incorporating SEA) and HRA.

The Development Management in Birmingham DPD (DMB)

2.2 The DMB supports the delivery of the vision, strategic policies and spatial strategy set out in the BDP by providing detailed development management policies which will help guide development and planning decisions up to the year 2031.

2.3 This document contains 16 policies covering a range of topics and arranged in themes to reflect the structure of the BDP. The objectives of the DMB mirror those of the BDP which aim to provide for significant new growth in the most sustainable way, ensuring that the development of new homes is matched by the provision of opportunities for new employment, accessible local services and a high quality environment.

Table 2.1 DMB Policy Topics and Titles

Topic	Reference	Policy Title
Environment and Sustainability	DM1	Air Quality
	DM2	Amenity
	DM3	Land affected by contamination, instability and hazardous substances
	DM4	Landscaping and trees
	DM5	Light pollution
	DM6	Noise and vibration
Economy and network of centres	DM7	Advertisements
	DM8	Places of worship
	DM9	Day nurseries and early years provision
Homes and neighbourhoods	DM10	Standards for residential development
	DM11	Houses in multiple occupation

	DM12	Residential conversions and specialist accommodation
	DM13	Self and custom build housing
Connectivity	DM14	Transport access and safety
	DM15	Parking and servicing
	DM16	Telecommunications

Environmental and Sustainability Considerations in the Plan and SA process

2.4 To provide the context for the SA and in compliance with the SEA Directive, a review of other relevant plans and programmes was undertaken and the relevant aspects of the current state of the environment and its evolution without the DMB were considered; together, they informed the identification of a series of key sustainability issues. This information was initially set out in the 2014 Scoping Report which was subsequently updated in 2018 (and then in subsequent SA Reports) to reflect changes since the Scoping Report was published.

2.5 The key sustainability issues identified through the review of plans and programmes and analysis of baseline information informed were reflected in the SA objectives and guide questions that comprised the SA Framework used to appraise the DMB. The SA objectives are shown in **Table 2.2**. Broadly, the SA objectives replicate the BDP SA objectives which present the preferred sustainability outcome. The resulting SA Framework comprised 15 sustainability objectives that were used to determine whether the DMB would be likely to achieve each objective. The SA Framework was used to appraise the DMB Objectives and Development Management policies.

2.7 The SA process considered the contribution of the DMB towards each of the appraisal objectives, drawing on the baseline information (and its evolution) to predict the likely significant effects of the plan in line with government guidance. The process was iterative and involved the development and refinement of the DMB by testing the sustainability strengths and weaknesses of the emerging policy options.

2.8 The appraisal identified the likely changes to the baseline conditions as a result of the DMB's implementation. These effects were described (where possible) in terms of their extent, the timescale over which they could occur, whether the effects would be temporary or permanent, positive or negative, short, medium and/or long-term. Secondary, synergistic and cumulative effects were also considered.

2.9 The SA Reports put forward recommendations to avoid or minimise negative effects identified or to enhance potential positive effects. In this way, environmental and sustainability considerations were integrated into the DMB as it was developed.

2.10 In addition to the use of the SA framework to assess the potential effects of DMB objectives, options and policies as they were drafted, environmental and sustainability considerations were integrated into the DMB through close working between Wood and the Council officers drafting the plan. Early draft sections of the DMB, including draft policies, were sent to Wood for appraisal and the SA team engaged with Council officers during the process of carrying out the SA of the emerging DMB.

Table 2.2 Sustainability Objectives, Guide Questions and Indicators

SEA Directive Topic Area(s)	SEA Directive Topic Area(s)	Guide Questions	Indicators
Material assets	ENV1 To encourage development that optimises the use of previously developed land and buildings	Will the use of previously developed land be encouraged? Will development densities be maximised?	Proportion of new development on previously developed land Development densities chieved
Material assets	ENV2 To promote the application of high standards of design, construction and maintenance of buildings	Will development be encouraged to meet and where possible exceed standards for energy efficiency?	Proportion of developments meeting energy efficiency standards for design, construction and maintenance
Material assets	ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	Will development be encouraged to incorporate measures which promote sustainable transport? Will development help to reduce the need to travel?	Work place travel plans Measures to promote sustainable transport such as provision for cyclists
Landscape, cultural heritage, biodiversity, flora and fauna	ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	Will development protect and where possible enhance the City's cultural and natural heritage?	Development affecting historic assets Development affecting natural assets including open space
Climatic factors	ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing flood risk	Will development help to reduce flood risk? Will development take into account and actively mitigate climate change impacts?	Renewable energy installed Other measures installed such as SUDS Flooding events Approvals made contrary to EA advice
Water, air, material assets	ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	Will development incorporate water efficiency measures? Will development actively avoid creating additional pollution burdens?	Water use and technologies Changes in water quality Change to/within Air Quality Management Areas Noise complaints Sustainable waste Management
Population and human health	ECON1 To help improve the performance of the	Will development promote growth in key economic sectors? Will development	Employment creation by area and type Business start-ups

SEA Directive Topic Area(s)	SEA Directive Topic Area(s)	Guide Questions	Indicators
	local and City-wide economy to provide opportunity for all	contribute to encouraging a culture of enterprise and innovation?	
Population and human health	ECON2 To help promote the vitality of local centres	Will development contribute to the maintenance and enhancement of the vitality of local centres?	Local centre health checks
Population and human health	ECON3 To promote the regeneration of areas across the City through appropriate development	Will development contribute to regeneration of areas of the City most in need?	Location and type of development
Population and human health	ECON4 To encourage investment in learning and skills development	Will development contribute to investment in learning and skills?	Local initiatives to promote skills development
Population and human health	SOC1 To help ensure equitable access to community services and facilities	Will development help to promote equitable access to services?	Accessibility indices of key facilities
Population and human health	SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	Will development help to promote access to a range of housing types which meet the needs of residents?	Development types and spatial distribution
Population and human health	SOC3 To encourage development which promotes health and well-being	Will development help to promote a healthier, more active population?	Activity levels by area and sector of the population
Population and human health	SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	Will development help to discourage crime?	Crime levels by area and type
Population and human health	SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	Will public participation be encouraged as part of the planning of new development?	Participation in consultations

3. How the SA Report Has Been Taken into Account by the Council

Overview

3.1 The development of the DMB has been iterative. SA has played an integral role in this iterative process with each of the plan stages having been accompanied by a SA Report in order to help inform the DMB and fully integrate environmental and sustainability considerations into decision making. **Table 1.1** presents a summary of the key stages in the development of the DMB, the associated SA work undertaken and the key conclusions of the appraisal.

How the Findings of the SA Have Been Taken into Account by the Council

3.2 Through the SA, mitigation measures were made concerning the emerging plan policies and these were set out in the SA Reports prepared in support of the Regulation 18 and 19 versions of the DMB. Council officers preparing the DMB took the SA findings and recommendations into account while making changes to the DMB.

3.3 No suggestions for the amendment of policy wording were made. This reflected the positive scores, the absence of negative effects and the intention to use the policies in combination with the policies of the BDP. The results of the SA of the DM policies indicate that there are likely to be largely positive or significantly positive effects resulting from implementation of the policies.

3.4 More generally, the Development Management policies represent the lowest tier in a hierarchy of planning policies, adding local detail to implement the broader principles of policies within the NPPF and the BDP. As such they specifically address local issues and are designed to mitigate potential adverse effects associated with development.

3.5 No significant negative effects, either associated with specific sustainability objectives or cumulatively, were identified. This contrasts with the scores attributed to the absence of a policy which are typically significantly negative, reflecting the clear need to systematically control development and the likely consequences of the absence of such a policy framework which is to the benefit of applicants, residents and the City as a whole.

3.6 No additional recommendations were identified following a review of the proposed modifications. The recommendations are summarised in Table 3.2 together with the how the SA report was taken into account in the DMB.

Table 3.2 Summary of the Recommendations from the SA and how the DMB has responded

Recommendation/ comment	How the DMB responded
Ensure that, wherever possible, the specific criteria against which the policy will be implemented and monitored are included.	This was considered through the development of the monitoring framework for the DMB.
For each policy, provide further detail against the cited BDP policies on how these will work together.	Reference to specific BDP policies was added.
Set out more clearly which matters are covered by the BDP and which by the Development Management DPD. Fully reference BCC strategies on various topics relating to specific policies.	The relationship with the BDP was clarified in the DMB. Full reference to BCC strategies was added where relevant.
Set out a summary table of how the policies will be monitored, indicating where this can be covered by the existing Authority Monitoring Report. Some	This was addressed through the monitoring framework for the DMB.

4. How Opinions Expressed During Consultation Have Been Taken into Account

4.1 The development of the DMB has been informed by extensive, ongoing engagement and public consultation, in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012.

4.2 On submission of the Local Plan to the Secretary of State, the Council published a Statement of Consultation[11] which set out the consultation undertaken during the preparation and publication of the DMB, a summary of the main issues raised and details of how the comments received have been taken into account. This is summarised in the following subsections.

Consultation on the DMB

Development Management Development Plan Document Consultation (Regulation18) (June 2015)

4.3 Following scoping of the Sustainability Appraisal Report (12 December 2014 – 22 January 2015) comprising a review of existing policies and guidance, analysis of the evidence base, and internal consultation - work on preparing an initial consultation document commenced. An initial consultation document – 'Development Management DPD Consultation Document' – was approved for consultation by the Council's Cabinet Member for Transport, Development and the Economy on 27 July 2015. The document set out the broad topics to be covered in the DMB and informed readers that future consultations would follow that will set out the detailed policies and seek comments on these.

4.4 During the 6-week consultation period, a total of 26 individuals and organisations responded, generating 91 comments/representations. A precis of the main issues raised in the Consultation Statement (Regulation 22). This includes a summary of the Council responses indicating how the comments were taken into account in the next stage of the plan. The full schedule of the representations, including the Council's detailed response to each comment is included as Appendix 1 in the Consultation Statement Appendices. All the comments received, and the Council's responses were reported to, and approved, at the Council's Cabinet meeting of 22 January 2019.

Development Management in Birmingham Preferred Options Consultation (Regulation 18) (January 2019)

4.5 Given the time that had elapsed between the SA Scoping Report (December 2014) and the subsequent stage in the preparation of the DMB, the Council re-consulted the statutory bodies on the scope of the SA report between 22 May 2018 – 29 June 2018 (5 weeks). The main changes to the SA report were updates to the evidence base, updated DMB objectives (which were proposed to be consistent with the now adopted BDP objectives) and an updated review of relevant policies and

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[11] https://www.birmingham.gov.uk/downloads/file/16783/csd7_consultation_statement_regulation_22

programmes. The responses of the statutory bodies to the updated SA report were included in the SA of the Preferred Options Document.

4.6   As a consequence of the modified polices in the adopted BDP and the time that had elapsed between the two stages, the Council reviewed the initial Consultation Document taking into account not only the comments received in 2015 but also updated national planning policy and guidance and the now modified adopted BDP policies.

4.7   The Preferred Options Document was prepared having regard also to the Sustainability Appraisal (including consideration of alternative options) of the proposed policies in the DMB.

4.8   The key differences between the 2015 Development Management Consultation Document and the 2019 Preferred Options Document were:

- The objectives - the Preferred Options Document proposed objectives that were consistent with the adopted BDP objectives;
- The policy list - the list of policies in the Preferred Options Document was streamlined and restructured. Some policies in the 2015 Consultation Document were not taken forward into the Preferred Options Document as originally 'drafted' for reasons set out in the Preferred Options Document. The most common reason was that they would be covered by a combination of a 'new' or 'amended' policy proposed in the Preferred Options Document and adopted BDP policy (see Appendix 3: Policies in Stage 1 Regulation 18 Consultation not included in Preferred Options Document and justification, Preferred Options Document, January 2019).

4.9   The Preferred Options consultation document was prepared in accordance with Regulation 18 of the Regulations and made available for public consultation between 4 February and 29 March 2019 (a period of 8 weeks).

4.10   During the 8-week consultation period, a total 69 respondents commented on the Preferred Options Consultation Document, generating 650 individual comments/representations. A precis of the main issues raised is contained in the Consultation Statement (Regulation 22). This includes a summary of the Council's response to each comment/ representation. A full schedule of the representations, including the Council's detailed response to each comment raised is included as Appendix 2 in the Consultation Statement Appendices. The representations and the suggested Council response were reported to the Council's Cabinet meeting of 29 October 2019, and subsequently approved.

Development Management in Birmingham Publication Document (Regulation 19) (October 2019)

4.11   The Publication version of the DMB took full account of all representations received at the Preferred Options stage. Appendix 3 of the Consultation Statement Appendices sets out the Council's detailed response to each representation and the action taken, where necessary, through the preparation of the Publication version. The Publication version also took into account relevant findings from new evidence

base reports such as the Financial Viability Assessment of the DMB, changes to Government policy and guidance, and Sustainability Appraisal of the DMB. The Publication version DMB was approved for consultation by Cabinet on 29 October 2019 and reported to and discussed at Planning Committee on 13 February 2020.

4.12   The Publication DMB was prepared in accordance with Regulation 19 of the Regulations and made available for public consultation between 9 January – 21 February 2020 (6 weeks). During the 6-week consultation period, a total 32 respondents commented on the Publication DMB, generating 122 individual comments/representations. An overview of the results is provided in the Consultation Statement (Regulation 22). This includes a summary of the Council's response to each comment/ representation. A full schedule of the representations, including the Council's detailed response to each comment raised is included as Appendix 3 in the Consultation Statement Appendices.

Submission of the Development Management in Birmingham Publication Document (Regulation 22)

4.13   On 17 July 2020 Birmingham City Council submitted the Development Management in Birmingham Publication Document to the Secretary of State. An addendum to the SA Report (May 2020) was produced to accompany the submitted plan.

Consultation on Main Modifications

4.14   The MMs were published for consultation between 24 March 2021 and 5 May April 2021 (6 weeks). The MMs were screened for their significance to the SA. All the MMs were considered not to affect the assessment of policy within the SA. (Appendix 1)

Consultation on the SA

4.15   At each stage of the DMB's development, an SA Report was published alongside the DMB for consultation. The SEA Regulations require the SEA Adoption Statement to summarise how any opinions expressed by the public and the consultation bodies in relation the SEA have been taken into account.

4.16   The Local Plan consultation stages and responses received relating to the SA documents are summarised below.

SA Scoping (2014 and 2018)

4.17   The first Scoping Report was subject to consultation between 12 December 2014 – 22 January 2015 (5 weeks). A total of 4 responses were received to the first consultation from the statutory SEA consultation bodies and the Equality and Human Rights Commission.

4.18   Due to the time that had elapsed between the SA Scoping Report (December 2014) and the subsequent stage in the preparation of the DMB, the Council re-consulted the statutory bodies on the scope of the SA report between 22 May 2018 – 29 June 2018 (5 weeks).

4.19   The statutory bodies' responses to the 2014 scoping exercise were summarised and addressed within the updated SA Scoping Report 2018. The main changes to the SA report were updates to the evidence base, updated DMB objectives (which were proposed to be consistent with the BDP objectives) and an updated review of relevant policies and programmes.

4.20   Responses related to various aspects of the Scoping Report and resulted in amendments to the SA Framework. Appendix D of the SA of the DMB Publication Document[12] contains a schedule of the consultation responses received on the Scoping Report, the Council's response and the subsequent action taken.

Preferred Options (2019)

4.21   An SA of the Preferred Options Document accompanied the Preferred Options Document and was open to public consultation 4 February - 29 March 2019 (8 weeks). The Council received 4 comments in relation to the SA of the Regulation 18 draft DMB. St. Modwen commented that the policy on residential standards had not been considered in the Sustainability Appraisal. Natural England noted a drafting error in reference to the HRA. Historic England welcomes the attention to safeguarding cultural heritage in the SA. The Council for British Archaeology noted that Table 2.1 in the SA report should include the documents - Archaeology Strategy SPG and Regeneration through Conservation SPG. Appendix F of SA of the DMB Publication Document[13] contains a schedule of the consultation responses received and how they were addressed in the SA.

Publication version (2019)

4.22   A SA of the Publication DMB was undertaken and accompanied the Publication DMB which open for public consultation between 9 January – 21 February 2020 (6 weeks). One comment was raised on the SA by Pegasus Group that the introduction of the revised thresholds for M4(2) dwellings within new developments did not appear to be addressed in the Sustainability Appraisal. Appendix G of SA of the DMB Publication Document[14] contains a schedule of the consultation responses received and how they have been addressed in the SA. The revised threshold for the Part M4(2) was subsequently assessed through an addendum to the Sustainability Appraisal submitted with the DMB.

4.23   Following receipt and consideration of the consultation responses on the Publication DMB Document, the Council identified a number of proposed minor changes. An Addendum to the SA (May 2020) was prepared in order to update the appraisal where necessary, taking into account the proposed minor modifications. This

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https://www.birmingham.gov.uk/downloads/file/16789/csd9_sustainability_appraisal_of_the_publication_dmb_oct_2019
13

https://www.birmingham.gov.uk/downloads/file/16789/csd9_sustainability_appraisal_of_the_publication_dmb_oct_2019
14

https://www.birmingham.gov.uk/downloads/file/16789/csd9_sustainability_appraisal_of_the_publication_dmb_oct_2019

ensured that all the likely significant effects of the DMB (as proposed to be modified) had been identified, described and evaluated. This Addendum has also considered proposed changes made by the Council to the DMB following consultation on the Publication version. The SA Report was updated to reflect the changes but there were no impacts on the findings of the SA.

Main Modifications (2021)

4.24   The MMs were published for consultation between 24 March 2021 and 5 May April 2021 (6 weeks). The MMs were screened for their significance to the SA. All the MMs were considered not to affect the assessment of policy within the SA.

4.25   The Inspector concluded that:

"The Council carried out a sustainability appraisal of the Plan, prepared a report of the findings of the appraisal and published the report along with the Plan and other submission documents under regulation 19. The appraisal was reviewed to assess the main modifications. The SA is considered adequate."

5. The Reasons for Choosing the Local Plan as Adopted in the Light of the Other Reasonable Alternatives Considered

Overview

5.1 Text Article 5 (1) of the SEA Directive and SEA Regulation 12(2) require that "*an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated*". Information to be provided includes "*an outline of the reasons for selecting the alternatives dealt with*" (SEA Directive Annex I (h) and SEA Regulations Schedule 2 (8)).

5.2 The European Commission guidance on the SEA Directive discusses possible interpretations of handling 'reasonable alternatives' as required by Article 5(1). It states that *"The alternatives chosen should be realistic. Part of the reason for studying alternatives is to find ways of reducing or avoiding the significant adverse effects of the proposed plan or programme"*.

5.3 The findings of the appraisal of the Preferred Options and reasonable alternatives were reported in the SA Report and subject to public consultation.

The Reasons for Choosing the Policies and for Rejecting Reasonable Alternatives

5.4 The SA of the Publication DMB Document describes the evolution of the development management policies, including the outcomes of the appraisal of associated preferred options and reasonable alternatives. **Table 5.1** of this Post Adoption Statement provides a summary of the options considered in the process. The SA of the Publication DMB Document sets out the reasons for selecting and rejecting the options considered.

Summary

5.5 Overall, the adopted DMB reflects the preferred options selected following the consideration of reasonable alternatives during each stage of its preparation, taking into account the evidence base, engagement and assessment including SA. The adopted DMB also reflects the Main Modifications put forward by the Inspector and appended in their final Report. The Main Modifications include changes to policy wording and supporting text. These are all deemed to be necessary to ensure that the DMB provides a sound and legally compliant plan for the City.

5.6 In the Council's view, the DMB, as adopted, provides the framework for contributing to sustainable development across the City and offers significant opportunities to realise the Council's vision for Birmingham. It reflects a rigorous process of evidence gathering, assessment, consultation and independent examination.

Table 5.1 Summary of results and the reasons for selecting/rejecting the Alternatives

Policy	Summary of Appraisal of the Proposed Policy	Alternatives Considered
Environment and Sustainability		
DM1 Air Quality	A policy which clearly address environmental protection issues will help to reinforce existing regulatory regimes. The outcome is likely to be enhanced sustainability performance across most indicators, reflecting greater certainty for developers in respect of both minimum standards and good practice. No likely significant negative effects have been identified. The policy could benefit from the inclusion of examples of measures against which the policy will be implemented and measured.	**No alternative** has been identified to this policy - National policy requires planning to contribute towards compliance with relevant limit values or national objectives for pollutants and take into account local AQMA and Clean Air Zones (CAZ). Therefore, in order to comply with national policy it is considered necessary to set policy aimed at improving air quality and mitigating the impacts of development on air quality. Having no air quality policy will risk undermining the AQMA and CAZ and failure to deliver relevant actions within the City's Air Quality Action Plan, transport strategy and the objectives of the BDP in promoting sustainable development and helping to address climate change.
DM2 Amenity	Good design is important to securing sustainable development through balancing a wide variety of considerations. The detailed criteria within DM01 against which developments will be considered serve as a reference point against which specific proposals can be considered, thereby helping to ensure that development takes account of the specific matters which help to make the City and its neighbourhoods attractive and successful places to live. The specific requirements of DM02 complement the overarching principles set out in DM01. There are no suggested changes to the content of the policies arising from the appraisal. The option of developing a new policy to address design issues yields more positive sustainability outcomes than the reasonable alternatives presented.	**No policy** on amenity and rely instead on the NPPF and ad hoc considerations of proposals on a case by case basis. Reason for rejection: The Council believes the preferred approach will provide a more transparent, consistent and fairer basis for considering planning proposals than having no policy. To ensure the successful delivery of the BDP, amenity considerations are considered important. The NPPF is clear that planning should seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.

Policy	Summary of Appraisal of the Proposed Policy	Alternatives Considered
DM3 Land affected by Contamination, Instability and Hazardous Substances	A policy which clearly addresses environmental protection issues will help to reinforce existing regulatory regimes. The outcome is likely to be enhanced sustainability performance across most indicators, reflecting greater certainty for developers in respect of both minimum standards and good practice. No likely significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal.	**No alternative** to this policy has been identified - Environmental health legislation requires local authorities to identify contaminated land and ensure it is managed in an appropriate manner. The NPPF also stresses the need for policies to ensure that new development is compatible with its location. The NPPF makes clear that developers and landowners are responsible for securing safe development where a site is affected by contamination.
DM4 Landscaping and Trees	Trees and landscaping are fundamental to a high quality and ultimately sustainable environment, contributing aesthetically and functionally to the quality of life across the City. Specification of expectations for design and use of trees and landscaping as part of new development will ensure that, in combination with other policies, high quality design is realised, and wider sustainability enhancements are secured. There are no suggested changes to the content of the policy arising from the appraisal, other than cross-referencing Council Strategies relating to Green Infrastructure, for example.	**No alternative** to this policy has been identified - The NPPF and BDP provide strong support for protecting and enhancing valued landscapes. Local planning authorities are advised to set criteria-based policies against which proposals for any development on or affecting protected wildlife or landscape areas will be judged.
DM5 Light Pollution	A policy which clearly address environmental protection issues will help to reinforce existing regulatory regimes. The outcome is likely to be enhanced sustainability performance across most indicators, reflecting greater certainty for developers in respect of both minimum standards and good practice. No likely significant negative effects have been identified. There are no suggested changes to the content of the policies arising from the appraisal.	**No alternative** to this policy has been identified - The NPPF is clear that planning policy should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation. The draft policy provides a detailed approach for achieving this.

Policy	Summary of Appraisal of the Proposed Policy	Alternatives Considered
DM6 Noise and Vibration	A policy which clearly address environmental protection issues will help to reinforce existing regulatory regimes. The outcome is likely to be enhanced sustainability performance across most indicators, reflecting greater certainty for developers in respect of both minimum standards and good practice. No likely significant negative effects have been identified. There are no suggested changes to the content of the policies arising from the appraisal.	**No alternative** has been identified to this policy - National planning policy requires development to contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability. In addition, the BDP seeks to create well designed, healthy and safe environments. It is therefore considered necessary to include this policy.
Economy and Network of Centres		
DM7 Advertisements	A specific policy which clearly controls the siting and design of advertisements will provide an important reference point for ensuring that a range of sustainability benefits are secured, focused on enhancing economic development in the City whilst ensuring that residential amenity and City-wide amenity is protected. In all cases, the greater certainty and precision associated with an updated policy is likely to yield positive sustainability effects. No likely significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing a new policy to address siting and design of these uses yields more positive sustainability outcomes than the reasonable alternatives presented.	**No policy** on advertisements Reasons for rejection: Not having a policy and relying upon applications being considered against the National Planning Policy Framework would not be favoured since there would be no safeguard against inappropriate advertisements and signs.

Policy	Summary of Appraisal of the Proposed Policy	Alternatives Considered
DM8 Places of Worship and other faith related community facilities	Ensuring the appropriate location and design of these uses will help to ensure that sustainable development is promoted, particularly having regard to equitable access through public transport and sensitive design ensuring that impacts on local amenity are minimised. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing a new policy to address siting and design of these uses yields more positive sustainability outcomes than the reasonable alternatives presented.	**Retain the wording of existing policy** in paragraphs 8.31 - 8.35 of the Saved Unitary Development Plan 2005 and Places for Worship and Faith-related Community and Educational Facilities SPD (2011) Reasons for rejection: This policy needs to be updated to reflect Policy TP21 of the BDP which states that the preferred location for community facilities (e.g. health centres, education and social services and religious buildings) is within the network of defined centres. **No policy** on places of worship and faith related community uses. Reasons for rejection: Birmingham has a diverse mix of faiths and cultures. A policy is required to ensure that development for places of worship and faith related community uses takes place in the appropriate locations and their impacts on the local area are managed.
DM9 Day nurseries and early years provision	A policy which ensures the consistent provision of educational facilities of various kinds across the City will help to ensure that there is equitable access (for example through sustainable locations) and in a fashion which maintains and enhances local amenity. The precise effects of the policy will have to be monitored to determine whether the policy objectives are being realised in practice. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing a new policy to address education-related development issues yields more positive sustainability outcomes than the reasonable alternatives presented.	**Retain existing UDP policy** Reasons for rejection: The policy requires updating as it refers to out of date policies. The existing policy does not reflect the Policy TP21 in the BDP which states that the preferred location for community facilities (e.g. health centres, education and social services and religious buildings) is within the network of defined centres. No policy on day nurseries and childcare provision **Reasons for rejection:** Without a policy on the development of day nurseries and childcare provision, development may result in adverse impacts on the vitality of local centres, residential amenity and character of an area.

Homes and Neighbourhoods

Policy	Summary of Appraisal of the Proposed Policy	Alternatives Considered
DM10 Standards for Residential Development	This policy will yield a range of sustainability benefits, associated with ensuring that there is high quality residential development throughout the City. No likely significant negative effects have been identified. There are no suggested changes to the content of the policies arising from the appraisal. The option of developing new policy to address residential design matters yields more positive sustainability outcomes than the reasonable alternatives presented.	**Retain existing UDP policy** in paragraph 8.39-8.44 of the Saved Unitary Development Plan regarding house extensions. There is no existing policy on housing technical standards for internal space, outdoor amenity space or accessible and adaptable housing. Reasons for rejection: The policy requires updating to achieve good standards of amenity for the occupiers of new residential buildings and protect the amenity of nearby occupiers and residents. The general thrust of the existing policy regarding residential extensions is taken forward into the new policy. **No minimum space standards or policy** on separation distances, outdoor amenity space and accessible and adaptable housing. Reasons for rejection: Having no such policy would risk developments not achieving a reasonable level of amenity therefore impacting on quality of life. Minimum space standards will help to ensure that there is sufficient space, privacy and storage facilities to ensure the long- term sustainability and usability of homes. DM9 is consistent with the NPPF requires local planning authorities to seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.

Policy	Summary of Appraisal of the Proposed Policy	Alternatives Considered
DM11 Houses in Multiple Occupation (HMO)	The sustainability effects of a clear policy which seeks to control Houses in Multiple Occupation (HMO) is likely be positive, reflecting the potential issues associated with them. The sustainability effects relate to ensuring that local amenity and design quality is appropriately protected, whilst providing for the needs of those in need. No likely significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing a new policy to address siting and design of these uses yields more positive sustainability outcomes than the reasonable alternatives presented.	**Retain existing UDP policy** Reasons for rejection: This policy requires updating as it refers to out of date UDP policies, but the main thrust of the policy remains unchanged in DM11. **No policy on HMO** Reasons for rejection: Without a HMO policy, development could result in concentrations of HMOs which can lead to a number of negative impacts on local communities, for example more frequent noise nuisance, depopulation of neighbourhoods during academic vacations, and increased pressure on parking due to higher population densities. **Less prescriptive policy** Reasons for rejection: Defining cumulative impact by using a threshold against which applications will be assessed will aid in transparency and consistency in decision-making.
DM12 Residential conversions and specialist accommodation	Promoting sensitive residential conversions and the development of appropriate specialist accommodation is likely to result in significant positive effects through the provision of appropriate accommodation for those in particular need. The option of having no specific policy could result in some minor adverse effects relating to social indicators.	**No policy** on Residential Conversions Reasons for rejection: Without a policy on residential conversions and specialist accommodation there are likely to be a range of negative effects relating to poor quality living environments and negatives impacts on local amenity arising from over-concentrations of such uses.

Policy	Summary of Appraisal of the Proposed Policy	Alternatives Considered
DM13 Self and Custom-build Housing	Promoting self- and custom-build housing through a specific policy is likely to yield positive sustainability effects City-wide with no adverse effects identified. There are no suggested changes to the content of the policy arising from the appraisal. The option of having no specific policy could result in some minor adverse effects relating to social indicators.	**No policy** on self and custom build housing. Reasons for rejection: The Council wishes to take a proactive approach to supporting individuals or groups of individuals that wish to build their own homes as a more affordable means by which to access home ownership. It is also a duty upon local authorities to have regard to the Self and Custom Build Register in carrying out their planning, housing, land disposal and regeneration functions.
Connectivity		
DM14 Highway Safety and Access	Ensuring that there is a rounded approach to transport planning across the City should yield a broad range of sustainability benefits, notably in respect on enhancing the City's economic performance through ensuring more efficient and effective movement. In turn and more broadly, the well-being of residents is enhanced though the greater opportunities for efficient travel within the City. No likely significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal.	**No alternative** to this policy has been identified - the NPPF requires development to provide for safe and suitable access to the site for all users. It states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
DM15 Parking and Servicing	Ensuring that there is a rounded approach to transport planning across the City should yield a broad range of sustainability benefits, notably in respect on enhancing the City's economic performance through ensuring more efficient and effective movement. In turn and more broadly, the well-being of residents is enhanced though the greater opportunities for efficient travel within the City. No likely significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing new policy to address siting and design of these uses yields more positive sustainability outcomes than the reasonable alternatives presented.	**No policy** Reasons for rejection: National policy makes clear that parking standards should be determined at the local level in response to local circumstances. The proposed policy supports the implementation of the BDP in developing a sustainable, high quality, integrated transport system. It is considered essential that appropriate parking is provided to contribute to traffic reduction and ensure safety, inclusive development and manage any impact on amenity.

Policy	Summary of Appraisal of the Proposed Policy	Alternatives Considered
DM16 Telecommunications	Ensuring that the City has an up-to-date telecommunications infrastructure will ensure sustainability benefits across a range of objectives, notably the contribution to the City's economic performance, creating opportunities for travel reduction and ensuring that all residents have equitable access to high quality services that enable them to fulfil their economic and social potential. No likely significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing new policy to address telecommunications siting matters yields more positive sustainability outcomes than the reasonable alternatives presented.	**No policy** Reasons for rejection: policy supports the implementation of the Policy TP46 Digital Communications of the BDP. The Council supports well- designed and located high quality communications infrastructure and this policy is intended to facilitate provision in line with this aspiration.

6. Monitoring

Overview

6.1 The SEA Regulations (17 (1)) set out that *"The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying any unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action"*. The Regulations are clear that it is not necessary to monitor everything. Instead, monitoring should focus on significant effects.

6.2 Government guidance[15] states that details for monitoring the significant effects of implementing a local plan must be included in the SA report, the Post Adoption Statement or in the local plan itself. The guidance also states that the monitoring results should be reported in the local planning authority's monitoring report. Monitoring the adopted Local Plan for sustainability effects can help to answer questions such as:

- Were the SA's predictions of sustainability effects accurate?
- Is the DMB contributing to the achievement of desired SA objectives?
- Are mitigation measures performing as well as expected?
- Are there any adverse effects? Are these within acceptable limits, or is remedial action desirable?

The DMB Monitoring Framework

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[15] MHCLG (2015) Planning Practice Guidance: Strategic Environmental Assessment and Sustainability Appraisal, Paragraph: 025 Reference ID: 11-025-20140306

6.3   Monitoring of the DMB's implementation will focus on:

- significant sustainability effects that may give rise to irreversible damage, with a view to identifying trends before such damage occurs;
- significant effects where uncertainty was identified in the SA and where monitoring would enable preventative or mitigation measures to be undertaken; and
- where there is the potential for effects on sensitive environmental receptors.

6.4   **Appendix 2** sets out a framework for monitoring the likely significant effects of implementing the adopted DMB. These reflect the indicators proposed within the monitoring framework for the DMB itself as the data collected will also be relevant to understanding sustainability effects in many instances. The monitoring table was previously presented in the Publication SA Report but has now been updated to reflect the final set of monitoring indicators included in the adopted DMB where relevant.

6.5   The MMs included changes to the Monitoring Framework and these were screened to assess the extent to which proposed indicators aligned with the SA objectives. The Monitoring Framework is provided at **Appendix 2** of this PAS and it is concluded that the monitoring framework provides the basis for meeting monitoring requirements for the DMB associated with the SA.

6.6   As noted above, the SA monitoring process will be nested within the DMB monitoring process. It is envisaged that there will be an ongoing programme of monitoring, which will be reported on an annual basis in the Council's Authority Monitoring Reports (AMRs). The AMRs will be available to view on the Council's website and will be used to monitor the implementation of the DMB. Monitoring will also identify unexpected outcomes which will allow the Council to take appropriate action.

