

# **BIRMINGHAM CITY COUNCIL**

## **CABINET**

**TUESDAY, 11 OCTOBER 2022 AT 10:00 HOURS**  
**IN COMMITTEE ROOMS 3 & 4, COUNCIL HOUSE, VICTORIA**  
**SQUARE, BIRMINGHAM, B1 1BB**

## **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](http://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.

<u>5 - 48</u>	5	<b><u>FULL BUSINESS CASE FOR THE LEGACY DEVELOPMENTS FOLLOWING THE COMMONWEALTH GAMES AT ALEXANDER STADIUM, PERRY BARR</u></b>	Report of the Strategic Director, City Operations
<u>49 - 62</u>	6	<b><u>FINANCIAL MONITORING REPORT MONTH 5 2022/23</u></b>	This report is from Director of Council Management
<u>63 - 86</u>	7	<b><u>MEDIUM TERM FINANCIAL PLAN (MTFP) REFRESH</u></b>	This report is from Director of Council Management
<u>87 - 98</u>	8	<b><u>COST OF LIVING EMERGENCY PROGRAMME</u></b>	Report of the Director for Strategy, Equality and Partnerships.
<u>99 - 132</u>	9	<b><u>BUILDING BIRMINGHAM – LONG NUKE ROAD DEVELOPMENT</u></b>	Report of Acting Director Inclusive Growth
<u>133 - 438</u>	10	<b><u>ADOPTION OF EDGBASTON RESERVOIR MASTERPLAN DRAFT SUPPLEMENTARY PLANNING DOCUMENT (SPD)</u></b>	Strategic Director – Place, Prosperity & Sustainability
<u>439 - 484</u>	11	<b><u>STREET NAMING AND NUMBERING POLICY REVISION</u></b>	Report of Strategic Director Place, Prosperity and Sustainability
<u>485 - 518</u>	12	<b><u>SEXUAL HEALTH SERVICES COMMISSIONING AND PROCUREMENT PLAN</u></b>	Report of Director for Public Health
<u>519 - 664</u>	13	<b><u>THE BIRMINGHAM PLAN ISSUES AND OPTIONS DOCUMENT CONSULTATION</u></b>	Strategic Director Of Place, Prosperity And Sustainability
<u>665 - 674</u>	14	<b><u>NON KEY DECISION PLANNED PROCUREMENT ACTIVITIES (NOVEMBER 2022 – JANUARY 2023)</u></b>	Report of Assistant Director - Procurement

15 **OTHER URGENT BUSINESS**

To consider any items of business by reason of special circumstances (to be specified) that in the opinion of the Chair are matters of urgency.





# Birmingham City Council

## Report to Cabinet

11 October 2022



**Subject:** FULL BUSINESS CASE FOR THE LEGACY DEVELOPMENTS FOLLOWING THE COMMONWEALTH GAMES AT ALEXANDER STADIUM, PERRY BARR

**Report of:** Rob James - Strategic Director of City Operations

**Relevant Cabinet Member:** Councillor Ian Ward, Leader  
Councillor Mariam Khan – Cabinet Member for Health & Social Care  
Councillor Yvonne Mosquito, Cabinet Member for Finance and Resources

**Relevant O&S Chair(s):** Councillor Jack Deakin - Commonwealth Games, Culture and Physical Activity  
Councillor Saima Suleman – Economy and Skills  
Councillor Akhlaq Ahmed, – Resources

**Report author:** Dave Wagg  
Project and Client Manager, Strategic Sport  
Telephone No: 0121 464 0939  
Email Address: [dave.wagg@birmingham.gov.uk](mailto:dave.wagg@birmingham.gov.uk)

Are specific wards affected?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No – All wards affected
If yes, name(s) of ward(s): Perry Barr		
Is this a key decision?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If relevant, add Forward Plan Reference: 010468/2022		
Is the decision eligible for call-in?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Does the report contain confidential or exempt information?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
If relevant, provide exempt information paragraph number or reason if confidential:		

## 1 Executive Summary

- 1.1 The Perry Barr 2040 regeneration seeks to meet both need and aspiration. It is a long-term programme with the hosting of the Birmingham 2022 Commonwealth Games (the Games) acting as a catalyst for accelerated growth and a moment of significance in its journey. Alexander Stadium and Perry Park are at the heart of the regeneration and played a key role in the successful delivery of the Games.
- 1.2 An FBC for the redevelopment of the Stadium was approved in 2020; this report addresses the post-Games legacy and the opportunities to maximise it along with the surrounding parkland as part of Perry Barr regeneration.
- 1.3 Post-Games, the continued success of the Stadium and its parkland setting, require further capital investment to ensure this asset has a lasting, positive legacy for the local community, the city, partners and visitors.
- 1.4 Access to high-quality facilities for sport and recreation is an important facet of the future vision for the area of Perry Barr and neighbouring wards and the local needs and aspirations are central to this project.
- 1.5 This report presents the Full Business Case for the legacy developments at the Alexander Stadium and Perry Park following the Games. These proposals will contribute to the Council's most recent strategic outcomes, specifically 'A Prosperous Birmingham' by maximising the benefits of the Commonwealth Games, 'A Healthy Birmingham' by providing improved leisure facilities to encourage physical activity and healthy living and 'A Green Birmingham' by contributing to the aim of becoming a city of nature.
- 1.6 Some elements of the proposals will be subject to further consultation, including via the planning process, but have been created following significant engagement with key stakeholders to appraise how to enhance the site and its potential future uses to ensure a sustainable legacy beyond the Games. They include:
  - A new dry leisure facility within the Stadium complex;
  - A new visitor centre and café located in Perry Park;
  - New physical activity installations / external play facilities for all ages in the Park; and
  - Delivery of new pathways and cycle routes around the Park.
- 1.7 The Council is working with Birmingham City University and other future tenants on the offering for elite and community sports provision in the Stadium Complex.
- 1.8 The Walsall Road Allotments are safeguarded as a part of these proposals and remain an important community asset to the residents of Perry Barr.
- 1.9 This report seeks approval of the Full Business Case for the legacy development of the Stadium and Perry Park, to develop and submit the planning applications necessary to support the delivery of the proposals and to commence the procurement process for the contracts required to support the legacy aspirations.

## **2 Recommendations**

That Cabinet:

- 2.1 Approves the Full Business Case included at Appendix 1 to this report, containing the following.
  - 2.1.1 Notes the results of the formal bids for funding contributions to the overall costs of the works.
  - 2.1.2 Approves the submission of an application to Sport England for a grant of up to £2 million for provision of improved community sports leisure facilities.
  - 2.1.3 Confirms the funding of £5 million of Council resources to support the development of the investment and £0.5 million of Community Infrastructure Levy (CIL), subject to such funding becoming available, approved in the outline business case.
- 2.2 Delegates to the Strategic Director of City Operations, in conjunction with the Strategic Director of Council Management, authority to make bids for and accept subsequent offers of funding from any other organisations or funders that may be identified as appropriate contributors to the costs of the proposed works, subject to any funding conditions attached to the funding offers being acceptable.
- 2.3 Approves the submission of any planning applications necessary to facilitate the delivery of the proposals set out in this FBC.
- 2.4 Delegates to the Strategic Director of City Operations and the City Solicitor & Monitoring Officer (or their delegates) authority to negotiate and agree the terms of lease agreements for the occupation of commercial space in and around the Stadium and Perry Park to help secure the post-Games legacy.
- 2.5 Delegates authority to the Strategic Director of City Operations in conjunction with the Assistant Director, Procurement, the Strategic Director of Council Management and the City Solicitor & Monitoring Officer (or their delegates) to develop a procurement strategy including the procurement route in consultation with the Cabinet Member for Finance and Resources and then to award contracts for the following as detailed in paragraph 7.5.1:
  - Legacy Works
  - Facilities Management
  - Catering Services
- 2.6 Authorises the City Solicitor & Monitoring Officer (or delegate) to execute and complete all legal documentation necessary to implement the above recommendations.

### **3 Background**

- 3.1 In January 2017 the ambition to deliver sustainable growth and regeneration in Perry Barr was set out in the Birmingham Development Plan (BDP). Perry Barr 2040: A Vision for Legacy (adopted in February 2022) builds on the BDP to guide regeneration in the area over the next two decades.
- 3.2 The hosting of the 2022 Commonwealth Games has provided a worldwide platform for Birmingham to showcase the area and has provided a catalyst for the regeneration of Perry Barr.
- 3.3 The Alexander Stadium in particular was a key venue for the Games, not only hosting athletics events, but also as the home for the Opening and Closing Ceremonies. To ensure a sustainable future for the stadium and its wider parkland setting beyond the Games, a legacy package of investment is required to secure additional uses on site and improve access and connectivity, whilst maintaining its position as the UK's premier elite athletics stadium.
- 3.4 The stadium complex has been planned to provide a varied facility mix that provides a financially sustainable legacy with modern, attractive and fit-for-purpose venues. This includes the adjoining park and integration of the site with the canal, cycle routes and footpaths to other sporting facilities in the area.
- 3.5 The project will provide measurable, socio-economic impact to the local community, while attracting new users to the site following the investment that will generate greater footfall, improve safety of visitors, encourage physical activity for all ages and provide a focal point for the local community.
- 3.6 The proposals draw on the results of consultations with key stakeholders and wider public consultation will continue through the planning process.

#### **Project Objectives**

- 3.7 The key objectives for the project include:
- An increase in physical activity participation;
  - Improved community engagement with the facilities and the Park;
  - Widening the use of the site by residents and visitors;
  - Provision of an increased sports offer for the community;
  - Ensuring the Stadium continues to operate within its pre-redevelopment revenue budget.

#### **Delivery Options**

- 3.8 The Outline Business Case (OBC) outlined the potential delivery options for the post-Games legacy and provided a justification for the preferred option. This consisted of operating the Stadium with Birmingham City University (BCU) as a tenant, along with the provision of new leisure facilities in Perry Park (visitor centre, café, external play facilities, new pathways, investment in cycling routes).

3.9 The Outline Business Case considered replacing the Beeches Pool and Fitness Centre with a new wet and dry leisure facility at the Stadium, closing Beeches and selling the site. The decision has now been taken to retain Beeches. It will continue to provide swimming facilities under the 15-year contract agreed in 2016 with Birmingham Community Leisure Trust, which has refurbished the pool in the last 5 years.

3.10 The project will drive a number of positive outcomes for the Perry Barr area and Birmingham as a whole:

- The substantial infrastructure on the site will provide a minimum 20-year built legacy for Birmingham's residents and visitors;
- The substantial investment into the community will generate direct and indirect social and economic impact;
- Making Perry Park and Alexander Stadium a shared community facility will create an enhanced destination and combine with other leisure facilities in Perry Barr and the surrounding area to offer complementary programming;
- The creation of high-quality mixed sport facilities will encourage the community to engage and participate;
- The upgrading of the stadium complex and its facilities (including the High Performance Centre) will attract elite athletes to base themselves there for training etc. It will also retain its core purpose of being the UK's premier elite athletics stadium;
- Additional activity will be brought into the park with new uses, interactive pathways and improved connectivity to key walking and cycling routes;
- Provision of facilities that meet local community need and aspiration alongside that of elite sport;
- The partnership with Birmingham City University providing a new educational offering;
- An improved offering of a range of free-to-use facilities alongside commercial facilities to increase visits and dwell time and encourage repeat attendance that supports a sustainable business plan;
- Addressing the spending objectives set by the Council.

3.11 The capital works to deliver the preferred option has been broken down into a series of workstreams, each with a defined scope for delivery:

Workstream 1	Planned Reinstatement works Works deferred from pre-Games Programme
Workstream 2	Internal Spaces
Workstream 3	GMAC & HPC
Workstream 4	Enhancement of Stadium Complex
Workstream 5	Perry Park Legacy

An additional parallel workstream will be delivered by BCC for a potential tenant, which is unable to commission the fit-out works for its tenancy. The tenant will fund and bear the risk of the works, under a funding agreement with BCC.

#### **4 Options Considered and Recommended Proposal**

- 4.1 The options considered in the Options Appraisal of the approved outline business case were:

**Option 1 – Do Minimum** – Operation of the Stadium to include Birmingham City University as a tenant and transfer use of the High-Performance Centre (HPAC) to the University, in line with the approved Stadium FBC.

**Option 2 – Improved offering for Perry Park – Lower Cost** – As Option 1, plus the provision of new leisure facilities in Perry Park, inclusive of a visitor centre, café, external play facilities, new pathways and investment in cycling routes.

**Option 3 – Improved offering for Perry Park and a new leisure centre** - As Option 2, plus the provision of a new dry leisure facility.

- 4.2 Option 3 provides the optimum balance between the capital costs, net operating costs and against the social and economic value impact.

#### **5 Consultation**

The proposals being taken forward via this FBC have been designed to reflect the outcomes of extensive consultation with partner organisations and key stakeholders, who are supportive of the proposals:

#### **6 Risk Management**

- 6.1 The project has a risk register for the development and delivery of the project and its workstreams to deliver in the stadium and park.
- 6.2 These have been considered and risk mitigation plans put in place to reduce the likelihood or impact of these occurring. Project risks and their mitigations are presented to, evaluated and monitored by the Project Board.
- 6.3 Risks associated with the implementation of the decisions are managed within the BCC Project Risks, Issues and Dependencies (RID) Management Protocol. This dynamic approach to RID management is embedded within project delivery and includes clear lines of escalation.
- 6.4 Key risks at this stage of the project include:
- The Stadium condition upon handback from the Organising Committee
  - Pre-Games scope issues (e.g. snagging, deferred works) are not resolved, causing scope, programme and budget issues
  - The procurement of key pieces of work, including the advisory team and the contractor(s), cause delay to the programme
  - Perry Park Masterplan and design development is delayed
  - Key roles in the project team are not filled in a timely manner

- Inflation

## **7 Compliance Issues**

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

- 7.1.1 The legacy from the Games will seek to contribute to tackling health inequalities across the City, by inspiring more people to become active either through taking part in physical activity or being a volunteer for the Games, improving both their physical, mental health and general wellbeing.
- 7.1.2 The project has been developed to ensure the outcomes align to National, Regional and Council Strategies and Policies (e.g. DCMS, Sport England, Council Corporate Plan, Council budgets, LEP plans and strategies etc.).
- 7.1.3 The proposed expansion of the site is an indication of Birmingham's ambitions to increase the relative scale and magnitude of the existing infrastructure at the Stadium ensuring a sustainable legacy for the site post-Games. The essential requirements are not limited to increasing capacity, but also include other sporting facilities and aesthetics that should conform to contemporary athletic infrastructure in order to present a competitive and attractive sporting facility that will leverage events and returns on capital employed.
- 7.1.4 Increasing local community use of the site is paramount to project outcomes, as the Games legacy cannot be achieved without a direct increase in local activity levels coming from an improved facility provision and service offering.
- 7.1.5 The relocation of the BCU sports science faculty to the Stadium will increase footfall, academic learning and additional complementary sports-related outputs and activities. Integrating BCU into the Stadium site for the benefit of the wider community is a key element to delivering successful project outcomes.
- 7.1.6 The Council has worked with its partners to develop a vision for the Games and legacy which supports the development of the scheme to impact positively on local communities, including:
- harder to reach groups;
  - delivering opportunities to collaborate with partners and other local organisations;
  - providing social and economic benefits arising from the delivery of the construction project;
  - visitor spend and private investment; and
  - the provision of high-quality education through the partnership with the BCU and the provision of facilities for elite sport.
- 7.1.7 Uniquely the Legacy project is well placed to deliver solutions that will address the issues affecting the local communities, including encouraging people to move more, increasing their physical activity, improving nutrition, reducing obesity,

reducing social isolation, and reducing the financial impact on NHS through providing preventative health education and classes.

- 7.1.8 In summary the decisions within this report will help contribute to tackling health inequalities across the city, especially the local community, by inspiring more people to be active by engaging with the stadium and park, improving both their physical and mental health and general wellbeing.

## 7.2 **Birmingham Business Charter for Social Responsibility (BBC4SR)**

- 7.2.1 The requirements of the Birmingham Business Charter for Social Responsibility are mandatory and form part of the terms and conditions for any contract awarded in accordance with the Council's policy and will include the payment of the Real Living Wage. This will provide opportunities to support the Perry Barr ward and surrounding areas through:

- The creation of jobs, apprenticeships, work experience graduate placements;
- Training opportunities;
- Supply chain opportunities for local businesses, small and medium enterprises and social enterprises;
- Support for local community projects advertised on [matchmyproject.org](http://matchmyproject.org).

- 7.2.2 This has been demonstrated successfully in the project to develop the Stadium for Games-time use and will be maintained for the legacy development.

## 7.3 **Legal Implications**

- 7.3.1 Under Section 1 of the Localism Act 2011, the Council has the power to enter into the arrangements set out in this report, which are within the remit and limits of the general power of competence in Sections 2 and 4 of the Localism Act 2011 and S111 of the Local Government Act 1972, which contains the Council's subsidiary financial powers to spend borrow or lend money which is calculated to facilitate or is conducive or incidental to the discharge of any of its functions.

- 7.3.2 Sections 120-123 of the Local Government Act 1972 contains the Council's land acquisition and disposal powers. S123 of the Local Government Act 1972 prohibits the disposal of property for a consideration less than the best that can be reasonably obtained. The S123 best consideration duty applicable to this report will be discharged by an independent expert valuation report.

- 7.3.3 All constituent transactions forming part of this business case will be negotiated on commercial terms, such terms being consistent with the conditions and requirements for receipt of the grant funding necessary to implement the proposals, including the requirement that the constituent transactions do not breach competition law.

## 7.4 **Financial Implications**

- 7.4.1 Comparative Net Costs have been modelled for the re-developed Stadium and Park, using base case and best case assumptions, including associated financing



costs. These show a small anticipated ongoing revenue saving of between £0.1m and £0.3m per annum compared with the current annual direct net operating cost of the Stadium (£2.153m). Crucially, both base- and best-case scenarios are still within the current net budget for the Stadium, whilst providing BCC with a new sustainable leisure offer for the area for the next 25 – 30 years, based on additional and improved facilities and services.

	<b>Current Budget £'000</b>	<b>Base Case £'000</b>	<b>Best Case £'000</b>
External Income	(923)	(2,133)	(2,352)
Staffing Costs	1,018	1,524	1,524
Other Operating Costs	1,407	1,696	1,696
Financing Costs	651	988	988
<b>Net Operating Cost</b>	<b>2,153</b>	<b>2,075</b>	<b>1,856</b>

7.4.2 A detailed Target Operating Model has been developed which underpins the net costs and allows for opportunities to grow additional income streams which will help to minimise the net cost and provide additional offers. These include:

- Additional tenants and users of the site;
- Hosting additional legacy events; and
- Wider Perry Barr regeneration scheme and synergies.

7.4.3 As part of the development of the Full Business Case for the Legacy phase of the project, capital costs, funding and net operating budgets have been established for the scope of works. The identified capital investment identified to deliver this project amounts to £21.432m, including those elements included within the Stadium Redevelopment FBC, but planned to be delivered post-Games. The following table sets out total anticipated costs and funding sources for the works.

		2022/23 £'000	2023/24 £'000	Total £'000
<b>Capital Investment</b>				
Workstream 1	Planned Reinstatement works	4,075		4,075
	Works deferred from pre-Games Programme	1,185		1,185
Workstream 2	Internal Spaces	3,574		3,574
Workstream 3	GMAC & HPC	2,000	2,060	4,060
Workstream 4	Enhancement of Stadium Complex	4,546		4,546
Workstream 5	Perry Park Legacy		2,492	2,492
Tenant-Funded Works	HPC Tenant Fit-Out	1,500		1,500

		2022/23 £'000	2023/24 £'000	Total £'000
<b>Total Capital Investment</b>		<b>16,881</b>	<b>4,552</b>	<b>21,432</b>
<b>Capital Financing</b>				
Stadium Redevelopment	Previously approved as part of CWG	(4,629)		(4,629)
CWG	Residual Capital Contingency / Underspends	(6,607)		(6,607)
Corporate Capital Resources	Identified in outline business case – Approved Feb 2020	(2,145)	(2,855)	(5,000)
CIL	Identified in outline business case – Approved Feb 2020		(500)	(500)
External Grants & Contributions	f	(2,000)	(1,197)	(3,197)
Tenant Works Contribution		1,500		
<b>Total Capital Financing</b>		<b>(16,881)</b>	<b>(4,552)</b>	<b>(21,432)</b>

## 7.5 Procurement Implications (if required)

7.5.1 The following works and services are required to be undertaken and the procurement implications are detailed below:

- Reinstatement Works

This requirement is for the works to reinstate from games mode to an operational site. Cabinet was advised of the procurement strategy for the reinstatement works in the Planned Procurement Activity report dated 11<sup>th</sup> May 2021 to enter into single contractor negotiations with McLaughlin & Harvey Construction Ltd with delegated authority to award the contract. Therefore, in order to achieve a contract award in October 2022, it is proposed to conclude the award of contract under the previously approved governance process.

- Technical Professional Services for the reinstatement and legacy works

Cabinet was advised of the procurement strategy for professional services to support the reinstatement works in the Planned Procurement Activity report dated 22nd July 2022.

- Legacy Works

This is for the works to the site to meet the legacy requirements as detailed in the FBC. The procurement route will use a compliant framework agreement in the first instance and to undertake either a further

competition exercise or a direct award, in accordance with its protocol. In the event that the framework route is not the most suitable option, a procurement exercise will be undertaken advertised on Find a Tender, Contracts Finder and [www.finditinbirmingham.com](http://www.finditinbirmingham.com).

- Operational Services

- Facilities Management

Following the capital investment, the Stadium Complex requires a facilities management (FM) service to maintain the site throughout the life of the asset to the level consistent with standards for a major stadium. Historically, a statutory-only FM service has been undertaken by Acivico. However, with the increased level of tenants and users with the potential for additional events, there is an opportunity to specify and deliver an enhanced level of service, in line with the SFG20 standard delivered temporarily during the Commonwealth Games.

The procurement route will be to use a compliant framework agreement in the first instance undertaking either a further competition exercise or a direct award in accordance with its protocol. In the event of the framework route not being the most suitable option and not demonstrating best value, a procurement exercise will be undertaken advertised on Find a Tender, Contracts Finder and [www.finditinbirmingham.com](http://www.finditinbirmingham.com).

- Catering

A range of catering services within the Stadium Complex is required to be provided which will be in line with a world-class venue. The service will provide a daytime catering offer for the multiple conference, meeting and event spaces, as well as an evening offer for functions such as dinners, award ceremonies, parties and themed functions. There will also be provision of access to the built-in concession units to sell food and drink during spectator-led events.

The contract will be for a concession awarded in accordance with the Concession Regulations 2016 and a procurement exercise will be undertaken advertised on Find a Tender, Contracts Finder and [www.finditinbirmingham.com](http://www.finditinbirmingham.com).

## 7.6 Human Resources Implications (if required)

7.6.1 There are no Human Resources implications arising from this FBC.

7.6.2 Project delivery, procurement activity and the subsequent contract management of the works will be undertaken by Council staff and external support.

## **7.7 Public Sector Equality Duty**

- 7.7.1 An Equality Act 2010 screening reference was undertaken on 3<sup>rd</sup> May 2019 and identified that there was no requirement to assess this further. A further exercise was carried out in August 2022 (ref. EQUA965), which reconfirmed that completion of an Equality Assessment form is not required for the recommendations in this report.

## **8 Background Documents**

- Perry Barr 2040: A Vision For Legacy
- Commonwealth Games 2022 Legacy Plan
- Stadium Development FBC
- Stadium Legacy OBC (outline business case)

## **9 Appendices**

Appendix 1- Full Business Case

Appendix 2 -Environment and Sustainability Assessments

Appendix 3 -Risk Assessment

Appendix 4 - Equality Impact Assessment

FULL BUSINESS CASE (FBC)			
<b>A. GENERAL INFORMATION</b>			
<b>A1. General</b>			
<b>Project Title</b>	LEGACY DEVELOPMENTS FOLLOWING THE COMMONWEALTH GAMES AT ALEXANDER STADIUM COMPLEX, PERRY BARR		
<b>Voyager Code</b>			
<b>Portfolio / Committee</b>		<b>Directorate</b>	City Operations
<b>Approved by Project Sponsor</b>	Rob James, Strategic Director, City Operations	<b>Approved by Finance Business Partner</b>	Guy Olivant
<b>A2. Outline Business Case approval (Date and approving body)</b>			
<p>The Outline Business Case (OBC) for the legacy development of the Stadium was approved by Cabinet in February 2020 and described the opportunities to maximise the Games investment along with the regeneration of Perry Park.</p> <p>An FBC for the redevelopment of the Stadium was approved in 2019 and the pre-Games element of the project completed in time for hosting Commonwealth Games events in July and August 2022.</p>			
<b>A3. Project Description</b>			
<p>The Perry Barr regeneration seeks to meet both need and aspiration. It is a long-term programme with hosting the Birmingham 2022 Commonwealth Games (the Games) acting as a catalyst for accelerated growth and a moment of significance in its journey. Alexander Stadium and Perry Park are at the heart of the regeneration and have played a key role in the successful delivery of the Games.</p> <p>Post-Games, the continued success of the Stadium and its parkland setting require further capital investment to ensure this asset attracts a new range of users to create a lasting and sustainable positive legacy for the local community, the city, partners and visitors.</p> <p>This project covers the investment in infrastructure and services that provide a positive legacy from hosting the Birmingham 2022 Commonwealth Games (the Games). The focal point is the provision of facilities and services for local people, by investing in health and wellbeing, improving healthy lifestyles and providing access to activities that deliver both social and economic value to the community. These will be achieved via:</p> <ul style="list-style-type: none"> <li>• Opportunities to further develop and enhance the offer of Alexander Stadium and the wider Perry Park following the Games;</li> <li>• Creating user-based facilities that attract a range of tenants and partners to the site who will support the delivery of the legacy business plan</li> </ul>			

- The development of the Park to include a variety of additional facilities which will attract greater use by the whole community by investing in natural spaces and physical structures which may allow for the creation of a café and visitors centre, along with improvements to the setting aligned to Sport England's Active Environments philosophy;
- The enhancement of the offering within the Stadium Complex to broaden its appeal as a location for elite and organised sport, both for training and for hosting events, particularly, but not limited to, athletics.

#### A4. Scope

The scope of the project is:

- to deliver post-Commonwealth Games reinstatement of the Alexander Stadium (AXS) to meet previously approved planning commitments;
- to develop the Stadium Complex to support its extended operation with strategically-aligned tenants and a multi-sport approach;
- to develop further the facilities and services offered within Perry Park and to enhance its infrastructure for the benefit of the local community.

The specific deliverables which align with this scope are shown below in section B2.

#### A5. Scope Exclusions

There are two notable exclusions from the project scope:

- The Walsall Road Allotments are excluded from any consideration under these proposals and are therefore safeguarded
- The removal of the Games-time Transport Mall and associated reinstatement of the Park in accordance with Planning Conditions being carried out by the Commonwealth Games Organising Committee at its cost. A study carried out by the Council set out the planning, strategic and technical reasons why this temporary overlay should not be retained.

### B. STRATEGIC CASE

#### B1. Project Objectives and Outcomes

The project objectives were developed by the project team, shared and approved in the OBC and are set out below. Developing the Stadium and Perry Park following the Commonwealth Games is planned to generate:

- An increase in physical activity participation;
- Improved community engagement with the facilities and the Park;
- Widening the use of the site by residents and visitors;
- Provision of an increased sports offer for the community;
- Ensuring the Stadium continues to operate within its pre-redevelopment revenue budget.

The wider legacy from the Games will contribute to tackling health inequalities across the City, by inspiring more people to become active through taking part in physical activity, improving their physical, mental health and general wellbeing.

The essential requirements for this legacy phase include development of additional facilities that provide an attractive offer that will leverage return on capital employed, enhance the wellbeing of the local community and deliver a financially-sustainable future.

Increasing local community engagement at the site is paramount to the project outcomes: the Games legacy cannot be achieved without a direct increase in local activity levels, which requires an improved facility provision and service offering.

The relocation of the Birmingham City University (BCU) sports science faculty to the Stadium complex will bring increased footfall, academic learning and additional complementary sports-related outputs and activities. Integrating BCU into the Stadium site on the right commercial deal will benefit the wider community and will therefore be a key element to delivering successful project outcomes. Negotiations to agree the Heads of Terms are currently in progress.

A key objective is for the Stadium to be financially viable in the period following the Games. A significant part of this strategy has been to maximise the Stadium's tenancies without undermining its status as a world class athletics and sports venue. In addition to BCU, BCC has entered into negotiations with other potential tenants and licence holders, all of whom would broaden the appeal of the Stadium and contribute to the overall running costs. Capital works are required to adapt the Stadium (West Stand and Gym / Martial Arts and High-Performance Centres) to accommodate these new tenancies.

The current list of target tenants includes the following (NB - these negotiations may not conclude in successful tenancies and others may be added in future): Birchfield Harriers (BH), UK Athletics (UKA), Sport Birmingham (SB), Corporate & Sporting Events Management (CSE), Midlands Hurricanes RFL (MH), England Volleyball (EV) and University Campus of Football Business (UCFB).

Market analysis has been carried out to inform how to balance commercial and community needs and aspirations, whilst also retaining the core purpose of the Stadium as the country's premier elite athletics stadium.