	Appendix 1 - Implications of the Main Modifications for the Sustainability Appraisal		
Ref	Policy and/ or paragraph number	Subject to Sustainability Appraisal	Reason
MM1	Policy DM1 Air Quality Paragraph 2.7	No	All modifications set out as part of MM1 are for clarification purposes. The changes are therefore not expected to affect the assessment of the policy within the SA.
MM2	Policy DM2 Amenity Paragraph 2.20	No	The Policy itself is not subject to any direct modification apart from the addition of a footnote to cross reference with Policy DM10. The addition to paragraph 2.20 of the supporting text to the policy is for clarification. Neither change is expected to affect the assessment of Policy DM2 within the SA.
MM3	Policy DM3 Land affected by contamination, instability and hazardous substances	No	MM3 provides clarity to the application of the policy and is unlikely to change the result of the SA.
MM4	Policy DM4 Landscaping and trees Paragraph 2.37 Paragraph 2.39	No	Modifications to Policy DM4 provide clarification as to how the Policy is to be applied as well as providing additional references to documents for clarification. These changes are not expected to result in changes to the SA.
MM5	Policy DM6 Noise and vibration Paragraph 2.52	No	All modifications set out as part of MM5 relating to Policy DM6 are for clarification purposes. The changes are unlikely to affect the assessment of the policy within the SA.
MM6	Policy DM8 Places of worship and faith related community uses Paragraph 3.10	No	MM6 provides clarification on the application of the policy and is not expected to have any implications on the SA.
MM7	Policy DM9 Day nurseries and early years provision Paragraph 3.18 Paragraph 3.19 Paragraph 3.20	No	All modifications set out as part of MM7 relating to Policy DM9 are for clarification purposes. The changes are therefore not anticipated to affect the assessment of the policy within the SA.
MM8	Policy DM10 Standards for residential development Paragraph 4.5 Paragraph 4.11	No	The changes proposed in MM8 relate to clarifications to Policy DM10 in terms of its application. As such, the changes are unlikely to affect the assessment of the policy within the SA.

Appendix 1 - Implications of the Main Modifications for the Sustainability Appraisal			
Ref	Policy and/ or paragraph number	Subject to Sustainability Appraisal	Reason
MM9	Policy DM13 Self and custom build housing	No	The modifications set out as part of MM9 are for clarification purposes. The changes are not expected to affect the assessment of the policy within the SA.
MM10	Policy DM14 Transport Access and Safety New paragraph 5.10	No	The modifications set out as part of MM10 are for clarification purposes. The changes are unlikely to affect the assessment of the policy within the SA.
MM11	Policy DM15 Parking and Servicing Paragraph **5.14 (formerly 5.13)** Paragraph **5.15 (formerly 5.14)** Paragraph **5.16 (formerly 5.15)**	No	The modifications set out as part of MM11 are for clarification purposes. The changes are not expected to affect the assessment of the policy within the SA.
MM12	Appendix 2: Monitoring Framework	No	The modifications set out in MM12 relate to changes to the monitoring indicators. These are not expected to affect the assessment of the policies themselves in the SA.

Appendix 2 – Monitoring Framework					
Policy	**DMB Monitoring Indicator**	**Target**	**Trigger**	**Potential indicators suggested in the SA**	**Related SA Objective (s)**
Policy DM1 Air Quality	•Number of applications approved contrary to the policy • Number of applications refused on air quality grounds and successfully defended at appeal	• All relevant applications meet the policy requirements • All relevant appeal decisions uphold air quality impact as valid reason for refusal	• 10% of applications approved contrary to policy • 10% of appeals where inspector rejected air quality as a reason for refusal	• AQ monitoring • Change within AQMA • Effects on human health and biodiversity	• ENV2 • ENV4 • ENV6 • SOC3
Policy DM2 Amenity	• Number of applications approved contrary to the policy Number of applications refused on amenity grounds and successfully defended at appeal	• All relevant applications meet the policy requirements • All relevant appeal decisions uphold loss of amenity as valid reason for refusal	• 10% of applications approved contrary to policy • 10% of appeals where inspector rejected amenity as reason for refusal •	• DM statistics applications refused as contrary to policy • Development affecting natural assets including open space • Effects on heritage assets and biodiversity	• ENV2 • SOC2 • SOC3 • SOC4
Policy DM3 Land affected by Contamination and Hazardous substances	• Number of applications approved contrary to the policy • Number of applications refused on contamination grounds and successfully defended at appeal	• All relevant applications meet the policy requirements • All relevant appeal decisions uphold risk of contamination as a valid reason for refusal	• 10% of applications approved contrary to policy • 10% of appeals where inspector rejected contamination as reason for refusal	• DM statistics on applications with contamination/stability issues • Proportion of new development on previously developed land	• ENV1 • ENV6 • ECON3 • SCO3
Policy DM4 Landscaping and Trees	• Ha/ sq. m. in loss of ancient woodland • Number of applications approved without tree replacement provision (where relevant)	• No loss of ancient trees/ woodland • No applications approved without tree replacement provision (where relevant)	• 10% loss of ancient trees/ woodland • 10% of applications approved without tree replacement provision (where relevant)	• BDP monitoring of city-greening • DM statistics on conditions attached to applications	• ENV2 • ENV4 • ENV5 • ENV6 • SOC3
Policy DM5 Light Pollution	• Number of applications approved contrary to the policy	• All relevant applications meet the policy requirements	• 10% of applications approved contrary to policy	• DM statistics on applications refused as contrary to policy	• ENV4 • ENV6 • SOC3

Appendix 2 – Monitoring Framework					
Policy	**DMB Monitoring Indicator**	**Target**	**Trigger**	**Potential indicators suggested in the SA**	**Related SA Objective (s)**
	• Number of applications refused on light pollution grounds and successfully defended at appeal	• All relevant appeal decisions uphold light pollution as a valid reason for refusal	• 10% of appeals where inspector rejected light pollution as reason for refusal	• Effects on heritage assets and biodiversity	
Policy DM6 Noise and Vibration	• Number of applications approved contrary to the policy • Number of applications refused on noise impact grounds and successfully defended at appeal	• All relevant applications meet the policy requirements • All relevant appeal decisions uphold noise impact as a valid reason for refusal	• 10% of applications approved contrary to policy • 10% of appeals where inspector rejected noise impact as reason for refusal •	• DM statistics on applications refused as contrary to policy • Noise complaints • Effects on heritage assets and biodiversity	• ENV6 • SOC3
Policy DM7 Advertisements	• Number of applications approved contrary to the policy • Number of applications refused on this policy and successfully defended at appeal	• All relevant applications meet the policy requirements • All relevant appeal decisions uphold the reason(s) for refusal related to the policy	• 10% of applications approved contrary to policy • 10% of appeals where inspector rejected the reason(s) for refusal related to the policy	• DM statistics on applications refused as contrary to policy • Effects on heritage assets	• EN4 • ECON1
Policy DM8 Places of Worship	• Number of applications approved contrary to the policy • Percentage of applications refused on this policy and successfully defended at appeal	• All relevant applications meet the policy requirements • All relevant appeal decisions uphold the reason(s) for refusal related to the policy	• 10% of applications approved contrary to policy • 10% of appeals where inspector rejected the reason(s) for refusal related to the policy •	• DM statistics on applications • Accessibility indices of key facilities	• ENV3 • ECON2
Policy DM9 Day nurseries and early years provision	• Number of applications approved contrary to the policy • Percentage of applications refused on	• All relevant applications meet the policy requirements • All relevant appeal decisions uphold the	• 10% of applications approved contrary to policy • 10% of appeals where inspector rejected the	• DM statistics on applications • Accessibility indices of key facilities	• ENV3 • ECON2 • ECON4

Appendix 2 – Monitoring Framework					
Policy	DMB Monitoring Indicator	Target	Trigger	Potential indicators suggested in the SA	Related SA Objective (s)
	this policy and successfully defended at appeal	reason(s) for refusal related to the policy	reason(s) for refusal related to the policy		
Policy DM10 Standards for Residential Development	• Number of dwellings meeting NDSS. • Number of dwellings provided as accessible and adaptable • Number of applications refused on 45 Degree Code successfully defended at appeal	• 100% of dwellings meet NDSS • 100% of development of 15 or more dwellings provide 30% accessible homes • All relevant appeals on 45 Degree Code policy successfully defended	• Provision of NDSS compliant homes falls below 80% • Provision of accessible and adaptable homes falls below 80%. • 10% of appeals where inspector rejected 45 Degree Code policy as reason for refusal •	• DM statistics on applications refused as contrary to policy	• ENV2 • ENV3 • ENV4 • ECON3 • SOC2 • SOC3
Policy DM11 House in multiple occupation	• New areas with over 10% concentration of HMOs	• No new areas with over 10% concentration of HMOs	• Increase in areas with over 10% concentration of HMOs	• DM statistics on applications refused as contrary to policy	• ENV1 • ECON3 • SOC2
Policy DM12 Residential conversions and specialist accommodation	• Number of applications approved contrary to policy	• All relevant applications to meet the policy requirements	• 10% of applications approved contrary to the policy	• DM statistics on applications refused as contrary to policy	• ENV2 • ENV3 • ECON3 • SOC2
Policy DM13 Self and custom build housing	• Numbers of plots made available for self and custom build each year	• No specific target	• No specific trigger	• DM statistics on applications	• ENV2 • ECON3 • SOC2
Policy DM14 Highway and safety access	• Number of applications approved contrary to the policy	• All relevant applications meet the policy requirements	• 10% of applications approved contrary to the policy	• DM statistics on applications refused as contrary to policy	• ENV3 • ECON3 • SOC1
Policy DM15 Parking and servicing	• Number of applications approved contrary to the policy	• All relevant applications meet the policy requirements	• 10% of applications approved contrary to the policy	• DM statistics on applications refused as contrary to policy	• ENV3 • ECON3 • SCO1

Appendix 2 – Monitoring Framework					
Policy	**DMB Monitoring Indicator**	**Target**	**Trigger**	**Potential indicators suggested in the SA**	**Related SA Objective (s)**
	• Number of applications refused on this policy successfully defended at appeal				
Policy DM16 Telecommunications	• Number of applications approved contrary to the policy	• All relevant applications meet the policy requirements	• 10% of applications approved contrary to the policy	• DM statistics on applications refused as contrary to policy	• ENV45 • ECON3

APPENDIX 9

Birmingham City Council

PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)
THE TOWN AND COUNRTY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012
(AS AMENDED) REGULATION 26

DEVELOPMENT MANAGEMENT IN BIRMINGHAM (DMB)

DEVELOPMENT PLAN DOCUMENT ADOPTION STATEMENT: DECEMBER 2021

Notice is hereby given in accordance with Regulations 17, 26 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), that the Development Management in Birmingham Development Plan Document (DMB) was formally adopted by Birmingham City Council on 7th December 2021.

The DMB was submitted to the Secretary of State on 17 July 2020 and was subject to examination by an independent inspector appointed by the Secretary of State. The Inspector's report concluded that with the recommended main modifications set out, the DMB satisfies the requirements of the Planning and Compulsory Purchase Act 2004 and meets the criteria for soundness in the National Planning Policy Framework. Pursuant of section 23(3) of the Planning and Compulsory Purchase Act 2004, the adopted DMB incorporates these modifications. The full list of main modifications made to the DMB following receipt of the Inspector's Report is set out in the 'Schedule of Recommended Main Modifications', published as an Appendix to the Inspector's Report. A number of additional modifications have also been included as necessary technical, factual, grammatical and typographical corrections that do not materially affect the policies in the DMB.

In accordance with the regulations the following documents have been made available:
- Development Management in Birmingham (adoption version);
- this Adoption Statement;
- the Sustainability Appraisal Report; and
- the Sustainability Appraisal Post Adoption Statement.

These documents are available to view and download on the Council's website by clicking on this Link to the DMB section of the Council's website www.birmingham.gov.uk/DMB

Hard copies of the Development Management in Birmingham document and this Adoption Statement will also be made available for inspection at the Council Offices and libraries listed below: (Please check opening times and guidelines if intending to visit).

- Birmingham City Council, 10 Woodcock Street, Birmingham, B7 4BL
- Library of Birmingham, Centenary Square, Broad Street, B1 2ND

APPENDIX 9

- Druids Heath Library and Customer Service Centre, Idminston Croft, B14 5NJ
- Erdington Customer Service Centre, 67 Sutton New Road, B23 6QT
- Northfield Customer Service Centre, 1a Vineyard Road, B31 1PG
- Saltley Customer Service Centre, 54 Highfield Road, Washwood Heath, B8 3QU
- Sparkbrook Customer Service Centre, Grantham Road, B11 1LU
- Harborne Library, High Street, B17 9QG
- Kings Heath Library, High Street, B14 7SW
- Shard End Library, The Shard, All Saints Square, Shard End Crescent, B34 7AG
- Aston Library, 99 Whitehead Road, B6 6EJ
- Handsworth Library, Soho Road, B21 9DP
- Sutton Coldfield Library, Lower Parade, B72 1XX
- Walmley Library, Walmley Road, B76 1NP
- South Yardley Library, Yardley Road, B25 8LT

Any person aggrieved by the DMB may make an application to the High Court under Section 113 of the Planning and Compulsory Purchase Act 2004 on the grounds that:

- the document is not within the appropriate powers conferred by Part 2 of the Planning and Compulsory Purchase Act 2004;
- a procedural requirement of the Planning and Compulsory Purchase Act 2004 or its associated Regulations has not been complied with.

Any such application must be made no later than the end of the period of six weeks after the day the DMB is adopted (18 January 2022).

A copy of this adoption statement will be sent to the Secretary of State for Housing, Communities and Local Government.

* Please note that a hard copy of the Sustainability Appraisal Report is only available to view at the Council's principal offices at Woodcock Street. The report can be viewed online at: www.birmingham.gov.uk/DMB

For further information please contact: Planning Strategy, Birmingham City Council, PO Box 28, Birmingham, B1 1TU or email planningstrategy@birmingham.gov.uk

Title of proposed EIA	Adoption of the 'Development Management in Birmingham' DPD (DMB)
Reference No	EQUA747
EA is in support of	New Policy
Review Frequency	Two Years
Date of first review	01/11/2023
Directorate	Inclusive Growth
Division	Planning and Regeneration
Service Area	Planning Policy
Responsible Officer(s)	☐ Martin Dando
Quality Control Officer(s)	☐ Richard Woodland
Accountable Officer(s)	☐ Uyen-Phan Han
Purpose of proposal	Sets out non-strategic planning policies for the determination of planning applications
Data sources	Consultation Results; relevant reports/strategies; relevant research

Please include any other sources of data

ASSESS THE IMPACT AGAINST THE PROTECTED CHARACTERISTICS

Protected characteristic: Age

Wider Community

Age details:

In general, the DMB provides policies which seek to ensure the creation of a sustainable, inclusive and a connected city. This will have positive impacts on people of all ages. The policies have evolved and been adapted following consultation which has been carried out in line with relevant guidance and best practice including the principles set out in the Council's Statement of Community Involvement (2008 and updated in 2019). The approach to public consultation has been City wide but made as relevant as possible to the community profile of the City as well as targeting citizens of all ages to ensure needs are met and adverse impacts on any particular age group are minimised or eliminated.

Some policies in particular will have a positive impact age characteristics as follows:

009059/2021

The Air Quality policy (DM1) will particularly benefit children, young people and the elderly who are more vulnerable to air pollution by ensuring that developments for sensitive uses such as schools and residences should be located away from major sources/areas of air pollution. If not, such developments must be designed and sited to reduce exposure to air pollutants by incorporating mitigation measures. Responses to the consultation in relation to this policy were, in general, supportive particularly in relation to school development. No issues were raised by any specific groups representing particular age groups or characteristics. Minor issues were raised by the Planning Inspectorate during the examination of the DMB in relation to this Policy but did not effect its beneficial effects..

The Standards for Residential Development policy (DM10) will help to support the ageing population and the specific needs of people with mobility problems by requiring housing of 15 or more dwellings 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. Building accessible housing can make a substantial difference to quality of life and ensure that future need is delivered throughout the lifetime of the Plan.

DM10 also seeks to adopt the minimum Nationally Described Space Standards for all residential development to ensure high quality residential environments and internal space to protect the health and well-being of residents of existing and new dwellings. The quality of new housing in the city (including implementation of the internal space and access standards) has a role to play in addressing health and wellbeing. Wide support was received for this policy approach during the consultation subject to evidence and

viability. However, no specific groups representing particular age groups or characteristics provided any direct comments. Following examination, the Planning Inspectorate recommended some changes to the Policy but these did not change the thrust of the policy and its benefits for people of all ages.

The policy on Day nurseries and childcare provision (DM9) will help to ensure that the development of such facilities is well located and provides suitable and sufficient indoor and outdoor space play space to meet the needs of children. Again, the policy is generally welcomed but no specific issues were raised from particular groups. Minor changes were made following examination by the Planning Inspectorate but did not effect the thrust of the Policy.

Protected characteristic: Disability

Disability details:

Wider Community

The document is part of a suite of local plan documents which seek to plan for the development needs of all including the needs of people with disabilities. Detailed technical design matters and needs are addressed in specific dedicated documents e.g. Access for People with Disabilities SPD and the Birmingham Design Guide SPD.

In general, the DMB provides policies which seek to ensure the creation of a sustainable, inclusive and a connected city. This will have positive impacts on people with disabilities.

The Parking and Servicing policy (DM15) sets parking standards for the city which will be included in the Parking SPD (to be adopted in November 2021). This will benefit people with disabilities by setting out clear standards for disabled parking provision so that all new developments include adequate parking for people with disabilities.

Page 675 of 804

The Standards for Residential Development policy (DM10) will help to support the ageing population and the specific needs of people with mobility problems by requiring housing of 15 or more dwellings 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. Building accessible housing for all can make a substantial difference to quality of life and ensure that future need is delivered throughout the lifetime of the Plan.

DM10 also seeks to adopt the minimum Nationally Described Space Standards for all residential development to ensure achieve high quality residential environments and internal space to protect the health and well-being of residents of existing and new dwellings. The quality of new housing in the city (including implementation of the internal space and access standards) has a role to play in addressing health and wellbeing and ensuring the adequate supply of suitable homes to meet the requirements of people with disabilities.

The policy on residential conversions and specialist accommodation (DM12) (which can include supported accommodation for older people and people with mental health, learning disabilities, dementia, physical and sensory impairment) promotes the development of high quality residential accommodation and facilities, including provision for safety and security, is suitable for the intended occupiers.

Although groups representing people with disabilities were consulted during the preparation of the DMB, no specific comments were received from such groups. General comments were received in support of the policy approach and no significant alterations have been made to any of the policies following consultation.

Page 676 of 804

Following examination, the Planning Inspectorate recommended modifications to all of the above policies. However, these changes were mainly for issues of clarity and did not affect the thrust of the policies and their beneficial impact on people with disabilities.

Protected characteristic: Sex

Gender details:

Wider Community

The policies have evolved and been adapted following consultation which has been carried out in line with relevant guidance and best practice including the principles set out in the Council's Statement of Community Involvement (2008 and updated in 2019). The approach to public consultation has been City wide but made as relevant as possible to the community profile of the City as well as targeting particular groups or representatives of specific groups.

In general, the DMB provides policies which seek to ensure the creation of a sustainable, inclusive and a connected city. This will have positive impacts on all people and no adverse comments have been received in relation to gender during consultation on the DMB. Following examination, the Planning Inspectorate recommended modifications to some of the policies. However, none of these changes are deemed to have a material impact on the implementation of any policy in relation to gender.

Protected characteristics: Gender Reassignment

Gender reassignment details:

Not Applicable

Protected characteristics: Marriage and Civil Partnership

Marriage and civil partnership details:

Not Applicable

Protected characteristics: Pregnancy and Maternity

Wider Community

Pregnancy and maternity details:

The policies have evolved and been adapted following consultation which has been carried out in line with relevant guidance and best practice including the principles set out in the Council's Statement of Community Involvement (2008 and updated in 2019). The approach to public consultation has been City wide but made as relevant as possible to the community profile of the City as well as targeting particular groups or representatives of specific groups.

The policy on Day nurseries and childcare provision (DM9) is relevant to this characteristic as it will help to ensure that the development of such facilities is well located and provides suitable and sufficient indoor and outdoor space play space to meet the needs of children. General support has been received for this policy during the consultation but nothing specific was raised from groups representing this protected characteristic in particular. Modifications to this policy were recommended by the Planning Inspectorate following examination. However, none of these changes are deemed to have a material impact on the implementation of the policy in relation to pregnancy and maternity.

Protected characteristics: Race

Race details:

Wider Community

The policies have evolved and been adapted following consultation which has been carried out in line with relevant guidance and best practice including the principles set out in the Council's Statement of Community Involvement (2008 and updated in 2019). The approach to public consultation has been City wide but made as relevant as possible to the community profile of the City as well as targeting particular groups or representatives of specific groups.

Page 678 of 804

A consultation statement has been developed in parallel to the DMB document to set out how the public consultation has been carried out. A database of consultees for planning documents ensures that a wide range of groups, organisations and individuals are consulted representing all communities and all protected characteristics. No issues have been raised by specific groups during consultation in relation to this particular protected characteristic. Modifications were made to the policies as recommended by the Planning Inspectorate following examination. However, none of the changes are deemed to have a material impact on the implementation of any of the policies as well as in relation to race.

Protected characteristics: Religion or Beliefs

Religion or beliefs details:

Wider Community

The DMB document contains a policy (DM8) on 'Places of worship and other faith-related community facilities' to make provision and provide positive policies for the location of such places and may have some impact on this particular protected characteristic. The preferred location of such uses is within the network of urban centres identified in the Birmingham Development Plan but can also be acceptable where the specific policy criteria are met.

The consultation process included specific religious and belief groups. However, although comments were made by individuals and other organisations, there were no comments received from specific religious or faith groups. The comments received were generally supportive but the Policy has been simplified to provide sufficient flexibility for locations outside of the network of centres to be considered where they are well located to the population the premises is to serve or is

Page 679 of 804

well served by means of walking, cycling and public transport. Following examination, the Planning Inspectorate recommended modifications to Policy DM8. However, these changes were mainly for issues of clarity and did not affect the thrust of the policy and its beneficial impacts in this respect.

Protected characteristics: Sexual Orientation

Sexual orientation details:

Wider Community

In general, the DMB provides policies which seek to ensure the creation of a sustainable, inclusive and a connected city to have a positive impact on all protected characteristics. The policies have evolved and been adapted following consultation which has been carried out in line with relevant guidance and best practice including the principles set out in the Council's Statement of Community Involvement (2008 and updated in 2019). The approach to public consultation has been City wide but made as relevant as possible to the community profile of the City as well as targeting particular groups or representatives of specific groups.

A consultation statement has been developed in parallel to the DMB document to set out how the public consultation has been carried out, meeting the requirements of relevant guidance and best practice including the principles set out in the Statement of Community Involvement (2008 and updated in 2019). A database of consultees for planning documents ensures that a wide range of groups, organisations and individuals are consulted to ensure needs of particular communities are met and adverse impacts on any particular groups such as the LGBTQ community are removed. No issues have been raised by specific groups during consultation in relation to sexual orientation. Modifications were made to the policies as recommended by the

Planning Inspectorate following examination. However, none of the changes are deemed to have a material impact on the implementation of any of the policies as well as in relation to sexual orientation.

Socio-economic impacts

Please indicate any actions arising from completing this screening exercise.

This analysis has been updated following examination into the DMB by the Planning Inspectorate which took account of consultation responses to recommend a series of modifications which were themselves subject to consultation earlier in 2021. Whilst the modifications helped to improve the clarity and detail of some of the policies, none of the changes had a direct impact on the thrust of any of the policies or have a material impact on their implementation or effect on individuals with protected characteristics as set out above.

Please indicate whether a full impact assessment is recommended

NO

What data has been collected to facilitate the assessment of this policy/proposal?

The DMB is backed by an extensive evidence base to justify each proposed policy within the document. It has also been informed by national and local planning policies, guidance and evidence produced by the Government, the Council and its partners. It has also drawn upon the evidence base which informed the development of the Birmingham Development Plan. Evidence reports have also been specifically prepared for this DMB which form the background to the policy formation process. The evidence base supporting the DMB can be found on the DMB page of the Council's website at www.birmingham.gov.uk/DMB

Consultation analysis

This analysis has been updated following examination into the DMB by the Planning Inspectorate which took account of

Page 681 of 804

consultation responses to recommend a series of modifications which were themselves subject to consultation earlier in 2021. Whilst the modifications helped to improve the clarity and detail of some of the policies, none of the changes had a direct impact on the thrust of any of the policies or have a material impact on their implementation or effect on individuals with protected characteristics as set out above.

Adverse impact on any people with protected characteristics.	The proposed policies are not predicted to have an adverse impact on any people with protected characteristics. Indeed, all the policies are expected to have a positive impact on the community by ensuring that development is guided to the right location, is of a high standard, enhances quality of life and protects the environment. This assumption was tested at the examination by the Planning Inspectorate and, although modifications were recommended as a result, none of these changes had a direct impact on the thrust of any of the policies or have a material impact on their implementation or effect on individuals with protected characteristics.
Could the policy/proposal be modified to reduce or eliminate any adverse impact?	The DMB has been modified already (through several consultation stages) to take into account some issues which may have had an adverse impact in terms of Equality. Examples of this include making Policy DM8 on Places of worship and other faith related community facilities more flexible to be able to adapt to the diverse needs of different faith communities. A further example relates to Policy DM9 on Day nurseries and early years provision where the policy was changed to include explicit need for sufficient outdoor play space for improved quality of life for children within such nursery facilities. Whilst some modifications were recommended by the Planning Inspectorate following examination and subsequently made, none of the changes had a direct impact on the thrust of any of

the policies to have any direct effect on individuals with protected characteristics.

How will the effect(s) of this policy/proposal on equality be monitored?

The DMB contains a monitoring framework to monitor the effectiveness of the policies once adopted. This will be reported through the Authority Monitoring Report (AMR).

What data is required in the future?

Are there any adverse impacts on any particular group(s)   No

If yes, please explain your reasons for going ahead.

Initial equality impact assessment of your proposal

Consulted People or Groups

Informed People or Groups

Summary and evidence of findings from your EIA

Analysis of consultation responses as well as modifications recommended by the Planning Inspectorate following examination, has enabled further scrutiny of the Document and its policies to ensure compliance with the Equality Act and minimise any potential impacts on the protected characteristics.

The policies in the DMB are not predicted to have an adverse impact on any people with protected characteristics. Indeed, all the policies are expected to have a positive impact on the community by ensuring that development is guided to the right location, is of a high standard, enhances quality of life and protects the environment. This assumption will be tested throughout the final stages of the plan-making process.

QUALITY CONTORL SECTION

Submit to the Quality Control Officer for reviewing?   No

Quality Control Officer comments

Decision by Quality Control Officer   Proceed for final approval

Submit draft to Accountable Officer?   No

Decision by Accountable Officer   Approve

Date approved / rejected by the Accountable Officer   01/10/2021

Reasons for approval or rejection   The policies in the DMB are not predicted
                                                                        to have an adverse impact on any people
                                                                        with protected characteristics. The DMB
                                                                        policies are expected to have a positive
                                                                        impact on the community as described in
                                                                        the assessment.

Decision by Accountable Officer   Approve

Date approved / rejected by the Accountable Officer   01/10/2021

Page 684 of 804

Birmingham City Council
Report to Cabinet
9th November 2021

Subject:	City-Wide Electric Vehicle Charge Point Strategy
Report of:	Acting Director, Inclusive Growth
Relevant Cabinet Member:	Councillor Waseem Zaffar-Transport and Environment
	Councillor Tristan Chatfield - Finance and Resources
Relevant O &S Chair(s):	Councillor Liz Clements - Sustainability and Transport
	Councillor Mohammed Aikhlaq - Resources
Report author:	Sylvia Broadley, Specialist Energy Manager
	Email:Sylvia.broadley@birmingham.gov.uk

Are specific wards affected? If yes, name(s) of ward(s):	☐ Yes	☒ No – All wards affected
Is this a key decision? If relevant, add Forward Plan Reference: 009090/2021	☒ Yes	☐ No
Is the decision eligible for call-in?	☒ Yes	☐ No
Does the report contain confidential or exempt information?	☐ Yes	☒ No
If relevant, state which appendix is exempt, and provide exempt information paragraph number or reason if confidential :		

1   Executive Summary

1.1   This report seeks approval to adopt the City-wide Electric Vehicle (EV) Charge Point (EVCP) Strategy (2021-2032) ("Strategy") provided as Appendix A. The Strategy covers the existing initial roll-out of 197 EV fast and rapid chargers (394 charge points) in strategic locations, as previously approved by Cabinet on 24th January 2018 in the report titled "EV Charge Point Network Development Programme – Full Business Case". This initial phase will kick-start the 'charge and go' approach of the Strategy, across the city centre and within local communities in the Birmingham area, to be followed by further deployment of

009090/2021

charge points until 2032. A key focus of the Strategy is on enabling the widest possible public access to EV charge points. Therefore, they will continue to be placed at strategic locations, whilst also targeting the use of innovative charge point technologies that will allow installation in accessibility-challenged areas, including areas where there is low electric grid power coupled with residential areas of high-rise flats and terraced housing where there is limited or no off-street parking.

1.2 The Strategy has been co-developed with the Council's procured EVCP Strategic Delivery partner, ESB Energy. They are currently installing the initial 394 Office for Low Emission Vehicles (OLEV) funded fast (22kw full charge within 2 hours) and rapid (50kw full charge within 40 minutes) network, to be completed by 30th September 2022, and going on to provide for further delivery, to ensure that a minimum of 3,600 EV charge points are installed by 2032.

1.3 The Strategy will align with the EV market development, and that of the Birmingham Transport Plan priority objectives to achieve significant modal shift from private car usage to public transport, walking and cycling, as well as reducing traffic congestion. The Strategy recognises the role of private sector charge point provision (e.g. private land, supermarkets, petrol stations) towards delivering the 3,600 charge point target. Accordingly, ongoing monitoring of EV vehicle take up and usage will also inform the roll-out of EV charge points.

1.4 The Strategy envisages EV charge points being installed at strategic sites on the highway, public car parks, and public land, within the city centre and within local communities (subject to the relevant approvals, permissions and licences), to ensure the widest possible public access.

2 Recommendations

2.1 Approves adoption of the City-wide Electric Vehicle Charge Point (EVCP) Strategy, provided as Appendix A.

2.2 Notes that a key focus of the Strategy is to address residential areas that have low electric grid capacity, coupled with limited off-street parking which is likely to impact equality of accessibility to EV charge point provision, through on-going public consultation and through the use of communication tools such as 'Be-Heard' in order to gauge local community intent in the take-up of EV vehicles and the barriers they experience.

2.3 Authorises the Cabinet Member for Transport and Environment, and the Cabinet Member for Finance and Resources, with the Acting Director, Inclusive Growth and Director of Council Management to accept further government funding up to a limit of £1m, to access emerging and innovative EV charge point solutions that complement the implementation of the EVCP Strategy, consistent with the Council's Financial Approval Framework.

2.4 Delegates authority to the Acting Director, Inclusive Growth, the Assistant Director Corporate Procurement or their delegate, in conjunction with the Director

of Council Management or their delegate, and the City Solicitor or their delegate, in consultation with the Cabinet Member for Transport and Environment, and the Cabinet Member for Finance and Resources, to approve any procurement strategies and subsequent contract award decisions required to support the implementation of the recommendations within this report.

3   Background

3.1   The Birmingham Transport Plan, sets out the big moves which need to be made to achieve the vision for Birmingham's transport as a sustainable, green, inclusive and go-anywhere network. Safe, healthy environments are needed to make active travel – walking and cycling – the first choice for people making short journeys. A fully integrated, high quality public transport system will be the go-to choice for longer trips. Where these choices are not possible, electric vehicles will be an important part of providing innovative, carbon neutral and low emission alternatives for supporting sustainable and inclusive economic growth, tackling climate change and promoting the health and well-being of Birmingham's citizens.

3.2   The declaration of a climate emergency and the introduction of Birmingham's Clean Air Zone is a signal of our intention and an important first step towards establishing a net zero emissions provision of EV charge points in assisting the modal shift required to achieve this.

3.3   Over £1 billion of investment is taking place in walking, cycling and public transport projects in Birmingham. This will support the significant modal shift required to enable the reduction in car use required for Birmingham to meet its climate emergency objectives. In line with 3.1, modelling in 2019 showed that to meet 2030 emission targets, a 40% reduction in car use overall within Birmingham is required by 2030, compared to 2018 levels, amongst other measures. Where car use is a necessity, enabling the transition to electric vehicles will be a sustainable alternative to public transport, walking and cycling.

3.4   In August 2019 the Council procured ESB Energy as an EV Charge Point Network Development Partner having secured an OLEV grant of £2.92m to deliver a 'backbone' EV charging infrastructure of 197 chargers (394 fast and rapid charge points) by 2022, as the first phase towards meeting market need. Delivery of this work is underway.

3.5   The Phase 1 fast and rapid charge point roll out to September 2022 will utilise locations on highway, public car parks, public land and some private sites in strategic locations where ESB are responsible for any lease arrangements. This is alongside initial private sector development on private land such as supermarkets, fuel stations and private car parks.

3.6   Phase 2 will continue delivery in line with market growth, funded through ESB investment, on the highway, public car parks, public and private land, as well as private sector intervention on private land. This will include roll out of fast and rapid EV charge point hubs across local areas, with a focus on challenging areas such as

terraced housing/blocks of flats where the power capacity or land availability is not present. This phase will therefore deploy innovative charging technology such as lamp post and/or inset kerbstone low power level residential EV charging, in consultation with the Council's Highways PFI Contractor where applicable.

3.7 An agile approach to EV charging infrastructure will be taken to ensure on-going city-wide charging infrastructure that aligns to public need. This is based on modelled numbers using Transport for West Midlands (TfWM) data, Council traffic modelling data, and Department for Transport (DfT) data, in regard to the number of charge points to be provided by 2032 at around 3,600, if the Council is to achieve the ambitious levels of modal shift it anticipates, as a result of the major road infrastructure changes, plus road and transport management systems planned for under the Transport Policy.

3.8 If Council objectives for modal shift are only partly achieved then the provision of charge points will need to rise to around 5,000 (or much higher if modal shift is not achieved at all), to accommodate market demand for charging.

3.9 Other uncertainties may impact the number of charge points required. The Strategy sets out how market development will be monitored throughout to ensure that EV charge point infrastructure is being deployed where it is needed and continues to build on best practice. The following factors will be monitored:

- EV uptake among key user groups, including taxis, residents, commercial fleets and car clubs, as well as visitors to the city;
- Vehicle stock and usage trends as indicators of modal shift;
- Progress in the number of charge points installed and geographic coverage;
- Available data on charging behaviour and consumer preferences; and
- Technology progress that may impact charging behaviours or infrastructure requirements.

3.10 The core principles underpinning the development and delivery of the city-wide charging Strategy are to provide a network that:
- Follows the best practice approach for choice of technology
- Aligns with consumer preferences and current deployment trends
- Aligns with wider aims within the Council, including reducing reliance on private cars and encouraging modal shift (changes in travel away from private cars and towards public transport, walking and cycling)
- Is accessible and equitable for all

3.11 The Strategy prioritises areas of the city for rapid hub deployment based on indicators of high charging demand for key use cases:

- **Taxi charging:** based on number of taxis ranks in an area

- **Residents without off-street parking:** based on the share of cars and vans in an area that have low access to off-street parking

- **En-route charging:** based on car and van traffic levels on major roads

- **Destination charging:** based on the number of amenities in an area (e.g. supermarkets, cafes, hotels, shopping centres, leisure facilities etc) and number of trips ending in an area

3.12 Figures for delivery of a comprehensive public charging network can only be achieved in collaboration with the private sector. The Strategy outlines the Council's approach to EVCP deployment, whereby the 3,600 total charge points projected by 2030 include those deployed by the Council, alongside private sector and other regional stakeholders interventions, e.g. TfWM charge point plans for their 'Park & Ride' scheme. The Strategy outlines how the Council and its EVCP Network Delivery Partner will work with wider stakeholders to both encourage deployment and to guide our own deployment approach.

3.13 Responding to Council financial pressures, the Strategy will be at 'nil cost' and no liability to the Council. This is addressed through the procured EVCP Network Delivery Partner (ESB Energy) contract in how the EVCP network is invested in, developed, owned, maintained and serviced by the EVCP Network Development Partner, with 24/7 customer support 365 days a year, with Key Performance Indicators relating to 99% uptime performance requirements, and run as a commercial operation throughout the contracted period to 2032. Whilst the current contract has revenue income, this is limited to charge point use only. For any future commercial opportunities, in regard to paragraphs 2.3 and 2.4, these will be investigated and assessed, providing more specific detail via the subsequent procurement strategy.

3.14 However, whilst the Council is aiming to reduce the overall level of congestion, private car use and encourage significant shift to public transport, walking and cycling, there are mitigations being put in place to minimise the impact of loss of parking charges, where parking fees apply to some parking bays being used for EV charging within the City centre. Actions include; reducing the number of charge point highway locations to be used to not exceed 14 sites, where existing car parking fees apply; minimising the use of car parking bays at each site for EV charging where existing parking fees apply; and only installing rapid chargers (which use one car bay per rapid charger) with 'one hour no return' signing. This will maximise the use of each car bay, but minimising the number of bays used. Additionally, the EVCP Delivery Partner contract secured following the 24th January 2018 Cabinet decision means that there is potentially a revenue income share generated from EV charging.

3.15 The level of Traffic Regulation Orders, lease agreements and processes for licences, and permits to enable works on the highway will increase as a result of implementing the EVCP Strategy, from the current level of applications to be able to accommodate the anticipated demand of 3,600 charge points by 2030. This is being managed within current workloads, and is anticipated to grow gradually over the next 5 years, but will be monitored to avoid any potential of delay in charge point installation in future, if demand increases exponentially at any time.

3.16 The Highway Authority provides enforcement of parking regulations on the highway. Implications for enforcement as a result of the implementation of the EVCP Strategy, where charge point users using car parking bays potentially over-stay beyond the parking order limits, have been considered. Given that EV charge points are being installed within existing car park bay provision, the level of enforcement requirement will not go beyond the existing parking order requirements.

3.17 The EVCP Network Provider will arrange all private land agreements and manage their own rental/lease arrangements.

3.18 EVCP Network Partner is responsible for all works, signage, bay marking, associated contracted services to meet all relevant Highway, Transportation, Planning, Electrical , Engineering regulations and primary legislation, as well as additional future digital/technology services aligned with charge point technology with agreement/collaboration with the Council. All associated costs are fully met by them.

3.19 The EVCP network will only use 100% renewable energy. The price of power to be competitive with, or lower than the pence per KW/hr other region/UK charge point providers charge, with price incentives for key target groups e.g. taxis.

3.20 Whilst the Strategy contributes to the overall picture of carbon reduction, it is vital that modal shift away from private car usage is the focus of the Council's transport policy. Carbon reduction will not be a direct consequence of installing EV charge Point infrastructure, in itself. This must be coupled with significant reduction in overall levels of car ownership and usage. If not, the Council's wider aims regarding active travel, addressing network congestion and air quality cannot be achieved.

4 Options considered and Recommended Proposal

4.1 Do nothing – Should the Council not adopt a city-wide EVCP Strategy it will not be supporting the Council's commitment to be net carbon zero by 2030 and will not be doing all it can to drive modal shift from petrol and diesel cars to electric vehicles thereby reducing levels of NO2 pollution across the City. It will also help to deliver the main pillars of the Council's Plan as detailed in para 7.1 below.

4.2 Recommended Proposal – adopt the city-wide EVCP Strategy, which will provide clear strategic direction for deployment of a comprehensive charging network, and ensure continued monitoring and adaptation to public accessibility and market growth EV charge point requirements.

5 Consultation

5.1 Consultation has been undertaken with the Air Quality Clean Air Zone (Brum Breathes) Board, the Highways Authority and the Planning Authority.

5.2   TfWM and the West Midlands Combined Authority have been consulted with via direct engagement to ensure alignment with regional ULEV strategy and local plans for EV charge points located at Park and Ride sites.

5.3   Each identified charge point location is assessed against a criteria and consultation in regard to suitability and accessibility. This includes electric grid capacity assessment and approval from Western Power Distribution, as the Network Distribution Operator, and is the key determiner of any charge point location; road traffic flow levels and proximity to or on key routes within the city centre and local communities; the 'outline' design, technical specification of the proposed site, as well as use of site for EV charging with the Planning Authority, the Highways Authority or 'Landlord'; percentage of existing localised EV take-up; and access to local amenities.

5.4   The implementation of each highway charge point will be subject to standard Transport Regulation Order (TRO) which necessitates Ward Member and public consultation, and consultation with the Council's Highways PFI Contractor where applicable.

5.5   Charge points located at public car parks (including those owned by TfWM in regard to their Park and Ride scheme) and public land, including parking areas within public parks, will be subject to approval via the relevant Cabinet Members, Council Directorate and Public Sector management requirements and consultation processes, including local Councillors. Specifically, this will determine the lease arrangements for the area of land taken up by the charge points, are approved and signed off with the relevant public sector 'Landlord' and legal approvals, noting the need for individual site agreed length of lease according to the available life time of the public car park or public land location.

5.6   The EVCP Network Delivery Partner is responsible for consulting with and agreeing lease arrangements with Landowners where their charge points are to be located on privately owned land.

5.7   Throughout procurement and contractual arrangements and during assembly of the Strategy, the views of stakeholders such as the taxi trade, TfWM and the West Midlands Combined Authority, as well as local businesses have been gathered and incorporated. The Distribution Network Operator (Wester Power Distribution) have also been consulted regarding grid capacity and capability.

6   Risk Management

6.1   The risk register at Appendix B, notes that available suitable sites that meet relevant criteria, as a key risk, also outlining the mitigating actions that have been put in place.

6.2   The Council has addressed financial risk as noted at 7.3.1 and 7.3.2.

7   Compliance Issues:

7.1   How are the recommended decisions consistent with the City Council's priorities, plans and strategies?

7.1.1   The adoption of the City-wide EVCP Strategy will support the following City Council priorities from the Council Plan 2018-2022 (2019 update).

- Birmingham is an entrepreneurial city to learn, work and invest in

- Birmingham is a great, clean and green city to live in

- Birmingham is a city that takes a leading role in tackling climate change

7.1.2   The Strategy aligns with numerous Council strategies and plans including, but not limited to, the Birmingham Development Plan, the Birmingham Transport Plan, the Future City Plan, the forthcoming Parking Supplementary Planning Document and Route to Zero Taskforce priorities.

7.2   Legal Implications

7.2.1   Delivery of the Strategy includes the installation of a charge point network on public land. The relevant primary legislation covering decisions around locations of points and specification requirements for civil works on the public highway includes the Highways Act 1980; New Roads and Street Works Act 1991; Road Traffic Act 1974; Traffic Management Act 2004 and the Road Traffic Regulation Act 1984 including the use of Traffic Regulation Orders (TROs).

7.2.2   Under the general power per Section 1 of the Localism Act 2011, the Council has the power to enter into the arrangements set out in this report and are within the boundaries and limits of the general power of competence Sections 2 and 4 of the Localism Act 2011.

7.3   Finance Implications

7.3.1   There are no capital implications for the Council in implementing the city-wide EVCP Strategy as these are funded by the EVCP Network Provider through the OLEV grant or carried out at their expense and risk.

7.3.2   There may be revenue implications from the potential loss of parking charges where existing fees apply on the highway. However, locations have not been identified at this point and with mitigation actions, as set out in para 3.14, are included in the strategy to minimise revenue losses. This includes existing parking fee highway locations not to exceed 14 sites, minimising the use of car parking bays at each of these sites for EV charging where existing parking fees apply, and only installing rapid chargers with 'one hour no return' signing.

7.3.3   Staff resources to manage the EVCP Network Delivery Partner contract and the implementation of the EVCP Strategy are already covered within current funded Transport and Connectivity, Inclusive Growth Directorate posts.

7.4 Procurement Implications

7.4.1 No direct procurement implications arise from this report. However, noting the delegation to approve any future procurement strategy and subsequent contract award decision as set out in paragraph 2.4, that the Cabinet Member for Transport and Environment and Cabinet Member for Finance and Resources, agree any procurement implications arising from the implementation of the recommendations within this report and to be undertaken in accordance with the Council's standing orders relating to contracts and the delegation within recommendation 2.4 of this report.

7.5 Human Resources Implications

7.5.1   Not applicable.

7.6 Public Sector Equality Duty

7.6.1 An Equality Assessment has been undertaken for the City-wide EVCP Strategy, and a copy is included as Appendix C.

8   Appendices

List of appendices accompanying this report:
- Appendix A – The City-wide Electric Vehicle Charge Point Strategy
- Appendix B - Risk Register
- Appendix C - Equality Impact Assessment- EA number of EQUA714

9   Background Documents

- Cabinet report 24th Jan 2018 EV Charge Point Network Development Programme FBC Forward Plan number: 003724/2017
- Birmingham Connected White Paper (2014)
- Birmingham Transport Plan (2021)

City-Wide Electric Vehicle Charging Strategy

Draft report

Birmingham City Council

23rd September 2021

Birmingham
City Council

1

009090/2021

Executive Summary

Introduction

In June 2019, Birmingham City Council declared a climate emergency and set an ambition for the city to become net-zero by 2030 or as soon as possible after that date as a 'just transition' allows.

Transport currently accounts for around a third of CO_2 emissions in Birmingham, over 95% of which is from road transport.[1] To reduce, and eventually eliminate emissions from transport, it is necessary to both reduce vehicle usage and ownership, and shift remaining vehicles to electric vehicles (EVs).

To enable the uptake of electric vehicles, **a comprehensive public EV charging network across Birmingham will be needed**. This network must be accessible to all of Birmingham's residents and serve the needs of all key user groups within the city, including taxis (hackney carriages and private hire vehicles), car clubs, commercial fleets, and residents without off-street parking.

The Council has already taken steps to begin expanding the public charging network in Birmingham. The Council have procured ESB Energy as an EV Charge Point Network Development Partner and have secured funding to deliver a backbone of 394 fast and rapid charge points by 2022, as the first phase of our 12 year strategy. This document sets out our strategy to grow the public charging network beyond this first phase and aims to answer the questions of:

- **How much** EV charging infrastructure will be needed by 2030?
- **Where** should this infrastructure be deployed?
- **What timeframe** should this infrastructure be deployed over?

Core Principles

The core principles underpinning the development and delivery of the city-wide charging strategy are to provide a network that:

- Follows the best practice approach for choice of technology
- Aligns with consumer preferences and current deployment trends
- Aligns with wider aims within the council, including reducing reliance on private cars and encouraging modal shift (changes in travel away from private cars and towards public transport, walking and cycling)
- Is accessible and equitable for all

To meet the needs of all EV user groups, the network will provide a combination of different charging types at strategically selected sites. This includes Electric Vehicle Charge Point (EVCP) deployment along major routes, for in-trip charging, at destinations, and in residential areas (highlighted charging types in Figure 1).

Based on the core principles set out above, **rapid charging – preferably in hubs – is the priority approach for residential charging in Birmingham, supported by EV charge points on the Highway, within public car parks and on public land. Innovative technology for residential on-street charging (e.g. using lamp posts, kerbstone or**

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[1] UK National Statistics: UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2018 https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2018 *accessed April 2021.*

i

embedded charge points) will be deployed as an alternative where locally accessible fast and rapid charging is not viable. The focus on rapid charging hubs is aligned with best practice in other UK cities, research into consumer preferences and economic considerations.

Charging type	Home charging	Residential charging		En-route charging	Destination charging	Workplace charging
		On-street	Charging hubs			
Use case	Charging at home in a private driveway / garage / allocated space	Charging at public on-street EVCP close to driver's house	Charging at public EVCPs in the drivers local areas.	Charging along major arterial routes or main roads in urban areas.	Charging in car parks at the end of an outward journey. "Top up" charging model.	Charging while parked at workplace.
Key user groups	Residents with off-street parking	Residents without off-street parking	Residents without off-street parking, taxis, car clubs etc.	All residents, visitors, commuters and commercial vehicles.		Employees (particularly those without off-street parking)
Typical charging speed	Slow, 3-7kW	Slow to fast 3-22kW	7-150kW but more likely to be 50-150kW	Rapid to ultrarapid (50-350kW)	Slow to fast 3-22kW with some sectors moving towards rapid	Slow, 7kW
Led by	Residents/building owners	Council	Council or private sector			Private sector (unless for council employees)

Not council led – not a focus of this strategy	Main focus of strategy

Figure 1 Overview of charging types considered in this strategy

Birmingham's Charging Needs

We have carried out detailed modelling to estimate the scale of infrastructure required to meet Birmingham's EV charging needs. This modelling takes into account EV uptake among Birmingham's vehicles and their associated charging demand, as well as charging behaviour and required technology type.

The number of charge points required to meet charging demand depends heavily on the type of charging technologies installed and the extent of change in travel behaviour away from private cars towards sustainable modes such as walking, cycling and public transport (modal shift) achieved in Birmingham. To meet our target of net zero by 2030, significant modal shift will be needed alongside the switch to EVs. Previous modelling for the Council has shown that car use needs to reduce by 40% compared to 2018 levels to achieve our climate targets. If we achieve this level of modal shift, **at least 3,630 public charge points** (*ca.* 1,600 chargers) will be needed across Birmingham, with residential charging predominantly met by fast and rapid charging hubs.

However, the size of infrastructure is highly dependent on market need and the number of charge points required could reach over 5,000 if, for example, more residential charging must be met with on-street charging or the level of modal shift achieved is much lower (for example, in-line with a 2050 target). If modal shift is not achieved and car use grows in line with historic trends, the number of charge points required could be greatly in excess of 5,000.

The range of EVCP numbers that the Council is planning for is illustrated in Figure 2. This includes deployment by the Council as well as by the private sector and regional stakeholders; however, the share provided by the private sector could go beyond these numbers. The Council will continue to monitor market development and we will adjust our plans as the market develops.
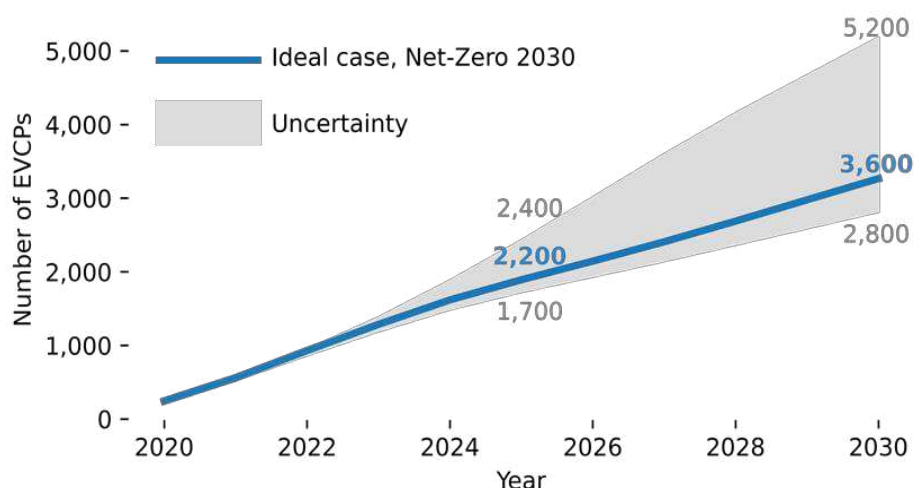
Figure 2 Projected number of public EVCPs needed in Birmingham reflecting the ideal case in which Birmingham meets net zero by 2030 (blue line) and the range of uncertainty that the Council must plan and monitor for.

Deployment Approach

Geographic Deployment Strategy

A crucial consideration for deploying rapid charging, particularly while EV uptake is in its early stages, is aggregating demand across user groups and charging types. This ensures that the charge points are highly used to meet market needs.

We have prioritised areas of the city for rapid hub deployment based on indicators of high charging demand for key use cases:

- **Hackney carriage and private hire vehicle charging:** based on number of taxi ranks in an area
- **Residents without off-street parking:** based on the share of cars and vans in an area that have low access to off-street parking
- **En-route charging:** based on car and van traffic levels on major roads
- **Destination charging:** based on the number of amenities in an area (e.g. supermarkets, cafes, hotels, shopping centres, leisure facilities etc) and number of trips ending in an area

Early deployment of rapid charging (to 2025) will focus on locations in the city centre and some satellite areas where these use cases overlap and demand is expected to be most concentrated (Figure 3). **Medium term deployment** (2025-2030) will **expand the network to ensure comprehensive coverage across the city**, including hard-to-reach areas.

Rapid hub charging will be prioritised in all suitable areas. Where areas are considered unsuitable for rapid hubs (e.g. where demand is not high enough or where space or grid constraints limit deployment), we will prioritise innovative solutions for on-street charging.

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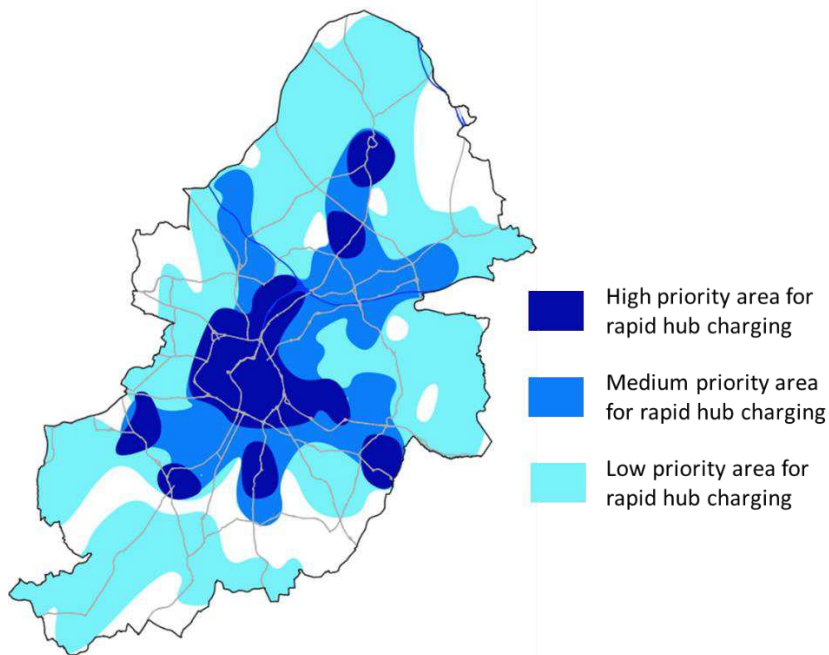
Figure 3 Priority areas for deployment of rapid hub charging in Birmingham based on aggregated demand from all sources.

EV Charging Delivery

The Council will take a leading role in developing Birmingham's EV charging infrastructure, alongside our appointed EV Charge Point Network Development Partner and associated stakeholders. Council-led deployment will play a larger role in the early stages of deployment to stimulate the market and enable the required step change towards EV uptake. Public sites, such as public car parks, green parks and Council-owned land, will continue to be developed for EV deployment, since they enable the Council to ensure that:

- standards for full public accessibility are met
- priority user groups are catered for
- there is a comprehensive spread of charge points across the city, including in hard-to-reach areas

In the short term, deployment may be focused on public sites to stimulate the market before shifting towards a greater mix of public and private sites. In the long term, deployment will be increasingly weighted to private sites as the market grows and EV uptake increases.

In addition to directly supporting delivery, there are a range of supporting activities we will take to facilitate deployment. These include:

- **Engaging with the private sector** to communicate the volume of infrastructure that will be required, to give confidence in the future EV landscape in Birmingham and to encourage deployment.
- **Developing systems to identify clusters of demand** and prioritise charging deployment in these areas.
- **Working with local commercial fleets** to enable us to identify and prioritise deployment in areas that support the early transition of these fleets to EVs.

iv

- **Reviewing our regulations, policies and processes** to address barriers to deployment for charge point operators.

Working with Wider Stakeholders

While this strategy outlines the Council's approach to EVCP deployment, the 3,600-5,200 total charge points projected to be needed in Birmingham by 2030 includes those deployed by the Council alongside those deployed by the private sector and other regional stakeholders. We will work with all relevant stakeholders to align plans and to encourage growth in Birmingham.

EV Charging Delivery Roadmap

Our deployment strategy and key activities to support our charging vision are summarised in the roadmap in Figure 4.

While this roadmap gives high-level, indicative timelines for delivery of the City-Wide network, in practice the precise rollout trajectory will depend on market trends and growth. We will work to ensure that the deployment approach is adaptable to continue to drive the EV transition and meet the needs of all users in Birmingham.

v

Figure 4 Roadmap for expanding charging infrastructure across Birmingham

Contents

1

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Acknowledgements

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2

Glossary

<u>Acronyms</u>

BCC   Birmingham City Council

BEV   Battery Electric Vehicle

CAZ   Clean Air Zone

CCC   Committee on Climate Change

DfT   Department for Transport

EV   Electric Vehicle

EVCP   Electric Vehicle Charge Point

ICE   Internal Combustion Engine

kW   kilowatt

MSOA   Middle Layer Super Output Layer

PHEV   Plug-in Hybrid Electric Vehicle

PHV   Private Hire Vehicle

TfWM   Transport for West Midlands

vkm   Vehicle kilometres

<u>Definitions</u>

EV – the term electric vehicle is used to refer to vehicles that use electric motors for propulsion; for the purposes of this strategy, we primarily use the term electric vehicle to refer to plug-in hybrid electric vehicles (PHEVs) and battery electric vehicles (BEVs); these are vehicles which must plug in to charge points to recharge the battery that powers their electric motion.

EV charger – standalone charging device, which can have multiple EV charging connectors

Electric vehicle charge point (EVCP) – individual charging connectors / plugs attached to an EV charger, which can charge different EVs simultaneously

EV Charging Speeds

- Slow charging: 3-5 kW
- Fast charging: 7-22 kW
- Rapid charging: 50-99 kW
- Ultra-rapid charging: 100 kW+

3

1   Background and Context

Key messages

- Reducing the use of cars and vans and transitioning to electric vehicles is central to reducing greenhouse gas emissions in Birmingham and across the UK

- To drive electric vehicle uptake, a comprehensive charging strategy is required that accounts for future demand and is integrated with other initiatives within the city.

- In partnership with ESB, as the procured EV Charge Point Network Delivery Partner, Birmingham City Council has already initiated the first component of our strategy to increase the number of fast and rapid charge points in Birmingham.

- The city-wide strategy considers the next phase of deployment and will take into account demand from vehicles within the city and those that travel in from surrounding areas out to 2030.

- The city-wide EV charging strategy must align with other mobility related schemes within the Birmingham region, for instance charge points should not be installed in areas intended for pedestrianisation.

1.1   Climate Emergency and Birmingham's Ambition

Following the UK government's commitment to reducing greenhouse gas (GHG) emissions to net zero by 2050,[2] local and regional authorities across the UK, including in the West Midlands, have strengthened their climate ambitions. In June 2019, Birmingham City Council declared a climate emergency and set an ambition for the city to become net-zero by 2030 or as soon as possible after that date as a 'just transition' allows.

Transport currently accounts for around a third of CO_2 emissions in Birmingham, over 95% of which is from road transport.[3] Of road transport emissions, 70% is from car use.[4] The UK Climate Change Committee's advice to Government[5,6] sets out several measures to reduce, and eventually eliminate emissions from transport through:

- **Reducing car miles** travelled through avoiding travel (e.g. working from home) and switching from private cars to walking, cycling, and shared and public transport
- **Transitioning remaining cars and vans to electric vehicles (EVs)**[7] alongside measures to reduce freight emissions.

The Council is already supporting EV uptake through purchase grants for ultra-low emissions hackney carriage and private hire vehicles as part of the Clean Air Zone mitigation measures.[8] Alongside direct incentives, a critical supporting step is to develop **a comprehensive public EV**

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[2] The Climate Change Act 2008 (2050 Target Amendment) Order 2019
[3] UK National Statistics: UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2018 https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2018 *accessed April 2021.*
[4] Analysis of sub-national road transport fuel statistics, 2019
[5] Net Zero – The UK's contribution to stopping global warming (2019) Climate Change Committee
[6] The Sixth Carbon Budget (2020) Climate Change Committee
[7] vehicles that use electric motors for propulsion; for the purposes of this strategy, we primarily use the term electric vehicle to refer to vehicles which must plug in to charge points to power their electric motion, including plug-in hybrid electric vehicles (PHEVs) and battery electric vehicles (BEVs).
[8] https://www.brumbreathes.co.uk/homepage/7/financial-incentives

4

charging network. While not delivering carbon reductions directly, widespread deployment of public charging infrastructure is a necessary requirement for enabling the uptake of electric vehicles and preparing for the UK's planned 2030 phase out of petrol/diesel cars and vans. The public network must be accessible to all of Birmingham's residents and serve the needs of all key user groups within the city.

This document sets out Birmingham City Council's strategy to grow the public EV charging network across the city. Our strategy is based on detailed modelling of future EV charging

needs and aims to answer the following key questions:

- **How much** EV charging infrastructure will be needed by 2030 to support our wider carbon reduction ambitions, alongside modal shift and EV uptake?
- **Where** should this infrastructure be deployed?
- **What timeframe** should this infrastructure be deployed over?

1.2   EV Charging in Birmingham

Introduction to electric vehicle charging

EV charge points are broadly categorised by their power rating, which determines how fast vehicles can be charged. There are four broad categories:

Type	Power rating	Typical charge time
Slow	3-5 kW	11-17 h
Fast	7-22 kW	2-4 h
Rapid	50-99 kW	40 min
Ultra-rapid	100 kW+	10-20 min

Slow charge points are typical of home charging and on-street solutions such as lamppost chargers, whereas rapid and ultra-rapid charge points are increasingly deployed at destinations and en-route locations, such as service stations and car parks.

The power rating of the charger determines the maximum power that can be delivered by the charge point. The actual power delivered to a vehicle that plugs into a charge point depends on both the power rating of the charge point and the charging capability of the vehicle. For example, an electric car that is only capable of charging at 50 kW can plug into a 100 kW charge point, but the actual power delivered will be 50 kW or below.

An increasing number of battery electric cars released onto the market can charge at 50 kW or more, but none can handle very high power ratings yet (e.g. 350 kW). Rolling out an increasing share of higher power chargers as Birmingham's network develops will future-proof the network for future technology developments but will not impact accessibility for existing vehicles (see also section 2.1).

Current EV Charging Infrastructure

There are currently over 140 chargers in Birmingham.[9] Charge points are most densely clustered around the city centre (see map in Figure 1.1), with some chargers along major routes. Over two-thirds are fast chargers (7 kW and 22 kW; Figure 1.1) while just over a fifth are rapid or ultrarapid (50-150kW+).

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[9] Data from Open Charge Map (https://map.openchargemap.io/#/search) and inspection of Zapmap (https://www.zap-map.com/live/) from March 2021.
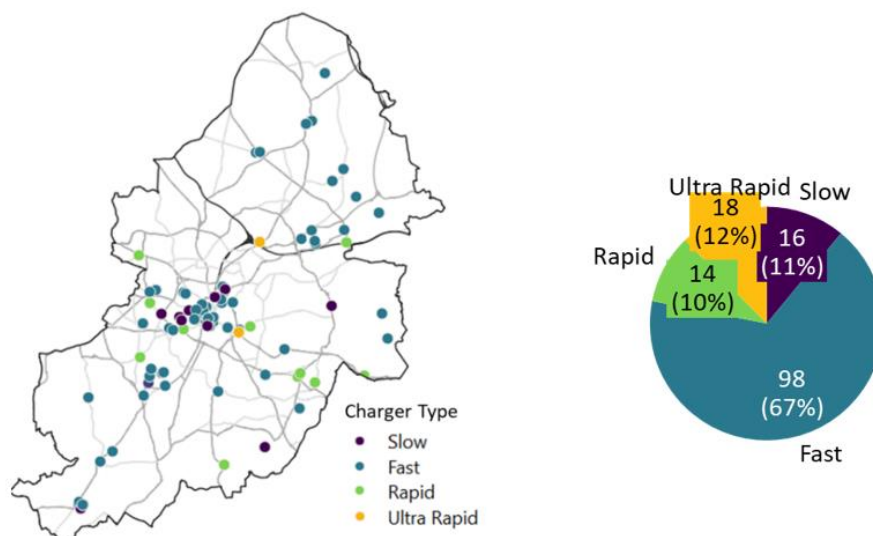
Figure 1.1: Distribution of EV charge points in Birmingham, as of March 2021.[5]

Phase 1 of 12-year EV Charge Point Strategy

Birmingham City Council's first step in expanding EV charging was securing £2.92m funding from the Office for Zero Emissions Vehicles (OZEV)[10] Taxi Infrastructure Scheme to deploy fast and rapid charging. In 2020, we appointed ESB Energy as our procured EV Charge Point Network Development Partner and have worked with consultancy Element Energy to develop a strategy for this first phase of public fast and rapid charge points (Figure 1.2). Phase 1 of the strategy began in 2020 and will add 197 fast and rapid chargers (394 charge points) to Birmingham's network by 2022 (see accompanying Appendix). While this planned network prioritises demand from hackney carriages and private hire vehicles, a core aim is to enable wider public access.

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[10] Formerly Office for Low Emissions Vehicles, OLEV

6

First phase – Fast & rapid public infrastructure

- 394 fast and rapid connectors (97 fast chargers and 100 rapid chargers with two connectors each) to be deployed by September 2022 as part of the public charging infrastructure

- Aimed at hackney carriage and private hire vehicles due to their high number of miles travelled and to accommodate their uptake in the Clean Air Zone

- Focus primarily on charging at destinations and along busy routes

- The charge points will be deployed on a combination of publicly owned sites (on-street and car parks) and privately owned sites

- ESB Energy will install, own, maintain and operate the EVCPs

- Although aimed at hackney carriages and private hire vehicles, the charge points will be universally accessible, and supported 24/7, 365 days a year

Indicative EVCP deployment plans in phase 1

- Sites where deployment is planned [40]
- Sites under investigation [>150]
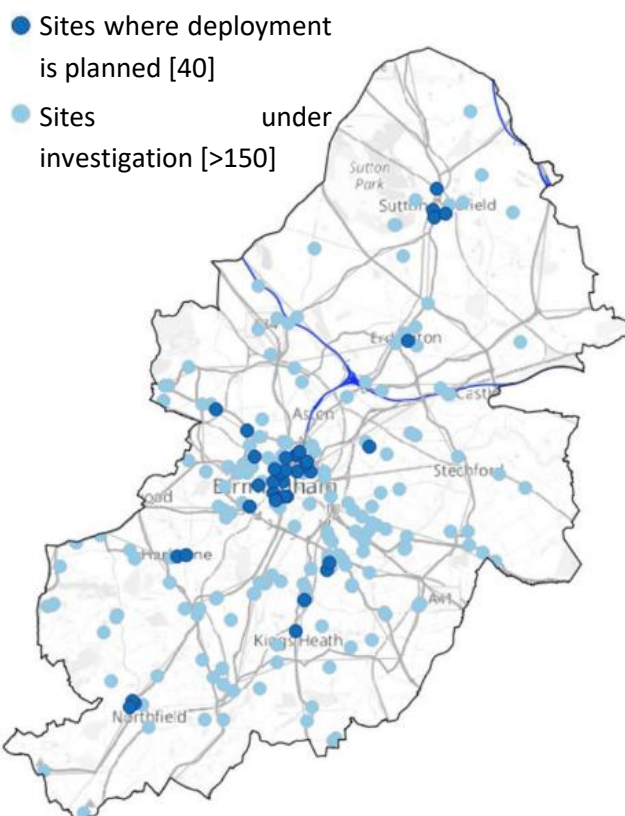
ESB Energy is a leading charge point provider, that maintains a network of over 3,000 charge points across the UK and Ireland. They were appointed the official EV Charge Point Network Development Partner for Birmingham in 2020 and will provide on-going support to the Council to develop the network in Birmingham until 2032. The charge points in Birmingham will be supplied with 100% renewable energy to support emissions reduction ambitions.

Figure 1.2 Overview of the first phase of Birmingham's public charging Strategy[11]

Phase 2 of the 12-year strategy

Phase 2 of the **city-wide strategy** represents EV charge point deployment beyond 2022 and will cover expansion of Birmingham's network out to 2032, as laid out in Figure 1.3. The strategy has a wider focus than the first phase and covers all key user groups, including residents without off-street parking, car clubs, and commercial fleets.

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[11] Map © Crown copyright and database rights 2020 OS 100021326

The city-wide strategy must deliver a future network that is user friendly, cost-effective, and future proofed. To achieve this, it must complement the current EV charging infrastructure, address current barriers to EV uptake, and align with both best practice technology choices and changes in the way people travel.

Key strategic aims of the strategy are to:

- **Deliver a network that serves the needs of all vehicles** registered in and travelling in Birmingham that rely on a public network

- **Deliver a fully publicly accessible network** that is universally accessible, supported 24/7 over 365 days per annum across the city and to all users

- **Encourage uptake of EVs** by providing a comprehensive network and increasing public confidence that their charging needs will be met through a clear, transparent strategy

- **Future proof the network** by:
  - Avoiding locking-in private car ownership and prioritising options that are most suited to sustainable transport modes
  - Following the charging market and technology development and adapting as required
  - Being proactive in the trial of innovations, in particular to minimise impact on the electricity networks.
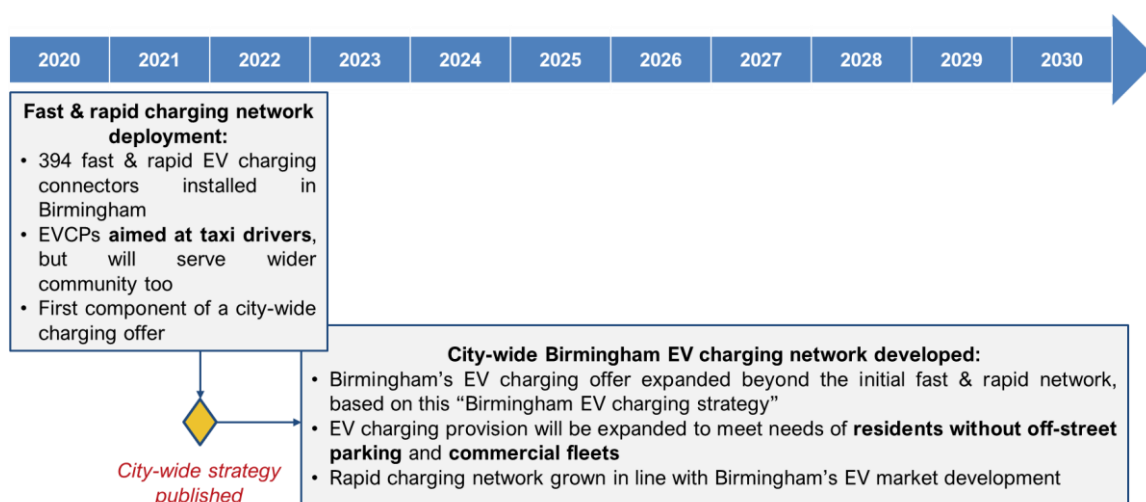
Figure 1.3: Timeline of Birmingham's EV charging strategies.