### Policy Fit

All the above outcomes and their benefits will play a significant role in facilitating and contributing to the wider regeneration of Perry Barr and the City of Birmingham. These are set out in **Error!**

**Reference source not found..**

The project features as a key element in the Commonwealth Games Legacy Plan and is the key location in support of Birmingham's 10-year Major Sporting Events Strategy. In the Legacy Plan, the Vision for the Stadium states "At the heart of the Perry Barr community, the Alexander Stadium complex will be a regionally significant multi-purpose stadium that builds on the momentum, energy, promise and possibility of the 2022 Commonwealth Games. Located within Perry Park, it will enable health and wellbeing through a diverse, accessible and inclusive programme of activity."

Developing the Park will also contribute to key pillars of the Legacy Plan for making Birmingham a "Thriving City", a "Healthy City" and a "Green Growth City". The future plans will ensure that the developed design aligns with these aspirations.

Policy	Strategic Alignment
City Council Plan (2018-2022)	The project supports the following objectives in the City Council's Plan:

	<ul style="list-style-type: none"> <li>• Birmingham is a great, clean and green city to live in', particularly 'improve the environment and tackle air pollution.</li> <li>• Birmingham residents gain the maximum benefit from hosting the Commonwealth Games.</li> <li>• Birmingham is a city that takes a leading role in tackling climate change.</li> </ul>
<b>Delivering a bold legacy for Birmingham</b>	<p>The Host City legacy plan sets out ambitions to:</p> <ul style="list-style-type: none"> <li>• Boost investment in Birmingham, creating thousands of jobs and become a world-leader in hosting international events.</li> <li>• Build programmes and community projects to kickstart an accessible fitness and wellbeing boom.</li> <li>• Launch green growth through high-quality sports facilities, new sustainable homes and green transport links to become a carbon neutral city by 2030.</li> </ul> <p>This project supports the delivery of these ambitions by providing a destination for events, high-quality sports facilities and programmes of activity, which will support sustainable growth.</p>
<b>Major Sporting Events Strategy</b>	<p>The strategy sets out how Birmingham will host major sporting events which deliver impact for the city. This project delivers the venue which is central to delivering this ambition.</p> <p>Plans and bids are progressing that would secure future European and World Athletic Championships.</p>
<b>Birmingham's Local Plan (elements below)</b>	
<u>Birmingham Development Plan</u> - This sets out how to deliver sustainable growth to 2031.	<p>The FBC is consistent with the following policies:</p> <ul style="list-style-type: none"> <li>• PG2 and TP25 promote Birmingham as an international city and reinforce its role as a centre for tourism, culture and events;</li> <li>• TP7 and TP8 maintain and expand the city's green infrastructure network and enhance the natural environment;</li> <li>• TP9 and TP11 support provision of facilities for formal and informal activities that contribute to healthier lifestyles;</li> <li>• TP27 requirements for sustainable neighbourhoods include attractive, safe and multifunctional public spaces such as squares, parks and other green spaces for social activities, recreation and wildlife;</li> <li>• TP38 – TP41 seek to deliver a sustainable transport network with an emphasis on active travel.</li> </ul>
<u>Perry Barr 2040: A Vision for Legacy</u> - Adopted in February 2022 to guide regeneration in the area over the next two decades.	<p>The FBC is consistent with the following:</p> <ul style="list-style-type: none"> <li>• The <b>Masterplan objectives</b>, including: "Embrace the scale of opportunity at Alexander Stadium and Perry Barr to deliver ambitious change which reflects the area's role at the heart of the Games</li> </ul>



	<p>and realises benefits for all”; and “Prioritise parks and public spaces to enhance biodiversity and create a joined-up green network which supports physical and mental wellbeing”;</p> <ul style="list-style-type: none"> <li>• The <b>Place Principles</b>, including “make a green, sustainable place”, “nurture a healthy community”, and “promote a thriving Perry Barr”;</li> <li>• <b>Proposals which enhance Perry Park</b> for the future, create a sustainable Alexander Stadium complex and enhance and connect with surrounding areas.</li> </ul>
<p><u>3Bs Neighbourhood Plan</u> - forms part of the City's local development plan, and seeks to create a clean, attractive, green area with easy access to a high-quality natural environment including extensive parks, waterways and open spaces.</p>	<p>The FBC is consistent with the following Community Objectives:</p> <ul style="list-style-type: none"> <li>• 1: Designated parks will be protected and enhanced. All development (in particular at Perry Park related to the Commonwealth Games) will improve the quality of these important community assets;</li> <li>• 2: Connections between the wide variety of green spaces will be improved by creating green connections, whilst supporting nature conservation and improving biodiversity. This will improve accessibility for exercise and leisure to these important open spaces.</li> <li>• 3: Accessibility to and visibility of the waterways that run through the area will be improved to provide more opportunities for exercise and leisure.</li> <li>• 7: Development of improved facilities for the Commonwealth Games should also provide long-term benefit to local people in terms of environmental improvements and public realm and continued public access.</li> </ul> <p>The project supports Neighbourhood Plan Policies 3 (Improving the Parks), 5 (Improving green and blue connections) and 7 (Improving biodiversity).</p>
<p><u>Other planning policy</u></p>	<p>The FBC is also consistent with the following:</p> <ul style="list-style-type: none"> <li>• Nature Conservation Strategy for Birmingham</li> <li>• Parks and Open Spaces Strategy</li> <li>• Sustainable Management of Urban Rivers and Floodplains SPD</li> </ul>
<p><b>Birmingham Transport Plan (2021)</b> guides investment in transport.</p>	<p>The FBC aligns particularly with the following objectives:</p> <ul style="list-style-type: none"> <li>• Reduce transport's damaging impact on the environment, supporting Birmingham's commitment to becoming a carbon neutral city by 2030.</li> <li>• Reconnect communities by prioritising people over cars.</li> </ul>
<p><b><u>Birmingham Business Charter for Social Responsibility (BBC4SR)</u></b></p>	

The requirements of the Birmingham Business Charter for Social Responsibility are mandatory and form part of the terms and conditions for any contract awarded in accordance with the Council's policy and will include the payment of the Real Living Wage.

This will provide opportunities to support the Perry Barr ward and surrounding areas through:

- The creation of jobs, apprenticeships, work experience graduate placements;
- Training opportunities;
- Supply chain opportunities for local businesses, small and medium enterprises and social enterprises;
- Support for local community projects advertised on matchmyproject.org.

This has been demonstrated successfully in the project to develop the Stadium for Games-time use and will be maintained for the legacy development.

## B2. Project Deliverables

This FBC supports the investment in the following range of uses on Alexander Stadium site and in Perry Park. The project proposes to deliver its scope through a series of workstreams (table below).

Whilst the capital works are being undertaken, areas of the Stadium and Park which are not under construction will gradually re-open for public use.

Workstream	Scope
<b>1. Reinstatement of the AXS: (a) to meet planning requirements (b) to complete outstanding capital works</b>	<ul style="list-style-type: none"> <li>• Deliver Alexander Stadium planning obligations, e.g. external works to remove North Plaza, adjust field of play lighting, landscaping, reduction of Athletes Road, installation of secure fence lines, and planting.</li> <li>• Review elements that potentially conflict with other workstreams</li> </ul>
<b>2. Internal Spaces - West Stand &amp; East Stand</b>	<ul style="list-style-type: none"> <li>• Readying spaces in the West and East Stands for future tenancy operations</li> <li>• Finalise operational and event spaces: Reception, Lounge, Offices, Boardrooms, Boxes, Function Room, Bar, Kitchens</li> </ul>
<b>3. Extension of the Gymnasium and Martial Arts Centre (GMAC) and improvements to the High Performance Centre (HPC)</b>	<ul style="list-style-type: none"> <li>• Accommodating elite sport provision in the HPC; relocation of the public gym to the GMAC with the inclusion of studios and creating new changing rooms for the warm-up track</li> </ul>
<b>4. Enhancement of Stadium Complex</b>	<ul style="list-style-type: none"> <li>• Includes enhancements to main track and to the warm-up track infield (converted to a 3G artificial surface); provision for future tenancies</li> </ul>
<b>5. Perry Park Legacy</b>	<ul style="list-style-type: none"> <li>• Masterplan that builds upon Perry Barr 2040 Masterplan</li> <li>• Delivers BCC priorities including new physical activity installations/external play facilities for people of all ages in the Park, park infrastructure such as café and toilets; delivery of new cycle and running pathways around the Park linked to the city cycle network</li> </ul>

There is an additional workstream, under which BCC will install the internal fit-out in the High-Performance Centre on behalf of the proposed tenant, according to its design specifications. A funding agreement will be put in place between BCC and the tenant governing the transfer of money to pay for this work, to a cost plan agreed with the BCC project team and its contractor. The tenant will be responsible for risk in this workstream; BCC will act only as delivery vehicle.

Workstreams 1, 2 and 4 currently have fully identified scope and have a design developed to an advanced stage. Workstream 1 also has an approved planning consent as it consists of reinstating part of the pre-Games design and therefore was part of the planning submission. Planning consent will be required for Workstreams 2 and 4.

Workstreams 3 and 5 require further refinement of detailed design and consultation with key stakeholders, including future tenants, and will be subject of a future planning submission.

### B3. Project Benefits

Measure	Impact
<ul style="list-style-type: none"> <li>Increase in physical activity participation</li> </ul>	<ul style="list-style-type: none"> <li>Relevant and demand-led facilities which provide quality community infrastructure;</li> <li>Programming of services that meet the needs of the community at price points that remove barriers to engagement;</li> </ul> <p><b>Measures:</b> levels of uptake in physical activity services, location of the users and user satisfaction via surveys</p>
<ul style="list-style-type: none"> <li>Improved community engagement with the facilities and the Park</li> </ul>	<ul style="list-style-type: none"> <li>Providing facilities for community groups and residents to gather and maximise footfall in the Park, including but not limited to a café, a visitors centre etc;</li> <li>Creating space to contemplate and relax;</li> <li>Providing facilities for fitness and natural activities including running, cycling and other informal sports</li> </ul> <p><b>Measures:</b> levels in all facilities (leisure and sport) assessed by footfall; revenues earned in café etc; user satisfaction via surveys</p>
<ul style="list-style-type: none"> <li>Widen the use of the site by residents and visitors</li> </ul>	<ul style="list-style-type: none"> <li>Making the place safer;</li> <li>Linking facilities to the wider cycle network;</li> <li>Creation of linkages with the canal towpath;</li> <li>Opening up the stadium to the community through pricing options;</li> <li>Providing improved accessibility to the site;</li> <li>Providing sign-posts to activities that are relevant to the community</li> <li>Providing a diverse range of activities on site for all ages and abilities</li> </ul> <p><b>Measures:</b> surveys of users to identify their locations, the range of distance travelled to the</p>

	Stadium and Park and the services and / or facilities used
<ul style="list-style-type: none"> <li>Provision of increased sports offer for the community</li> </ul>	<ul style="list-style-type: none"> <li>Delivery of new / enhancing existing facilities</li> <li>Creating linkages and events with BCU Doug Ellis Centre and Holford Drive Community Sports Hub</li> <li>Attract tenants who commit to delivering legacy benefits with the stadium with varied sports offerings and encourage existing tenants to extend uses of the facilities to new sports</li> </ul> <p><b>Measures:</b> types of sport on offer across the site and at what levels (schools, junior, community, elite)</p>
<ul style="list-style-type: none"> <li>Ensuring the Stadium continues to operate within its pre-redevelopment revenue budget</li> </ul>	<ul style="list-style-type: none"> <li>Improved rental income to support the sustainability of the stadium, through enhanced offering for elite performance, the creation of an international athletics venue and an expanded events programme;</li> <li>Increased rental concessions in the park;</li> <li>Efficient operating model which keeps cost base down despite the bigger footfall of the site and increased maintenance burden;</li> <li>Building design with reduced running costs;</li> </ul> <p><b>Measures:</b> management accounts for the Stadium and Park, showing revenue and expenditure</p>

#### B4. Benefits Realisation Plan

Benefits will be delivered in a phased manner, as the different stages of the project complete their capital works, the earliest of these happening in Q1 2023 as initial reinstatement is finished (Workstream 1). The planned benefits will be delivered by ensuring:

- Early engagement with contractors will be undertaken to ensure the scope can be delivered within the timescales;
- The contract award for detailed design will mitigate cost and time risks;
- A robust governance structure has been established to monitor progress and manage dependencies, risks and issues, as they arise. Clear tolerance and escalation levels are set to ensure issues are identified and managed in a timely manner;
- Post implementation reviews will be carried out after each phase has completed.

#### B5. Stakeholders

A comprehensive programme of Stakeholder Engagement activity took place to support the project which delivered the Stadium for the Commonwealth Games. This will continue up to and during the works to develop the Stadium and Park legacy.

The majority of stakeholders remain the same for the later phase of works, particularly the community groups which have an interest in how the wider Park is developed to offer more facilities

for local residents and users (see section G4). These stakeholder groups remain actively engaged with the project and will form part of any formal consultation process once planning consent is being sought. These will involve all impacted Ward Councillors.

## C. ECONOMIC CASE AND OPTIONS APPRAISAL

### C1. Summary of options reviewed at Outline Business Case

The options considered in the Options Appraisal of the approved OBC were:

**Option 1 – *Do Minimum*** – Operation of the Stadium to include Birmingham City University as a tenant and transfer use of the High-Performance Centre (HPAC) to the University. This is in line with the approved Stadium Redevelopment FBC.

**Option 2 – *Improved offering for Perry Park – Lower Cost*** – As Option 1, plus the provision of new leisure facilities in Perry Park. This could be inclusive of a visitor centre, café, external play facilities, new pathways and investment in cycling routes.

**Option 3 – *Improved offering for Perry Park and a new leisure centre*** – As Option 2, plus the provision of a new wet and dry leisure facility replacing the Beeches Pool and Fitness Centre which would be closed and the site sold.

**NB** – since the OBC was approved, the decision was taken to retain the Beeches Pool and Fitness Centre, so this no longer factors in this option. It will continue to operate and provide swimming facilities under the 15-year contract agreed in 2016 with Birmingham Community Leisure Trust, which has invested in refurbishing the pool in the last 5 years.

**Reason for preferred option** – The option that provides the optimum balance between the capital costs, net operating costs and against the social and economic value impact would be a revised Option 3 (noting that this no longer includes the wet leisure facility, with the retention of Beeches Pool). This provides:

- a comprehensive solution for a substantial fitness facility which meets requirements for the local community and improves the revenue position;
- improved facilities that will attract a range of strategically important tenants to the site to support the delivery of the legacy business plan
- inward public investment into the community;
- demand-led facilities;
- creation of varied and interesting facilities and programmes that will encourage the community to want to engage and participate;
- the chance to bring back into use a park with a visitor centre, linkages with the Perry Reservoir and the canal system.

**The impact of not delivering the project** – The works to configure the Alexander Stadium to host the Commonwealth Games do not leave a complex optimised for legacy operation. The reinstatement and other capital works described above will provide the facilities to service the current and future tenants and users to the site effectively. Not delivering the changes to the Park would also compromise key aspects of the regeneration of the Perry Barr area.

The project team has considered which if any of the temporary Games overlay may be usefully retained and has sought to limit the removal of overlay works to those elements deemed not to serve a future purpose. This includes parts of the north and south plazas. Where a change to the

planning consent may be required, this will be sought as part of the project's planning submissions. As noted in Section A5, the Transport Mall is being reinstated to parkland.

## C2. Evaluation of key risks and issues

The project risk register is included in **Appendix D**.

The key strategic risks affecting the project at this point are as follows:

- The condition of the Stadium following handback from the Organising Committee requires greater than planned reinstatement works, impacting programme and budget
- Pre-Games scope issues (e.g. snagging, deferred works) are not resolved, causing scope, programme and budget issues
- The procurement of key pieces of work, including the advisory team and the contractor(s) cause delay to the programme
- Perry Park Masterplan and design development is delayed, impacting decisions for AXS reinstatement and enhancements
- Key roles in the project team are not filled in a timely manner, causing delays in managing the project, driving through operations and recruiting the team
- Funding streams place constraints / requirements on the project in return for the funding, impacting design and / or operation
- Tenant operational requirements may be in conflict, requiring additional capital works to alleviate them, impacting budgets and programme
- A successful European Athletics Championships 2026 bid may require design changes after capital works are underway or are even completed
- Inflation risks impacting construction materials costs

## C3. Other impacts of the preferred option

There are a number of positive impacts leveraged from the development of the Preferred Option which include:

- Increased ongoing rental streams from the new and existing tenants;
- Increased footfall to the site from BCU students and new user groups;
- Enhanced reputation for elite sports provision through the development of the High Performance Centre and the reputation of the Stadium as a world class venue;
- Increased usage from the proposed provision of a new sports and leisure facility on site;
- Improved access to sport and physical activity for the local community from the range of services, some of which will be free to use or discounted for concession card holders;
- Improved access to the stadium facilities through pricing and programming;
- Potential for the venue to be used for additional events, e.g. concerts;
- Improved signposting and access to the site which was previously difficult to navigate.

## D. COMMERCIAL CASE

### D1. Partnership, joint venture and accountable body working

N/A

## D2. Procurement implications and Contract Strategy

The procurement strategy for any services and works to support the project will be subject to subsequent reports and in accordance with the Procurement and Contract Governance Rules within the Constitution.

The areas which require a procurement process are:

- Reinstatement Works

This requirement is for the works to reinstate from Games mode to an operational site. Cabinet was advised of the procurement strategy for the reinstatement works in the Planned Procurement Activity report dated 11<sup>th</sup> May 2021 to enter into single contractor negotiations with McLaughlin & Harvey Construction Ltd.

- Technical Professional Services for the reinstatement and legacy works

Cabinet was advised of the procurement strategy for professional services to support the reinstatement works in the Planned Procurement Activity report dated 22nd July 2022.

- Legacy Works

This is for the works to the site to meet the legacy requirements as detailed in the FBC (above). The procurement route will be to use a compliant framework agreement in the first instance and to undertake either a further competition exercise or a direct award, in accordance with its protocol. In the event that the framework route is not the most suitable option, a procurement exercise will be undertaken advertised on Find a Tender, Contracts Finder and [www.finditinbirmingham.com](http://www.finditinbirmingham.com).

- Operational Services

- Facilities Management

Following the capital investment, the Stadium Complex requires a facilities management (FM) service to maintain the site throughout the life of the asset to the level consistent with standards for a major stadium. Historically, a statutory-only FM service has been undertaken by Acivico. However, with the increased level of tenants and users with the potential for additional events, there is an opportunity to specify and deliver an enhanced level of service, in line with the SFG20 standard delivered temporarily during the Commonwealth Games.

The procurement route will be to use a compliant framework agreement in the first instance undertaking either a further competition exercise or a direct award in accordance with its protocol. In the event of the framework route not being the most suitable option and does not demonstrate best value, a procurement exercise will be undertaken advertised on Find a Tender, Contracts Finder and [www.finditinbirmingham.com](http://www.finditinbirmingham.com).

- Catering

A range of catering services within the Stadium Complex is required to be provided which will be in line with a world-class venue. The service will provide a daytime catering offer for the multiple conference, meeting and event spaces, as well as an evening offer for functions such as dinners, award ceremonies, parties and themed functions. There will also have be the provision of access to the built-in concession units to sell food and drink during spectator-led events.



The contract will be a for a concession awarded in accordance with the Concession Regulations 2016 and a procurement exercise will be undertaken advertised on Find a Tender, Contracts Finder and [www.finditinbirmingham.com](http://www.finditinbirmingham.com).

### D3. Staffing and TUPE implications

There are no TUPE implications with this project.

The Target Operating Model which has been developed to support the long-term functioning of the Stadium contains proposals for staffing the team in the post-Games period.

A separate service redesign paper has been developed with the BCC HR team to take to the Trades Unions, setting out the rationale for an increase in the staffing levels at the stadium to meet the new size and scale / diversity of skills needed to make a success of the stadium in legacy. Once agreed, recruitment will start for additional members of the commercial, front-of-house and grounds teams.

## E. FINANCIAL CASE

### E1. Financial implications and funding

The identified capital investment identified to deliver this project amounts to £21.432m, including those elements included within the Stadium Redevelopment FBC, but planned to be delivered post-Games. The following table sets out total anticipated costs and funding sources for the works.

		2022/23 £'000	2023/24 £'000	Total £'000
<b>Capital Investment</b>				
Workstream 1	Planned Reinstatement works	4,075		4,075
	Works deferred from pre-Games Programme	1,185		1,185
Workstream 2	Internal Spaces	3,574		3,574
Workstream 3	GMAC & HPC	2,000	2,060	4,060
Workstream 4	Enhancement of Stadium Complex	4,546		4,546
Workstream 5	Perry Park Legacy		2,492	2,492
Tenant-Funded Works	HPC Tenant Fit-Out	1,500		1,500
<b>Total Capital Investment</b>		<b>16,881</b>	<b>4,552</b>	<b>21,432</b>
<b>Capital Financing</b>				
Stadium Redevelopment	Previously approved as part of CWG	(4,629)		(4,629)
CWG	Residual Capital Contingency / Underspends	(6,607)		(6,607)
Corporate Capital Resources (Capital receipts)	Identified in OBC – Approved Feb 2020	(2,145)	(2,855)	(5,000)



CIL	Identified in OBC – Approved Feb 2020		(500)	(500)
External Grants & Contributions		(2,000)	(1,197)	(3,197)
Tenant Works Contribution		1,500		
<b>Total Capital Financing</b>		<b>(16,881)</b>	<b>(4,552)</b>	<b>(21,432)</b>

Whilst there will inevitably be a transitional period whilst this project is completed, during which time revenue costs and income will be distorted, a detailed Target Operating Model (TOM) has been developed that demonstrates the longer-term financial viability of the Stadium complex following completion of this project.

The following table sets out a comparison between the current approved budget and steady state TOM requirement (both base case and best case options), showing a small anticipated ongoing revenue saving of between £0.1m and £0.3m per annum.

	Current Budget £'000	Base Case £'000	Best Case £'000
External Income	(923)	(2,133)	(2,352)
Staffing Costs	1,018	1,524	1,524
Other Operating Costs	1,407	1,696	1,696
Financing Costs	651	988	988
Net Operating Cost	2,153	2,075	1,856

## E2. Evaluation and comment on financial implications

Whilst the capital investment requirements have not yet been exposed to a competitive procurement process, it is anticipated that it will be possible to identify a range of “value engineering” opportunities to help to de-risk capital financing requirements.

The majority of identified capital financing sources have already been secured subject to approval of this FBC, with the exception of the external grants and contributions, amounting to £3.332m in total. Positive discussions are under way with a number of funders. In the event that this funding is not fully realised, it will be possible to ensure that the overall project remains fully-funded and deliverable without increasing the financial burden on the Council through a review of detailed scope elements for the wider legacy proposals.

The long-term TOM provides a robust baseline to demonstrate the long-term financial viability of the Stadium complex, based on a cautious assessment of future commercial opportunities and future tenancy agreements. Whilst there are a number of risks to some elements of the anticipated costs of operating the Stadium (in particular relating to inflation, including utility costs), the Stadium is designed to be as energy efficient as possible and it is likely that substantial elements of income generated will increase over time in line with cost increases.

## E3. Approach to optimism bias and provision of contingency

The identified capital investment requirements for each workstream as set out in section E1, whilst having not yet been exposed to any competitive tender process, are calculated on a prudent basis and include allowances for both inflation and a proportionate level of contingency taking account of the nature of works to be undertaken. In the event that additional cost pressures emerge, opportunities will be explored to seek additional external funding or to crystallise any savings that may be possible through value-engineering, without undermining the future use or efficiency of the Stadium and Perry Park.

#### E4. Taxation

The FBC has been developed on the assumption that the current in-house operating model and VAT recovery status of the Stadium remain unchanged and in particular all costs and income are stated net of recoverable VAT.

There may be opportunities in the future to consider alternative models for the operation of the Stadium in particular (for example through a charitable trust), which may present an opportunity to secure savings through mandatory NNDR relief and other beneficial tax treatments. This opportunity does however present some commercial challenges, particularly in the short term as this project is delivered and the longer term operation of the Stadium “bedded in”. It is therefore not considered appropriate to pursue alternative delivery models at this time.

### F. PROJECT MANAGEMENT CASE

F1. Key Project Milestones	Planned Delivery Dates
FBC approval	October 2022
Handback of Stadium from Organising Committee  NB - Handback of public areas of the Stadium has commenced and the Gymnastics and Martial Arts Centre reopened on 20 September. Other areas (e.g. High-Performance Centres and warm-up track) will reopen once condition surveys and remedial works have been completed. It is anticipated that this will be prior to the full handback date of the site.	November 2022
<b>Workstream 1</b>	
Contract award	October 2022
Construction starts	November 2022
<b>Workstream 2</b>	
Design complete	September 2022
Contract award	November 2022
Construction starts	December 2022
Construction complete	March 2023
Stadium operations commence in the completed areas	April 2023
<b>Workstreams 3 &amp; 4</b>	
Design complete	December 2022
Planning submission (also Workstream 5)	January 2023
Planning approvals	April 2023
Contract award	March 2023

Construction starts	April 2023
Construction complete	December 2023
Operations commence in completed areas	January 2024
<b>Workstream 5</b>	
Design complete	February 2023
Contract award	June 2023
Construction starts	July 2023
Construction complete	May 2024
Full Park operations can commence in new developments	May 2024

The BCC Project Team recognises that the achievement of the programme and these milestones is subject to validation by the contractors once they have been procured. This is therefore not a baselined position.

Note that the operational ready dates in the table above relate only to those areas of the Stadium Complex and Park which have been under construction; other areas will be able to operate whilst the capital works are underway.

## F2. Achievability

This project will be delivered as a follow-on to the successful Stadium Redevelopment project that was delivered on time and within the £72m budget to support the Commonwealth Games, for which the Stadium was a key venue in July and August 2022. The Project will be delivered as a single project with a number of contributing workstreams, overseen by a dedicated project board as set out in section F5.

The project will be managed in accordance with the City Council's Standing Orders, Financial Regulations and Governance Arrangements as set out in the Council's Constitution. The Delivery Team within the City Operations will take the lead for the project.

The Council has a successful track record of delivering works similar to those included within each individual workstream of this project (including the Games-time project), and will utilise the full range of suitably skilled and experienced individuals within the council, complemented by additional external expert support where needed, to ensure the successful delivery of the project.

## F3. Dependencies on other projects or activities

The legacy project is dependent upon and has interfaces with the following:

- The handback of the Stadium from the Birmingham 2022 Organising Committee to the standards contained in the Venue Use Agreement;
- The development of relevant key milestones within the Perry Barr 2040 Masterplan: A Vision for Legacy as they impact Perry Park;
- Confirmation of funding;
- Securing Catering and Facilities Management Contractors
- Confirmation of the staffing structure and its adoption, including appointment of key leadership roles
- Finalisation of key tenancies

## F4. Officer support

**Project Manager:** Dave Wagg  
Strategic Sport Project & Client Manager  
0121 464 0939  
[dave.wagg@birmingham.gov.uk](mailto:dave.wagg@birmingham.gov.uk)

**Project Accountant:** Guy Olivant  
Major Developments Lead – Development & Commercial Team  
0121 303 4752  
[guy.olivant@birmingham.gov.uk](mailto:guy.olivant@birmingham.gov.uk)

**Project Sponsor:** Rob James  
Strategic Director of City Operations  
0121 303 2047  
[rob.james@birmingham.gov.uk](mailto:rob.james@birmingham.gov.uk)

## F5. Project Management

A Project Board has been established to oversee the delivery of this project, building on the successful management of the Stadium Redevelopment Project that forms a part of the Commonwealth Games capital programme governance. Membership of the Board has been refreshed to reflect the nature of this project and the Board will be accountable to the Council's Capital Board.

The Board will monitor, review, coordinate and share information on common issues impacting on the successful delivery of the capital projects. The Terms of Reference will be regularly updated through the life of the project to set out the function, length of time it will be in operation and how it will be managed.

The Project Board will provide reports to the Project Sponsor, BCC Senior Management and the BCC Capital Board on the progress towards completion.

The Project Board members include

- BCC Alexander Stadium Client Lead
- Sport England Representative (on behalf of DCMS)
- Representation from the following BCC teams:
  - Parks
  - Perry Barr 2040
  - Finance

The Board meets monthly to undertake the following functions:

1. To oversee the legacy project and ensure that appropriate control and accountability measures are in place.
2. To receive reports and monitor progress on the various elements of the legacy project.
3. To monitor the key dates and milestones in the programme and ensure the project is delivered to the agreed timescale.
4. To monitor the budget to ensure it is delivered with the funding available.
5. To consider risks and mitigation measures relating to the delivery of the legacy project.

6. To ensure integration of the various elements of the legacy project with the Perry Barr 2040 masterplan.
7. To ensure appropriate and timely engagement with statutory and regulatory bodies.
8. To ensure stakeholders are suitably engaged, consulted and kept inform of progress.

## G. SUPPORTING INFORMATION

### G1. Project Plan

*Detailed Project Plan supporting the key milestones in section F1 above*

Please refer to **Section F1** of this report for delivery milestones.

### G2. Summary of Risks and Issues Register

*Risks should include Optimism Bias, and risks during the development to FBC*

*Grading of severity and likelihood: High – Significant – Medium - Low*

Please refer to **Appendix D** for the project risk register.

### G3. External funding and other financial details

*Description of external funding arrangements and conditions, and other financial details supporting the financial implications in section E1 above (if appropriate)*

A summary of funding for the delivery of the project is provided in **Section E2** of this report.