1.3 Alignment with Wider Mobility and Development Plans

Birmingham's city-wide EV charging strategy has been developed to align with other ongoing and upcoming mobility-related schemes within Birmingham. This alignment will ensure that the network fully considers the future needs of all users while avoiding potential wasted investment, such as putting charge points in areas that are targeted for pedestrianisation.

Current mobility schemes share three significant aims which the city-wide EV charging strategy must consider:

- **Reducing local emissions and improving air quality** by driving uptake of zero-emission vehicles.

8

- **Reducing total emissions by reducing car miles travelled** and private car ownership.
- **Reducing city centre traffic** by understanding charging needs across the city and identifying priority areas to avoid encouraging city centre travel for charging needs.

An overview of relevant wider mobility schemes in Birmingham is provided in Table 1.1 along with an indication of how those schemes may influence the deployment of EV charging infrastructure.

Table 1.1: Wider mobility schemes in Birmingham that may have an impact on EV charging demand and infrastructure rollout.

Document / Initiative	Key Features	Considerations for EV charging infrastructure
Birmingham Transport Plan	– Plan to 2031 that aims to guide investment in local transport in a way that reduces car dependency and delivers public transport improvements – Includes plans for pedestrianising city centre areas and reclaiming land currently used for parking – Builds on principles and policies set out in Birmingham Connected	Impacts suitable EV charging areas
City Centre Segments	– Plan to divide the city within the ring road into 6 segments, aiming to tackle local traffic within the city centre – Will prevent through access for private vehicles between segments – Will deliver improved access for walking, cycling and public transport	Impact on accessibility of charging areas
Clean Air Zone	– Active from June 2021, to improve air quality in the city centre – Drivers of the most polluting vehicles will have to pay to enter the zone – Hackney carriage and private hire vehicles drivers are encouraged to switch to EVs through provision of grants	Vehicles travelling into the CAZ should be supported to go beyond diesel Euro 6/VI through the provision of EV charging. Travel patterns may change as a result of the CAZ, impacting traffic volume and locations with highest traffic flow.
Public Realm Improvements	– Comprehensive programme for pedestrianisation of city centre areas, using the Commonwealth Games as an opportunity to showcase Birmingham	Impacts suitable EV charging areas
Commonwealth Games 2022	– The Games are expected to bring an upswing in public transport use – EVs may be favoured in the Commonwealth Games fleet	May create new convenient/high demand charging areas
Other major city	– Multiple programmes with aims to increase the capacity of the public	

developments e.g. HS2	transport network and open up access to Birmingham's commercial centre to wider residential areas
	– Will create new shared and public transport hubs, including station access, and taxi drop off areas

Modal shift

Switching to electric vehicles alone will not meet our ambitions for Birmingham to be net-zero by 2030 or as soon after as possible. Due to the slow turnover of cars and somewhat limited supply of electric vehicles, especially in the 2020s, there will still be many petrol and diesel cars on the road by 2030. This means that there will still be emissions from fossil-fuelled cars in 2030. Figure 1.4 shows the reduction in emissions from cars if the Government's ambition for no new petrol and diesel vehicle sales by 2030 is achieved. This rollout reduces emissions by close to 50% in 2030 compared to 2020 levels. To close the gap to zero, car usage (measured in vehicle kilometres travelled) will also need to be reduced, through avoiding travel and 'modal shift' – changes in travel behaviour away from private vehicles towards more sustainable forms of transport. Previous modelling for the Council has shown that a reduction in car use of 40% compared to 2018 levels is required to meet Birmingham's climate ambitions (see also Section 3.2.2).
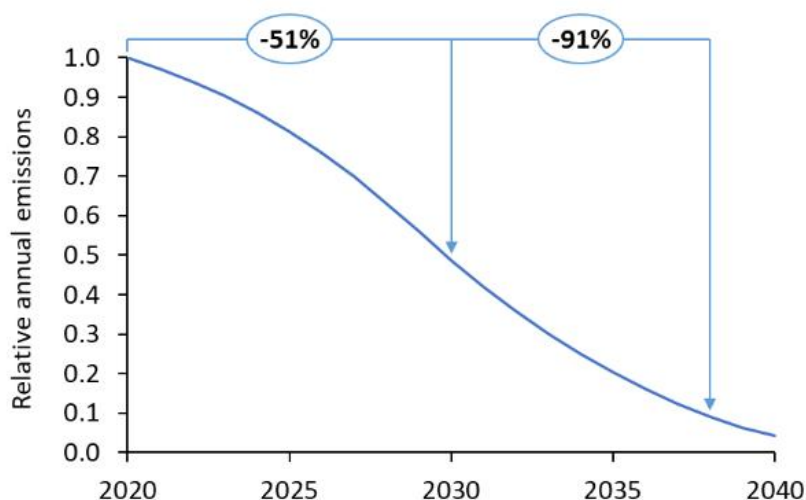
Figure 1.4: Impact on emissions from technology change alone: change in CO_2 emissions from all cars and vans as new petrol and diesel vehicles are phased out from sales in 2030.

While walking, cycling and public transport should take a leading role in taking the place of private car use, future transport systems must provide a range of options to fully meet users travel needs. As such, shared transport such as car clubs, car sharing, and hackney carriages and private hire vehicles have a role to play, and their electrification must be supported.

The Council is currently developing targets for the extent of modal shift ambition and these will be informed by ongoing developments at Transport for West Midlands (TfWM) level. In this strategy, we take into account the impact of different potential levels of modal shift but will remain flexible to ongoing plans.

10
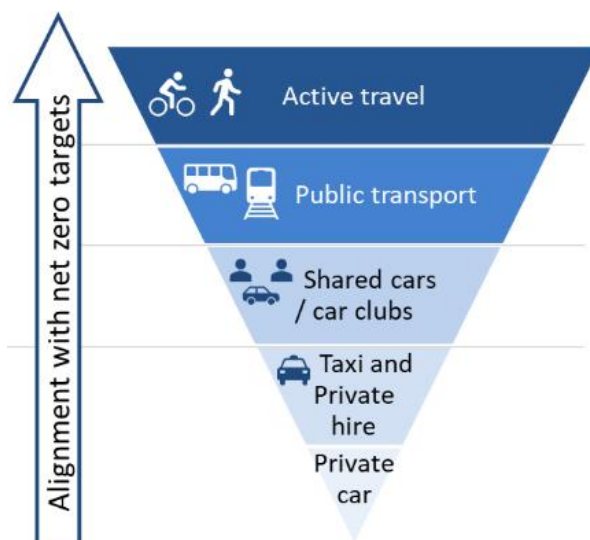
Figure 1.5: Compatibility of various modes of transport with net-zero targets.

1.4 Scope of the EV Charging Strategy

Timeline

The focus of the city-wide EV charging strategy is for a publicly accessible network that considers EV uptake and subsequent demand out to 2030. We will aim to deploy EV charging infrastructure at least a year ahead of projected EV demand in order to accelerate and promote EV uptake.

Vehicles

The city-wide EV charging strategy will cover charging demand from a range of vehicles shown in Table 1.2 including cars, hackney carriages, private hire vehicles, mopeds and motorcycles, and commercial light goods vehicles. The strategy does not cover demand from buses, heavy goods vehicles (HGVs) or e-scooters and e-bikes, as set out in Table 1.2, given either the low current market availability for EVs for these vehicle types (see projected uptake in Technical Appendix, section 5.1) or the more vehicle-specific charging requirements of these vehicles.

11

Table 1.2: Vehicle types within the scope of the EV charging strategy.

	✓ **In scope**		**X Out of scope**
Private and shared vehicles (including car clubs)	• Private vehicle charging will be split between public network and home charging, whereas shared cars will rely on public network. Dedicated charge points in car club bays are out of scope of the Council's strategy. • Demand will increase with EV uptake.	Buses	• Majority of charging expected to be done at the depot - not public demand • Strategy acknowledges TfWM strategy on opportunity charging
Taxis: hackney carriages and private hire vehicles	• High mileage vehicles therefore ideally suited to EV transition. • Taxis require fast turnaround times while charging during shifts.	e-bikes and e-scooters	• Privately owned will be charged at home / workplace • Public models will have minimal energy demand and their uptake / location is currently uncertain
Commercial light goods vehicles	• Some larger fleets will be depot based (out of scope) • Vehicles kept at users homes will have charging needs more similar to a high-milage private car.	Heavy Goods Vehicles	• Electric truck deployment will only be in early phases by 2030 • Public charging demand in timeline proposed will therefore be very limited

Charging types

To meet the full range of EV user groups, the network will provide a combination of different charging types at strategically selected sites. This includes EVCP deployment along major routes, for in-trip charging, at destinations, and in residential areas. One of the key challenges associated with the transition to EVs is providing access for residents without access to home charging (i.e. those without garages, driveways or car parks in shared accommodation). To achieve the level of transport emissions reduction required over the coming decade and beyond, it will be crucial to make owning and using an EV a viable option for this demographic.

Key User Groups

The city-wide EV charging strategy targets five key user groups:

• Hackney carriages
• Private hire vehicles (PHVs)
• Car clubs

- Light commercial vehicles (vans)
- Residents without off-street parking.

These user groups were chosen to represent the main demand requirements and charging behaviours within Birmingham. Table 1.3 gives an overview of each user group showing the factors that are likely to affect charging demand in Birmingham.

Table 1.3: Key user groups prioritised in the city-wide EV charging strategy.

Target user group for the strategy	Aligned with modal shift ambition	High mileage, and associated high share of carbon emissions	High EV charging demand	Home-based vehicles	Depot-based vehicles
Hackney carriages	✓	✓	✓	✓	
Private hire vehicles	✓	✓	✓	✓	
Car clubs	✓	✓	✓	✓	
Commercial vehicles		✓	✓	✓	✓
Residents without off-street parking				✓	

Priority group for fast & rapid network

> **Key messages**
>
> - The priority residential charging strategy for the Birmingham City area will be rapid charging hubs with on-street charge points deployed in a limited number of areas.
>
> - The focus on rapid charging hubs is aligned with best practice in other UK cities, research into consumer preferences and economic considerations.
>
> - The use of rapid charging hubs is also aligned with BCC's modal shift ambitions to reduce the miles travelled by private car shifting instead to walking, cycling and public transport.

2 Core Principles of Birmingham's EV Charging Strategy

The core principles underpinning the development and delivery of the city-wide charging strategy are to provide a network that:

- Follows the best practice approach for choice of technology
- Aligns with consumer preferences and current deployment trends
- Aligns with wider aims within the council, including modal shift
- Is accessible for all

2.1 Technology approach

The charging market can be broadly split into four main charging types according to their location (detailed in Figure 2.1) covering:

- **Residential:** charging at or close to homes
- **En-route:** located along major routes for charging away from home
- **Destination:** in car parks for charging at the end of journeys
- **Workplace:** provided for employees at workplaces

In practice, charge point locations often straddle multiple charging types. For example, a rapid charging hub installed in a car park within a residential area will meet both destination and residential charging needs. A key consideration when developing the deployment approach will be to aggregate demand across user groups to maximise utilisation.

The most appropriate charger type for any given location depends on the level of charging demand at that location and the typical charging behaviour of users. Broadly, different charging speeds are appropriate for different locations:

- **Slow chargers (3-5 kW)** are suitable for vehicles that are parked for long periods of time, such as overnight charging at home, at a depot or, in some cases, on a residential street
- **Fast chargers (7-22 kW)** are suitable for cases where a vehicle may be left for several hours, such as at a destination or workplace
- **Rapid and ultra-rapid chargers (50-350 kW)** are required where a vehicle needs to charge quickly, with charging time more similar to traditional refuelling of a petrol or diesel car; these are particularly suited to en-route charging but are appropriate across many charging types.

14

Charging type	Home charging	Residential charging		En-route charging	Destination charging	Workplace charging
		On-street	Charging hubs			
Use case	Charging at home in a private driveway / garage / allocated space, typically overnight	Charging at public on-street EVCP close to driver's house, typically overnight	Charging at public EVCPs in the drivers local areas. In the rapid hub case, quick turnaround means a similar model to petrol refuelling.	Charging along major arterial routes or main roads in urban areas. Quick turnaround times.	Charging in car parks at the end of an outward journey. "Top up" charging model.	Charging while parked at workplace. Predictable + long dwell times. Not strictly public charging.
EVs per EVCP	1 EV per EVCP	Small number of EVs per EVCP	Many EVs per EVCP			Small number of EVs per EVCP
Key user groups	Residents with off-street parking	Residents without off-street parking	Residents without off-street parking, taxis, car clubs etc.	All residents, visitors, commuters and commercial vehicles.		Employees (particularly those without off-street parking)
Typical location	Driveway, garage, private residents car park	Along residential pavements	Along urban roads, public car parks, forecourts, dedicated development on public land	Service station / petrol forecourts plus other sites near main roads including hotels, retail parks etc.	Range of car park types e.g. public car parks, supermarkets, shopping centre	Employee car park
Typical charging speed	Slow, 3-7kW	Slow to fast 3-22kW	7-150kW but more likely to be 50-150kW (rapid and ultrarapid)	Rapid to ultrarapid (50-350kW)	Slow to fast 3-22kW with some sectors moving towards rapid	Slow, 7kW
Led by	Residents/building owners	Council	Council or private sector			Private sector (unless for council employees)

Not council led – not a focus of this strategy	Main focus of strategy

Figure 2.1 Overview of charging types considered in this strategy.

For the case of residents without access to off-street parking, there are two charging options to complement destination charging:

- **Slow on-street charging** – provides residents with slow overnight charging close to their house; for example, at lampposts or at kerbside
- **Hub charging** – provides quick and accessible charging at central locations within a local area, similar to taking a car to a petrol station. These can be fast or rapid, but a benefit of rapid hubs in residential locations is that they will also support other user groups such as hackney carriages, private hire vehicles and car clubs.

Each option has strengths and weaknesses, as set out in

Table 2.1.The key takeaway from the comparison in

Table 2.1, and the view taken in this strategy, is that **rapid hub charging is the best solution for providing charging for residents in Birmingham**. This means that rapid charging will be preferred where it is technically and commercially viable. **Slow on-street charging will only be deployed in suitable areas where rapid charging is not feasible.**

Rapid charging hubs can take many forms. These range from dedicated developments solely used for charging (similar to a fuelling station), to hubs containing multiple EVCPs in a car park (e.g. at a supermarket), and more recently large developments with 30 or more charge points located with cafes and shops at service station-style sites.

The number of EVCPs per hub also varies, with car park hubs in the UK typically having around 6 EVCPs. Early in Birmingham's deployment strategy, it is likely that hubs will have a small number of EVCPs (2-4) and may be located on-street. However, in the mid-long term as the market develops, larger hubs on dedicated sites are expected to be the preferred option.

15

This view is based on the current market, but the charging market is rapidly changing. The city-wide strategy will need to be flexible in adapting to the market need and new technologies as they develop. By focussing on rapid hubs initially, this allows for innovative on-street charging technologies to be incorporated later in the deployment strategy, once functional and reliable options have been identified.

Table 2.1: Comparison of rapid-hub and on-street charging

	positive		neutral		negative

Consideration	Rapid hub charging	On-street charging
Key characteristics		
Description	Multiple rapid chargers deployed together in areas of high demand	Slow chargers deployed in residential areas, generally used for overnight charging.
Power rating	50 kW and above	3-22 kW
Typical charging times (depends on battery size)	Full charge would require 1-2 hours but typical charge is ca. 30 mins, to 80% state of charge	Full charge would be 10-20 hours, overnight will take most vehicles from 30% to 100% charge
Strengths and weaknesses against key criteria.		
Supporting the behaviour change needed to reduce private cars	Ideally suited to taxis and car clubs	Chargers outside homes makes private car ownership attractive, and could slow down a move away from private car use
Alignment with sustainable user groups (hackney carriages, private hire vehicles, car clubs)	Ideally suited to hackney carriages, private hire vehicles and car clubs	Less suitable for hackney carriages, private hire vehicles and car clubs that require quick charging turnaround times
Current business case	Attractive on high demand sites	Very challenging – typically fully funded through Government schemes
Future business case	Future business case is attractive - shorter payback and significant returns	Business case will improve as EV uptake grows but will be unable to match rapid charging for return on investment
Cost effectiveness	Many EVs are served by each charger, overall costs are lower than for equivalent on-street provision	Few EVs are served per charger, overall cost is higher than equivalent rapid charging provision
Avoidance of street clutter	Limited number of hubs installed away from residential streets	Charge points add to street clutter and infrastructure must be installed along pavements on residential streets
Technology maturity and improvement	Technology is mature and fully commercial. Charging is getting faster and the market is growing	Innovative solutions are being developed and trialled but there is no dominant technology yet – unclear which solution will "win"

16

Siting challenges	Space for hubs required in areas that are often already busy and with limited space – car parks mitigate this to a certain extent	Requires additions to street and can create competition between EV and non-EV, plus not all streets are suitable
Current cost of charging tariff to drivers	Rapid charging is typically more expensive than slow on-street charging although it still provides cost savings vs petrol	Slow charging is typically lower cost and overnight charging can access cheap electricity

2.2 Alignment with Latest Deployment Trends

UK trends

Birmingham's focus on rapid charging is in line with UK wide deployment trends (Figure 2.2) that show a growing number of fast and rapid chargers being deployed. The rapid charging market has seen significant growth in the last couple of years, with the majority of rapid EVCPs deployed in the UK being installed in 2019/2020.
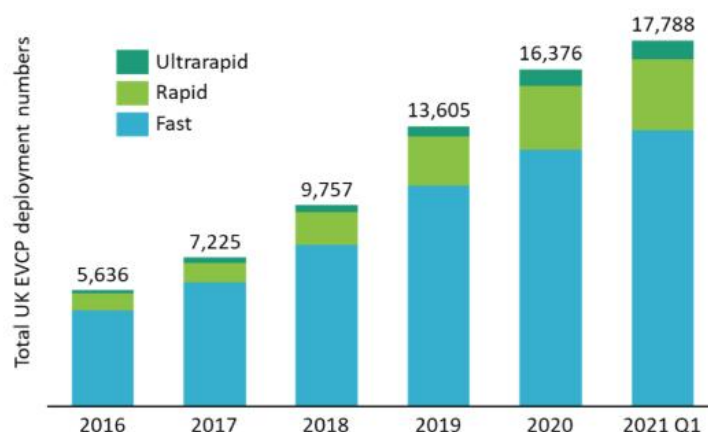
Figure 2.2: UK annual deployment figures for fast, rapid and ultra-rapid EV charge points.[12]

There is also a trend towards deployment of EVCPs in hubs, where multiple chargers are installed at the same location. Over a quarter of the UK's rapid and ultrarapid chargers have been deployed in a set of three or more with nearly 20% having been deployed in hubs of five of more.[13] Additionally, more than half of ultrarapid chargers deployed in hubs of five or more. These deployments are part of a growing trend towards hub charging favoured in areas of high demand where fast charging and charger availability are important to customers.

The focus on rapid hubs is generally in line with consumer preferences. Research has found that public opinion of charging infrastructure is more heavily influenced by charging speeds than spatial coverage.[14] The latest Energy Systems Catapult research showed that residents without

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[12] ZapMap: EV Charging Stats 2021 https://www.zap-map.com/statistics/#points *accessed April 2021*

[13] Based on data from Open Charge Map (https://map.openchargemap.io/#/search

[14] J. Globisch, P. Plötz, E. Dütschke, M. Wietschel, "*Consumer preferences for public charging infrastructure for electric vehicles",* Transport Policy, **2019**

off-street parking would prefer quick turnaround hub charging compared to slow on-street or slow hub charging.[15]
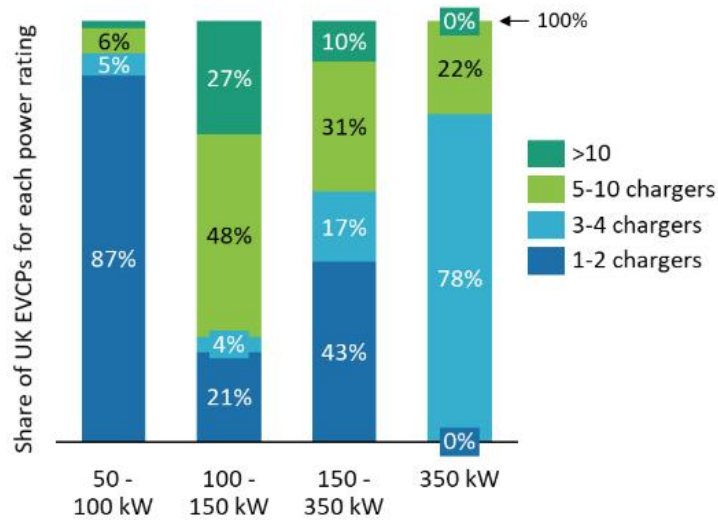
Figure 2.3: Annual UK EVCP deployment split according to hub size.[16]

Best Practice of Other UK Cities

The preference for rapid hub charging over on-street charging is also reflected in the approach being taken by other large UK cities, an overview of which is given in Table 2.2. London, Dundee and Nottingham are now focussing on rapid hub deployment aimed at all user types (i.e. hackney carriages, private hire vehicles, car clubs etc.) while on-street charging only forms a central focus of smaller, more residential cities such as Oxford.

Table 2.2: Overview of EVCP deployment strategies in other UK cities.

City (population)	Early deployment	Total EVCPs (Jan 2021)[17]	Current situation	Focus going forward
London (9 million)	Started early with slow on-street charging	6,150	50% of chargers are **slow** but there is also a high portion of **rapid**	Focus on **rapid hubs** aimed at range of users
Nottingham (330,000)	Fast and rapid	140	Majority of devices are **fast** with another third **rapid**	Focus on **rapid hubs** aimed at range of users

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[15] *Electric Vehicles: What will persuade the 30% of households without off-street parking to adopt electric vehicles?* Energy Systems Catapult (2021)
[16] Open Charge Map https://openchargemap.org/site *accessed April 2021*
[17] UK Department for Transport: Electric vehicle charging devices by local authority, http://maps.dft.gov.uk/ev-charging-map/ *published January 2021, accessed April 2021*

18

Oxford (150,000)	On-street focused on residents	100	Majority of devices are **fast** but with a third **slow** due to focus on on-street charging	Likely to deploy **on-street** lamppost chargers alongside plans for rapid points via the Energy Superhub
Dundee (150,000)	Rapid charge points focused on taxis	110	Almost all public charge points are **fast or rapid** with rapid making up nearly 30% of points	Focus on **rapid hubs** aimed at range of users

2.3 Alignment with Wider Aims

Modal shift and mobility schemes

Both the siting of charging infrastructure in the Birmingham region and overall deployment approach should align with wider modal shift plans: **the city-wide EV charging strategy must support sustainable transport modes and must not lock in behaviours that encourage private car ownership**.

Although the city-wide EV charging strategy will provide charging infrastructure for both private and public vehicles, the **prioritisation of rapid chargers over slow, on-street chargers is in line with the Council's aim to encourage modal shift**. Providing residents with overnight charge points outside their homes is expected to encourage private vehicle use and ownership more than the "charge and go" model of rapid hubs. Conversely, this charge-and-go model is ideally suited to the charging requirements of more sustainable forms of car use, such as car clubs, hackney carriages and private hire vehicles.

To maximise modal shift benefits, the strategy should also be designed to support other schemes that aim to reduce vehicle mileage and energy consumption such as cycling, pedestrianisation and low/zero-emission buses and other public transport.

2.4 Equity and accessibility for all

It is fundamental that the city-wide EV charging strategy delivers a network that is accessible to all users in Birmingham. Some of the potential accessibility considerations are addressed in Table 2.3.

Table 2.3: Equity and accessibility considerations for the city-wide EV charging strategy.

Factor	Barriers to accessibility	Key considerations for EV charging strategy
Geographic	Charge points currently do not cover enough of the Birmingham area to make public charging accessible to all residents	Ensure good spatial coverage according to need, including solutions for hard-to-reach areas
Households without off-street parking	Without their own driveway, many residents do not have easy access to EV charging.	The city-wide EV strategy aims to remove access to off-street parking as a barrier to EV ownership by prioritising the development of accessible rapid hub charging.
Technology	Some charge points can only be used by subscribers to a specific company or scheme and require an app to be downloaded, relying on all users having access to smartphones.	Charging infrastructure should be available to use by all members of the public with pay-as-you-go functionality (i.e. not solely on subscription services), made easy to pay for (i.e. contactless payments rather than relying on the use of a smartphone) and using a single payment metric such as pence per kilowatt hour (kWh) similar to pence per litre for petrol.[18]
Disability	There are a number of disability considerations: ○ Appropriate height for disabled users ○ Accessibility of area around charge point ○ Trip hazards	Design charging bays according to best practice guidelines to enable access for disabled users wherever possible (see blue box, next page). Prioritise technologies and innovative solutions that have actively considered accessibility for disabled people with mobility or dexterity impairments.
Price of charging	Cost of charging at public chargers can be up to 6 times more expensive than charging at home. Consumers with Agile EV tariffs can pay as low as 5p/kWh for charging overnight (https://www.octopusev.com/tariff) Placing EVCPs in existing on-street bays that currently have parking fee charges creates an accessibility barrier compared to locations without parking fee charges.	Prioritise development of flexible charging tariffs for those who charge overnight. Engage with government on subsidising public infrastructure for those without a driveway. Implementation of a consistent approach for on-street EV charge point use, that aligns with an EV 'Charge and go' approach, and removes any parking fee charges in existing bays. See also section 4.2.2.

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[18] These considerations align with proposals in a UK Government on "The consumer experience at public chargepoints" – the findings from this consultation should be used to establish best practice with regards to accessibility. https://www.gov.uk/government/consultations/the-consumer-experience-at-public-electric-vehicle-chargepoints/the-consumer-experience-at-public-chargepoints *accessed April 2021.*

> **Ensuring accessibility for disabled users:**
>
> The specific design considerations for each charging site will be determined by the EVCP type and location; however, ensuring that each chargepoint is designed in a way that considers all those using the space around the EVCP as well as the EVCP itself is critical to accessibility of our future network. In designing our EVCP infrastructure, we will adhere to best practice principles; for example, those outlined in London's electric vehicle charge point installation guidance[19] and Government's upcoming accessibility standards, expected in 2022.[20]
>
> Key considerations for disabled access include minimum parking bay length, width and space between bays to ensure adequate space, kerb height, and chargepoints being of a height suitable for wheelchair users. While it will not always be possible to adapt all bays to ensure adequate space (e.g. in bays not previously designed for disabled access in off-street car parks), we will ensure that access is provided in sufficient bays to meet the needs of Birmingham's disabled residents and visitors.

Summary

- Rapid charging is better aligned with BCC's modal shift ambitions to move away from private car ownership as it is ideally suited to car clubs, hackney carriages and private hire vehicles.
- A focus on rapid hubs is in line with consumer preferences and deployment trends, including strategies of other large UK cities
- Despite the above, some areas may still be more suited to on-street slow to fast charging where there is not sufficient demand (or space) for rapid hubs.

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[19] https://lruc.content.tfl.gov.uk/london-electric-vehicle-charge-point-installation-guidance-december-2019.pdf

[20] https://www.gov.uk/government/news/uk-government-partners-with-disability-charity-to-set-standards-for-electric-vehicle-chargepoints

21

3   Estimating Birmingham's Charging Needs

Key messages

- The number of charge points required to meet charging demand depends heavily on the type of charging technologies installed and the extent of modal shift achieved in Birmingham.
- If we achieve the level of modal shift that is compatible with our target of net zero by 2030, at least 3,630 public charge points will be needed across Birmingham, with residential charging predominantly met by fast and rapid charging hubs.
- However, the size of infrastructure is highly dependent on market need and could reach in excess of 5,000 if, for example, more residential charging must be met with on-street charging or modal shift is not achieved.
- The Council will continue to monitor market development and we will adjust our plans as the market develops.

3.1   Approach

The core aim of this City-Wide Strategy is to deliver a comprehensive public charging network that drives EV uptake and meets the needs of all users within Birmingham over the next ten years and beyond. The scale of infrastructure required will depend on market development, which will be influenced by three main factors outlined in Table 3.1.[21]

Table 3.1 Main factors impacting size of charging infrastructure needed by 2030

Factor	Impact on EVCP Requirements
Rate of electric vehicle uptake	The faster the uptake of EVs, the earlier charging infrastructure is required to meet demand and therefore the higher the rate of installation.
Extent of modal shift	The higher the reliance on private (electric) cars is, the higher the charging demand will be, leading to more charge points required. The Council's ambition to move away from private vehicle use towards walking, cycling and public transport will affect the demand on the EV charging network.
Number of cars in challenging areas that need on-street solutions	Charging at on-street chargers is slower than at rapid hubs, meaning that fewer electric vehicles are served per charging point. As such, the higher the need for on-street charging, the more charge points will be needed to cater for the total charging demand. As set out in Section 2, the Council's strategy is to prioritise rapid hubs and use on-street charging only in challenging areas where rapid hubs are not suitable. However, the share of rapid vs on-street charging will be determined by the share of demand that falls into these challenging areas.

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[21] Additional factors include improvements in battery technology that mean more charging is carried out at home than at public EVCPs, and the extent of workplace charging which would decrease dependency on public EVCPs.

22

To estimate the likely number of public EVCPs that the Council will need to plan for in Birmingham, detailed modelling has been carried out to reflect a range of market conditions as defined by these main factors. This modelling is based on stock and charging behaviour of cars, vans, motorcycles, hackney carriages and private hire vehicles within Birmingham, covering the scope outlined in Figure 3.1.

While this city-wide strategy focuses solely on development of the public charging network (residential, en-route and destination charging, Figure 3.1), home and workplace charging also have an important role to play in meeting the charging needs of vehicles in Birmingham. These charging types are not the focus of this strategy (see also Figure 2.1) but their rollout does have an impact on the public network. For example, if workplace charging becomes widespread, demand on the public charging network would be lower and less public infrastructure would be needed. Therefore, the impact of home and workplace charging was accounted for in the modelling to ensure public charging infrastructure is suitably scaled to meet Birmingham's charging demand.

Full details of the modelling are given in the Technical Appendix.
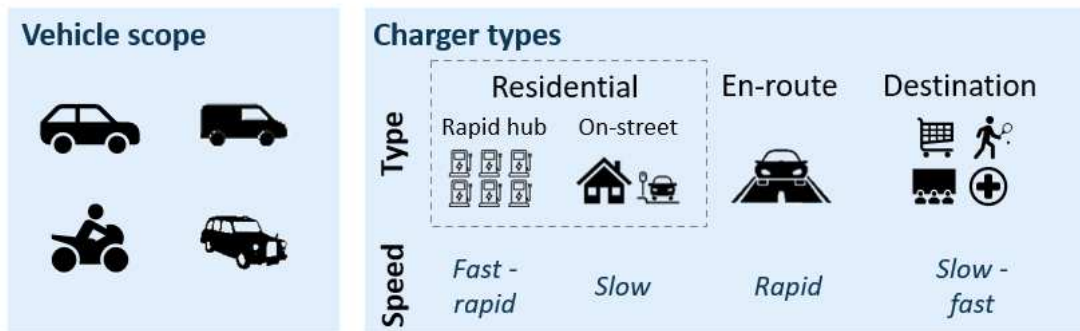
Figure 3.1 Recap of scope of city-wide strategy in terms of vehicles and charging types

3.2 Birmingham's EVCP requirements

3.2.1 Core assumptions

Rate of EV uptake: The rate of EV uptake is largely outside of the Council's control. In this strategy, we have assumed that EV uptake is consistent with the Government's ambition to phase out the sale of purely petrol and diesel cars and vans by 2030. This is an ambitious target set at national level that requires sales of EVs to increase from less than 10% in 2020 to 100% in 2030. While a public charging network can encourage EV uptake, reaching this sales share relies on people choosing to switch to EVs, enough EVs being available for people to buy, and likely enforcement of the ambition at national level.

Share of charging needed at public sites: The majority (79%) of cars and vans in Birmingham have access to off-street parking and will be able to charge at home. As such, they will not rely solely on the public charging network and most of their charging will be done at home.[22] However, while homeowners with access to off-street parking are overrepresented among early adopters, this will necessarily change as more people switch to electric vehicles. As such, as the market grows, a growing share of the total charging demand will fall on the public network.

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[22] 75% of charging is typically carried out at home; Source: *Electric Vehicle Charging Behaviour Study* (2019) Element Energy for National Grid ESO

Rapid vs on-street residential demand: While the Council will prioritise fast and rapid hubs to meet residential charging demand, we recognise that not all areas will be suitable for rapid hubs and those in challenging areas[23] will need alternative, innovative solutions. We have based our projections for EVCPs on close to 80% of cars and vans without off-street access being within areas suitable for rapid hubs; however, we have explored the impact of higher reliance on on-street parking in Section 3.2.2.

Deployment trajectory: To prevent the provision of public charging points being a barrier to EV uptake, annual EVCP deployment targets have been set a year ahead of projected demand. By staying ahead of demand, the public charging network across Birmingham can be a driver for EV uptake within the city.

3.2.2 EVCP projections

Impact of modal shift

Historically, the number of vehicles registered in Birmingham has grown with population. With Birmingham's population set to reach 1.25 million by 2031,[24] without behaviour change, this could lead to close to 800,000 cars in Birmingham. This increase in car ownership is incompatible with both Birmingham's and the UK's national climate ambitions.

Birmingham has set a target of reaching net zero by 2030 or as soon as possible after and, as set out in Section 1.3, this cannot be achieved only through switching to EVs. The Council commissioned modelling in 2019 using the SCATTER tool which showed that meeting the 2030 target requires a reduction in car use of 40% by 2030 compared to 2018 levels, among other measures. This is equivalent to someone who only uses their car for commuting, changing to work from home for 2 days a week instead of travelling 5 days a week.

If we meet our target, there would be over 170,000 EVs in Birmingham by 2030, of which, over 153,000 would be cars (compared to 2,700 EVs today[25]). To meet the charging demand from these vehicles, there would need to be 3,630 public charge points (*ca.* 1,600 chargers), with 1,375 on-street residential charge points and close to 450 rapid residential hubs (Table 3.2).