### G4. Stakeholder Analysis

The table below identifies all of the stakeholders involved in the project outlining their role and significance and how these relationships will be managed throughout the successful delivery of the project.

The table below shows the current stakeholder list and the results of an interest and influence analysis carried out for the pre-Games phase of works. This list will continue to be actively managed and will evolve as the project is delivered.

	Influence	
	High Interest/High Influence	High Interest/Low Influence
	Low Interest/High Influence	Low Interest/Low Influence
Interest	Birmingham City Council – Leader, Deputy Leader, Chief Executive, Cabinet, Opposition leaders Birmingham City Council – Inclusive growth Birmingham City Council – Planning Birmingham City Council – Lead Local Flood Authority Birmingham City Council – Parks Birmingham City Council – Neighbourhoods Birmingham City Council – Commonwealth Games Commonwealth Games Federation Partners Birmingham 2022 Organising Committee Commonwealth Games England The Department for Digital, Culture, Media & Sport World Athletics/International Association of Athletics Federations Commonwealth Games Delivery Partner Sport England UK Athletics Local MPs Ward Councillors Sports Ground Safety Authority West Midlands Police Birchfield Harriers Birmingham City University Greater Birmingham and Solihull Local Enterprise Partnership West Midlands Combined Authority West Midlands Mayor – Andy Street	Transport for West Midlands The Active Wellbeing Society Walsall Road Allotments Friends of Perry Park Birmingham Open Spaces Forum Aston Manor Cricket Club St John the Evangelist Church Holford Drive Community Sports Hub Perry Villas 3B's Neighbourhood Planning Forum Local residents and businesses English Institute of Sport Midland Counties Athletic Association England Athletics Corporate & Sporting Events Management Sport Birmingham Birmingham Crematorium Friends of Perry Hall Park Nechells POD The Athletics Museum Greater Birmingham Chambers of Commerce Local schools, colleges and universities Stadium staff
	Birmingham City Council – Highways Birmingham City Council – Ecology Birmingham City Council – Regulatory Services Birmingham City Council – Landscape Practice Group Birmingham City Council – Conservation Birmingham City Council – Arboriculture Birmingham City Council – Public Health Environment Agency Canal and River Trust Natural England Historic England Highways England West Midlands Fire and Rescue West Midlands Ambulance Service NHS Foundation Trust Utility providers	Midlands Engine Access Birmingham Birmingham BMX Club British Gymnastics Perry Hall Community Association The Ramblers BrumBats Federation of Small Businesses One Stop Shopping Centre Perry Barr Greyhound Stadium England Hockey Other third sector organisations (UCAN)

Other Attachments <i>provide as appropriate</i>	
• Appendix B –	
• Appendix C – Perry Park and Alexander Stadium Masterplan	
• Appendix D – Risk Register	
• Appendix E –	
• Appendix F –	
• Appendix G – Equalities Analysis	
• Appendix H –	
• Exempt Appendix I – Exempt Appendix	

FBC template 2019 02 20



Appendix C of FBC -  
Current Site Masterplan





### Environment and Sustainability Assessment

Birmingham City Council is required to assess any positive or negative impacts that any policy/strategy/ decision/development proposal is likely to have on the environment. This assessment must be completed for CLT and Cabinet reports where appropriate. It is the responsibility of the Service Director signing off the report to ensure that the assessment is complete.

To complete the assessment, you should consider whether the proposal will have a positive or a negative impact on each of the key themes by placing a (✓) for positive, (x) for negative and (?) for unclear impact, and (N/A) for non-applicable impact. Further guidance on the completion of the template is available on page 3 below.

<b>Project Title:</b>	<b>FULL BUSINESS CASE FOR THE LEGACY DEVELOPMENTS FOLLOWING THE COMMONWEALTH GAMES AT ALEXANDER STADIUM, PERRY BARR</b>			
<b>Directorate:</b> City Operations	<b>Team:</b> Alexander Stadium	<b>Person Responsible for assessment:</b>		
<b>Date of assessment:</b> 17 August 2022	<b>Is it a new or existing proposal?</b> New, but building on an existing project delivered for the Commonwealth Games			
<b>Brief description of the proposal:</b> <p>Following the successful delivery of the Commonwealth Games, with the redeveloped Alexander Stadium at the core of the event, this project is centred around the transition of the stadium and its surroundings from a Games driven configuration to one better suited to the ongoing delivery of a sustainable and financial viable venue for both elite supports and community use over the longer term.</p> <p>Planned works include elements required to be undertaken under the terms of the Planning Consent for the Stadium Redevelopment, together with enhancements to internal facilities and to the wider Perry Park (anticipated to improve useability and reduce flood risk for surrounding properties).</p> <p>A full sustainability assessment was undertaken as a part of the Planning process for the core Redevelopment Project.</p>				
<b>Potential impacts of the policy/development/ decision on:</b>	<b>Positive Impact</b>	<b>Negative Impact</b>	<b>No Specific Impact</b>	<b>What will the impact be? If the impact is negative, how can it be mitigated, what action will be taken?</b>
Natural Resources - including water, soil, air	✓			Whilst the construction phase of the project will inevitably use natural resources, the project is predicated on the delivery of solutions that reduce reliance on polluting forms of transport, increase the useability of the park and reduce

				flood risk in the area. It is anticipated that the longer term benefits will outweigh the immediate costs.
Energy use and CO <sub>2</sub> emissions	√			Energy efficiency measures including elements such as air source heat pumps / efficient lighting solutions are embedded as design principles. The overall plan for future use of the stadium is predicated on a move away from vehicular access towards increased reliance on public transport and active travel.
Quality of environment	√			Building on the existing positive impact of the Stadium Redevelopment, this is a key part of the design principles being followed
Impact on local green and open spaces and biodiversity	√			The sympathetic improvement of Perry Park to encourage greater and more diverse usage is a key workstream within the proposals.
Use of sustainable products and equipment	√			Embedded as a key design principle. Improved quality of construction could reduce maintenance costs over the lifetime of the assets. All materials that are used with the development are to be sourced where possible with the use of local suppliers encouraged as part of the social value agenda
Minimising waste	√			<p>Embedded as a key design principle. The Employer's Requirements and Specification requires contractors to minimise environmental damage, minimise the use of non-renewable building materials and use materials that require less energy to manufacture. In addition, the contractors will submit proposals for social responsibility where they are encouraged to eliminate unnecessary waste.</p> <p>Generally, contractors use segregated waste and disposal bins on site with all waste transfer notes kept on site and available for inspection. Re-cycling of materials on site and within the factory will be maximised with waste to landfill kept to an absolute minimum, with KPI's reported</p>

				<p>monthly. Contractors are expected to reduce waste by re-cycling during the construction process, with waste wood and materials re-used locally. Contractor will be ISO 14001 accredited for the protection of the environment and operate with an environmental policy statement. Large construction plant(s) will not be idling when not in use.</p> <p>Contractors are requested to use recycled and recyclable materials where standards allow, use materials that require less energy to manufacture – low embodied energy materials and to recycle materials within the build where possible</p>
Council plan priority: a city that takes a leading role in tackling climate change	√			As noted above, the entire ethos of the proposals include making sure that negative impacts are minimised and positive impacts are at the centre of the design principles adopted.
Overall conclusion on the environmental and sustainability impacts of the proposal	<p>During construction phases, it is acknowledged that there will be some unavoidable adverse impacts, but the longer term benefits are designed into the project proposals to ensure they are delivered / maximised, with the clear intention that these outweigh the short term costs.</p>			

**Guidance for completing the template**

<b>Theme</b>	<b>Example</b>
Natural Resources - Impact on natural resources including water, soil, air.	<p>Does the decision increase water use?</p> <p>Does the decision have an impact on air quality?</p> <p>Does the decision discourage the use of the most polluting vehicles (private and public) and promote sustainable modes of transport or working from home to reduce air pollution?</p> <p>Does the decision impact on soil?</p> <p>For example, development will typically use water for carrying out various operations and, once complete, water will be needed to service the development. Providing water to development and treating affluent water requires energy and contributes to climate change. Some of the activities including construction or disposal of waste may lead to soil pollution. The decisions may lead to more journeys thereby deteriorating air quality and thus contribution to climate change and greenhouse gases.</p>
Energy use and CO <sub>2</sub> emissions.	<p>Will the decision have an impact on energy use?</p> <p>Will the decision impact on carbon emissions?</p> <p>Most day-to-day activities use energy. The main environmental impact of producing and using energy such as electricity, gas, and fuel (unless it is from a renewable source) is the emission of carbon dioxide.</p>
Quality of environment.	<p>Does the decision impact on the overall quality of the built environment?</p> <p>Decisions may have an impact on the overall setting, character and distinctiveness in the area. For example, if development involves ground digging and excavations etc. it may have an impact on the local archaeology.</p>
Impact on local green and open spaces and biodiversity	<p>The proposal may lead to localised impacts on the local green and open spaces which may have an impact on local biodiversity, trees and other vegetation in the area.</p> <p>Will the proposal lead to loss (or creation) of green and blue infrastructure?</p> <p>For example, selling an open space may reduce access to open space within an area and lead to a loss of biodiversity. However, creating a new open space would have positive effects.</p>
Use of environmentally sustainable products, equipment and packaging'	<p>Will the decision present opportunities to incorporate the use of environmentally sustainable products (such as compostable bags, paper straws etc.), recycled materials (i.e. Forest Stewardship Council (FSC) Timber/wood), non-polluting vehicles, avoid the use of single use plastics and packaging.</p>
Minimising waste	<p>Will the decision minimise waste creation and the maximise recycling during the construction and operation</p>

	<p>of the development/programme/project?</p> <p>Will the decision provide opportunities to improve recycling?</p> <p>For example, if the proposal involves the demolition of a building or a structure, could some of the construction materials be reused in the new development or recycled back into the construction industry for use on another project?</p>
Council plan priority: a city that takes a leading role in tackling climate change and deliver Route to Zero.	How does the proposal or decision contribute to tackling and showing leadership in tackling climate change and deliver Route to Zero aspirations?

If you require further assistance with completing this template, please contact: [ESAGuidance@birmingham.gov.uk](mailto:ESAGuidance@birmingham.gov.uk)



Risk Assessment (Current Exposure)																
Status	Risk Title	Risk Cause	Risk Consequences	Risk Owner (Project)	Proximity	Exposure Start Date	Expected Close-Out	Likelihood	Capital	Revenue	Time	Financial Claims	Legacy Outcomes	Reputation	Risk Score	Risk Response Actions
Open	Inadequate condition of the Stadium following handback from the Organising Committee	OC hands back Stadium in poor condition, failing to meeting requirements within VUAs, and the handover process is not managed in an efficient way	Greater than planned reinstatement works required Delays to programme delivery and increase to programme costs Delays to post-Games activities at venues Terms of VUA are not met requiring legal involvement at additional cost	Dave Wagg	Imminent	08/08/2022	05/11/2022	5	3	2	3	4	3	3	20	1. Handover requirements captured in VUA. 2. Rigorous monitoring of OC withdrawal activities; detailed capturing of condition of works 3. Recover costs from OC via VUA mechanism
Open	Unresolved pre-Games scope issues	Pre-Games scope issues (e.g. snagging, deferred works) are not resolved	Scope, programme and budget issues	Dave Wagg	Imminent	08/08/2022	31/12/2022	4	3	1	3	3	3	2	12	1. Capital investment requirements to include contingency allowance. 2. If required seek additional external funding or to crystallise any savings that may be possible through value-engineering.
Open	Delays to procurement of key pieces of work	Delays to procurement of key pieces of work, including the advisory team and the contractor(s)	Delay to the programme with late opening of stadium and Park	Charlie Short	Close	08/08/2022	31/10/2022	3	3	2	3	0	2	3	9	1. Procurement approach outlined in FBC. 2. Rigorous management of procurement timelines 3. Use of existing mechanisms (e.g. frameworks) to avoid open tender exercises
Open	Delays to Perry Park Masterplan and design development	Perry Park Masterplan and design development is delayed	Impact on decision making for AXS reinstatement and enhancements	TBC	Close	08/08/2022	31/03/2023	3	3	3	3	0	3	2	9	1. Identification of project sponsor accountable for Perry Park scope who will own the risk 2. Close management of Park work package
Open	Failure to recruit to key roles in the project team in a timely manner	Delays to recruitment of project team roles.	Delays in managing the project, driving through operations and recruiting the team	Dave Wagg	Close	08/08/2022	15/11/2022	3	0	3	3	0	4	2	12	1. Agree & issue job description(s) 2. Appoint team and form leadership group
Open	Constraints are planned on the project in return for funding	Funding streams place constraints / requirements on the project in return for the funding	Impact on design and / or future operations	Joanne Martin	Approaching	08/08/2022	31/03/2023	3	3	2	3	2	4	4	12	1. Clear guidelines on acceptable conditions prior to entering contract discussions 2. Robust negotiating position 3. Identify fall-back options for funding
Open	Conflicting operational requirements amongst tenants	Tenant operational requirements may be in conflict	Requirement for additional capital works, impacting budgets and programme and limiting tenant operations	Dave Wagg	Approaching	08/08/2022	31/12/2022	3	3	3	3	3	4	3	12	1. Early determination of tenant requirements 2. Workshop to identify overlaps / clashes and determine priorities 3. Negotiate with tenants
Open	Late design changes to enable delivery of the European Athletics Championships 2026	A successful European Athletics Championships 2026 bid may require design change	Requirement for design changes after capital works are underway or are even completed	Dave Wagg	Distant	08/08/2022	31/12/2022	3	4	0	4	0	4	4	12	1. Workshop expected EAC requirements, based on CWG and prior experiences and include as options in design process 2. Capital investment requirements to include contingency allowance. 3. If required seek additional external funding for EAC.
Open	Fluctuating inflation levels impacting construction material costs	Rise in inflation levels	Increase in construction materials costs increases the project budget above approved levels	Neil McLeod	Close	08/08/2022	31/12/2023	5	5	2	4	3	4	3	25	1. Capital investment requirements to include allowances for both inflation and a proportionate level of contingency. 2. The contract award for detailed design will include mitigations for cost risks.
Open	Increased flood risk associated with the reservoir as a result of Stadium development	Stadium is found to have an impact on the flood risk associated with the reservoir	Flood risk increases impacting flood management Potential disruption to local residents	Neil McLeod	Close	08/08/2022	31/12/2023	2	3	0	2	0	3	2	6	1. Carry forward mitigations from Stadium development 2. Minimise works close to reservoir
Open	Drainage failure within Perry Park	Existing drainage failure within Perry Park requiring a solution to permanently fix	Increased risk of flooding	Neil McLeod	Live	08/08/2022	31/12/2023	2	3	0	2	0	3	2	6	1. Consider options from Stadium development into Park Masterplan design





Title of proposed EIA	Alexander Stadium Legacy FBC
Reference No	EQUA965
EA is in support of	Amended Function
Review Frequency	Annually
Date of first review	19/09/2022
Directorate	City Operations
Division	Neighbourhoods
Service Area	Sport Service
Responsible Officer(s)	<input type="checkbox"/> Dave Wagg
Quality Control Officer(s)	<input type="checkbox"/> Leroy Pearce
Accountable Officer(s)	<input type="checkbox"/> Chris Jordan
Purpose of proposal	Legacy of Stadium following delivery of CWG
Data sources	Consultation Results; relevant research
Please include any other sources of data	None
ASSESS THE IMPACT AGAINST THE PROTECTED CHARACTERISTICS	
Protected characteristic: Age	Not Applicable
Age details:	
Protected characteristic: Disability	Service Users / Stakeholders; Employees; Wider Community
Disability details:	The enhancements to facilities will ensure there is access for those with disabilities.
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	Not Applicable
Pregnancy and maternity details:	
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.