We recognise that our targets are ambitious and must plan for the case where progress is slower. As a minimum, Birmingham must achieve modal shift that is compatible with the national target of net zero by 2050. To meet this target, the Climate Change Committee's 6th Carbon Budget requires a much less ambitious reduction in car use of 1.3% by 2030.

If Birmingham only achieves the CCC's level of modal shift, there would be close to 230,000 EVs in the city by 2030, of which, over 210,000 would be cars. To meet the charging demand from these vehicles, there would need to be over 5,000 public charge points, with close to 1,900 on-street residential charge points and over 600 rapid residential hubs (Table 3.2).

If modal shift is not achieved and car usage grows in line with historic trends, the number of charge points required could be greatly in excess of 5,000.

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[23] Where there is not sufficient demand or space for rapid hub charging
[24] Birmingham Transport Plan 2031 (2020)
[25] Department for Transport Vehicle Licensing statistics (2020) VEH0132b

Table 3.2: Number of EVCPs of each type required as a result of two different modal shift ambitions relating to different net-zero targets

Scenario	Year	Residential		En-route	Destination	Total
		Rapid	On-street			
Net-Zero 2030	2025	191	642	93	1,176	**2,102**
	2030	454	1,375	124	1,675	**3,629**
Net-Zero 2050	2025	215	734	106	1,370	**2,425**
	2030	609	1,886	176	2,508	**5,179**

Impact of share of on-street charging

Different types of chargers operate at different power ratings and therefore take different lengths of time to charge a car (see also Section 1.2). This variation in charging time means that faster chargers can charge many more vehicles per day and fewer chargers are needed to accommodate the total charging demand for all vehicles. On-street chargers, which are generally slow chargers, serve around four EVs per charge point while rapid hubs serve around 70 EVs per charge point (illustrated in Figure 3.2). Therefore, the number of charge points that will be required depends heavily on how Birmingham's EV charging demand is split across technology types.

As set out in Section 3.1, the split of on-street and rapid solutions will depend on the distribution of cars and vans reliant on public charging across those areas that are suitable for rapid charging and those that are challenging for rapid hubs.

If only 60% of electric cars and vans without off-street parking are in areas suitable for rapid hubs, this will increase the number of public charge points required to meet the net zero 2030 target to 4,940 (Table 3.3). Of this 4,940, over 2,900 will be on-street. Conversely, if more areas of Birmingham are suitable for rapid hubs, the total number of public charge points needed to meet the 2030 target could drop to 2,820 (Table 3.3).
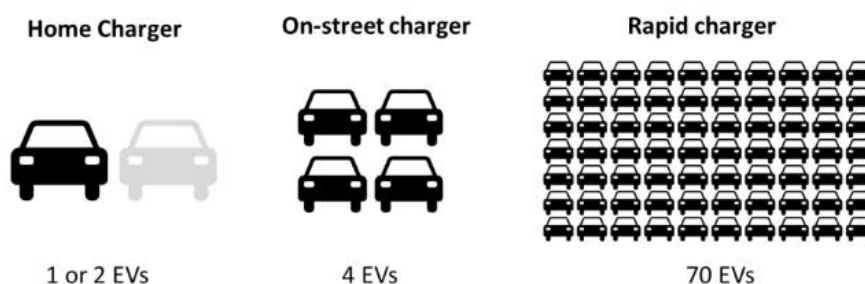
Figure 3.2: Illustration of the number of electric vehicles served by each kind of charge point

Table 3.3: Number of EVCPs of each type required depending on suitability of areas for rapid hub charging.

Share of cars and vans parked on-street in areas suitable for rapid hubs	Residential		En-route	Destination	Total
	Rapid	On-street			
60%	332	2,915	124	1,567	**4,938**
80%	454	1,375	124	1,675	**3,629**
95%	531	423	124	1,741	**2,819**

3.2.3 Summary of Birmingham's approach

The Council's strategy is to deliver a public charging network that meets market need. While the public charging network will encourage EV uptake and sustainable transport measures will support modal shift, these measures alone will not guarantee the transition to a sustainable transport system; the Council is reliant on action at national and regional level, as well as by local businesses and residents.

We will continue to strive to meet our target of net zero by 2030 or as soon thereafter as a just transition allows, and, in our ideal case, we will aim to achieve 3,630 charge points in the city by 2030 (Figure 3.3). However, as set out above, there are a number of uncertainties that impact the number of charge points required, and we will continue to monitor market development to ensure that infrastructure is being deployed where it is needed and to continue to build on best practice. This monitoring will include:

- EV uptake among key user groups, including hackney carriages, private hire vehicles, residents, commercial fleets and car clubs, as well as visitors to the city
- Vehicle stock and usage trends as indicators of modal shift
- Progress in the number of charge points installed and geographic coverage
- Available data on charging behaviour and consumer preferences – more data will become available as EV uptake increases (both nationally and within Birmingham itself)
- Technology progress that may impact charging behaviours or infrastructure requirements – for example, in innovative charging solutions for challenging areas, and EV technology

Maintaining an awareness of these factors will allow us to be agile in our approach to EV charging infrastructure, and to create a city-wide charging infrastructure that continues to align with the public's needs.
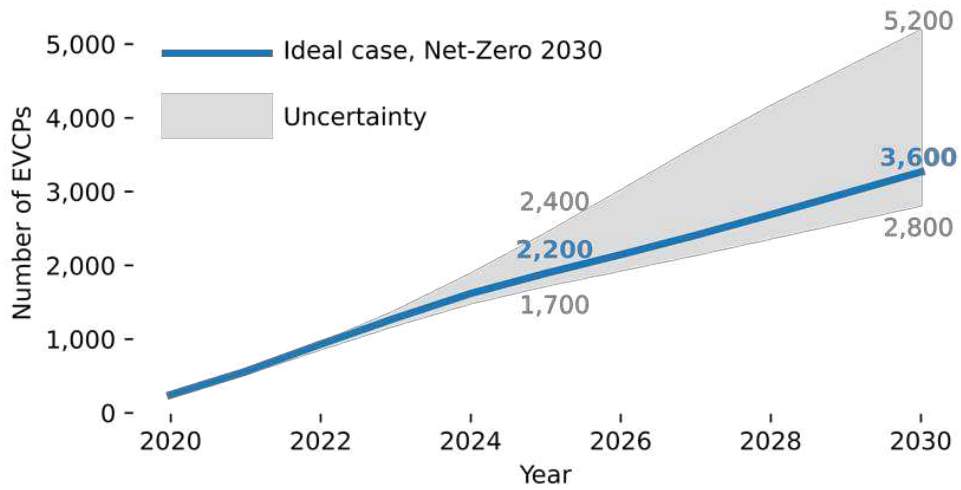
Figure 3.3: Projected number of public EVCPs needed in Birmingham reflecting the ideal case in which Birmingham meets net zero by 2030 (blue line) and the range of uncertainty that the Council must plan and monitor for

4 EV Charging Infrastructure: Deployment Approach

Summary

- We have prioritised areas of the city for EV charge point deployment based on indicators of high charging demand whilst taking into account future plans for traffic management and pedestrianisation.
- Early deployment (to 2025) will focus on locations in the city centre and some satellite areas where demand is expected to be most concentrated.
- Medium term deployment (2025-2030) will expand the network to ensure comprehensive coverage across the city, including hard-to-reach areas.
- The Council will play a key role in early deployment and will work with the private sector in partnership with our official charge point provider to ensure comprehensive network coverage.

This strategy considers deployment out to 2030 and has defined target areas for charging in the short term (out to 2025) and medium term (2025 to 2030). Short-term priorities will focus on areas of highest demand that cater for a range of charging types such as residential charging, demand from hackney carriages and private hire vehicles, destination charging etc. The medium-term priority areas will cover a larger area and deployment in these areas will be informed by lessons learned and trends observed in the early deployment phases.

To deliver a city-wide EV charging strategy capable of delivering the infrastructure required and that is in line with Birmingham City Council's wider aims for the city, the following will be taken into consideration:

- **Charging infrastructure siting will be demand-led** and where possible aim to aggregate demand across user groups, with a particular focus on vehicle types that align with longer term modal shift ambitions such as e-taxis and car clubs.
- **EVCP deployment will leverage a range of location types** in order to develop a comprehensive charging network in a timely manner, including private and publicly owned sites.
- **Charging infrastructure will align with wider mobility schemes in the region** so that it supports modal shift and the decarbonisation of Birmingham's transport system.

4.1 Geographic Deployment Strategy

To identify priority areas for deploying charging infrastructure, we have used geospatial analysis to build up a picture of potential charging demand across Birmingham. This is based on a range of relevant datasets describing travel patterns and local characteristics related to charging from key sources of demand.

As set out in Section 2, the primary focus for EV charging in Birmingham will be rapid charging, preferably deployed in hubs. A crucial consideration for deploying rapid charging, particularly while EV uptake is in its early stages, is aggregating demand across user groups and charging types. This ensures that the charge points are highly used to meet market needs. For example, putting rapid chargers in car parks in targeted locations may serve residential demand as well as destination charging, therefore meeting the needs of residents, car clubs and visitors to Birmingham. Prioritising areas where several user groups are catered for means that the Birmingham's EV charging strategy:

- Is able to cater for all types of charging demand
- Has a clear short-term focus with target areas to begin deployment

28

- Ensures early deployment where there is the best business case
- Allows the council and the market to understand charging demand and behaviours in high priority areas before deploying to medium priority areas.

The maps shown in this section of the strategy broadly identify the areas with highest potential demand from four key sources of charging demand:

- **Taxis including hackney carriages and private hire vehicles:** high mileage and early EV uptake
- **Residents without off-street parking**: residents who will be reliant on public charging infrastructure
- **En-route charging:** charging during journeys, most akin to the current petrol station refuelling behaviour
- **Destination charging:** charging while parked at a destination such as supermarkets, shopping centres, parks, leisure facilities etc.

The overall deployment strategy brings together demand from all of these major sources to identify areas where these demands overlap and therefore where rapid hub charging is most suitable.

4.1.1 Rapid Charging Suitability Assessment

Although rapid charging hubs are the primary focus for Birmingham's charging infrastructure, rapid hubs are not suitable in all areas.

To assess suitability, several metrics were analysed as shown in Table 4.1. These metrics have been shown to be key indicators of high EVCP utilisation, and therefore provide an indication of where future demand for rapid EV charging is likely to be highest.

Table 4.1: The metrics below were analysed to identify areas of Birmingham that are likely to have the highest demand for public EV charging.

Metric	Reason for assessment	Most relevant user groups	Relevant charging types
Taxis ranks	Taxi ranks indicate areas with high taxi operation and analysis has proven that proximity to taxi ranks drives EVCP utilisation		*Rapid hub*
Off-street parking	Areas with a low availability of off-street parking will be more reliant on public charging infrastructure, as fewer residents can charge at home		*Residential on-street or rapid hub*
Traffic flow	Routes with high traffic flows will develop higher en-route charging demand as EV uptake grows, due to the overall throughput of		*En-route*

29

	vehicles		
Trip data	Areas in which a large number of vehicle trips end (i.e. places where people are travelling to) have high demand for destination charging.		
Amenities	Analysis of real-world charging data shows that a high number of nearby amenities attracts EV drivers to EVCPs and drives utilisation		*Destination*

4.1.2 Recommended Infrastructure

Priority areas for EV charge point deployment have been identified for each of the metrics outlined in Table 4.1. The maps in this section illustrate the high and medium priority areas for each metric individually. The aggregated demand from all sources is then shown in Figure 4.2.

Taxi demand

Taxis, both hackney carriages and private hire vehicles, are a key user group for early deployment of fast and rapid charge points, partly because they drive many more miles annually than the average private car leading to higher charging demands. Taxi demand is closely linked to taxi rank locations, and the distribution of taxi ranks in Birmingham is shown Figure 4.1(a). Taxi demand tends to be more localised around the city centre than other demand types, in the area covered by the Clean Air Zone. As taxi use is particularly concentrated within the Clean Air Zone, supporting the taxi fleet in the transition to electric vehicles is key to improving air quality in the city centre.

Residents Without Off-Street Parking

Residents without off-street parking are generally unable to charge at home and therefore much more reliant on the public charging network. Modelling carried out by Element Energy has indicated that around 75% of car-owning households in Birmingham have access to off-street parking (60% of all households). This leaves around 66,000 car-owning households within Birmingham without access to off-street parking. Figure 4.1(b) shows the areas of Birmingham with the highest reliance on on-street parking. As would be expected in a major city, areas with a high reliance on on-street parking are found densely around the city centre with a low reliance in the areas to the north of the city and a more varied pattern in the south.
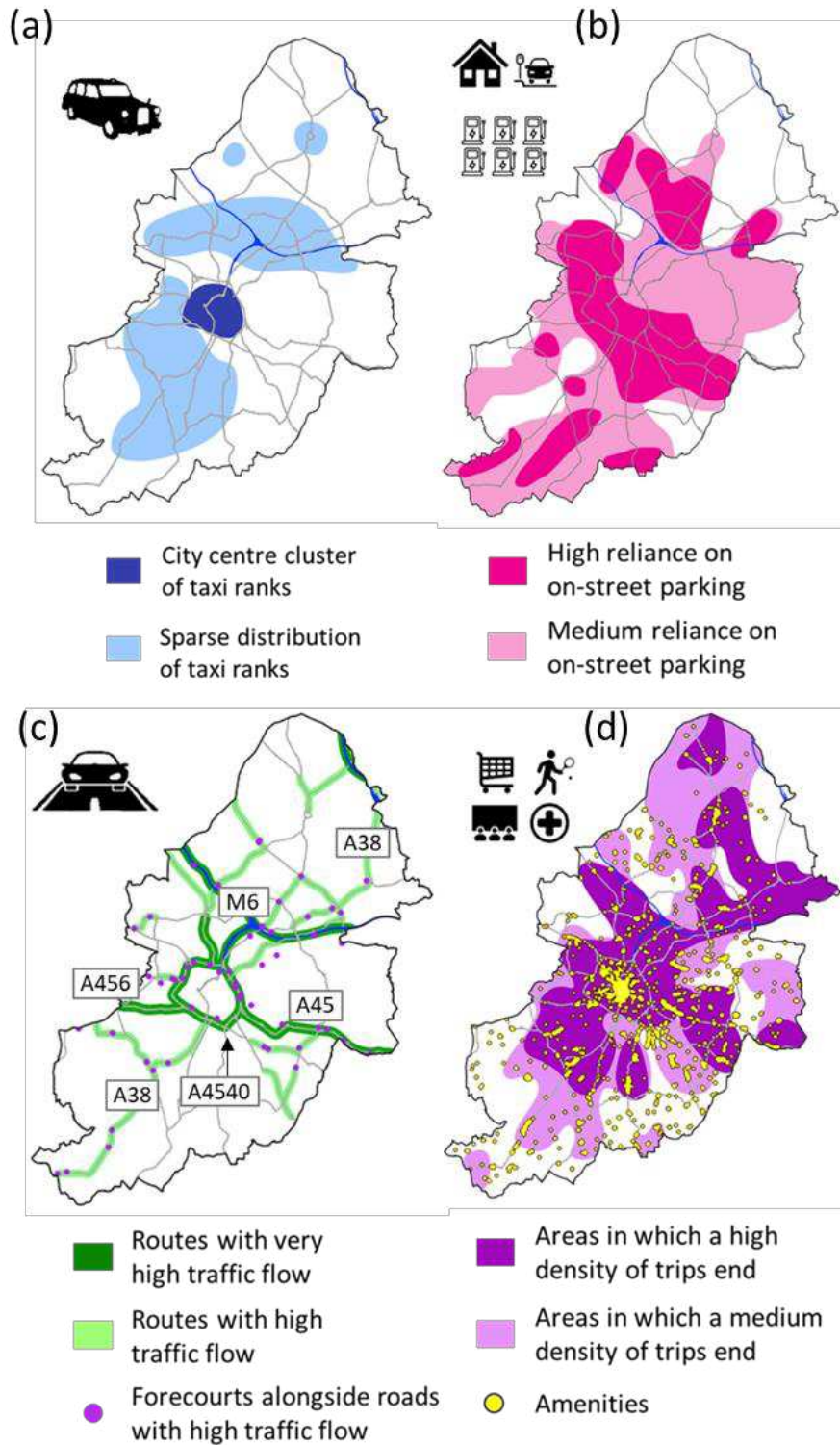
Figure 4.1 Geospatial analysis of potential charging demand across Birmingham: (a) Spread of taxi ranks across Birmingham indicating areas of demand for EV charging from taxis, (b) Areas with high or medium reliance on on-street parking leading to demand from residents for local EV charging infrastructure, (c) Roads in Birmingham with the highest car and van traffic flows leading to demand for en-route charging, (d) Areas with a high and medium density of trips ending in them, leading to demand for destination charging.

31

Rapid En-Route Charging

Rapid en-route charging is most similar to the current model of service stations or refuelling stations, generally found along main roads. En-route charging demand is naturally highest on large, busy roads where there is the highest traffic flow. Figure 4.1(c) shows the roads in Birmingham with the highest annual average daily traffic flow of cars and vans that would therefore be most suitable for en-route charging options.[26] Figure 4.1(c) also highlights forecourts that are found along these busy routes as obvious candidates for deployment of en-route charging.

The highest priority routes for en-route charging are those with the highest traffic flows in Birmingham, covering the M6 motorway, the A4540 ring road around the city centre, the A456 to the west and the A45 to the east of the city centre. The medium priority routes cover the rest of the main arterial routes into the city centre, including the A38 from the South.

Although the A4400 through the city centre is currently a very high traffic flow road, it has been excluded from en-route charging priorities in line with Birmingham City' Council's plans to reduce through traffic in the city centre. These plans aim to split the city centre into segments and limit through traffic, which will have a major impact on traffic flow on this section of road and could lead to stranded assets if infrastructure was deployed based on historic levels of traffic flow.

The introduction of the CAZ as well as changes to travel due to COVID-19 may also impact travel patterns across Birmingham. It is not currently clear what the long-term impacts of either COVID-19 or the CAZ will be; however, we will continue to monitor changes in traffic to ensure EVCP deployment follows the market need.

Destination Charging

Destination charging can be a useful source of "top up" charging or alternative charging for drivers unable to install an EVCP at home. The location and popularity of areas as destinations has been used to identify priority areas for destination charging, shown in Figure 4.1(d). This is based on the areas of Birmingham with the highest number of trips ending in them, in other words, the areas that drivers are most likely to be travelling to.[27] As would be expected, the areas with clusters of amenities (such as supermarkets, fast food outlets etc.) are associated with a large number of vehicle trips. Having rapid charging hubs close to these clusters of amenities makes charging infrastructure convenient for drivers as they can incorporate charging into their trip. Clusters of amenities are often served by large car parks which are suitable locations for EVCPs.

Overall Priority Areas for rapid charging

Priority areas from the four demand types given above were combined to establish the overall priority areas for rapid charging in Birmingham, shown in Figure 4.2.

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[26] Source: UK Department for Transport Road Traffic Statistics, which gives annual average daily flow data (AADF) for traffic flow along major roads in the UK. Data from 2019.

[27] The numbers used for the map were based on the total number of non-home based trips (i.e. not starting or finishing at home) per Middle Layer Super Output Area (MSOA) divided by the area of the MSOA to account for the fact that some MSOAs are much bigger than others in terms of area.
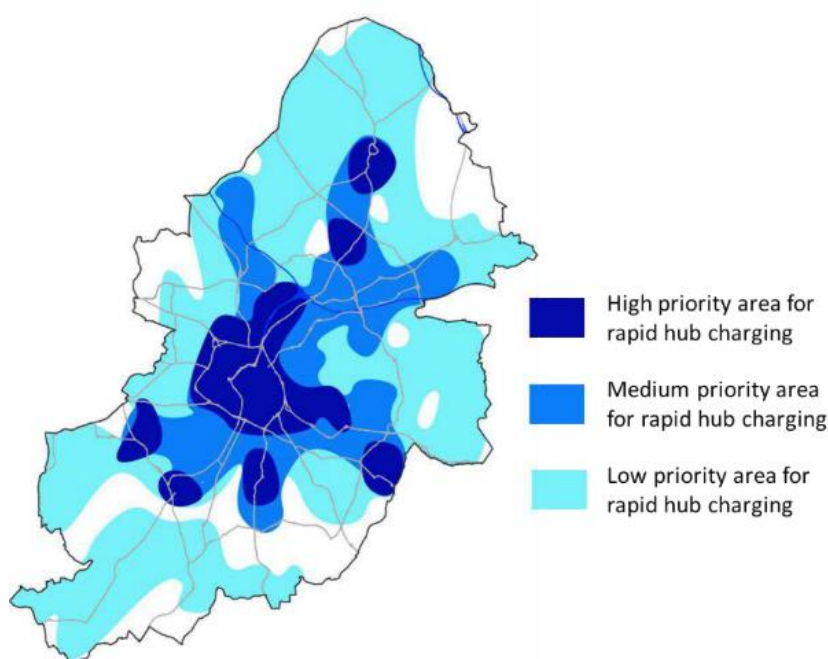
Figure 4.2: Priority areas for deployment of rapid hub charging in Birmingham based on aggregated demand from all sources.

Deployment across these areas will be divided across two main timeframes:

- **Short-term (to 2025)**: deployment will focus on finding sites within the highest priority areas (darkest blue in Figure 4.2) that serve multiple user groups and charging types; these include the city centre and some satellite areas, typically with clusters of amenities.

- **Medium-term (2025-2030):** deployment will expand to include sites within medium and low priority areas that radiate out from the city centre. While aggregating demand will remain a priority, these areas may serve a smaller range of charging types and therefore site selection will be informed by potential demand for each relevant charging type (e.g. residential charging will be informed by the priority areas in Figure 4 1(b), en-route charging by routes in Figure 4 1(c)).

Although these areas have been highlighted as priority candidates, specific locations within these areas will be subject to a detailed feasibility assessment before the appropriate charging solution is decided and deployed. We will continue to engage with key user groups (see also Section 4.2.2) to identify clusters of demand and will remain flexible in our assignment of priority. For example, where clusters of demand occur in areas identified as low priority in Figure 4.2, these sites will be moved up in priority.

Areas that are not highlighted in Figure 4.2 are where on-street charging is more likely to be suitable where charging infrastructure is required. This may change over time as charging behaviour and consumer preferences become clearer.

Throughout the timeframe of this strategy, additional demand centres may appear within Birmingham as a result of new infrastructure, such as HS2, or new developments, such as new housing developments or shopping centres. The strategy will remain flexible to developments to ensure future demand is met.

4.1.3 On-street Charging Approach

As set out in Section 2, on-street charging will primarily be used to extend the public charging network to areas where either:

- demand is not high enough to warrant the deployment of more expensive rapid chargers
- or local restrictions limit other deployment options, such as lack of space or grid constraints that are too costly to overcome.

The need for on-street charging will be minimised as far as possible by prioritising rapid charging wherever feasible. Where on-street chargers are identified as the most viable option for a given area, the Council's focus will be on the deployment of innovative chargers that minimise additional street furniture.

Early deployment will focus on high priority areas within Figure 4 1(b) that are not otherwise catered for by rapid charging. This approach will aim to supplement the developing rapid charging network and offer full coverage in these high priority areas. Medium-term deployment will expand coverage to suitable candidate areas in the medium and low priority residential areas, with the aim of providing a fully comprehensive network that is accessible to all.

Where on-street charging is installed, innovative, low-profile and low street-clutter devices, currently under trial, will be preferred over mature technologies such as lamppost charging. The Council is an official partner in a government-funded trial of the Trojan Charger and will continue to seek to participate in suitable future trials to ensure the latest and most effective solutions are deployed in Birmingham.

4.1.4 Catering for changing demand across the city

Our aim is for Birmingham's EV strategy to be aligned with wider schemes within the city: both long-term city development plans and major events held within the city.

Birmingham is an international city, regularly hosting large-scale events that bring an influx of visitors to the city. These events include high-profile, one-off events like the Commonwealth Games and more regular, often annual events such as conferences and sporting events. To ensure Birmingham's EV charging infrastructure can support such events, infrastructure will be strategically deployed in places that can cater for these demand surges and local, year-round demand.

Some of the major schemes with which the city-wide EV strategy must align are those focussed on the city centre, such as the Clean Air Zone (CAZ) and the City Centre Segments. Both schemes aim to reduce traffic in the city centre air with the CAZ adopted specifically to improve air quality in the area. It is hoped that vehicles travelling into the CAZ will be encouraged to go beyond diesel Euro 6/VI through the provision of EV charging, and by provision of grants for taxi fleets. The proposals for the City Centre Segments will need to be considered in relation to deployment of EV charging infrastructure within the city centre. It is important that EV charging infrastructure is not cut off from major local sources of demand that it has been set up to serve, such as major roads or housing developments.

Major city infrastructure developments and redevelopments, such as HS2 and Birmingham Connected, will have a significant impact on demand for and suitability of EV charging infrastructure across Birmingham. Key examples include plans for the pedestrianisation of areas within the city centre which will eliminate demand for vehicle charging in these areas, and areas identified for regeneration that are likely to involve changes to road layouts and accessibility. Other schemes that promote walking, cycling and public transport that, although aiming to

34

reduce vehicle travel overall, may create centres of local demand where commuters drive to Park & Ride sites (or similar) and shift to another mode of transport to move around the city.

4.2   EV Charging Delivery

4.2.1   Deployment Approach

The Council will take a leading role in developing Birmingham's EV charging infrastructure, alongside our appointed EV Charge Point Network Development Partner and associated stakeholders. As set out in Sections 1 and 2, our focus is to first develop a fast and rapid charging backbone (first phase of deployment) then deploy residential rapid hubs and work to expand access in challenging areas.

Council-led deployment will play a larger role in the early stages of deployment to stimulate the market and enable the required step change towards EV uptake. Public sites, such as public car parks, green parks and Council-owned land, are strong candidates for early deployment, since they enable the Council to ensure that:

- standards for full public accessibility are met
- priority user groups are catered for
- there is a comprehensive spread of charge points across the city, including in hard-to-reach areas

However, as the network grows, EVCP deployment will need to leverage a range of location types and the role of private sector stakeholders will become increasingly important. While public sites will continue to be developed to support the wider network, the Council will work to encourage increasing deployment at private sites as private car parks, destination car parks (e.g. supermarkets, shopping centres, hotels, leisure facilities etc.), and en-route refuelling station forecourts.

Figure 4.3 shows locations of five types of potential sites for EVCP deployment in Birmingham (see also Section 4.2.3 for Park & Ride sites). In addition to those shown, potential off-street sites include privately owned car parks, hotels, sports grounds, hospitals, transport hubs and more. From Figure 4.3, it is clear that there is a good spread of potential sites available in Birmingham to cover all areas of the city and to suit all types of EV charging demand including those likely to be targeted by the private sector.

In the short term, deployment may be focused on public sites to stimulate the market before shifting towards a greater mix of public and private sites. In the long term, deployment will be increasingly weighted to private sites as the market grows and EV uptake increases.

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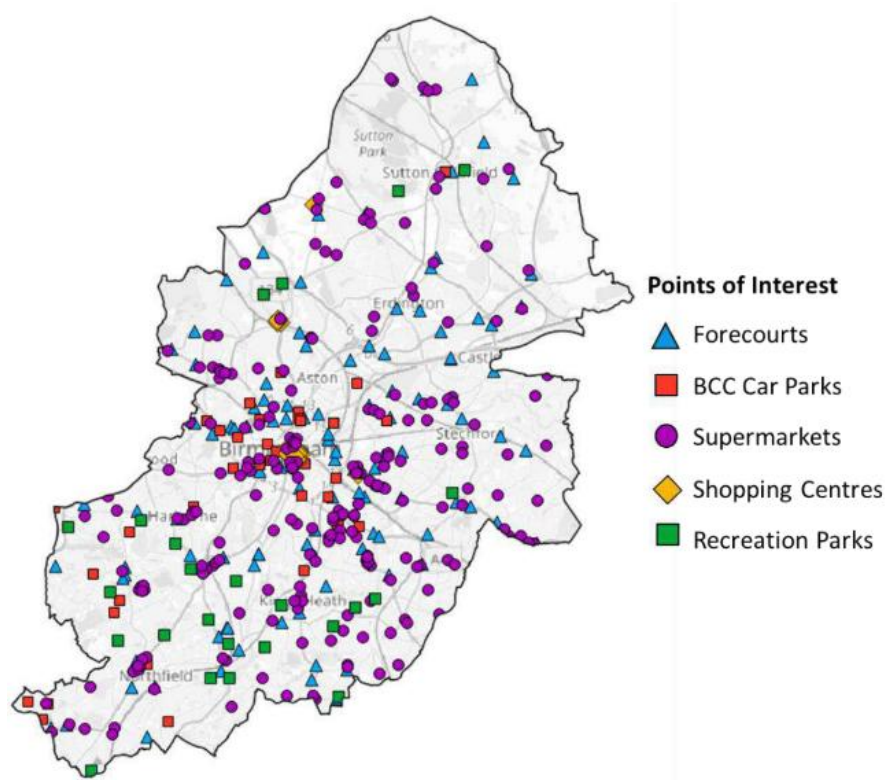
Figure 4.3 Distribution of selected potential sites for charge point deployment (car parks, supermarkets, and refuelling forecourts) across Birmingham.

4.2.2   Facilitating the Rollout of EV Charge Point Infrastructure

There are several ways that the Council will facilitate rollout of the EV charging network, and the precise business model and level of public support will vary across sites. We will continue to leverage our ongoing relationship with ESB Energy, our official charge point network delivery partner, to support development of rapid charge points beyond the first phase of rollout.

In addition to directly supporting delivery, there are a range of supporting activities we will take to facilitate deployment. These include:

- **Engaging with the private sector** to communicate the volume of infrastructure that will be required, to give confidence in the future EV landscape in Birmingham and to encourage deployment. This could involve identification of ideal sites or areas or by supporting organisations in accessing public funding (see information box for details of recently announced Government funding streams). Many organisations already have plans for EV charging at their sites (see section 4.2.3) and we will seek to support this uptake in Birmingham.
- **Developing systems** to identify clusters of demand and prioritise charging deployment in these areas, covering residents and commercial fleets.
- **Working with commercial fleet operators and representative fleet organisations such as the FTA (Fleet Transport Association)** to enable us to identify and prioritise deployment in areas that support the early transition of these fleets to EVs. For example, we are collaborating with British Gas (see local engineer fleet case study below) to identify areas where British Gas engineers will be reliant on public infrastructure and might be suitable for early rapid charging deployment.

36

- **Adopting a clear approach to parking charges** that encourages 'charge and go' usage patterns at charge points within the city centre. Specifically, where EVCPs are to be deployed at strategic sites along the Highway in which parking charges currently apply, only rapid EVCPs will be installed at these locations. Charging will be permitted at these sites for up to 1 hour (with no return) with no parking fee applied, in line with the approach of neighbouring authorities. At Highway locations where parking charges do not currently apply, both fast and rapid EVCPs will be deployed, and no additional parking charges or time limits will be imposed. Off the Highway, such as in public car parks, normal parking charges will apply. This approach ensures that charging patterns across Birmingham's future network align with our modal shift ambitions and wider aims to reduce congestion within the city centre, as well as ensuring equality of access across all charge points.
- **Reviewing our regulations, processes and policies for solutions to address barriers to charge point deployment for charge point operators**, such as planning restrictions on footprint of sites under development and constraints such as Conservation Area requirements.
- **Developing supplementary planning policies that support charge point deployment** in new and change-of-use developments through setting minimum standards for residential and destination EVCP provision. We will seek to encourage EVCP provision that supports multiple users, and the wider public network, wherever possible.
- **Continuing to work with Western Power Distribution** to support assessment of potential sites and address grid constraints

Government Infrastructure Grants announced in 2021:

Rapid Charging Fund: A total of £950m in funding has been announced for rapid charge points at A road and Motorway sites along the strategic road network. The fund will invest in locations where upgrading connections to install rapid charge points is prohibitively expensive and uncommercial. The fund will be open to applicants at approximately 400 Strategic Road Network sites and will support the deployment of approx. 6,000 ultra-rapid charge points (150 – 350kW capable) by 2035. Fund is likely to open for applicants in early 2022.

Local EV Infrastructure Fund: A total of 90m in funding has been allocated to support the roll out of large on-street charging projects and rapid charging hubs across England. The funding will be focused in regions where there is a market failure. The funding scope will be published in 2022.

British Gas operate the third largest fleet of light goods vehicles in the UK with around 9,000 vans and 1,000 cars on the road. They have committed to electrifying the entire fleet by 2025, with a third fully electric by 2022.

More than 100 British Gas drivers live in Birmingham with a further 130 serving Birmingham from surrounding areas. Of the drivers living within Birmingham, our analysis shows that close to a third live in areas with high reliance on on-street parking. Drivers all take their vans home overnight and those without home-charging will be reliant on the public network.

The Council are collaborating with British Gas in identifying how the public network can support early deployment of EVs in their fleet while also serving other user

37

4.2.3   Working with wider stakeholders

While this strategy outlines the Council's approach to EVCP deployment, the 3,600-5,200 total charge points projected to be needed in Birmingham by 2030 includes those deployed by the Council alongside those deployed by the private sector and other regional stakeholders. We will work with wider stakeholders to both encourage deployment and to guide our own deployment approach.

Private sector

It is expected that en-route and destination charging will make up at least 50% of EVCP deployments in Birmingham, and a significant portion will be installed at private sites such as supermarkets, private car parks and petrol forecourts. This is the case in other cities; for example, in London, over 50% of new rapid EV sites installed in 2020 were on private land, and this share appears to be increasing.

Many national organisations already have plans for EVCP deployment and we will work with them to encourage growth in Birmingham. Table 4.2 provides and an overview of general deployment plans within sectors while

38

Table 4.3 provides more detailed information on the plans of individual organisations.

Deployment of EVCPs at public destinations will not be the sole remit of large national organisations with multiple car parks across the city such as those listed in Table 4.2. The Council and ESB will also seek to engage with independent businesses and forecourts to understand how such sites can support the wider public charging infrastructure.

Table 4.2: Overview of deployment plans within private sectors.

Supermarkets	Eight large chains have published charge point deployment plans or have significant deployment to date, representing approx. 90 sites in Birmingham.
Hotels	Five large hotel chains have published charge point deployment plans or have significant deployment to date, representing at least 22 sites in Birmingham.
Fuel Stations	There are a total of 75 fuel forecourts in Birmingham, the largest companies and their EVCP deployment plans are listed in Table 4.3. 12 fuel forecourts in Birmingham are operated by supermarkets whose plans are listed under these supermarkets.

Table 4.3: EVCP deployment plans for organisations within the supermarket, hotel and fuel retailers with sites in Birmingham. Sources are provided in Table 5.7 in the Appendix.