None

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

Positive impact

Adverse impact on any people with protected characteristics.

None

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?

Annually on site through consultation with users and stakeholders

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

Works to adapt the Alexander Stadium (AXS) from its Commonwealth Games (CWG) configuration to a World-class facility for community and elite sports including the development of facilities and services offered in Perry Park which will enhance its infrastructure for the benefit of the local community. The enhanced Stadium and Park will generate a positive impact on all users and stakeholders.

## QUALITY CONTORL SECTION

Submit to the Quality Control Officer for reviewing?

No

Quality Control Officer comments

This EIA has been passed to the Accountable Officer for final approval.

Decision by Quality Control Officer



Proceed for final approval

Submit draft to Accountable Officer?

No

Decision by Accountable Officer

Approve

23/09/2022, 15:11	Assessments - Alexander Stadium Legacy FBC
Date approved / rejected by the Accountable Officer	23/08/2022
Reasons for approval or rejection	positive impact
Please print and save a PDF copy for your records	Yes
Content Type: Item	
Version: 78.0	
Created at 15/08/2022 05:22 PM by  Dave Wagg	
Last modified at 23/09/2022 02:02 PM by Workflow on behalf of  Dave Wagg	

Close



# Birmingham City Council

## Report to Cabinet

11<sup>TH</sup> OCTOBER 2022



**Subject:** FINANCIAL MONITORING REPORT 2022/23  
MONTH 5 (UP TO 31<sup>ST</sup> AUGUST 2022)

**Report of:** Strategic Director of Council Management and S151  
Officer – Rebecca Hellard

**Relevant Cabinet Member:** Councillor Yvonne Mosquito – Finance & Resources

**Relevant O & S Chair(s):** Councillor Akhlaq Ahmed - Resources

**Report author:** Director of Finance (Deputy S151 Officer) – Sara Pitt

Are specific wards affected?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No – All wards affected
If yes, name(s) of ward(s):		
Is this a key decision?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If relevant, add Forward Plan Reference: 010523/2022		
Is the decision eligible for call-in?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Does the report contain confidential or exempt information?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
If relevant, provide exempt information paragraph number or reason if confidential:		

### 1 Executive Summary

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

### 2 Recommendations

That the Cabinet:-

- 2.1 Approves that up to £5.0m of the Financial Resilience Reserve (FRR) is used to fund the costs of the Cost of Living Emergency, as set out in paragraph 4.1.
- 2.2 Approves the delegation of expenditure on the Cost of Living Emergency, as set out in paragraph 4.2.
- 2.3 Notes that due to the extraordinary national economic circumstances, an update on the financial position will be provided to Cabinet each month, rather than just quarterly during the 2022/23 financial year. A more detailed report will be provided quarterly. We will also continue to provide the monthly report to Resources Overview & Scrutiny Committee.
- 2.4 Notes that at Month 5 the City Council's strategic aim continues to be to deliver a balanced revenue position by the end of this financial year.
- 2.5 Notes that the Council faces a number of financial challenges in 2022/23. However, the Council is in a strong robust position with strong financial planning processes in place. Reserves are healthy and within recommended limits.
- 2.6 Notes that due to the ongoing improvements in the restructuring of cost centres to improve financial management this is a high level report. A more detailed report will be available at quarter 2.

### **3 Background**

- 3.1 At the meeting on 22nd February 2022, the Council agreed a net revenue budget for 2022/2023 of £759.2m to be met by government grants, council tax and business rates. Appendix A sets out the high level financial position at Month 5.

### **4 Key Issues**

#### **Revenue position**

- 4.1 As described in Appendix A paragraphs 1.8 to 1.12, Cabinet is asked to approve the use of up to £5.0m of the FRR to fund the Cost of Living Emergency.
- 4.2 Cabinet is asked to approve that authority for this expenditure is delegated to the Director of Strategy, Equality and Partnerships and the Section 151 officer, in consultation with the appropriate Cabinet Members.

#### **Revenue position**

- 4.3 Unlike many Councils we undertake a rolling review of our budget all year rather than as a one off annual process, so are constantly looking at the pressures we are facing or may have to face in the future, giving us an early warning and time to react and put in place actions to manage impacts.
- 4.4 The Director of Council Management will be presenting a Medium Term Financial Plan update report to this meeting providing an update on the financial pressures the Council is facing and the mitigating actions being taken.

- 4.5 Appendix A sets out in Section 7 a number of risks that have been identified at this stage in the year. Whilst there are potential pressures, there is sufficient time for these to be quantified and mitigating actions taken to ensure a balanced revenue position by the end of the year.
- 4.6 In Section 8 of Appendix A, a number of opportunities to reduce expenditure are described. More details will be provided in later reports.

### **Capital Programme**

- 4.7 A capital budget of £531.7m was set in the Financial Plan 2022/23 and approved by full Council on the 22<sup>nd</sup> February 2022. Following slippage of £162.7m at the end of 2021/22 which was approved by Cabinet on 26<sup>th</sup> July 2022 the Capital budget for 2022/23 is now £694.4m
- 4.8 Like all financial years capital spend is weighted towards the later end of the year, and often spend will slip in to the following year due to the complex nature of many of the capital projects.
- 4.9 Further details will be provided in the Quarter 2 report.

### **Treasury Management**

- 4.10 Gross loan debt is currently £3,210m, compared to £3,035m at quarter 1, with no foreseen risks to the year-end planned level of £3,452m. The annual cost of servicing debt represents approximately 29.5% of the net revenue budget. The planned level of debt and annual cost of servicing debt currently includes over £200m borrowing for the Enterprise Zone (EZ), due to be financed from Business Rates growth within the EZ.
- 4.11 The Council's treasury investments are currently £44m, against a planned level of £40m. The Council's cash balances are no longer at elevated levels from government support for Covid and energy relief and the Council has resumed short-term borrowing, as per the Treasury Management Strategy.

## **5 Options considered and Recommended Proposal**

- 5.1 CLT have recently adopted a set of budget management principles to ensure the delivery of a balanced budget this year whilst delivering Best in Class Services. These principles include the agreement that all overspends, demands, growth and pressures should be managed and contained at a Directorate level. Any residual gap must be managed across CLT collectively in order to achieve a balanced budget by the end of the year.
- 5.2 As referred in paragraph 7.3 of the Month 4 Financial Monitoring report presented to Resources Overview and Scrutiny Committee on 8 September 2022, the Council is returning to rigorous spend controls focusing on staffing, facilities management and procurement. We have in place measures to ramp up the benefit of these controls and look for opportunities to implement other spend control panels focusing on specific areas of spend.

## **6 Consultation**

- 6.1 The Leader and Cabinet Members, Directors and the City Solicitor 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 2022/23.

## **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.
- 8.2.2 Section 111 of the Local Government Act 1972 contains the Council's ancillary financial and expenditure powers in relation to the discharge of its functions.

### **8.3 Financial Implications**

- 8.3.1 The Appendix attached gives details of the risks, potential financial pressures the city council faces and actions to be taken to ensure 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 2022/23 approved at Council 22nd February 2022
- 9.2 Quarter 1 Financial Monitoring Report approved by Cabinet 26th July 2022
- 9.3 M4 – Resources Overview and Scrutiny Committee 8<sup>th</sup> September 2022



## Report to Cabinet – 11<sup>th</sup> October 2022.

### Month 5 Financial Monitoring Report 2022/23

#### 1. High Level Summary Financial Position

- 1.1. Due to the extraordinary economic situation nationally, it has been agreed that a high level Financial Monitoring Report will be provided to Cabinet and Resources Overview and Scrutiny Committee each month during 2022/23. The more detailed reports will continue to be provided on a quarterly basis.
- 1.2. At month 5 the City Council's strategic aim continues to be to deliver a balanced revenue position by the end of the financial year.
- 1.3. At the Council Meeting on the 22<sup>nd</sup> February 2022 Birmingham City Council approved a net revenue budget of £759.2m for the 2022/23 financial year as shown in table 1. This report sets out the high-level financial performance against that budget at the end of month 5, along with a review of risks and mitigating factors to ensure a balanced budget is delivered.

**Table 1 High Level 2022/23 Net Revenue Budget**

Directorate	Budget
	£m
Children & Families	329.589
City Operations	192.682
City Housing	15.369
Place, Prosperity and Sustainability	61.844
Strategy, Equalities and Partnerships	3.253
Adult Social Care	357.744
Council Management	93.212
<b>Directorate Sub Total</b>	<b>1,053.693</b>
Corporate Budgets	(294.461)
<b>Corporate Subtotal</b>	<b>(294.461)</b>
<b>City Council General Fund Budget</b>	<b>759.232</b>

- 1.4. The budget for 2022/23 when approved by full Council in February 2022 was balanced, however there was a gap for future years of £33m. An approach to balance the budget has been developed and agreed by the Corporate Leadership Team (CLT) and work is underway for this year and future years through the rolling Medium Term Financial Plan (MTFP) process. This Cabinet Committee of 11<sup>th</sup> October is also receiving a separate report providing an update on the MTFP and progress to close this future budget gap.
- 1.5 While we have seen other Councils failing due to poor governance and decision making, weak procurement, low levels of reserves and over borrowing, Birmingham City Council remains in a strong robust position with strong

financial planning processes in place. Reserves are healthy and within recommended limits. Borrowing is not excessive and is reducing, and the Council scores well on the CIPFA Resilience Index Indicators.

- 1.6 The Council is a CIPFA 3 Star Financial Management Authority recognising the significant financial management improvements made across the organisation since 2019 and we are continuing to further improve and aim for a 4 Star rating by April 2023.
- 1.7 The City Council like all other local authorities is facing a number of financial challenges in 2022/23. The current cost of living crisis is impacting on our citizens, businesses, and the services we deliver, resulting in a greater demand for our services and reducing income generating opportunities. Examples include, rising energy costs, increases in the costs of goods and services and the impact from the war in Ukraine.
- 1.8 The cost of living crisis is so severe that at Cabinet on 6<sup>th</sup> September 2022, the Leader of the City Council declared a “Cost of Living Emergency”.
- 1.9 There are a number of actions that have been taken already:
  - Cabinet of 28<sup>th</sup> June approved an additional £1.3m to support the most vulnerable in our cities on top of the £12.6m being spent via the Household support fund
  - The Council has ensured that over £56m has been paid out in Council Tax Energy Rebates to approximately 376,000 households out of a total of 390,000;
  - The Council has begun to issue Healthy Start vouchers to eligible children with the Children’s Trust granting hardship payments to those most in need.
  - The Council is working with third sector partners to promote debt prevention and providing advice on cash management as well as promoting benefits take up – which will be crucial in ensuring that the most vulnerable receive some support as quickly as possible.
  - The Council has also announced plans to look at the feasibility of creating warm banks across the City as we head into autumn and winter.
- 1.10 The Council is aware that even the above measures will not be enough to fully mitigate the impact of the rising cost of energy, food and fuel.

- 1.11 Therefore, the Council is moving to deploy resources to support residents and businesses. This includes providing advice to residents on claiming benefits and supply of food through food banks. More details will be provided in the coming months. The Council is anticipating support will be offered by the Government. Until that is known, the impacts will not be clear.
- 1.12 As detailed above, Cabinet is asked to approve the use of up to £5.0m of the Financial Resilience Reserve (FRR) to fund costs of the emergency.
- 1.13 We continue to recognise that there are a number of risks to balancing the budget. These risks must all be carefully gripped and managed at pace and offset by opportunities to make savings. Rigorous spend controls introduced last year for workforce, property and procurement expenditure remain in place to reduce and minimise costs.

## **2 Capital**

- 2.1 A capital budget of £531.7m was approved by full Council on the 22<sup>nd</sup> February 2022. Following slippage of £162.7m at the end of 2021/22 which was approved by Cabinet on 26<sup>th</sup> July 2022 the Capital budget for 2022/23 is now £694.4m.
- 2.2 Like all financial year's capital spend is weighted towards the later end of the year, and often spend will slip into the following year due to the complex nature of many of the capital projects.
- 2.3 There remain risks to delivery, particularly relating to labour and material shortages for construction projects as a result of Brexit and HS2. These will be kept under review and appropriate action taken to mitigate where possible.
- 2.4 Whilst we endeavour to align the profile of budgets and expenditure, this is not always entirely possible. However, it is important to note that no financial resources will be lost if there is slippage in the programme's expenditure at the end of the financial year. The resources and planned expenditure will be "rolled forward" into future years.
- 2.5 A more detailed Capital Programme monitoring report will be provided at quarter 2.

## **3 Housing Revenue Account (HRA)**

- 3.1 The HRA budget for 2022/23 is £431.485m of which £287.738m is revenue expenditure and £143.747m is capital expenditure. Overall, the HRA spend is forecast to remain within budget this year. Any variation to this will be managed from the ring fenced HRA reserve.

## **4 Dedicated Schools Grant (DSG)**

- 4.1 The total DSG for 2022/23 is £1,374.2m before deductions. The allocation after deductions is £686.9m. This is allocated as follows: school block £377.2m, High Needs block £210.4m, Early Years block £83.0m and £16.3m Central School

Services Block. It is anticipated that there will be a balanced position for the total DSG this financial year.

## **5 Collection Fund**

- 5.1 As detailed in the Medium Term Financial Plan Report presented to Cabinet in February 2022, there is a forecast in year deficit for Business Rates of £1.8m. Generally, a surplus or deficit on the Collection Fund impacts on the following year's budget, which in this case will be 2023/24. The deficit is mainly related to a deficit on reliefs of £1.7m (partially offset by extra Section 31 Grant of £1.1m).
- 5.2 The in-year forecast for Council Tax is a surplus of £3.6m. This is mainly due to lower than forecast costs of Council Tax Support and other reliefs and discounts.
- 5.3 However, given the economic situation, there is a risk that collection rates for Business Rates and Council Tax could be worse than budgeted. This will be closely monitored throughout the remainder of the year.

## **6 Borrowing**

- 6.1 Gross loan debt is currently £3,210m, compared to £3,035m at quarter 1, with no foreseen risks to the year-end planned level of £3,452m. The annual cost of servicing debt represents approximately 29.5% of the net revenue budget. The planned level of debt and annual cost of servicing debt currently includes over £200m borrowing for the Enterprise Zone (EZ), due to be financed from Business Rates growth within the EZ.
- 6.2 The Council's treasury investments are currently £44m, against a planned level of £40m. The Council's cash balances are no longer at elevated levels from government support for Covid and energy relief and the Council has resumed short-term borrowing, as per the Treasury Management Strategy.
- 6.3 We will continue to closely review interest rates and where possible lock in rates, minimising risk and over exposure.

## **7 Risks**

- 7.1 All budgets contain risks and a number of risks were identified when setting the budget (as shown in Appendix E of the Financial Plan agreed by Council on 22<sup>nd</sup> February 2022).
- 7.2 In Appendix E, after weighting the risks for probability, there was a total risk of £118m. Given that not all risks would be expected to happen at the same time, a deflator of 70% was applied, leaving a total risk of £34.5m. This is more than covered by the General Fund Balance of £38.4m and the Financial Resilience Reserve (FRR) balance of £125.5m.

- 7.3 Like quarter 1 the City Council is continuing to deal with a number of financial risks at month 5 and is undertaking further due diligence to verify and mitigate these. The new risks or risks where further information is now available are shown below. Further detail will be provided at quarter 2.

### **Children and Families**

- 7.4 **Special Educational Needs Assessment and Review Service (SENAR) Service.** As previously reported the Ofsted inspection in May 2021 reported that the SENAR service was extremely under resourced and unable to meet its statutory responsibilities and additional funding was allocated to the service in 2021/22 and 2022/23.
- 7.5 The additional funding of £5.1m in 2021/22 and £5.3m in 2022/23 was based on the activity and backlogs of statutory tasks identified at that point, however further due diligence has identified a pressure of £4.9m.
- 7.6 The Directorate have a reserve that will be used to offset this pressure as a one off for 2022/23.
- 7.7 The service has undertaken extensive resource planning to ensure there is a sustainable structure. There will be a Cabinet report this month that will provide more details.
- 7.8 **Children & Young People Travel Service, formerly Home to School Transport (H2ST).** Significant improvements have been made which include work that will enable financial projections to be calculated from September onwards. Additional budget has been allocated to the service for 2022/23 due to significant financial pressures incurred in 2021/22. There remains a risk of overspend this year for the service of at least £5m which will be confirmed by Quarter 2.
- 7.9 **Birmingham Children's Trust.** Placement costs continue to represent the single biggest pressure for the Trust in 2022/23. The Trust operates CareFirst Financials for care pay, including payments to care leavers, care providers and foster carers. Based on data extracted from the CareFirst system the Trust are forecasting an in-year pressure which they are working with the City Council to manage and mitigate and a more detailed report will be provided at quarter 2 as to the analysis of care costs and the management response to this.

### **Adult Social Care**

- 7.10 **Demand for Adult Social Care** continues to remain hard to predict as the impact of the last two years of coronavirus has created the risk of a surge in numbers beyond the current high levels of referrals we are currently seeing. Prevention, Early Intervention, and hospital discharge schemes are picking up the bulk of the demand increases and the forecast is for packages of care costs to remain within the 2022/23 budget. So while pressure on adult social care services remains challenging it is currently being managed within existing budgets.

## Housing

- 7.11 **Temporary and Emergency Accommodation.** As reported previously demand for housing continues to increase as more citizens are struggling to manage in the current financial climate. The City Council is continuing to work at pace with citizens to prevent crisis, however based on current demand trends there is a risk that costs will exceed budget by around £5m this year. Work is underway and will continue throughout the year to manage and reduce costs wherever possible. Further details on the action being taken will be presented in the quarter 2 report to Cabinet.

## Corporate items

- 7.12 **The Pay Award.** The 2022/23 budget included a 2.5% increase for pay. It is estimated that the pay award of £1,925 per full time employee that has been offered (but not yet accepted) by the National Employers for Local Government Services will cost the Council general fund in the region of £14m more than the budgeted provision. This will be funded from the Financial Resilience Reserve.
- 7.13 The Housing Revenue Account, Public Health Grant and Dedicated Schools Grant will all be financially impacted by the pay award as they fund staff who will receive the pay award. The estimated total impact is £3.8m and the increased cost will need to be funded from within these grants.
- 7.14 **Energy costs.** As reported at Month 4 energy costs are rising and are expected to be greater than budgeted for this year. As well as street lighting, there are expected to be significant increase in gas and electricity costs across the corporate estate. As far as possible, Policy Contingency will be used to fund additional costs where they cannot be contained by directorates through reducing energy consumption or implementing other savings to offset these costs. We will continue to work with providers and where possible through new contract arrangements as they arise to mitigate against rising future costs.
- 7.15 **Income Collection.** Income remains a risk for many services as habits have changed following the pandemic. It is forecast that the number and value of debtors will increase as citizens and businesses struggle financially. The City Council has provision to manage bad debt and will continue to work with individuals and businesses to help them manage their debts. At this stage of the financial year it is difficult to put a financial value to this. Services including Parking and Leisure are working on income strategies to manage delivery of services with less income to ensure they remain within budget.
- 7.16 **Non Delivery of Savings.** The 2022/23 budget contains a number of savings targets as detailed in section 9 of this report. These savings are a variety of department specific savings and corporate savings that are dispersed savings from corporate initiatives including: Automation / Debt Recovery / Traded



Services / Corporate Landlord / New Ways of Working (NWoW) / Customer Services / Workforce Transition / Procurement Savings. Work continues to develop and deliver these at pace however at the time of writing this report it must be noted that £11.6m of savings are identified as being red and therefore high risk to delivery.

## **8 Potential Opportunities.**

- 8.1 Whilst we have a number of financial risks there are also opportunities to off set these risks which must continue to be maximised. It must be recognised that as detailed above in paragraph 7.2 while there are significant balances in both the Financial Resilience Reserve and General Fund Balance these are one off funding sources and use of them should be the last resort once all other mitigations have been exhausted.
- 8.2 A review of reserves and balances is currently taking place to ensure that monies are being fully utilised for example Section 106 and Community Infrastructure Levy (CIL) and specific grants including Public Health.
- 8.3 We have returning to rigorous spend controls focusing on staffing, facilities management and procurement. We have in place measures to ramp up the benefit of these controls and look for opportunities to implement other spend control panels focusing on specific areas of spend.
- 8.4 The MTFP contains a number of budget savings that are currently due to be delivered in future years and we will continue to explore the opportunities to deliver future years savings sooner.
- 8.5 The City Council is implementing a number of transformation programmes under the three pillars of People, Place and Fit for Purpose Council and where safe to do so these need to be delivered faster, meaning that the financial benefits are achieved ahead of schedule.

## **9 Savings / Income Targets**

- 9.1 Like previous financial years the Financial Plan for 2022/23 includes budgeted savings, these total £40.8m. In addition, there are undelivered savings from last year of £2.1m. Work must continue at pace to ensure all savings are delivered this year.
- 9.2 The individual forecasts for each savings / income target for the whole of the City Council have been RAG rated and are summarised in table 2 below.

**Table 2: Savings Risks 2022/23**

<b>Risk Profile for Delivery</b>	<b>Quarter 1 (£m)</b>	<b>Month 5 (£m)</b>	<b>% of Target</b>
<b>Delivered</b>	2.549	5.036	12%
<b>Low Risk</b>	19.260	16.773	39%
<b>Medium Risk</b>	8.688	9.496	22%
<b>High Risk</b>	12.368	11.560	27%
<b>Total</b>	<b>42.865</b>	<b>42.865</b>	<b>100%</b>

- 9.3 At this stage in the financial year, this risk profile is as expected and reflects the known challenges in delivering these targets.
- 9.4 Table 2 shows that of the £42.9m savings / income to be delivered in 2022/23, £11.6m is currently rated high risk. Savings scored as high risk are not deemed as undeliverable and work is in progress to realise these targets. This is an improvement of £0.8m since Quarter 1 due to City Operations Business as Usual initiatives, mainly allocation of workforce savings and review of managerial arrangements now being rated as medium risk. There is also an improvement of £2.5m in savings ranked as delivered due to City Housing savings related to Dispersed Rental Income now having been delivered
- 9.5 The main theme that results in savings targets being scored as high risk is the delivery of transformation dispersed savings from corporate initiatives including: Automation / Debt Recovery / Traded Services / Corporate Landlord / New Ways of Working (NWoW) / Customer Services / Workforce Transition / Procurement Savings.
- 9.6 These transformation programmes are at risk because these are corporately driven activities to release dispersed savings across services. These targets will be re-allocated to Directorates as programme work progresses.
- 9.7 Full details of these savings were presented in the quarter 1 report and full details will continue to be presented on a quarterly basis throughout the remainder of this financial year.

Public Report

**Birmingham City Council**

**Report to Cabinet**

11 October 2022



**Subject:** **Medium Term Financial Plan (MTFP) Update**

**Report of:** Director of Council Management and S151 Officer – Rebecca Hellard

**Relevant Cabinet Member:** Councillor Ian Ward, Leader of the Council  
Councillor Yvonne Mosquito – Finance & Resources

**Relevant O &S Chair(s):** Councillor Aklaq Ahmed - Resources

**Report author:** Director of Finance (Deputy S151) – Sara Pitt

Are specific wards affected?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No – All wards affected
If yes, name(s) of ward(s):		
Is this a key decision?	<input checked="" type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
If relevant, add Forward Plan Reference: 010142/2022		
Is the decision eligible for call-in?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Does the report contain confidential or exempt information?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
If relevant, provide exempt information paragraph number or reason if confidential:		

**1 Executive Summary**

- 1.1 The Council needs to ensure that it has an up to date and robust plan for how it will manage its finances and maintain financial viability across the medium term. This report is part of the process of doing so. It provides an update to Cabinet on the latest Medium Term Financial Plan (MTFP) position. The latest position is based on information available up to September 2022.
- 1.2 This report updates the assumptions used in calculation of the Medium Term Financial Plan in light of the current economic situation as well as highlighting the work officers have been undertaking to identify and implement plans to close the Medium Term Financial gap, full details of which will be published and presented to Cabinet and Full Council in February 2023.

- 1.3 Since the Financial Plan was agreed in February 2022, sound financial management work has been underway to close the £33m reported budget gap, including spend controls, benchmarking, a review of reserves to ensure that activities they were set aside for have been undertaken and that they can be drawn down, previous modelling assumptions and transformative work. However, the national economic situation and the rise in inflation since February means that all Councils are experiencing further pressures on their budgets. After taking all these changes into account there has been an increase in the net budget gap to £80m for 2023/24.

## **2 Recommendations**

- 2.1 It is recommended that Cabinet should note:

- The impact of the economic situation on the assumptions used in the Medium Term Financial Plan (MTFP) since budget approval in February 2022
- the approach for the development of the budget for 2023/24 which will continue to focus on alignment of resources to the Corporate Plan and delivery of value for money services
- Developing best in class services that deliver on economy and efficiency, by:
  - a review of base budgets to identify opportunities for savings via:
    - reduced expenditure for planned growth and inflation;
    - acceleration of expenditure reduction;
  - income generation plans;
  - a review of reserves to ensure they are being used effectively and their application in the budget process
- the budget timetable, including timeframes for the engagement with citizens and businesses
- The estimated risks and mitigations so far identified as set out in this report.

## **3 Background**

- 3.1 As stated in the Financial Plan in February 2022, 2022/23 is "...one of the most challenging periods in public sector finance." This update is written in the context of the country entering a recession, inflation at levels not seen in decades, rising interest rates, with a cost of living crisis and a Government that has announced a number of measures to stimulate economic activity which is likely to prolong higher inflation, all be it, not at the peak previously forecast.

- 3.2 A number of events have added to those risks identified in February 2022, both the World and Domestic decisions have impacted on the UK economy by:

As identified in February:

- the ongoing financial impact post the Covid 19 Pandemic;
- the residual impact of a decade of austerity measures;

### Further or crystallised events

- Increasing inflation driven by such factors as the war in Ukraine and its direct impact on the wholesale cost of gas and oil giving rise to extreme increases in domestic and business energy costs, supply chain issues, changes in employment patterns in the UK and most recently the drought impacting on harvest yields;
- The Chancellors' Fiscal Statement (Mini-Budget) introducing tax cuts.
- the Bank of England has been increasing bank base rates to try and reduce demand and increase saving, but this will take time to work through the economy.
- The Bank of England's intervention in the Bond market, buying up Government Gilts.

3.3 The Bank of England's Monetary Policy Committee (MPC) sets monetary policy to meet the 2% inflation target, and in a way that helps to sustain growth and employment. At its meeting on 22 September 2022, the MPC voted to increase the Bank Rate by 0.50%, to 2.25%. It is likely that the rate will be increased further, with the recent announcements by Government on tax cuts expected to prolong the period that higher inflation will remain in the economy. The Bank of England also intervened in the Bond Market, buying Government Gilts to calm the market.

3.4 CPI inflation was expected to rise from 9.9% in August to over 11% in 2022 Q4, and to remain at very elevated levels throughout much of 2023, it had been expected to fall back to the 2% target two years ahead, however there is a view that higher inflation will remain for a longer period, given the Governments recent announcements. Although there has been speculation that there would be an impact of the various energy cost support schemes, the Office for National Statistics (ONS) completed its classification review of the Energy Bills Support Scheme (EBSS) and its treatment in consumer price inflation statistics in August 2022. They concluded that payments under the scheme will not affect consumer price inflation. Other more recently announced policy proposals will go through the same ONS procedures to determine their treatment in the consumer price inflation statistic.

3.5 Gross Domestic Product (GDP) growth in the United Kingdom is slowing. The rise in gas prices has led to a significant deterioration in the outlook for activity in the United Kingdom and the rest of Europe. The United Kingdom is now projected to enter a recession from the third quarter of this year, with a fall in GDP of 0.1% in the first quarter (April-June) and a forecast fall in the second quarter (July-September) also of 0.1%; this is earlier than previously forecast. Real household post-tax income is projected to fall sharply in 2022 and 2023, while consumption growth turns negative.