Sector	Company	Target	Sites in Birmingham
Supermarket	TESCO	A target of 2,500 charge points in 600 stores by 2020 (unclear if reached). This represents 75% (796 stores) of Tesco's large (non-convenience) stores.	14 (inc 2 Extra and 6 Express)
	ALDI	Target to deploy 140 charge point between 2020 – 2023 at their stores. Every new store will also have at least one EVCP with plans for 50 stores to open each year until 2025	16
	Morrisons	50 charge points were deployed in 2019, with a further 50 planned in 2020.	7
	Lidl	350 UK stores by 2022	11
	M&S	Trail started August 2020 with 3 charge points installed at 1 store	6
	Sainsbury's	No target announced but deployments underway	10 (inc 2 local)
	ASDA		8
	Co op		19
Hotels	Premier Inn	600 charge points across 300 hotels	8
	ACCOR HOTELS	No target announced but deployments underway	5 (Ibis and Novotel)
	AA	All 4000 of their UK hotels offered a charge point	unclear
	Best Western	All 270 hotels in UK with at least one, and increasing	1
	IHG	UK wide plan of 20-30 new charge points per month	8 (Holiday Inn & Crowne Plaza)

40

Fuel Forecourts	Shell	Aim to have 1-2 charge points in each of their 500 petrol stations	6
	TOTAL	Extensive deployment plans in the UK but not clear target on the number deployed at Total's forecourts	unclear
	bp	bp aims to double their number of public charge points in the UK and plans to deploy an increasing number of 150kW charge points at their forecourts.	8
	mfg motor fuel group / JET, Esso, bp, Texaco, Murco	40 charging hubs with 200 chargers are being developed in 2021, From 2022 MFG plans to develop 50 charging hubs each year. With 2,800 150kW charge points deployed across 500 sites by 2031	23 (4 Jet, 7 Esso, 12 Texaco)

Transport for West Midlands

Transport for West Midlands (TfWM) are in the process of developing a strategy for rollout of EV charging at their Park and Ride (P&R) sites. While these charge points will primarily target long-stay users – including commuters and leisure trip users – that charge during the day, suitability for residents, commercial fleets, hackney carriages and private hire vehicles,, and en-route users are also factors in prioritising sites for deployment. Modelling for TfWM estimates that 850 slow (7kW) charge points and 41 rapid (50kW) charge points could be deployed at P&R sites across the West Midlands, of which around 200 slow chargers and 10 rapid chargers could be deployed across 13 sites in Birmingham (Figure 4.4).

The Council, alongside ESB Energy, are working with TfWM to align and incorporate these sites into Birmingham's wider rollout plans. Where P&R sites are assessed to be strong opportunities to deliver fast and rapid charging, either as part of the first phase or wider deployment, we will work with TfWM to accelerate delivery at these sites.

41

Figure 4.4 Locations of TfWM Park and Ride sites across Birmingham

4.3 EV Charging Delivery Roadmap

Our deployment strategy and key activities to support our charging vision are summarised in the roadmap in Figure 4.5.

While this roadmap gives high-level, indicative timelines for delivery of the City-Wide network, in practice the precise rollout trajectory will depend on market trends and growth as well as available funding. We will work to ensure that the deployment approach is adaptable to continue to drive the EV transition and meet the needs of all users in Birmingham.

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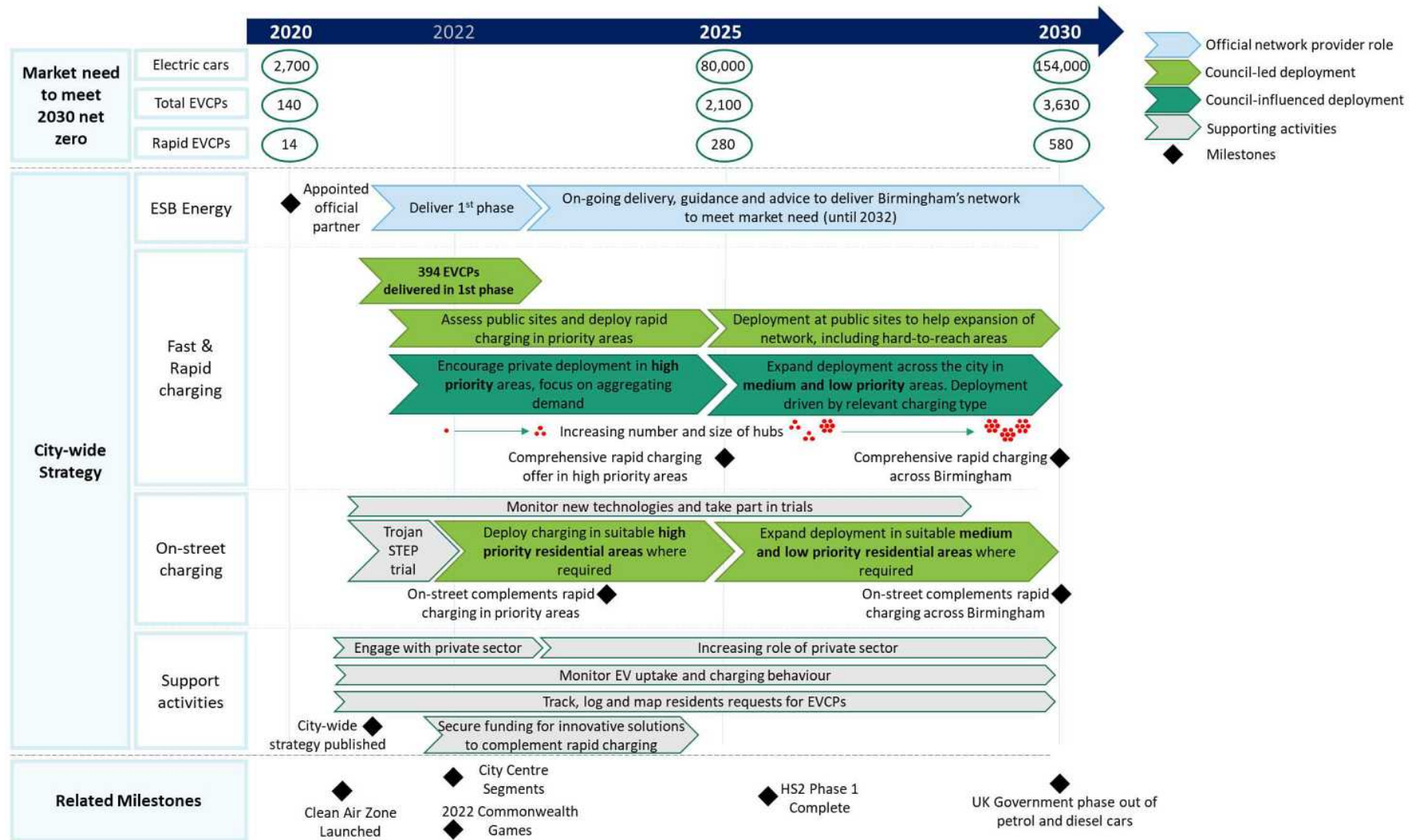
Figure 4.5 Roadmap for expanding charging infrastructure across Birmingham

43

5   Technical Appendix

5.1   Projected Uptake of Low Emission Buses and HGVs

Charging demand from buses and heavy goods vehicles (HGVs) have not been included in the analysis for this city-wide EV charging strategy for two main reasons:

1. Bus and HGV charging is expected to occur across a mix of depot-based and public infrastructure, with widespread public infrastructure likely developing later than at-depot.
2. Battery-powered bus and HGV availability and uptake is some way behind that of light vehicles and the percentage of stock transitioning to EVs over the timeframe of this strategy is expected to be relatively low.

Projected uptake of zero emissions vehicles (both battery electric and H_2 fuel cell) buses and HGVs are shown in Figure 5.1 and Figure 5.2. For both, the split between battery electric and fuel cell vehicles will depend on fuel cost and technology development. These projections were produced by Element Energy for the GB Gas Distribution Network Operators and National Grid,[28] and assume that all vehicles will have zero tailpipe emissions by 2050. To achieve this, sales of internal combustion engine (ICE) HGVs must end by 2040 to ensure the last models sold are off the road by 2050. The last sale of ICE buses is projected to occur before this, around 2035, due to the greater availability of zero emission models today and the total cost of ownership advantage of these buses compared to conventional vehicles. Although the UK Government is consulting on targets for ending the sale of heavy-duty ICE vehicles, policy is not currently in place to support this pace of uptake.

The increased power requirements for charging large vehicles (5-10 times higher than for cars and vans) means that buses and HGVs will rely on dedicated charging infrastructure rather than using the same public infrastructure deployed for cars and vans. Initially, bus fleets will rely largely on depots for charging but, as the electric bus fleet grows, there may be an increased reliance on en-route 'opportunity' charging, such as at route ends or at multiple sites along a route. Although a large share of HGV refuelling will occur at-depot, HGVs will rely more on public infrastructure than buses due to their duty cycles. As the market develops, a comprehensive, national public charging network will be vital for enabling long-haul HGVs to switch to zero emissions alternatives.

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[28] Element Energy 'The Future Role of Gas in Transport' http://www.element-energy.co.uk/wordpress/wp-content/uploads/2021/04/20210325-CADENT_HYDROGEN_TRANSPORT_REPORT.pdf *published March 2021*
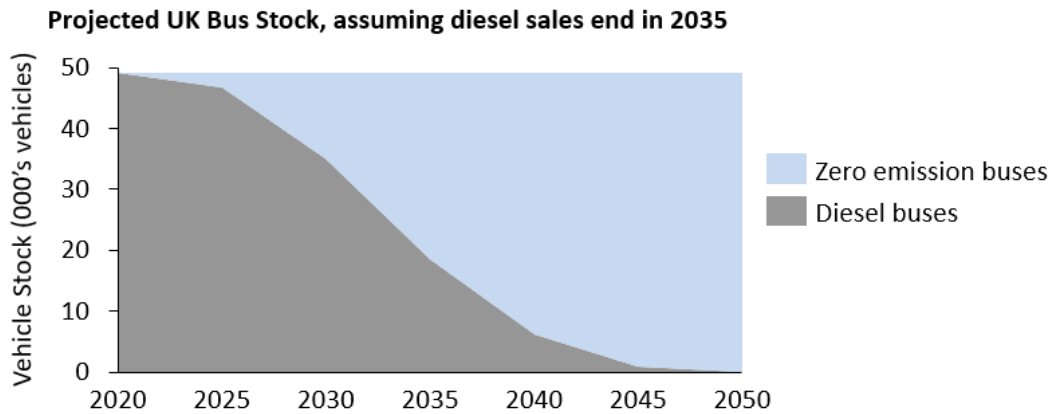
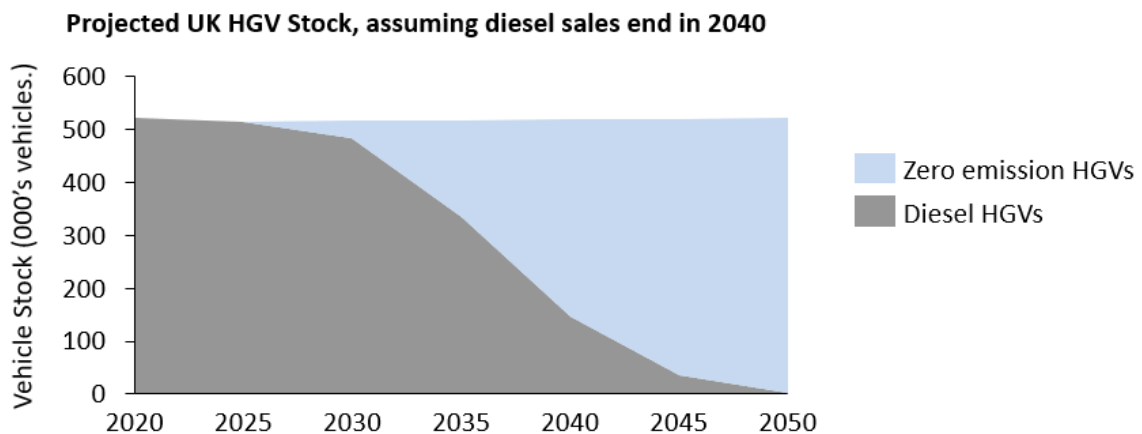**Figure 5.1: Projected bus stock in the UK split by broad powertrain.**

Figure 5.2: Projected HGV stock in the UK split by broad powertrain.

5.2   Modelling EV Uptake and Charging Demand

5.2.1   Model overview

The diagram shown in Figure 5.3 gives an overview of the modelling approach underpinning the projected EV charging demand within the city-wide EV charging strategy. Briefly, detailed stock modelling was carried out to project the number of EVs registered in Birmingham over the next decade and the number of kilometres travelled by those vehicles. The inputs for this section of the modelling were based on annual EV sales, turnover rates of vehicle stock and changes expected in vehicle kilometres travelled (vkm). The EV stock and total charging demand was then used to project EVCP requirements based on various scenarios for charging behaviour i.e. changing the ratio of rapid vs on-street chargers.
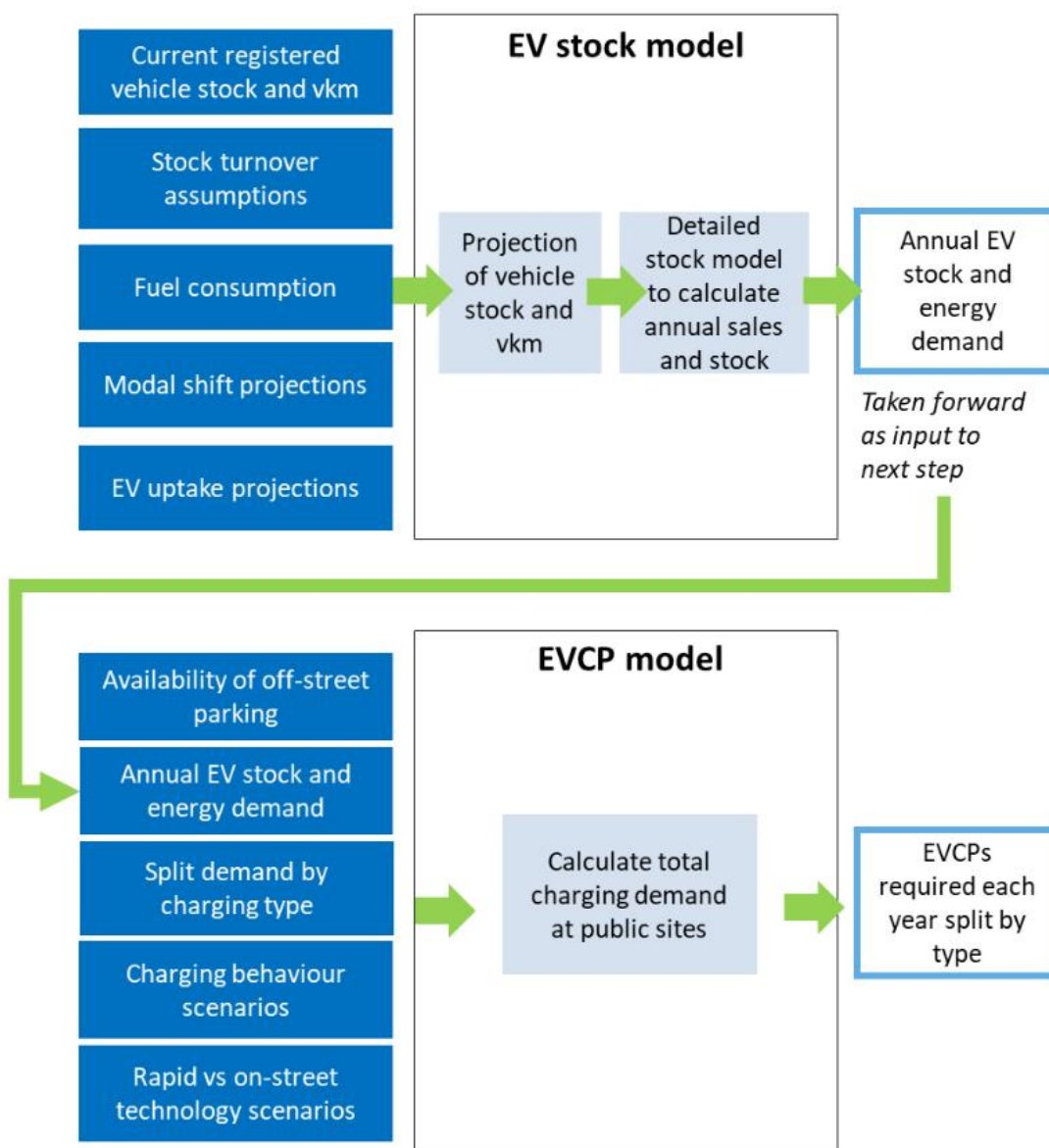
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Figure 5.3: Diagram of the modelling process underpinning the city-wide EV charging strategy showing the input data, modelling steps and model outputs.

5.2.2 Vehicle stock and demand modelling

Core inputs and assumptions

Input parameter	Source and description
Current registered vehicle stock	Department for Transport statistics covering cars, vans (VEH0105) and motorcycles (VEH0122) https://www.gov.uk/government/statistical-data-sets/all-vehicles-veh01 Hackney Carriage and private hire vehicle stock from Birmingham City Council licensing data
Current vehicle	Department for Transport statistics covering cars, vans,

kilometres travelled	motorcycles https://www.gov.uk/government/statistical-data-sets/road-traffic-statistics-tra#traffic-volume-in-kilometres-tra02
	Hackney Carriage and PHV calculated based on observed annual mileage (450 miles per week) from an Element Energy study for Birmingham City Council.
	For simplicity of modelling, Hackney Carriages and Private Hire Vehicles were modelled as one group (Taxis); however, it is acknowledged that these two groups have different duty cycles and different charging requirements in practice.
Fuel consumption	Fuel consumption is predicted by Element Energy's in-house Cost and Performance model (updated for DfT in 2020), which accounts for expected improvements in vehicle technology out to 2050.
EV uptake projections	Element Energy: ECCo model; a consumer choice model which takes into account policy and consumer preferences to forecast likely annual sales share, in use by DfT.
Modal shift projections	Based on SCATTER scenarios for Birmingham City Council and from the Committee on Climate Change's Sixth Carbon Budget for the UK Government

Modal shift scenarios

The impact of behaviour change from demand reduction and modal shift was represented by reductions in annual vehicle kilometres travelled (vkm). Table 5.1 shows the modal shift required to meet each net-zero target for the vehicle types modelled. Although car clubs and shared cars were not explicitly modelled, the shift to shared vehicles is implicit within the change in car vkm.

47

Table 5.1: Adjustments to the annual vehicle kilometres travelled (vkm) as a result of modal shift ambitions stemming from 2030 net-zero targets or 2050 net-zero targets.

Scenario	Vehicle type	Change in vkm compared to 2020	Source
2030 Net-Zero Compatible	Car	-26% (-40% relative to 2018)[29]	SCATTER modelling for Birmingham City Council (2019)
	Van	+7% (-2.3% relative to 2018)	
	Motorcycle	-26% (-40% relative to 2018)	Assumed to be in line with car travel
	Taxi	0%	Assumption
2050 Net-Zero Compatible	Car	-1.3%	CCC Sixth Carbon Budget, Balanced Scenario
	Van	+1.8%	
	Motorcycle	-1.3%	Assumed to be in line with car travel
	Taxi	0%	Assumption

EV uptake projections

Cars and vans: EV uptake projections for cars and vans are based on expected sales out to 2030 under a scenario in line with the UK Government's planned phase out of new cars and vans. EV uptake is calculated using predicted EV sales from Element Energy's consumer choice EV uptake model, ECCo. This model accounts for expected policy interventions and improvements to EV and charging technology to predict how EV sales and stock change each year from the present day to 2050.

Motorcycles: A lower ambition scenario was used, compatible with net zero by 2050 and based on scenarios used in net zero pathways for London.[30] This reflects the lower ambition of current national policy for motorcycles compared to cars and vans.

Taxis (Hackney Carriages and PHVs): Taxi EV uptake was assumed to be in line with cars. This is a highly ambitious projection and will likely require strong policy support to achieve.

The expected EV share of new vehicle sales are shown in Table 5.2.

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[29] SCATTER modelling projected vehicle usage decreases relative to 2018 data; however, these have been adjusted to account for reduced travel in 2020 due to the COVID-19 pandemic. It should be noted that as of Q1 2021, UK motor traffic levels have returned to pre-COVID levels.

[30] *Zero Carbon London: a 1.5°C Compatible Plan* (2018) Greater London Authority

48

Table 5.2: Share of EVs in new vehicle sales in 2025 and 2030.

Vehicle type	2025		2030	
	BEV	**PHEV**	**BEV**	**PHEV**
Car	64.2%	15.3%	86.3%	13.0%
Van	19.1%	0.3%	88.2%	6.7%
Taxi (Hackney Carriage and PHV)	64.2%	15.3%	86.3%	13.0%
Motorcycles	16.1%	0.0%	65.0%	0.0%

It should be noted that in the modelling, sales of cars and vans do not reach exactly 100%. This is because the stock model assumes a small uptake of hydrogen fuel cell electric vehicles. In 2030 plug-in cars actually make up 99% of sales but, for simplicity, this is referred to as 100%

To calculate the total number of EVs in Birmingham, the share of new sales that are EVs was applied to the total number of new cars added to Birmingham's fleet each year, and scrappage assumptions were applied to the total stock to represent stock turnover. The modal shift scenarios considered in this strategy result in a different number of total vehicles registered in Birmingham out to 2030 and therefore a different number of EVs. Figure 5.4 and Figure 5.5 show the projected number of EVs out to 2030 in the net-zero 2030 compatible scenario and the net-zero 2050 compatible scenario.
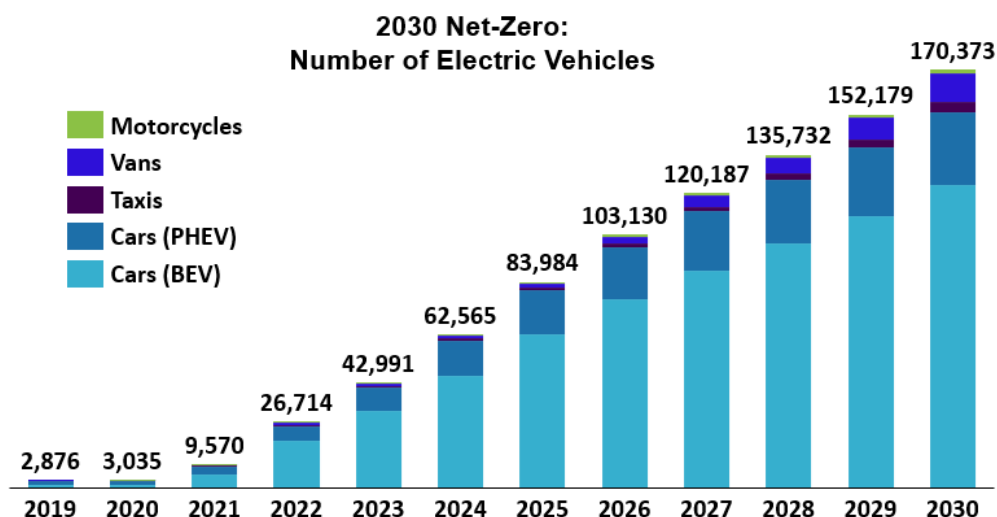

Figure 5.4: Projected EV numbers out to 2030 in the net-zero 2030 compatible scenario.
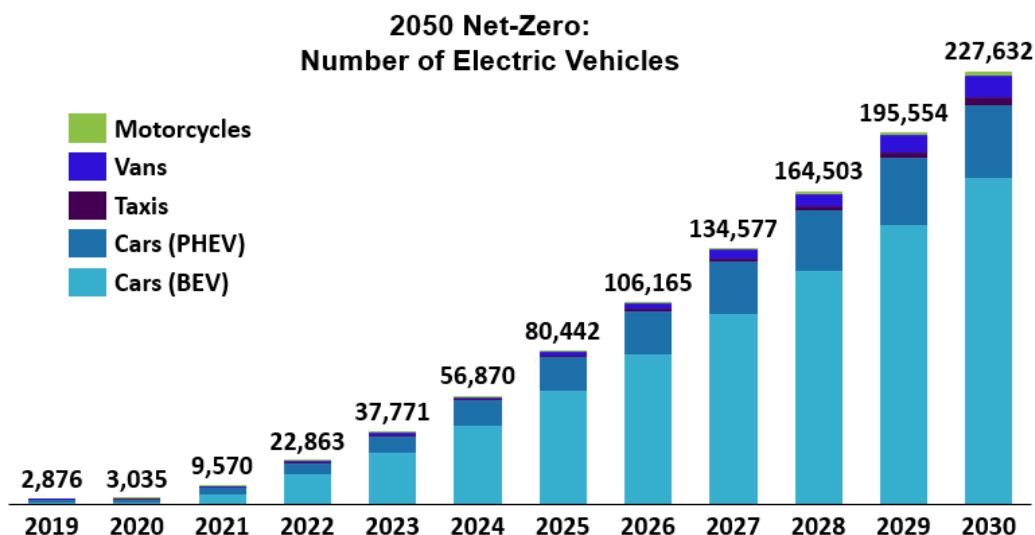
49

2050 Net-Zero:
Number of Electric Vehicles

Figure 5.5: Projected EV numbers out to 2050 in the net-zero 2050 compatible scenario.

5.2.3 EVCP projections

Core inputs and assumptions

Charging behaviour is assigned based on findings from real-world EV charging behaviour trials.[31] The majority of a vehicle's charging needs have been found to be satisfied by residential charging (off-street or public charging depending on availability of off-street parking), with the remaining demand split across workplace, destination, and en-route charging. The splitting of charging demand across the various charging types that was used for this strategy are shown in Table 5.3. The charging demand that can be delivered by each EVCP is dependent on the power rating of the charge point; the assumptions on power ratings are given in Table 5.4.

Table 5.3: Values used for splitting of charging demand across charger types for BEVs and PHEVs.

BEV	Cars	Vans	Motorcycles	Taxis
Residential[32]	75%	95%	75%	75%
Work	10%	0%	10%	0%
Destination	5%	0%	5%	0%
Rapid en-route	10%	5%	10%	25%
PHEV	Cars	Vans	Motorcycles	Taxis
Residential	75%	95%	–	80%

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[31] *Electric Vehicle Charging Behaviour Study* (2019) Element Energy for National Grid ESO
[32] Residential is assumed to be home charging for those with access to home charging and local (residential hub or on-street charging) for those reliant on on-street parking.

50

Work	10%	0%	–	0%
Destination	15%	5%	–	20%
Rapid en-route	0%	0%	–	0%

Table 5.4: Assumptions used for average power drawn at charge points for each charger type.

Charger power / kW	2020	2030
Destination	7	11
Work	7	11
Rapid en-route	100	150
Residential on-street	7	7
Residential rapid	50	50

The number of cars with access to off-street parking was calculated using Element Energy's in house model for establishing dependency on on-street parking based on local building types.

The number of vehicles using each charge point is determined in different ways depending on the type of charge point being considered:

- Off-street residential charging: 1 charge point is assumed for each EV.
- On-street residential charging: a half-hourly charging demand profile for a peak demand day is used to assess the maximum level of charging demand required. Sufficient on-street residential chargers are assumed to be installed to meet this maximum demand level.
- All other public charging locations (workplace, destination, en-route): each charging type is assumed to be used only for a certain portion of the day. The energy transferred per charger each day is used to determine the number of chargers required to satisfy daily demand from EVs that charge in the area. Details of the assumption used in this strategy are provided in Table 5.5.

Table 5.5: Assumptions on charge point utilisation levels.

Charger type	2020	2030
Destination	20%	20%
Work	10%	10%
Rapid en-route	11%	25%

51

Impact of Technology Choice

To assess the impact of chosen charger technology on the number of EVCPs needed, three scenarios were considered, as detailed in Table 5.6. These scenarios were established using geospatial analysis in which each Middle Layer Super Output Area (MSOA)[33] in Birmingham was assessed and ranked based on a score for likely future charging demand (more detail provided in section 5.4). The MSOAs with the highest future demand were assigned as suitable for rapid hubs while the MSOAs with the lowest demand were deemed more suitable for on-street chargers. The demand score at which the suitability switched from rapid to on-street was varied to study the impact on the number of EVCPs required, the details of which are shown in Table 3.3 in the main body of the strategy.

Table 5.6: Share of total vehicles and vehicles without off-street parking in areas assigned to rapid hub charging based on the portion of MSOAs designated suitable for rapid hub charging.

Share of MSOAs assigned to rapid charging	Share of vehicles assigned to rapid MSOAs	Share of vehicles without off-street parking assigned to rapid MSOAs
50%	45%	60%
75%	70%	80%
90%	88%	94%

EVCP projections

Figure 5.6 and Figure 5.7 show how the number of EVCPs of each type changes when the target date from net zero is moved from the 2050 UK-wide target to the Birmingham-specific 2030 target.

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[33] Middle Layer Super Output Areas (MSOA) are geographic areas designed to improve the reporting of small area statistics in England and Wales; there are 133 MSOAs in Birmingham
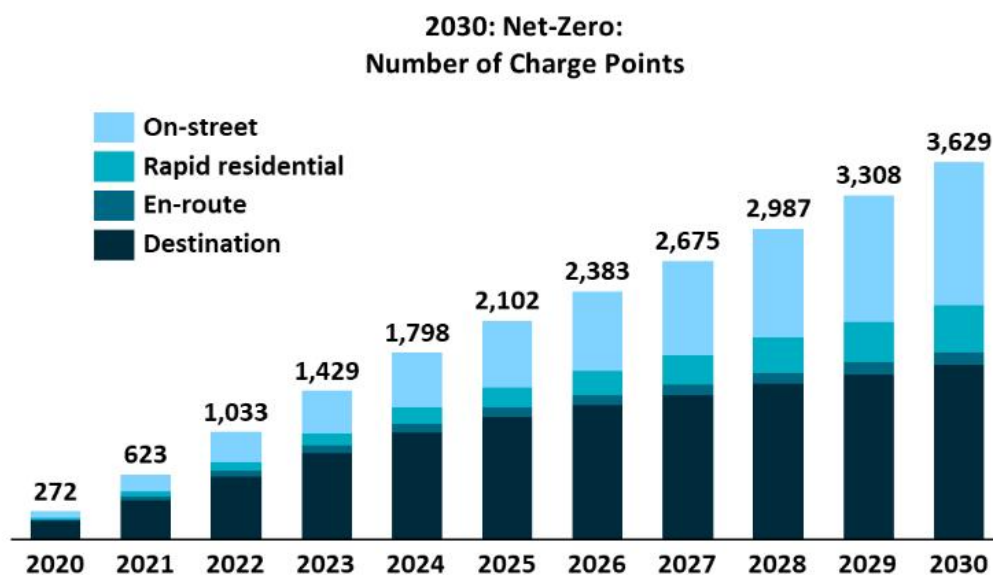
52

Figure 5.6: Number of EVCPs required for each year out to 2030 in the 2030 net-zero compatible scenario.
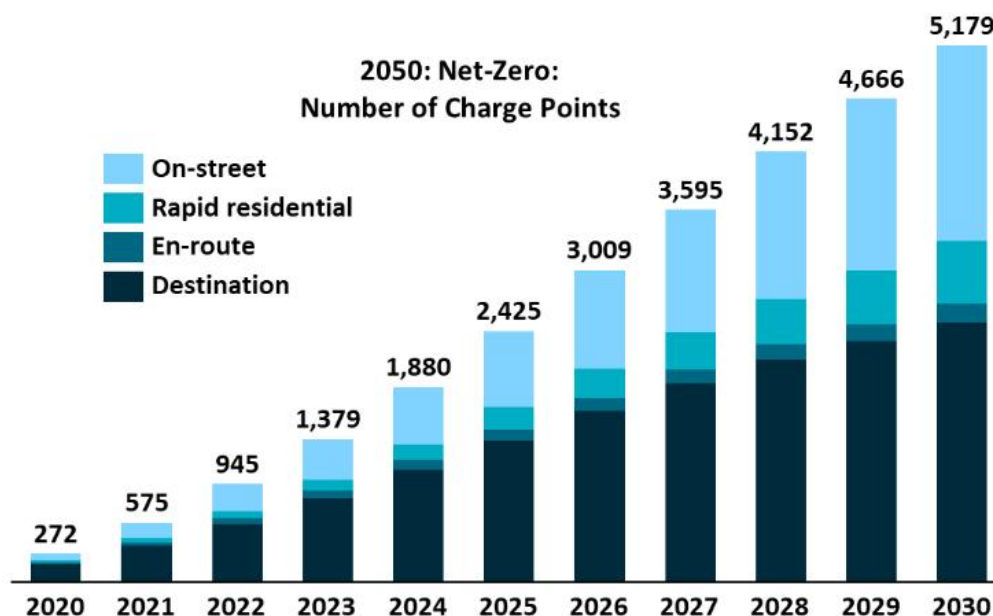

Figure 5.7: Number of EVCPs required for each year out to 2030 in the 2050 net-zero compatible scenario.

The number of EVCPs required in each of the scenarios shown in Figure 5.6 and Figure 5.7 follows a similar pattern to the EV uptake (as would be expected) where the 2030 scenario requires a more rapid roll-out of charging infrastructure. However, by 2024 more infrastructure is required in the 2050 compatible scenario as modal shift has less of an impact on charging demand.

53

5.3   Mapping Data

Data	Source
TEMPro Trip End Data	The data used here is taken from the Trip End Model Presentation program (TEMPro) provides datasets for vehicle trips across the UK, which are approved by the Department for Transport and used widely for traffic modelling. https://www.gov.uk/government/publications/tempro-downloads
Reliance on On-Street Parking	Element Energy's off-street parking model was used to estimate the number of vehicles with access to off-street parking, with remaining vehicles being entirely reliant on on-street charging. The model is based on 2011 Census data on accommodation type broken down by number of cars and vans registered at each dwelling, and car and van ownership, at output area (OA) level.[34, 35] Estimates for the share of different household types with access to off-street parking were taken from a study conducted by the RAC Foundation[36] and used to determine the share of households and vehicles with access to off-street parking.
Traffic Flow	Traffic flow was taken from road traffic statistics published by the Department of Transport showing annual average daily flow data (AADF) for traffic flow along major roads in the UK. https://roadtraffic.dft.gov.uk/downloads
Amenities and Taxi Ranks	Data on the locations of amenities and taxi ranks are open source, retrieved from OpenStreetMap through GIS software.

5.4   Assessing suitability for rapid charging

To assess which areas of Birmingham will have the highest demand for EV charging, each MSOA in Birmingham was assessed on a number of metrics:

- Density of taxi ranks (number per km^2)
- Density of amenities (number per km^2)
- Highest traffic flow within MSOA
- Non-home based trips ending in MSOA, taken from TEMPro data (number per km^2)
- Reliance on on-street parking (number of cars and vans without access to off-street parking per km^2).

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[34] ONS. *CT0876: Accommodation type (excluding caravans or other mobile or temporary structures) by car or van availability.* (2011)
https://www.ons.gov.uk/peoplepopulationandcommunity/housing/adhocs/009575ct08762011census
[35] Nomis. *KS404UK: Car or van availability*. (2014)
https://www.nomisweb.co.uk/census/2011/ks404uk
[36] Bates & Leibling. *Spaced Out – Perspectives on parking policy*. (2012)
https://www.racfoundation.org/research/mobility/spaced-out-perspectives-on-parking

54

The MSOAs were ranked, then assigned a score of 0-3 based on that ranking. An overall score based on combining the scores for each metric above was then assigned to each
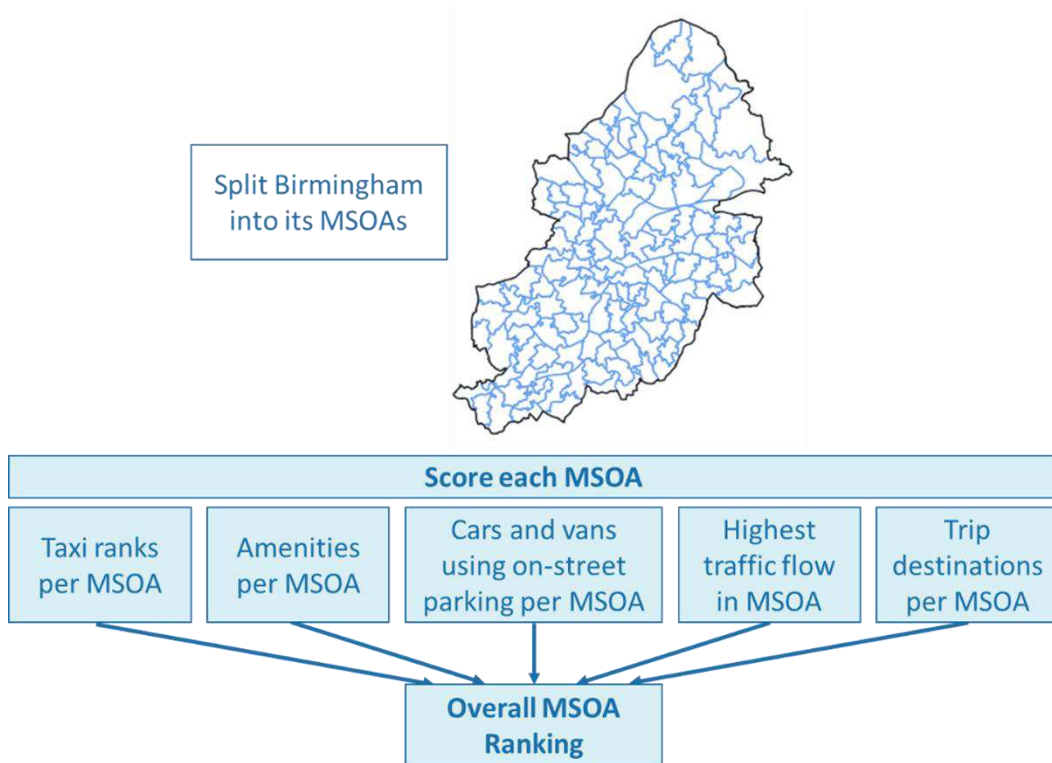
MSOA.

The combined score was then used to rank MSOAs in order of likely future demand for EV charging. These rankings were then used to assign a portion of MSOAs as suitable for a focus on rapid hubs and the remaining MSOAs assigned as challenging areas likely to need on-street charging solutions. In general, the areas highlighted in the maps as high priority correspond to the top 25% highest scoring MSOAs, and medium priority to the top 50% highest scoring MSOAs.

The MSOA assignments function as an indicator for where is most (and least) likely to be suitable for rapid charging. The assumed suitability of an area may change over the coming years as a result of progress in charging technologies or emerging trends in customer charging behaviour.

Figure 5.8: Illustration of MSOA scoring process.

55

Private Sector Deployment Targets

Table 5.7: Links to webpages detailing targets for a range of private organisations.

Sector	Company	Link
Supermarket	TESCO	https://www.volkswagen.co.uk/electric/partnerships/tesco
	ALDI	https://newmotion.com/en-gb/knowledge-centre/pressroom/aldi-pr
	Morrisons	https://airqualitynews.com/2019/10/25/morrisons-unveils-charge-whilst-you-shop-rapid-ev-chargers/
	LIDL	https://airqualitynews.com/2021/02/10/lidl-commits-to-installing-350-ev-chargers-by-2022/
	M&S	https://bpchargemaster.com/bp-chargemaster-goes-live-in-trial-at-ms-store/
	Sainsbury's / ASDA / CO OP	https://www.zap-map.com/supermarket-ev-charge-point-numbers-double-in-two-years/
Hotels	Premier Inn	https://www.premierinn.com/gb/en/news/2021/electric-car-charging.html
	ACCOR HOTELS	https://www.fleetnews.co.uk/news/environment/2015/12/17/electric-vehicle-charging-points-to-be-installed-at-novotel-and-ibis-hotels
	AA	https://bpchargemaster.com/4000-aa-hotels-and-bbs-offered-ev-charging-points-by-chargemaster/
	Best Western	https://www.bestwestern.co.uk/hotels-with-electric-car-charging-points
	IHG	https://bpchargemaster.com/ihg-offers-ev-drivers-warm-welcome/
Fuel Forecourts	Shell	https://www.electrive.com/2021/04/12/shell-reveals-charging-network-plans-for-the-uk/

56

TOTAL	https://services.totalenergies.uk/total-chargepoint-ev-hybrid-charging
bp	https://assets.publishing.service.gov.uk/media/6038e9618 fa8f5049a051f8f/bp_pulse.pdf https://bpchargemaster.com/pulse-150/
mfg *motor fuel group* SHELL JET ESSO bp TEXACO MURCO	https://www.motorfuelgroup.com/400-million-planned-investment-in-2800-ultra-rapid-150kw-ev-chargers-across-500-sites-in-the-uk-over-the-next-10-years/

57

Risk no.	Category	Risk in the 2021-2032 timeframe	Key impacts of risk	How strategy accounts for risk	Ownership	Likelihood	Impact	Overall risk
1	EVCP & EV market	**Scalable on-street solution is slow to emerge** meaning on-street charging remains expensive / challenging to rollout/lack of available suitable sites.	• Significant on-street deployment delayed • On-street deployment expensive where it is still installed • Wide scale on-street deployment not possible • Not maximising accessibility	• Considers both on-street and rapid hub approaches to residential charging, and recommends rapid EVCPs deployed where possible • Options for destination / rapid en-route charging highlighted, which would provide charging for those in areas waiting for on-street residential deployment • Options for innovative charge point technology where accessibility is challenging.	BCC/ESB			
2	EVCP & EV market	**EV uptake is slower** than expected	• Reduced charging demand • Higher investment may be needed to stimulate market (depending on reason for slow uptake)	• Uptake accounts for short term slow down due to market uptake. • Aggregating demand across user groups maximises EV uptake that does take place	N/A			

#	Category	Issue	Impact	Strategy Response	Owner			
3	EVCP & EV market	**Plug-in hybrids sell better than expected** compared to fully electric vehicles	• Reduced rapid EVCP need	• Strategy considers multiple charging technology futures, including all on-street, all rapid, and mixed technology	N/A	🟩	🟨	🟨
4	EVCP & EV market	**Plug & Charge technology is slow to develop** and will not become a standard solution by 2030	• PAYG must be offered for longer than planned	• Charging technology roadmap advises ensuring PAYG offered until Plug & Charge available	N/A	🟨	🟩	🟩
5	Deployment	There is only a **small volume of suitable publicly owned sites** for rapid hub development	• More on-street rapid deployment will be needed • Increasingly reliant on private site rapid hubs	• Strategy highlights forecourts that would make attractive hub sites as well as private car parks that could be leveraged	ESB	🟨	🟥	🟥
6	Deployment	There is **resistance to using Kerb-side space** for EV charging	• Limits residential charging deployment potential	• It is expected that in next few years, new charging technologies with limited space impact will proliferate	BCC	🟨	🟩	🟩
7	Grid Connection	**Grid Connection costs are generally unknown** from site to site. This can prohibit large deployment of chargers, making it commercially unviable.	• Less diverse charging network • Limits the large hub sites across the city.	• Strategy favours rapid charging where it is viable • On-street deployment assumed to shift to smart enabled charging hubs that will require lower grid connection per charger	ESB	🟨	🟨	🟨

8	**Mobility trends**	**Centre city will start to become pedestrianised** as part of a wider shift to sustainable forms of transport, and in order to reduce air pollution in the city	• Stranded assets • Wasted investment	• Deployment considers most sustainable user groups to future proof (e.g. taxi, car clubs) where possible • Rapid hubs recommended as areas are most likely to be pedestrianised	BCC	🟩	🟥	🟨
9	**Mobility trends**	There is a **shift away from private car ownership** as part of a wider shift to a more sustainable transport system	• Reduced charging demand • Underutilised / stranded assets • Worse return on investment	• Short-medium term deployment focussed on areas with multiple user groups, not just private cars	N/A	🟩	🟥	🟨
10	**Mobility trends**	**Public car parks may start to close** in city centre, to aid the trend away from private car use.	• Stranded assets • Wasted investment	• Recommended that private sector encouraged to deploy rapid charging on their sites in city centre • Identifies forecourt sites that could be leveraged	BCC	🟨	🟩	🟩
11	**Mobility trends**	There is **less commuting** as a whole as more people choose to work from home (due to Covid) and within this there is a **reduction in car commuting**	• Reduced charging demand in city centres • Underutilised assets	• Multiple user groups available for city centre EVCPS, not just commuters	N/A	🟨	🟩	🟩

12	**Mobility trends**	There is **decrease in commuting by train, tram and bus** due to COVID-19, leading to an **increase in car commuting** as people switch modes	• Increased charging demand • More EVCP investment needed	• Residential deployment to be targeted at priority areas • Includes scenario which considers very ambitious uptake	N/A			
13	**Mobility trends**	The **car market continues to be constrained** due to the supply of cars and COVID-19.	• Reduced charging demand while market constrained • Slower investment needed	• Stock size of cars must be continuously measured on an annual basis to confirm EVCP deployment strategy.	N/A			
14	**Policy & funding**	There is **less public funding available for EV infrastructure than expected** over the coming decade	• Lower EVCP volumes possible • Funding must be more targeted – high quality sites, multiple user groups etc.	• Key focus of strategy is on deploying well utilised rapid hubs, which represent best value for money • Coordinated hub approach is the goal for both on-street + rapid, which helps reduce costs	N/A			
15	**Modal Shift**	**Modal shift leads to reduced EV uptake** as travel behaviour moves to more sustainable forms of transport (e.g., walking, cycling, public	• Reduced charging demand • Underutilised / stranded assets	• Strategy accounts for modal shift; flexibility in current deployment plans is a key aspect. • Shared transport and its	N/A			

		transport.		electrification must be supported.				
17	**Charging Types**	Providing an **insufficient supply of EVCPs** to those without access to **home charging.**	• Reduced uptake of EVs	• Strategy focuses on High Power Charging and charging hubs to account for those in need of public charging infrastructure. • Evaluation and roll out of innovative charge point technologies where appropriate.	ESB			
18	**Modal shift and mobility scheme**	Strategy **promotes and encourages private (electric) car ownership**.	• Modal shift towards sustainable travel is reduced.	• Prioritisation of rapid 'charge and go' chargers over slow, on-street chargers to encourage modal shift. • The strategy will support other schemes that aim to reduce vehicle mileage and energy consumption.	BCC			

19	**Recommended infrastructure**	Areas of **high EVCP** demand are **not specifically targeted** to the extent required.	• Less diverse charging network • Potential of underutilised assets and wasted investment.	• Priority areas for EV charge point deployment have been identified, including taxi demand, residents without off-street parking, rapid on-route charging and destination charging. • Plans for deployment in these areas have been developed to target key customers.	BCC / ESB			
20	**Charging Delivery Roadmap**	The **Charging Delivery Roadmap is not achievable within the given timeline** (e.g., due to project delays, reduced EV uptake).	• Delays to EVCP deployment rollout • Reduced uptake of EVs	• Project objectives have been broken down into high-level, feasible milestones from 2020 through to 2030. • Strategy recognises the need to be adaptable in driving the EV transition and to achieving the project objectives. • The EV stock modelling and take-up growth will be monitored regularly.	BCC / ESB			
21	**Model overview**	The **stock modelling** carried out **underestimates**, or conversely, **over-estimates the expected EV uptake** from 2020	• Not enough investment or wasted investment • Too few or too many EVCPs to	• Detailed stock modelling was carried out to project the number of EVs registered in Birmingham over the next decade.	BCC/ESB			

		through to 2030	match demand	• A number of variables were used to calculate the stock model as accurately as possible. • Strategy account for the need to be adaptable in its approach to reflect current market needs.				
22	EVCP projections	**Calculated EVCP projections** for 2030 do not reflect the true market state at that time.	• Reassessment of EVCP demand required.	• Charging behaviour is assigned based on findings from real-world EV charging behaviour trials. • Calculated EVCP projections follow a similar pattern of EV uptake, as would be expected.	BCC/ESB			

Title of proposed EIA	Electric Vehicle Charging Point Strategy
Reference No	EQUA714
EA is in support of	New Function
Review Frequency	Two Years
Date of first review	01/10/2023
Directorate	Inclusive Growth
Division	Transportation and Connectivity
Service Area	Transport Infrastructure Projects
Responsible Officer(s)	▨ Sylvia Broadley
Quality Control Officer(s)	▩ Naomi R Coleman
Accountable Officer(s)	▨ Philip Edwards
Purpose of proposal	Adoption of the Electric Vehicle Charging Point Strategy
Data sources	Survey(s); Consultation Results; relevant reports/strategies; Statistical Database (please specify); relevant research

Please include any other sources of data

ASSESS THE IMPACT AGAINST THE PROTECTED CHARACTERISTICS

Protected characteristic: Age

Wider Community

Age details:

There is no adverse impact on any particular age group as a result of expanding the EV charging network in Birmingham.

Supporting the use of electric vehicles will have a positive impact in terms of reduced vehicle emissions and improved air quality – a positive, particularly for young and elderly age groups who are more adversely affected by air pollution. As an example, children in pushchairs and at walking height to vehicle exhausts are particularly exposed to pollutants such as diesel particulates which cause respiratory conditions. This strategy will support a reduction in this type of exposure.

Pavement charging options which would entail trailing cables have been discounted within this strategy due to the potential to cause trip hazards/obstruction, which could be of particular concern to more elderly age groups, and parents with pushchairs.

Protected characteristic: Disability

Wider Community

Disability details:

Research by Motability identifies that by 2035, up to 1.35 million disabled people in the UK will be wholly or partially reliant on public charging infrastructure. The Motability scheme enables a person in receipt of a state provided mobility allowance to use all or part of their allowance to lease a new vehicle with insurance, road tax, servicing, tyres and breakdown cover all included. A number of Electric Vehicles are already available through the Motability scheme and this is likely to increase significantly going forward. Therefore the expansion of the EV charging network within Birmingham will have a significantly positive impact on disabled people.

The City-wide Electric Vehicle Charging Strategy includes specific considerations around the provision of charging points to ensure access for Birmingham's disabled residents and visitors. These considerations include appropriate height of charge points, accessibility around the charge point area and minimisation of trip hazards. Technologies and innovative charging solutions that have actively considered accessibility for disabled people with mobility and/or dexterity impairments will be prioritised.

The specific design considerations for each charging site will be determined by the EVCP type and location; however, ensuring that each chargepoint is designed in a way that considers all those using the space around the EVCP as well as the EVCP itself is critical to accessibility of the future charging network. In designing the EVCP infrastructure, our partner ESB Energy will adhere to best practice principles; for example, those outlined in London's electric vehicle charge point installation guidance and Government's upcoming accessibility standards, expected in 2022.

Key considerations for disabled access include minimum parking bay length, width and space between bays to ensure adequate space, kerb height, and chargepoints being of a height suitable for wheelchair users. While it will not always be possible to adapt all bays to ensure adequate space (e.g. in bays not previously designed for disabled access in off-street car parks), ESB Energy and Birmingham City Council will ensure that access is provided in sufficient bays to meet the needs of Birmingham's disabled residents and visitors.

There will be no loss of blue badge parking bays as a result of the first phase of EVCP roll-out. Any subsequent installation of charging points will also ensure that there is no net loss of blue badge parking bays, even if relocation of spaces is required at any point.

Blue badge holders remain able to park for free in any available on-street pay and display parking space in the city. It is not possible to indicate figures for loss of standard on-street parking spaces as a result of installing charge points as the identification of sites and the number of charge points required are yet to be determined. The strategy sets out principles for a long-term partnership with ESB Energy to accommodate EV market demand and support wider transport policy objectives.

The wider aim to effect significant modal shift away from private car usage and ownership will support prioritisation of road space and parking space for those who rely most on car use, particularly those with mobility needs.

Protected characteristic: Sex	Not Applicable
Gender details:	There is no evidence of a positive or negative impact on this group as a result of the proposal.
Protected characteristics: Gender Reassignment	Not Applicable
Gender reassignment details:	There is no evidence of a positive or negative impact on this group as a result of the proposal.
Protected characteristics: Marriage and Civil Partnership	Not Applicable
Marriage and civil partnership details:	There is no evidence of a positive or negative impact on this group as a result of the proposal.
Protected characteristics: Pregnancy and Maternity	Wider Community
Pregnancy and maternity details:	Supporting the use of electric vehicles for essential car trips will have a positive impact in terms of reduced vehicle emissions and improved air quality this will have a positive health impact during pregnancy, when evidence shows that air pollution can be harmful.
	Design of charging infrastructure will avoid trailing cables and potential obstacles which could otherwise have been problematic when pushing a pram/pushchair or if there are mobility difficulties chased by pregnancy.
Protected characteristics: Race	Not Applicable
Race details:	There is no evidence of a positive or negative impact on this group as a result of the proposal.
Protected characteristics: Religion or Beliefs	Not Applicable
Religion or beliefs details:	There is no evidence of a positive or negative impact on this group as a result of the proposal.
Protected characteristics: Sexual Orientation	Not Applicable
Sexual orientation details:	There is no evidence of a positive or negative impact on this group as a result of the proposal.
Socio-economic impacts	Air pollution in Birmingham has been shown to affect areas of the city with higher levels of deprivation. The strategy will improve the availability, accessibility and affordability of electric vehicles when needed for essential car journeys. At the same time the strategy supports the overall aims of the Birmingham Transport Plan to effect modal shift away from private car ownership and usage. This will improve air quality and levels of noise pollution for those communities most affected by air pollution.
	The City-wide EV Charging Strategy has a key focus on enabling the widest use of publicly accessible charge points. Therefore the Council, with ESB Energy, are investigating charge point solutions for residential areas, where there is low grid capacity, coupled with the challenges of residential areas of high-rise flats and terraced housing where there is limited or no off-street parking no off-street parking. This requires more innovative solutions that are 'fit for purpose' within those residential areas.
	It should be noted that this equality assessment is focussed on the delivery of a charge point network, not the vehicles themselves so does not address the potential inequality of affordability of car ownership.
Please indicate any actions arising from completing this screening exercise.	Ongoing investigation into innovative charging options as these arise.
	Ongoing application of best practice principles regarding charge point accessibility for disabled users.
	Ongoing identification of charging point sites, with no net loss of blue badge parking spaces.
Please indicate whether a full impact assessment is recommended	NO
What data has been collected to facilitate the assessment of this policy/proposal?	Extensive data collection and modelling was undertaken for the EV Charge point strategy , including demand modelling, EV uptake scenarios, location identification, EV vehicle sales, and technology choice.
	Information regarding Disabled EV drivers was gathered from the following articles/research reports:
	https://uk.motor1.com/news/461244/disabled-drivers-struggle-ev-network/
	https://www.ridc.org.uk/sites/default/files/uploads/Research%20Reports/ElectricCars/RiDC_ElectricCars_Report.pdf

Page 768 of 804

Going Electric? Research report into the accessibility of plug-in electric vehicles

Research Institute for Disabled Consumers surveyed the RiDC consumer panel, Disability Motoring UK and local disability networks regarding Consumer knowledge of, and attitudes towards electric vehicles (2019)

https://www.motability.org.uk/motability-news/accessible-ev-charging-user-engagement-findings-published/

Data		Source
TEMPro Trip End Data	The data used here is taken from the Trip End Model Presentation program (TEMPro) provides datasets for vehicle trips across the UK, which are approved by the Department for Transport and used widely for traffic modelling. https://www.gov.uk/government/publications/tempro-downloads	
Reliance on On-Street Parking	Element Energy's off-street parking model was used to estimate the number of vehicles with access to off-street parking, with remaining vehicles being entirely reliant on on-street charging. The model is based on 2011 Census data on accommodation type broken down by number of cars and vans registered at each dwelling, and car and van ownership, at output area (OA) level.[1], [2] Estimates for the share of different household types with access to off-street parking were taken from a study conducted by the RAC Foundation [3] and used to determine the share of households and vehicles with access to off-street parking.	
Traffic Flow	Traffic flow was taken from road traffic statistics published by the Department of Transport showing annual average daily flow data (AADF) for traffic flow along major roads in the UK. https://roadtraffic.dft.gov.uk/downloads	
Amenities and Taxi Ranks	Data on the locations of amenities and taxi ranks are open source, retrieved from OpenStreetMap through GIS software.	

[1] ONS. *CT0876: Accommodation type (excluding caravans or other mobile or temporary structures) by car or van availability.* (2011)
https://www.ons.gov.uk/peoplepopulationandcommunity/housing/adhocs/009575ct08762011census

[2] Nomis. *KS404UK: Car or van availability.* (2014)
https://www.nomisweb.co.uk/census/2011/ks404uk

[3] Bates & Leibling. *Spaced Out – Perspectives on parking policy.* (2012)

https://www.racfoundation.org/research/mobility/spaced-out-perspectives-on-parking

Consultation analysis

Adverse impact on any people with protected characteristics.

Could the policy/proposal be modified to reduce or eliminate any adverse impact?

How will the effect(s) of this policy/proposal on equality be monitored?

What data is required in the future?

Are there any adverse impacts on any particular group(s)   No

If yes, please explain your reasons for going ahead.

Initial equality impact assessment of your proposal

Consulted People or Groups

Informed People or Groups

Summary and evidence of findings from your EIA

The purpose of this proposal is for Birmingham City Council to adopt the publicly accessible City-wide Electric Vehicle (EV) Charge Point Strategy (2021-2032). The strategy includes the existing initial roll-out of 197 EV fast and rapid chargers (394 charge points) in strategic locations, to kick-start the 'charge and go' approach of the strategy, across the city centre and within local communities, followed by the ongoing deployment of publicly accessible charge points until 2032. A key focus of the strategy is on enabling the widest use of public accessible charge points, therefore they will continue to be placed at strategic points, whilst also targeting the use of innovative charge point technologies to be installed in accessibility-challenged areas where there is low electric grid power coupled with residential areas of high-rise flats and terraced housing where there is limited or no off-street parking.

The proposals within the City-wide EV Charging Strategy, will have no overall negative impact on any of the protective characteristics. They will have a positive impact for all citizens due to the increased public amenity provided by the network of charging points.

Supporting the use of electric vehicles will have a positive impact in terms of reduced vehicle emissions and improved air quality as well as reduced noise pollution. This in turn, will have a positive impact on all citizens, but particularly young, elderly and pregnant citizens who are more adversely affected by air pollution.

QUALITY CONTORL SECTION

Submit to the Quality Control Officer for reviewing?	No
Quality Control Officer comments	Approved.
Decision by Quality Control Officer	Proceed for final approval
Submit draft to Accountable Officer?	Yes
Decision by Accountable Officer	Approve
Date approved / rejected by the Accountable Officer	04/10/2021
Reasons for approval or rejection	Content with analysis
Please print and save a PDF copy for your records	Yes

Julie Bach

Person or Group

Content Type: Item
Version: 35.0
Created at 21/06/2021 11:46 AM by Naomi R Coleman
Last modified at 04/10/2021 02:56 PM by Workflow on behalf of Philip Edwards

Close

Birmingham City Council
Report to Cabinet

9th November 2021

Subject:	**WESTSIDE METRO EXTENSION – REIMBURSEMENT OF UTILITIES COSTS TO THE WEST MIDLANDS COMBINED AUTHORITY**
Report of:	**Acting Director, Inclusive Growth**
Relevant Cabinet Member:	**Councillor Ian Ward – Leader** **Councillor Waseem Zaffar – Transport and Environment** **Councillor Tristan Chatfield – Finance and Resources**
Relevant O &S Chair(s):	**Councillor Liz Clements – Sustainability and Transport** **Councillor Mohammed Aikhlaq** – **Resources**
Report author:	Phil Edwards – Assistant Director, Transport and Connectivity Tel: 0121 303 6467, Email: philip.edwards@birmingham.gov.uk Nigel Tammo – Metro Project Officer Tel: 07803 261207, Email: nigel.tammo@birmingham.gov.uk

Are specific wards affected? If yes, name(s) of ward(s): **Ladywood**	☒ Yes	☐ No – All wards affected
Is this a key decision? If relevant, add Forward Plan Reference: 009466/2021	☒ Yes	☐ No
Is the decision eligible for call-in?	☒ Yes	☐ No
Does the report contain confidential or exempt information?	☐ Yes	☒ No

1   Executive Summary

1.1   This report provides details of the costs incurred in the diversion of an Engie combined heat and power (CHP) main along Centenary Square, and the subsequent financial contribution required from the Council to reimburse the West Midlands Combined Authority (WMCA). The location is shown in Appendix A.

Page 1 of 9

1.2 The diversion works were required by both the WMCA as project sponsors for the Westside Metro extension, and the Council as project sponsors for the Centenary Square project. The works were undertaken by Engie, their sub-contractors and the Midland Metro Alliance (MMA) on behalf of the WMCA.

1.3 The costs have been apportioned accordingly as set out in the table in paragraph 7.3.2. WMCA had the costs independently audited by cost consultancy Corderoy, and the summary of this is provided in Appendix B.

1.4 The WMCA requires the Council to contribute £0.933m towards the overall Engie cost of £2.077m, with payments to be based upon the opening to passenger service of the Westside Metro extension and the completion of associated remedial works to the public realm, signage and side roads.

1.5 This report explains the financial implications, including potential risks to the Council as a result of these proposals.

2 Recommendations

2.1 Notes the reasons for the Engie diversion, as outlined in this report, and the apportionment of costs between the West Midlands Combined Authority and the Council as detailed in Appendix A.

2.2 Notes the outcome of the independent financial audit of these Engie costs, as set out in Appendix B, which concluded that the Council's share of the cost is £0.933m.

2.3 Authorises the Assistant Director Transport and Connectivity, to place orders and make payment to the West Midlands Combined Authority for the Council's contribution to the main diversion costs up to a value of £0.933m

2.4 Authorises the Assistant Director Transport and Connectivity to agree a payment schedule with the Interim Managing Director of Transport for West Midlands based upon the opening of the Westside Metro Extension and the completion of associated remedial works for which a delivery plan is being finalised.

3 Background

3.1 WMCA and the Council had independently discussed utility works requirements with the various providers affected by their respective projects. From initial conversations with Engie, the Council had been advised that a diversion of the existing Engie CHP main under the proposed Centenary Square water feature was unlikely to be necessary.

3.2 WMCA had anticipated the need to divert part of the existing Engie main, and to then tie-in to the section that was remaining within Centenary Square (see Appendix A). As part of these negotiations, Engie advised WMCA that they would not accept any sections of the Engie main remaining within the Centenary Square area. Any works would have to involve the full diversion of the main out of Centenary Square into the new carriageway/footway created by the Metro Westside extension.

3.3   The re-development of the former Lloyds TSB Bank building (formerly 301 Broad Street) and the proposed amendments to the Symphony Hall entrance/frontage further complicated the matter. The new owners of the former Lloyds TSB Bank building had requested an Engie supply, and the Symphony Hall works required local diversions of the Engie main at their frontage.

3.4   Discussions between WMCA and the Council concluded that:

- Engie would not accept the original response given to the Council, that no diversion from under Centenary Square was required;

- Delay in reaching agreement with Engie would increase costs for the Metro Westside extension, and put the programme for delivering the passenger service at significant risk;

- Any connection provided for the former Lloyds TSB Bank building would be more significant/disruptive if the main pipe remained in its current position. Engie's proposal would avoid that;

- Any works undertaken would need to accommodate the Symphony Hall proposals; and

- The former Lloyds TSB Bank building and Symphony Hall would have to pay for any Engie works they required.

3.5   WMCA agreed to lead the discussions with Engie for a full diversion and, along with the MMA, helped to ensure that suitable resources were available for the works. This included liaison with the former Lloyds TSB Bank building and Symphony Hall to ensure that Engie provided for their requirements also. This maximised efficiency of delivery and avoided the new connection and Symphony Hall works from having to disrupt the tram/Centenary Square in the future. The drawing in Appendix A shows how the various elements of the works were apportioned. However, this meant that WMCA had to incur the upfront costs on the agreement that they would share the outturn costs 'open book' with the Council to identify the Council's contribution.

3.6   An estimate of the cost to the Council was identified through the annual corporate capital planning process, with the WMCA advised that proportional reimbursement would only occur following independent due diligence of the costs and necessary approvals via the Council's gateway and related financial approval framework.

3.7   The diversion works were successfully completed and the Metro extension to Centenary Square was opened to passengers in December 2019. The full opening of the Westside Metro extension to Edgbaston is scheduled to open later this winter, with a small number of remedial works remaining to be completed alongside the main build programme. These are predominantly focussed on the public realm, signage and side road treatments between New Street Station and the Hagley Road terminus. A delivery plan for these works is currently being finalised.

3.8 WMCA ensured that the various costs received from Engie, their sub-contractors, and the MMA were audited independently by cost consultancy Corderoy. A summary of this audit process is provided in Appendix B.

4 Options Considered and Recommended Proposal
Refuse to implement the Engie diversion

4.1 Refusing to cooperate with Engie would have led to the Westside Metro works coming to a standstill. The delay costs incurred by the MMA would have equated to £0.095m per calendar month. The tram would not have opened to Centenary Square in line with the programme, which would have put the extension to Hagley Road at risk of not opening in time for the Commonwealth Games. This was not an option that could be recommended. Furthermore, moving the old main from under the new water feature provides long term benefits as it removes the likelihood of damage to the water feature if future maintenance of the Engie main is required. As such, the proposed approach set out in this report is recommended.

5 Consultation

5.1 No further public consultation is applicable for these works.

5.2 Detailed engagement has been undertaken with WMCA and MMA as articulated within this report.

6 Risk Management

6.1 There are no risks to consider for the Engie works, as these were completed and no action beyond settlement of this monetary contribution is required.

7 Compliance Issues:

7.1 **How are the recommended decisions consistent with the City Council's priorities, plans and strategies?**

7.1.1 The proposals for the Metro Westside extension support the Council Plan and Budget 2018-2022 priorities (as updated in 2019), specifically:

- *'an entrepreneurial city to learn, work and invest in',* particularly *'develop our transport infrastructure, keeping the city moving through walking, cycling and improved public transport'.*

- *'a great, clean and green city to live in',* particularly *'improve the environment and tackle air pollution'.*

- *'gain the maximum benefit from hosting the Commonwealth Games'* particularly *''deliver high quality … transport infrastructure for the benefit of our citizens'.*

- *'takes a leading role in tackling climate change'.*

7.1.2 The proposals also support the objectives of Birmingham Development Plan (BDP) 2031 including:

- *'To provide high quality connections throughout the city and with other places including encouraging the increased use of public transport, walking and cycling'.*

- *'To create a more sustainable city that minimises its carbon footprint'.*

- *'To encourage better health and wellbeing'.*

7.1.3 The scheme supports the additional Climate Change Commitments agreed by Cabinet on 30 July 2019 following the motion on Climate Emergency passed at the full Council meeting of 11 June 2019, including the aspiration for the city to be net zero-carbon by 2030.

7.1.4 The measures will support the aspirations of the Birmingham Connected Transport Strategy, Birmingham Transport Plan and the Health and Wellbeing Strategy. They will contribute to the vision of a sustainable, low emission, inclusive, integrated public transport system. It will also complement the Clean Air Zone (CAZ), by helping the Council towards achieving compliance with the annual legal Limit Values for nitrogen dioxide (NO_2) of 40μg/m3.

7.1.5 WMCA's contract with the MMA incorporates similar requirements to provide social value commitments as the Birmingham Business Charter for Social Responsibility (BBC4SR), and further information is provided in the Metro Westside Extension Full Business Case.

7.1.6 The Westside Metro Extension is an important element in the expansion of Midland Metro, and in the development of the West Midland Strategic Transport Plan's Metropolitan Rail and Rapid Transit Network.

7.2 **Legal Implications**

7.2.1 The Council carries out transportation, highways and infrastructure work under the relevant primary legislation including the Town and Country Planning Act 1990, Highways Act 1990, Road Traffic Regulation Act 1984, Traffic Management Act 2004, Transport Act 2000, and other related regulations, instructions, directives, and general guidance.

7.2.2 WMCA has powers to construct the Metro under the Transport and Works Act Orders granted by the Government for this purpose.

7.2.3 Section 1 of the Localism Act 2011 contains the Council's general power of competence and Section 111 of the Local Government Act 1972 contains the Council's financial and ancillary powers required for the discharge of any of its functions.

7.3 **Financial Implications**

Capital Costs

7.3.1 The initial principle for the apportionment of the Engie costs was based on the length of diversion required for each authority. This equated to approximately 55% of the length being required for Centenary Square

(Council) and 45% for the Metro works (WMCA). For the estimated value of £1.900m this would have equated to £1.045m.

7.3.2 The table below shows the <u>actual</u> requested contribution, following the audit of the outturn costs. All figures exclude VAT. The outturn apportionment of costs equated to the Council paying approximately 45% of the total figure. The Council's contribution will be funded from Town and Country Planning Act 1990 Section 106 (S106) contribution for Arena Central (2018/00610/PA) which is expected in May 2022. The works are consistent with the terms of the S106 agreement. Payment of the contribution to WMCA will initially funded from corporate prudential borrowing until the S106 money is received,

BCC (£,000)	WMCA (£,000)	Total (£,000)
933.404	1,143.694	2,077.098

7.3.3 A further breakdown of the costs is provided in Appendix B.

Revenue Implications

7.3.4 No ongoing revenue costs are applicable to the Engie works.

7.3.5 The relevant contracts are between TfWM and MMA and TfWM and Engie, so TfWM will hold the warranties for the work carried out.

7.4 **Procurement Implications (if required)**

7.4.1 Contracts for the civil engineering works for the Engie requirements were awarded by WMCA/TfWM via the MMA, which is their route for work of this nature, to supplement any activities that Engie (or their sub-contractors) were unable to undertake.

7.5 **Human Resources Implications (if required)**

7.5.1 No implications

7.6 **Public Sector Equality Duty**

7.6.1 None of the issues identified in this report have an adverse impact on any of the protected groups. Equality matters were dealt with in the 2019 FBC report and this financial transaction does not make any changes to works already completed.

8 **Appendices**

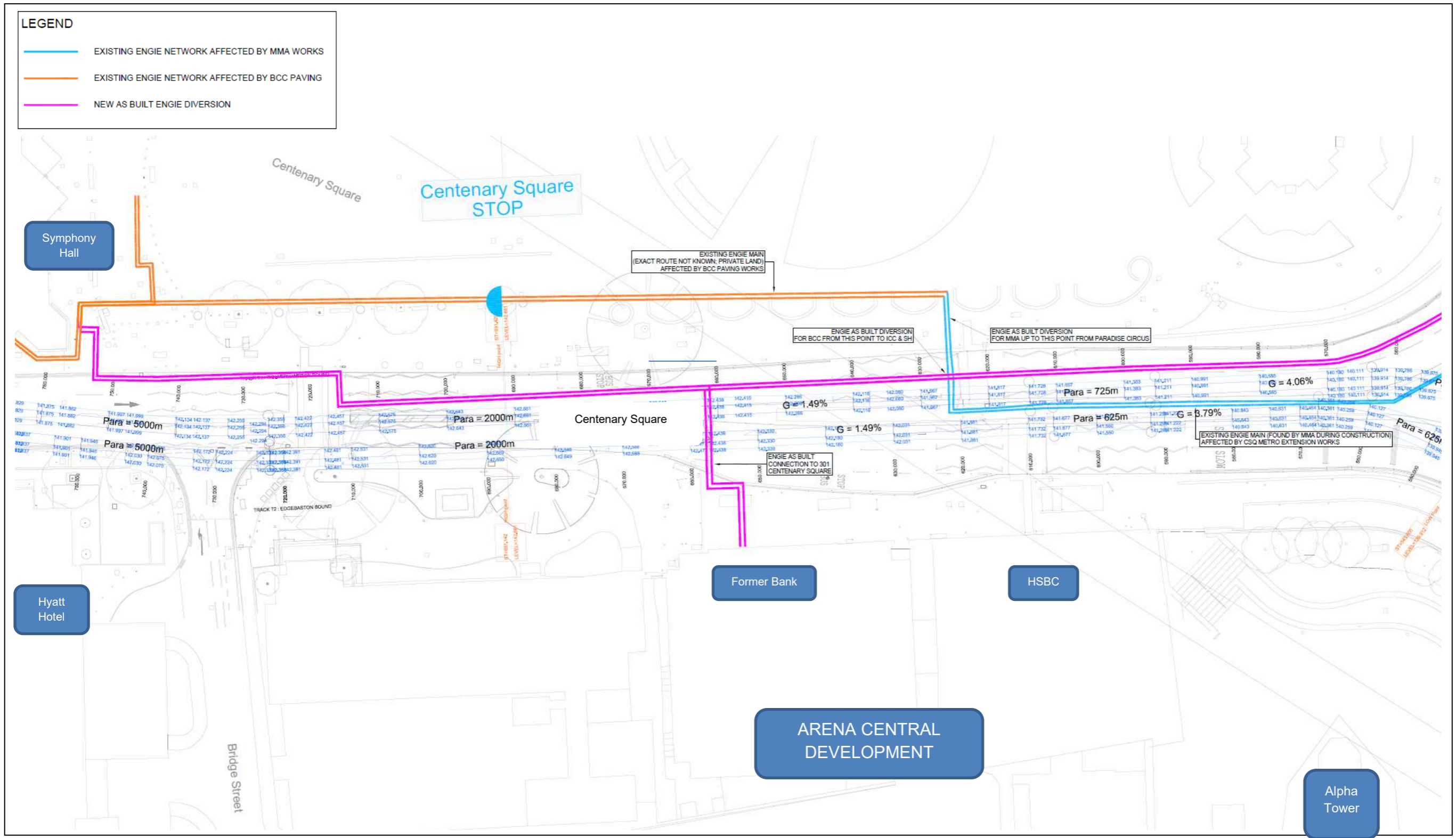8.1 List of Appendices accompanying this report:

Appendix A – Plan of the Engie diversion works

Appendix B – Summary of Engie works costs

9   Background Documents

9.1   Report to Cabinet, dated 12th February 2019, Metro Westside Extension and Associated Measures – Full Business Case

Appendix A – Plan of the Engie diversion works

Appendix B – Summary of Engie works costs

Cost element	Value after Corderoy assessment (£'000)	BCC costs (£'000)	TfWM costs (£'000)
MMA sub-total	**957.132**	**668.464**	**288.668**
Engie C9 – Broad Street	668.804	264.940	403.864
Engie C9 - pipe damage costs	310.722	0.000	310.722
Engie sub-total	**979.526**	**264.940**	**714.586**
CPC civils sub-total costs to repair pipe damage	**140.440**	**0.000**	**140.440**
Total	**2077.098**	**933.404**	**1143.694**

(all figures exclude VAT)

The Corderoy assessment of the MMA costs established that the additional cost was £0.957m.

The original C9 figure submitted by Engie was £1.356m. Following the assessment by Corderoy, the value was reduced to £1.234m. Furthermore, the assessment separated out the costs for:

- works in Victoria Square (not the Council's responsibility, and not included in this report/table); and

- the Engie C9 pipe damage costs (not the Council's responsibility but included in the table above for clarity).

Hence, the final value for Engie's C9 costs on Centenary Square were £0.979m, of which only £0.265m is attributable to the Council.

The costs incurred by CPC for repairing damage to pipes was not the Council's responsibility but is included in the table above for clarity

Birmingham City Council
Report to Cabinet

Date: 9th November 2021

Subject:	**PLANNED PROCUREMENT ACTIVITIES (DECEMBER 2021 – FEBRUARY 2022)**
Report of:	**ASSISTANT DIRECTOR – PROCUREMENT (INTERIM)**
Relevant Cabinet Member:	**Councillor Tristan Chatfield, Finance and Resources**
Relevant O &S Chair(s):	**Councillor Mohammed Aikhlaq, Resources**
Report author:	Steve Sandercock, Assistant Director, Procurement (Interim) Email Address: steve.sandercock@birmingham.gov.uk

Are specific wards affected? If yes, name(s) of ward(s):	☐ Yes	☒ No – All wards affected
Is this a key decision? If relevant, add Forward Plan Reference:	☐ Yes	☒ No
Is the decision eligible for call-in?	☒ Yes	☐ No
Does the report contain confidential or exempt information? If relevant, provide exempt information paragraph number or reason if confidential : 3. Information relating to the financial or business affairs of any particular person (including the council)	☒ Yes	☐ No

1   Executive Summary

1.1   This report provides details of the planned procurement activity for the period December 2021 – February 2022. Planned procurement activities reported previously are not repeated in this report.

1.2   The report enables Cabinet to identify whether any reports for procurement activities should be brought to this meeting for specific executive decision, otherwise they will be dealt with under Chief Officer delegations up to the value of £10m, unless TUPE applies to current Council staff.

2   Recommendations

2.1   Notes the planned procurement activities under chief officer delegations set out in the Constitution for the period December 2021 – February 2022 as detailed in Appendix 1.

3   Background

3.1   At the 1 March 2016 meeting of Council changes to procurement governance were agreed which gives Chief Officers the delegated authority to approve procurement contracts up to the value of £10m over the life of the contract. Where it is likely that the award of a contract will result in staff employed by the Council transferring to the successful contract under TUPE, the contract award decision has to be made by Cabinet.

3.2   In line with the Procurement Governance Arrangements that form part of the Council's Constitution, this report acts as the process to consult with and take soundings from Cabinet Members and the Resources Overview & Scrutiny Committee.

3.3   This report sets out the planned procurement activity over the next few months where the contract value is between the procurement threshold (£189,330) and £10m. This will give members visibility of all procurement activity within these thresholds and the opportunity to identify whether any procurement reports should be brought to Cabinet for approval even though they are below the £10m delegation threshold.

3.4   It should be noted that the procurement threshold has changed from £164,176 to £189,330 and will apply from 1st January 2020 for a period of 2 years.

3.5   Individual procurements may be referred to Cabinet for an executive decision at the request of Cabinet, a Cabinet Member or the Chair of Resources Overview & Scrutiny Committee where there are sensitivities or requirements that necessitate a decision being made by Cabinet.

3.6   Procurements below £10m contract value that are not listed on this or subsequent monthly reports can only be delegated to Chief Officers if specific approval is sought from Cabinet. Procurements above £10m contract value will still require an individual report to Cabinet in order for the award decision to be delegated to Chief Officers if appropriate.

3.7   A briefing note with details for each item to be procured is listed in Appendix 2. The financial information for each item is detailed in Appendix 3 – Exempt Information.

4 Options considered and Recommended Proposal

4.1 The report approved by Council Business Management Committee on 16 February 2016 set out the case for introducing this process. The options considered are:

- To refer the procurement strategy and contract award of individual procurements to Cabinet for decision.

- To continue with the existing process – this is the recommended option

5 Consultation / Engagement

5.1 This report to Cabinet is copied to Cabinet Support Officers and to Resources Overview & Scrutiny Committee and therefore is the process for consulting with relevant cabinet and scrutiny members. At the point of submitting this report Cabinet Members/ Resources Overview & Scrutiny Committee Chair have not indicated that any of the planned procurement activity needs to be brought back to Cabinet for executive decision.

6 Risk Management

6.1 Details of Risk Management, Community Cohesion and Equality Act requirements will be set out in the individual reports.

7 Compliance Issues:

7.1 How are the recommended decisions consistent with the City Council's priorities, plans and strategies?

7.1.1 Details of how the contracts listed in Appendix 1 and Appendix 2 support relevant Council policies, plans or strategies, will be set out in the individual reports.

7.2 Legal Implications

7.2.1 Details of all relevant implications will be included in individual reports.

7.3 Financial Implications

7.3.1 Details of how decisions will be carried out within existing finances and resources will be set out in the individual reports.

7.4 Procurement Implications (if required)

7.4.1 This is a procurement report and the implications are detailed in the appendices

7.5 Human Resources Implications (if required)

7.5.1 None.

7.6 Public Sector Equality Duty

7.6.1 Details of Risk Management, Community Cohesion and Equality Act requirements will be set out in the individual reports.

8 Background Documents

8.1 List of Appendices accompanying this Report (if any):
- 1. Appendix 1 - Planned Procurement Activity December 2021 – February 2022
- 2. Appendix 2 – Background Briefing Paper
- 3. Appendix 3 – Exempt Information
- 4. Appendix 4 – Notification of Minor Amendments

APPENDIX 1 – PLANNED PROCUREMENT ACTIVITIES (DECEMBER 2021 – FEBRUARY 2022)

Type of Report	Title of Procurement	Ref	Brief Description	Contract Duration	Directorate	Portfolio Finance and Resources Plus	Finance Officer	Contact Name	Planned CO Decision Date
Approval to Tender Strategy	Virtual School Tuition Programme	TBC	To provide an alternative education service for young people in the absence of a school place or while awaiting allocation of a school place. Tuition will be delivered through a hybrid model; face to face and remote learning. There will be some face to face tuition based on child's learning needs. Where the young person can access learning remotely and would value doing so and it will not slow progress, lessons may be virtual.	4-years with a break clause after year 2	Education and Skills	Education, Skills and Culture	Clare Sandland	Sandra Asiedu / Lisa Marie Smith	03/01/2022
Approval to Tender Strategy	Virtual School Enrichment Programme	TBC	A programme of services to enrich the education experience of children in care, maximising their chances of educational achievement, inclusion and progression.	4-years with a break clause after year 2	Education and Skills	Education, Skills and Culture	Clare Sandland	Sandra Asiedu / Lisa Marie Smith	03/01/2022
Strategy / Award	Childcare Vouchers	TBC	The provision of vouchers to enable employees to purchase childcare as a salary sacrifice scheme. The scheme operates as salary sacrifice and is a contractual arrangement whereby an employee gives up the right to receive part of their cash remuneration, usually in return for their employer's agreement to provide some form of non-cash benefit.	3 years	Finance and Governance	Finance and Resources	Lee Bickerton	Selina Erfani / Richard Tibbatts	03/01/2022
Strategy / Award	Provision of Free School Meal Vouchers as part of the DWP Household Support Fund Grant	TBC	This procurement is for the provision of Free School Meal vouchers during holiday periods.	various term dates	Education and Skills	Education, Skills and Culture	Clare Sandland	John Hardy / Christian Markandu / Mike Smith	13/12/2021
Strategy / Award - Amendment	SAP Netweaver Upgrade	TBC	The Council has a portfolio of SAP applications to support business functions in Human Resources, Payroll, Finance, Procurement.	1 year	Digital and Customer Services	Deputy Leader	Lee Bickerton	Claire Penny / Jamie Parris	22/11/2021

APPENDIX 2

BRIEFING NOTE ON PLANNED PROCUREMENT ACTIVITIES
CABINET – 9ᵗʰ November 2021

Title of Contract	**Virtual School Tuition Programme**
Director / Assistant Director	Pauline Madison – Assistant Director SEND and Inclusion
Briefly describe the service required	To provide an alternative education service for young people in the absence of a school place or while awaiting allocation of a school place. Tuition will be delivered through a hybrid model; face to face and remote learning. There will be some face to face tuition based on the child's learning needs. Where the young person can access learning remotely and would value doing so and it will not slow progress, lessons may be virtual.
What is the proposed procurement route?	An open procurement exercise will be undertaken advertised on In-tend, Find a Tender Service, Contracts Finder and www.finditinbirmingham.com
What are the existing arrangements? Is there an existing contract? If so when does that expire?	This service has previously been sourced on an off-contract basis via spot purchase from the following tuition companies; Equal Education, Winchmore, Connex and Teaching Personnel.
If single /multiple contractor negotiations is proposed, what is the reason for not tendering the requirement, how do we ensure value for money and compliance with the Birmingham Business Charter for Social Responsibility (BBC4SR)?	Not applicable.
Has the In-House Preferred Test been carried out?	Yes, and the test demonstrated this is not suitable to be carried out in-house as there are not the skills or ability within the Council to deliver this service.
How will this service assist with the Council's commitments to Route to Zero?	Where the tutor runs the lessons virtually this will reduce travel in the city and associated travel emissions for both the pupil and the tutor. Virtual learning will also increase the amount of taught learning time when not travelling to different pupils' homes.
Is the Council under a statutory duty to provide this service? If not, what is the justification for providing it?	There is a statutory duty for this service under the Children and Families Act 2014. All young people of statutory school age up to 19 years have a right to access education. The 2018 DfE 'Promoting the education of looked-after children and previously looked-after children' Statutory guidance for Local Authorities Page 11 states that ''The VSH is responsible for supporting social workers to ensure timely provision of a suitable education placement for looked-after children. Their views should be given appropriate weight as part of decisions on placement moves'' ''In the case of an emergency placement, the authority that looks after the child should secure a suitable new education placement within 20 school days.'' VSH – Virtual School Head
What budget is the funding from for this service?	This is funded from the DfE pupil premium plus section 31 grant.
Proposed start date and duration of the new contract	The proposed start date is 1st April 2022 for a period of 4 years with a break clause after year 2.

Title of Contract	**Virtual School Enrichment Programme**
Director / Assistant Director	Pauline Madison – Assistant Director SEND and Inclusion
Briefly describe the service required	A programme of services to enrich the education experience of children in care, maximising their chances of educational achievement, inclusion and progression.
What is the proposed procurement route?	An open procurement exercise will be undertaken. The opportunity will be advertised on In-tend, Find a Tender Service, Contracts Finder and www.finditinbirmingham.com.
What are the existing arrangements? Is there an existing contract? If so when does that expire?	These services have previously been achieved through multiple contracts with a variety of suppliers approved via Head of Service All existing arrangements expire in July 2022.
If single /multiple contractor negotiations is proposed, what is the reason for not tendering the requirement, how do we ensure value for money and compliance with the Birmingham Business Charter for Social Responsibility (BBC4SR)?	Not applicable.
Has the In-House Preferred Test been carried out?	Yes, and the test demonstrated this is not suitable to be carried out in-house as there are not the skills or ability within the Council to deliver this service.
How will this service assist with the Council's commitments to Route to Zero?	By combining current smaller single contracts into one framework we will be delivering the service more efficiently on a wider scale regionally and out of local authorly Therefore reducing travel, emissions, building cost for heating etc.
Is the Council under a statutory duty to provide this service? If not, what is the justification for providing it?	This service is being delivered under a statutory duty under the Children Act 1989 to safeguard and promote the welfare of a child looked after by them. This includes a specific duty to promote the child's educational achievement, wherever they live or are educated. The Virtual School Head is guided by the Statutory guidance as set out in the 2018 DfE 'Promoting the education of looked-after children and previously looked-after children' which states ''Virtual School Headteachers are integral to ensuring that local authorities discharge their duty to provide suitable advice and information for the purpose of promoting the educational achievement of previously looked-after children. They can also undertake any activity they consider appropriate where that activity will promote the educational achievement of such children in their area.
What budget is the funding from for this service?	This is funded from the DfE pupil premium plus section 31 grant.
Proposed start date and duration of the new contract	The proposed start date is 1st April 2022 for a period of 4 years with a break clause after year 2.

Title of Contract	Childcare Vouchers
Director / Assistant Director	Tim Normanton – Assistant Director, Human Resources
Briefly describe the service required	The provision of vouchers to enable employees to purchase childcare as a salary sacrifice scheme. The scheme operates as salary sacrifice and is a contractual arrangement whereby an employee gives up the right to receive part of their cash remuneration, usually in return for their employer's agreement to provide some form of non-cash benefit. Payments to the scheme reduce the employee's gross salary therefore a lower amount is taxable with less National Insurance Contributions (NIC). In turn the employer's NIC is also less as this is linked to the employee's salary excluding non-taxable reductions. This is for employees that are already on this scheme only and no longer available to new employees.
What is the proposed procurement route?	To undertake a direct award using the Eastern Shires Purchasing Organisation's Staff Benefits Framework Agreement. Value for money was established following benchmarking to establish the provider that can offer the best value for money and Sodexo demonstrated best value.
What are the existing arrangements? Is there an existing contract? If so when does that expire?	The existing contract with Sodexo approved under delegated authority expired on 30th June 2021. The services have continued to be provided under the terms of the existing contract on an off-contract basis. Access has continued from the employees' perspective and there has been no disruption to the provision.
If single /multiple contractor negotiations are proposed, what is the reason for not tendering the requirement, how do we ensure value for money and compliance with the Birmingham Business Charter for Social Responsibility (BBC4SR)?	Not applicable.
Has the In-House Preferred Test been carried out?	Yes, and the test demonstrated this is not suitable to be carried out in-house as the Council does not have the capability to directly administer a scheme of this size and scale.
How will this service assist with the Council's commitments to Route to Zero?	There is no physical delivery or impact on the environment. The system is paperless.
Is the Council under a statutory duty to provide this service? If not, what is the justification for providing it?	There is not a statutory duty to provide this service. However, providing a salary sacrifice scheme for childcare vouchers supports employees to reduce childcare costs down and supports flexible working, supports parents to work and is seen as an employee benefit, which in turn support the council with retention of staff.
What budget is the funding from for this service?	The requirement will be funded from budget code RBH17 for the provider margin and the Voucher funding will be from employees direct as part of the Salary Sacrifice Scheme. The employees make savings on tax and NIC and the Council as the employer will save on NIC which in turn replenishes the spend and creates a moderate saving.
Proposed start date and duration of the new contract	The contract will commence on 1st December 2021 for a period of 4 years.

Title of Contract	Provision of Free School Meal Vouchers as part of the DWP Household Support Fund Grant
Director / Assistant Director	Director, Kevin Crompton
Briefly describe the service required	On 6 October DWP launched a Household Support Fund in order to support vulnerable households. With significant levels of existing needs such children in receipt of Free School Meals (FSM) and immediate current pressures related to rising costs of living such as heating and other forms poverty and destitution, demand will be high. Potential spending options have been drawn up based upon learning from delivery of crisis support, emergency assistance and local welfare provision, drawing upon existing delivery mechanisms and outlets such as Neighbourhood Advice, Local Welfare Provision (LWP), Early Help/Neighbourhood Network Schemes, Free School Meals. This procurement is for the provision of Free School Meal vouchers during holiday periods.
What is the proposed procurement route?	It is proposed to undertake a further competition exercise called off from the Crown Commercial Services Voucher Schemes Lot 1 Framework Agreement.
What are the existing arrangements? Is there an existing contract? If so when does that expire?	Due to the urgency (the fund was launched on Oct 6th), a direct award was made to ensure service provision for the October half-term.
If single /multiple contractor negotiations is proposed, what is the reason for not tendering the requirement, how do we ensure value for money and compliance with the Birmingham Business Charter for Social Responsibility (BBC4SR)?	Not applicable.
Has the In-House Preferred Test been carried out?	Yes, there is no in-house capacity to deliver this service.
How will this service assist with the Council's commitments to Route to Zero?	The specification will require the service to be delivered in a way that reduces or eliminates their carbon footprint, in particular with regard to transportation.
Is the Council under a statutory duty to provide this service? If not, what is the justification for providing it?	No, this is the first time the Council has been directly awarded funds by the DWP for FSM Vouchers.
What budget is the funding from for this service?	From Birmingham's £12,791,135.04 allocation of DWP's £500 million Household Support Fund (HSF), providing one-off funds to local councils, in order to support vulnerable households up until 31 March 2022, affected by the ending of financial support such as furlough, the £20 per week UC uplift payment. DWP guidelines need to be followed including minimum of 50% must be spent on families with children
Proposed start date and duration of the new contract	The proposed start date is 20th December 2021 for the Christmas holiday period. The FSM voucher service will also be provided for the February half-term and, subject to funding, the Easter holiday period.

APPENDIX 4

Notification of Minor Amendments

This appendix provides the rationale for minor amendments to PPAR previously agreed by Cabinet in October 2021 which highlights the changes made to the original and revised PPAR items below for reference.

Title of Contract	SAP Netweaver Upgrade
Director / Assistant Director	Peter Bishop, Director, Digital and Customer Services
Briefly describe the service required	The Council has a portfolio of SAP applications to support business functions in Human Resources, Payroll, Finance and Procurement. Whilst the transition from SAP to Oracle Fusion Cloud takes place via the 1B ERP Programme, there is a requirement for support for SAP Netweaver for a further period. Since the expiry of the existing contract the support has been delivered under its terms and conditions.
What is the proposed procurement route?	A further competition exercise will be undertaken using the Crown Commercial Services Software Design and Implementation Services Framework.
What are the existing arrangements? Is there an existing contract? If so when does that expire?	The existing contract expired on 31st December 2020.
If single /multiple contractor negotiations is proposed, what is the reason for not tendering the requirement, how do we ensure value for money and compliance with the Birmingham Business Charter for Social Responsibility (BBC4SR)?	Not applicable.
Has the In-House Preferred Test been carried out?	Yes, and there is not the relevant skills and capabilities within the Council to support SAP Netweaver
How will this service assist with the Council's commitments to Route to Zero?	The specification will require the service to be delivered in a way that reduces or eliminates their carbon footprint as appropriate.
Is the Council under a statutory duty to provide this service? If not, what is the justification for providing it?	There is not a statutory duty to provide this service. However, without support in place for the SAP Netweaver would severely impact on several key/critical services currently utilised in the provision of statutory services to the Citizens of Birmingham.
What budget is the funding from for this service?	This is funded from the IT&D base budget RBF24 L9Y0 A00.
Proposed start date and duration of the new contract	The proposed start date is 1st December 2021 for a duration of up to 12 months.

Title of Contract	SAP Netweaver Upgrade
Director / Assistant Director	Peter Bishop, Director, Digital and Customer Services
Briefly describe the service required	The Council has a portfolio of SAP applications to support business functions in Human Resources, Payroll, Finance and Procurement. Whilst the transition from SAP to Oracle Fusion Cloud takes place via the 1B ERP Programme, there is a requirement for support for SAP Netweaver for a further period. Since the expiry of the existing contract the support has been delivered under its terms and conditions.
What is the proposed procurement route?	The proposed route to market albeit further competition or direct award will be via a compliant national framework agreement, CCS, ESPO, KCS, HTE or YPO dependent on the appropriateness of the framework, the lot and the best fit for the purposes of the requirement and required timescales.

What are the existing arrangements? Is there an existing contract? If so when does that expire?	The existing contract expired on 31st December 2020.
If single /multiple contractor negotiations is proposed, what is the reason for not tendering the requirement, how do we ensure value for money and compliance with the Birmingham Business Charter for Social Responsibility (BBC4SR)?	Not applicable.
Has the In-House Preferred Test been carried out?	Yes, and there is not the relevant skills and capabilities within the Council to support SAP Netweaver
How will this service assist with the Council's commitments to Route to Zero?	The specification will require the service to be delivered in a way that reduces or eliminates their carbon footprint as appropriate.
Is the Council under a statutory duty to provide this service? If not, what is the justification for providing it?	There is not a statutory duty to provide this service. However, without support in place for the SAP Netweaver would severely impact on several key/critical services currently utilised in the provision of statutory services to the Citizens of Birmingham.
What budget is the funding from for this service?	This is funded from the Finance budget RBF24 L9Y0 A00.
Proposed start date and duration of the new contract	The proposed start date is 1st December 2021 for a duration of up to 12 months.

Item 11

Birmingham City Council

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Decision Details

General	Reports	Decision History

This section allows you to view the general details of a Decision

Details

Status:	Decision Proposed

Title:
Use of Household Support Fund for Children Eligible for Free School Meals

Reference:	009494/2021

Urgent Decision - Not in Forward Plan	No

Details for Agenda Sheet	Report of the Director Education and Skills.

Implementation Date (not before meeting on)	Fri 15 Oct 2021

Purpose	

Key Portfolio	------ N/A ------

Include item on Forward Plan/ Key Decision	No

Decision Maker	

Reason For Key Decision	

Relevant Documents	

Decision Type:	Committee

Decision Maker:	Cabinet

Directorate	

Other Information	

Private Reason	

Decision Outcome

Following consultation with the Leaders of the Political Groups, the Chief Executive agreed emergency approval to the decisions below, which needed to be approved and implemented ahead of the next scheduled Cabinet meeting, in line with powers set out at paragraph 6.6 of Part B of the City Council's Constitution:

2.1 Approved the ordering of free school meal vouchers for eligible families for the October half-term period through Sodexo; and

2.2 Delegated responsibility for the delivery of this to the Interim Director Education and Skills, in conjunction with the Chief Finance Officer via a Single Contractor Negotiation.

NB: THIS DECISION IS NOT SUBJECT TO CALL-IN - paragraph 6.9i of Part B of the Council's Constitution, Immediate Decision Implementation: "If the interests of the Council are jeopardised unless an executive decision is implemented immediately then the Chief Executive in consultation with the Leader (or Deputy Leader in his/her absence) may designate such executive decision as so urgent that its implementation cannot wait until the expiry of the call-in period."

Rating:

Is the Decision Maker Aware of the Decision:	No

Is the Head of Services Aware of the Decision:	No

Is Decision County Wide:	No

Would the recommended decision be contrary to the budget and policy framework:	No

Further Information:

Decision Options:

Additional Information

Reg 10

Reg 11

Decision Criteria

This Decision does not contain any decision criteria records.

Wards

This Decision does not contain any Ward records.

Topics

This Decision does not contain any Topic records

Overview and Scrutiny

This Decision does not contain any Overview and Scrutiny records.

Back to Decisions

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Reports not on the Forward Plan / Confidential or Exempt Information not Notified

Birmingham City Council

09 November 2021

Subject:	Equal Pay
Report of:	Director of Council Management, the City Solicitor and Monitoring Officer and Interim Director of HR
Report author:	Suzanne Dodd, City Solicitor and Monitoring Officer

1) **Key Decisions not on the Forward Plan / not notified on the Notification of Intention to Consider Matters in Private**

To be completed for Key Decisions not on the Forward Plan 28 days before the Cabinet meeting at which the decision is to be taken.

Reasons for Urgency / why not included on the notification	The report is to seek authorisation from Cabinet to the settlement proposal agreed, it had not been included as negotiations had been continuing until last week.
Date Chief Executive Agreement obtained:	Deborah Cadman, Interim CEX

01 November 2021 |
| *Name, Date and any comments of O&S Chair agreement obtained:* | Cllr Carl Rice, Co-ordinating O&S Committee

01 November 2021 |

009545/2021

Public Report

Birmingham City Council

Report to Cabinet

9 November 2021

Subject:	Equal Pay
Report of:	The Director of Council Management, the City Solicitor and Monitoring Officer and Interim Director of HR
Relevant Cabinet Member:	Councillor Ian Ward – Leader of the Council
Relevant O &S Chair(s):	Councillor Carl Rice Co-Ordinating O&S Committee Councillor Mohammed Aikhlaq
Report author:	Suzanne Dodd, City Solicitor and Monitoring Officer

Are specific wards affected? If yes, name(s) of ward(s):	☐ Yes	☒ No – all wards affected
Is this a key decision? If relevant, add Forward Plan Reference:	☒ Yes	☐No
Is the decision eligible for call-in?	☐Yes	☒ No
Does the report contain confidential or exempt information?	☒ Yes	☐ No
If relevant, state which appendix is exempt, and provide exempt information paragraph number or reason if confidential : Exempt appendix 1 is exempt from public disclosure under paragraphs 4 and 5 of schedule 12A of the Local Government Act 1972.		

1   Executive Summary

1.1   This report is a late report, which is not on the forward plan, and is not subject to call-in, therefore Part B6, Para 6.2 and Para 6.9 of the Constitution have been complied with. The Chief Executive has consulted with the Leader, and it is agreed the decision is so urgent that its implementation cannot wait until the expiry of the call-in period; this is because the interests of the Council are jeopardised if this executive decision is not made immediately. The Chief Executive and the Leader also accept this late report. The Chair of Co-ordinating Overview and Scrutiny

Committees has been informed and has agreed to the report coming to Cabinet. Further details are set out in Appendix 1.

1.2 The exempt appendix is exempt from public disclosure under paragraphs 4 and 5 of schedule 12A of the Local Government Act 1972. The exemptions relied on are as follows:

1.2.1 Sch. 12A, para. 4 – 'information relating to any consultations or negotiations, or contemplated negotiations, in connection with any labour relations matter arising between the authority or Minister of the Crown and employees of, or office holders under, the authority'; and

1.2.2 Sch. 12A, para. 5 – 'information in respect of which legal professional privilege could be maintained in legal proceedings.'

1.3 These provisions apply because the equal pay claims, and the reasons for them, are subject to legal proceedings and/or are subject to negotiations with solicitors acting for the claimants and/or are commercially sensitive and subject to legal professional privilege.

1.4 Equal pay continues to present a challenge for the Council. Further to a Cabinet decision in December 2018 authorising the settlement of post-2011 equal pay claims, negotiations have been taking place with the no-win, no-fee solicitors who have brought such claims and with the trade unions in relation to their members who have not brought such claims but could potentially do so. A Cabinet decision was made in December 2020 approving the final terms of a head settlement agreement/MOU with the unions. The Council has been continuing to defend ongoing proceedings in the Employment Tribunal where settlement negotiations have failed. The purpose of this report is to seek authorisation from Cabinet to the settlement proposal in relation to those proceedings as set out in exempt appendix 1.

2 Recommendations

2.1 That Cabinet authorises the settlement proposal in exempt appendix 1.

2.2 That Cabinet delegates authority to the City Solicitor to enter all necessary documentation to execute the settlement in accordance with this Report.

2.3 Further to the Cabinet approvals from 3 December 2018 and 15 December 2020, Cabinet note that the expenditure required for the settlement proposal set out in exempt appendix 1 is still in line with those approvals.

3 Background

3.1 Authority for the settlement of equal pay claims was first granted by Cabinet on 25 July 2011. Cabinet approved the proposed decision of the Chief Executive to settle all equal pay claims issued in the Employment Tribunal by employees of the Council subject to adequate financial provision.

3.2 Since that time, Cabinet has approved the decision of the Chief Executive to make certain pay settlements taken under delegated authority granted by the report to Cabinet dated 25 July 2011. Further approval to an updated equal pay strategy was granted by Cabinet in July 2014, to include the establishment of the Cabinet Equal Pay Subgroup comprising the Leader, Deputy Leader and Chief Executive, and again in July 2015, August 2017, February 2018, December 2018 and December 2020. The Chief Executive has continued to authorise certain equal pay settlements in line with the strategy approved by Cabinet and the Cabinet Equal Pay Subgroup.

3.3 Further background information is set out in exempt appendix 1.

4 Options considered and Recommended Proposal

4.1 The options considered are set out in exempt appendix 1

5 Consultation

5.1 The Equal Pay Cabinet Committee met on 1 November 2021. The Trade Unions have been consulted.

6 Risk Management

6.1 Please see exempt appendix 1.

7 Compliance Issues:

7.1 How are the recommended decisions consistent with the City Council's priorities, plans and strategies?

7.1.1 The recommended decisions are in line with the Council's long-term financial planning and consistent with the Council's current equal pay strategy, which is to draw a line under any outstanding equal pay liability.

7.2 Legal Implications

7.2.1 The power conferred by section 222 of the Local Government Act 1972, 'power of local authorities to prosecute or defend legal proceedings', enables the Council to settle the ongoing proceedings in relation to equal pay.

7.2.2 Further legal implications are set out in exempt appendix1.

7.3 Financial Implications

7.3.1 The Council has been settling claims issued under the Equality Act 2010 and the preceding Equal Pay Act 1970 for several years. As at the end of the 2020/21 financial year, £1.1bn had been spent on Equal Pay settlements. A further estimate of liability of £153.8m in respect of unsettled equal pay claims was identified at 31 March 2020 and means that total expected expenditure will rise to around £1.3bn. Budgetary provision has been made for £153.8m of outstanding liability, funded mainly by proceeds from asset disposals.

7.3.2 Any revenue implications of the equal pay settlements have been reflected in the Council's latest budget and within the financial plans in relation to later years. This includes capital financing costs arising from previous years' capital expenditure, loss of income and other costs arising from asset sales and the repayment of any temporary borrowing from reserves.

7.3.3 Further financial implications are set out in exempt appendix 1.

7.4 Procurement Implications (if required)

7.4.1 If the Council is unable to manage the processing of individual offers internally, it may need to call off an EU compliant competitive framework to procure the services.

Human Resources Implications (if required)

7.4.1 Further human resources implications are set out in exempt appendix 1.

7.5 Public Sector Equality Duty

7.5.1 All settlement strategies to date have endeavoured to limit any adverse equality impact on staff at BCC.

8 Appendices

8.1 Exempt appendix 1

9 Background Documents

9.1 Cabinet Report dated 25 July 2011

9.2 Cabinet Report dated July 2014

9.3 Cabinet Report dated 3 December 2018

9.4 Cabinet Report dated 15 December 2020