- 3.6 Domestic inflationary pressures are projected to remain strong over the first half of the forecast period. Firms generally report that they expect to increase their selling prices markedly, reflecting the sharp rises in their costs. The labour market has remained tight, with the unemployment rate at 3.6% in the three months to July and vacancies at historically high levels. Although the labour market may loosen only slowly in response to falling demand, unemployment is expected to rise from 2023.
- 3.7 Although the specific support measures announced by the Government to help households over this winter, will bring down the peak of inflation, the tax cutting measures will benefit those more able to afford price rises more than those on lower incomes. As a consequence of the combined effects of the cost of living crisis and Government policy, it is likely that demand for our services will increase. Particular areas expected to be impacted are an increase in those presenting themselves as homeless, requirement for social care, mental health and the ability for people to pay us.
- 3.8 The cost of living crisis is being taken seriously by the Council and there are a number of actions being undertaken in the current financial year (2022/23):
- Cabinet approved an additional £1.3m to support the most vulnerable in our cities on top of the £12.6m being spent via the Household support fund;
  - The Council has ensured that over £56m has been paid out in Council Tax Energy Rebates to approximately 376,000 households out of a total of 390,000;
  - The Council has begun to issue Healthy Start vouchers to eligible children with the Children's Trust granting hardship payments to those most in need;
  - The Council is working with third sector partners to promote debt prevention and providing advice on cash management as well as promoting benefits take up – which will be crucial in ensuring that the most vulnerable receive some support as quickly as possible. The Council has also announced plans to look at the feasibility of creating warm banks across the City as we head into autumn and winter.
- 3.9 The Council is aware that even the above measures will not be enough to fully mitigate the impact of the rising cost of energy, food and fuel.
- 3.10 Therefore, the Council is moving to deploy further resources to support residents and businesses. The Month 5 Financial Report for 2022/23 at this October Cabinet requests allocation of £5m from Council reserves to be set aside to support our residents.
- 3.11 Due to the extraordinary economic situation nationally, it was agreed that a brief high level Financial Monitoring Report will be provided to Cabinet each month during 2022/23. More detailed reports will continue to be provided on a quarterly basis.

- 3.12 We continue to recognise that there are a number of risks to balancing the budget. These risks must all be carefully gripped and managed at pace and offset by opportunities to make savings.
- 3.13 There are inflationary and demographic pressures on the Council, however, there are rigorous spend controls in place in 2022/23 to mitigate these pressures, focusing on areas of high spend which includes workforce, procurement and property and facilities management.

#### **4 Updated Position**

- 4.1 The key movements from the MTFP position since City Council approved the budget in February 2022 are shown in the table below. The projections continue to identify a significant budget shortfall across the medium term, with a cumulative budget gap of £80.1m in 2023/24 rising to £146.5m in 2026/27, which reflects the extent to which the costs of current service provision exceed the funding levels.
- 4.2 Because of the volatility of the economic situation, with the extent and type of Government intervention, likely to have both foreseen and unforeseen consequences, a range of scenarios for inflation have been calculated. The table below shows a mid-point of these scenarios with inflation being calculated as 7.5% 2023/24, 3.7% 2024/25, before falling back to the Bank of England target of 2% in subsequent years. It should be noted that most economic experts are predicting that inflation may remain above target for a longer period following the Chancellor's Fiscal Statement on Friday 23 September 2022, further work will be required to quantify what this may mean for future years.
- 4.3 Paragraphs 4.12 to 4.16 show the inflation scenarios and the potential additional pressure they would put onto the budget.

	2023/24 £'000	2024/25 £'000	2025/26 £'000	2026/27 £'000
<b>Budget as at February 2022 Cabinet</b>	<b>32,555</b>	<b>32,444</b>	<b>32,794</b>	<b>35,726</b>
<b>Expenditure</b>				
Corporately Managed Budgets	(4,859)	(6,980)	(8,474)	(3,059)
<b>Meeting Budget Pressures &amp; Policy Choices</b>				
Staffing	4,248	6,256	6,256	6,256
Demand/Complexity Growth	72,476	67,765	70,900	81,239
Statutory Requirement	2,406	2,406	2,406	2,406
Borrowing costs, investment etc	16,650	16,650	16,650	16,650
<b>Budget Pressure &amp; Policy Choices Sub-total</b>	<b>95,780</b>	<b>93,077</b>	<b>96,212</b>	<b>106,551</b>
Pay Inflation	24,154	24,703	25,265	25,843
Contract Inflation	29,831	30,092	30,690	31,306
Other Inflation	13,113	13,956	15,385	16,903
<b>Inflation Sub-total</b>	<b>67,098</b>	<b>68,751</b>	<b>71,340</b>	<b>74,052</b>
<b>Mitigating Options</b>				
Children and Families	(83)	(83)	(83)	(83)
City Operations	(500)	(500)	(500)	(500)
Place, Prosperity and Sustainability	(174)	(174)	(174)	(174)
Adult Social Care	(32)	(32)	(32)	(32)
<b>Savings Subtotal</b>	<b>(789)</b>	<b>(789)</b>	<b>(789)</b>	<b>(789)</b>
<b>Total Expenditure Movements</b>	<b>157,230</b>	<b>154,059</b>	<b>158,289</b>	<b>176,755</b>
<b>Resources</b>				
Business Rates	(45,832)	(45,524)	(47,760)	(51,526)
Council Tax	(23,319)	(9,018)	(4,337)	(4,458)
Net Payment to/(from) Reserves	(23,264)	-	-	-
Other Grants Excl DSG & ABG	(4,907)	(7,514)	(8,485)	(8,860)
Top Up Grant	(12,333)	(5,919)	(5,419)	(1,084)
<b>Total Resources Movement</b>	<b>(109,655)</b>	<b>(67,975)</b>	<b>(66,001)</b>	<b>(65,928)</b>
<b>MTFP Budget Gap at October 2022</b>	<b>80,130</b>	<b>118,528</b>	<b>125,082</b>	<b>146,553</b>

4.4 Budget pressures and Policy choices are anticipated to increase by £95.780m in 2023/24 as shown in the table above, the main specific pressures are:

- Staffing £4.248m
- Demand/Complexity Growth £72.476m
- Statutory Requirements £2.406m
- Borrowing costs etc £16.650m

4.5 Demand and complexity cost are mainly driven by the Children's Services, including the Birmingham Children's Trust and Assisted Travel costs.

4.6 The assumption that the Fair Cost of Care reforms will be cost neutral remains as per the February Financial Plan.



- 4.7 Public Works Loan Board (PWLB) interest rates have increased markedly over the last week, in light of the Gilts market, which will increase our cost of borrowing above the prudent assumptions we had made.
- 4.8 The Business Rates forecast for 2023/24 is £45.8m higher than previously assumed. Full details of the movement is shown in Appendix B.
- 4.9 The Council Tax forecast for 2023/24 is £1.0m less than previously forecast as at this stage, we are being cautious and assuming that the non-collection rate will be 3.15% as assumed in 2022/23, rather than the 2.90% assumed in the years before Covid. For years from 2024/25, we are assuming that the non-collection rate will return to 2.90%, and the forecast is in line with previous assumptions.
- 4.10 We assume that the Council will take up the offer by DLUHC to increase the Adult Social Care precept by 1% in both 2023/24 and 2024/25.
- 4.11 Contract inflation has been assumed at an average of 7.5%, unless specific data is available. This is being kept under review as the timings and the negotiated position become clearer
- 4.12 General inflation has been calculated at 7.5%, however, given the expected recession, inflation at levels not seen in decades and a cost of living crisis, general Inflation has been calculated using a number of scenarios, the assumptions for CPI used in each are shown below:

	2023/24	2024/25	2025/26	2026/27
Scenario 1	5.0%	3.2%	2.0%	2.0%
<b>Scenario 2 (Mid-Point)</b>	<b>7.5%</b>	<b>3.7%</b>	<b>2.0%</b>	<b>2.0%</b>
Scenario 3	10.1%	4.5%	2.0%	2.0%
Scenario 4	14.0%	7.0%	2.0%	2.0%

- 4.13 In 2023/24 Scenario 2 (Mid-Point) includes the additional £14.0m that the 2022/23 pay offer (not yet accepted) will cost the Council, plus the incremental cost of a 4.5% pay award in 2023/24, returning to 2.5% subsequent years. Contract inflation of £29.3m and other inflation of £13.3m.
- 4.14 Scenario 1, which sees a rapid fall in inflation would reduce the pressure by £16.3m.
- 4.15 Scenario 3, which sees inflation remain at current levels for a longer period before falling in the falling year, increases the pressure by £21m.
- 4.16 Scenario 4, which sees inflation climbing further, before falling back increases the pressure by £27m.

- 4.17 All of the inflation assumptions will be kept under review as the economic outlook is volatile at present. As the implications of the Chancellors Fiscal Statement are further analysed, it is certain that the MTFP assumptions will have to be amended on a regular basis between now and the approval of the budget in February 2023, to take into account that volatility.

#### **Ongoing work to look how to close the revenue financial gap**

- 4.18 A number of options have been considered and work is ongoing:
- Use of benchmarking data and other insights to inform efficiencies
  - Corporate Leadership Team (CLT) have collectively reviewed all current budget growth in 2022/23 and the planned growth for 2023/24
  - A review of reserves continues to be undertaken, with all reserves which are currently held by the Directorates being held centrally, and any drawdown to be supported with a fully justified business case. Any residual amounts are applied to offset growth in future years whilst adhering to the Reserves Policy
  - CLT have agreed that, where possible, all overspends, demands, growth, pressures must be managed and contained at a Directorate level and if unable to be resolved within the Directorate, to be mitigated at the CLT level. This will mean that no requests will come forward for a corporate solution
  - A review of the transformation programme to ensure that it delivers effectively, focusing on the previously agreed three pillars:
    - Fit for Purpose Council: Delivering new ways of working
    - People: Shifting our focus from crisis to prevention
    - Place: Increasing the pace and scale of growth.

#### **Next Steps**

- 4.19 There remains significant uncertainty in respect of public spending levels and the level of funding for local government and therefore the assumptions outlined in this report will be subject to continual review over the coming months to ensure that the Council's short term and medium term financial stability can be protected and critical services delivered.

- 4.20 The timetable for the remainder of the budget planning process is as follows:

<b>Activities</b>	<b>Date</b>
Public engagement on resource prioritisation	Mid October – December 2022
Scrutiny of budget development proposals	November/December 2022
Provisional Local Government Settlement	Mid December 2022 (TBC)
Cabinet – setting of council tax and business rate tax base	17 January 2023
Final Local Government Settlement	January/February 2023 (TBC)
Cabinet consideration of the 2023/24 budget and Financial Plan	14 February 2023

Council approval of 2023/24 budget and setting of Council tax	28 February 2023
---	------------------

## **5 Engagement**

- 5.1 The Council believes that it is important that it engages with citizens and business when planning activity and the financial implications of those plans. Therefore, a plan of how to engage with those citizens and businesses is currently being completed, with a view of gathering the views of Council Tax and Business Rates payers.

## **6 Risk Management**

- 6.1 Assumptions made in this report have been examined for risks and estimates of expenditure and income have been made on a prudent basis, informed by previous experience, evidence in the current financial year, market forces and service intelligence. An assessment of, and arrangements for, the management of the Council's principal budget risks is set out in the Strategic risk section Appendix D of this report.

## **7 Compliance Issues:**

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

- 7.1.1 The setting of a robust and balanced Medium Term Financial Plan will enable the Council to provide and deliver services within its overall corporate and financial planning framework. The Medium Terms Financial Plan underpins the delivery of the Council's priorities as laid out in the Council Plan, and support the delivery of its plans and strategies.

### **7.2 Legal Implications**

- 7.2.1 A local authority is required under the Local Government Finance Act 1992 to produce a balanced budget.

### **7.3 Financial Implications**

- 7.3.1 The detailed financial implications have been covered throughout the report.

### **7.4 Procurement Implications (if required)**

- 7.4.1 There are no procurement issues arising directly from the contents of this report.

### **7.5 Human Resources Implications (if required)**

- 7.5.1 There are no specific human resources implications arising from this report. Any Human resource implication will be identified as specific budgets are developed.

## **7.6 Public Sector Equality Duty**

- 7.6.1** In compliance with the Council's duties on equality, changes in the budget that impact on the provision of services will need to be properly assessed. An Equalities Impact Assessment will be undertaken on proposals as they are developed where this is considered necessary to do so.

## **8 Appendices**

Appendix A – Financial Plan February 2022 Overview

Appendix B – Collection Fund Overview

Appendix C – Capital

Appendix D - Risk

## **9 Background Documents**

- 9.1** Financial Plan 2022– 2026, approved by Council on 22 February 2022  
Finance / Budget Monitoring – Month 5

## Appendix A – Financial Plan February 2022 Overview

- A1. Council approved the annual budget and Medium Term Financial Plan (MTFP) on 22 February 2022 as part of the annual budget setting cycle. A number of assumptions were used to enable the balancing of the 2022/23 Budget and in calculating a deficit (“Budget Gap”) of £33m for 2023/24 onwards. This report updates the assumptions in light of the current economic and geo-political situation as well as highlighting the work officers have been undertaking to identify and implement plans to close the Medium Term Financial gap, full details of which will be published in February 2023. A review of service growth has also been undertaken to ensure that the latest financial forecasts reflect commercial and market realities and service pressures following two quarters of financial monitoring. A review has also been undertaken of forecasts for the main funding streams, including grants from Central Government, business rates and council tax incomes.
- A2. Council approved the annual budget and Medium Term Financial Plan (MTFP) on 22 February 2022 as part of the annual budget setting cycle.
- A3. The high level objectives of Birmingham City Council’s Medium Term Financial Plan (MTFP) are:
- Prioritise resources to align spending plans with our vision and strategic priorities as outlined in the Corporate Plan. The corporate priorities will focus on benchmarking, best in class services, value for money, fit for purpose and a transformation programme that reflects the reallocation of resources to priority areas;
  - Using our resources more effectively.
  - Manage council finances within the context of a forward-looking service and financial planning framework to assist decision making processes;
  - Maintain a balanced budget and continue to strengthen the medium term position through the development of transformative change across services and improving our processes to ensure value for money for local tax-payers;
  - Manage financial risks and identify appropriate mitigations;
  - Maintain the council tax and business rates income levels, taking into account the current economic conditions;
  - Maintain the General Fund reserve at a minimum of 4.5% (£38.5m) of the annual net revenue budget to cover significant unforeseen expenditure;
  - Maintain Earmarked Revenue Reserves for specific purposes, consistent with achieving our priorities and managing risks. The use of Earmarked Revenue Reserves will be in line with the Reserves Policy at Appendix 1 of this report;
  - Identify the affordable level of capital investment required to support our corporate priorities whilst focusing on reducing the level of Council borrowing and remaining within prudential borrowing limits;
  - Ensure that fees and charges are set at appropriate levels that take account of the economic conditions and ability to pay; and

## **Appendix A – Financial Plan February 2022 Overview**

- Pursue opportunities for securing external funding where available and use effectively where granted, and support opportunities for joint and collaborative working with partners to improve value for money.

A4. Budgets were balanced up to and including 2022/23 on the assumption that:

- £40.794m of savings were delivered during 2022/23.
- managers are diligent in working within budgetary envelopes.
- Council tax was increased by 2.99% (including 1% for social care), pay award of 2.5% was forecast and that income levels would largely return to pre- Covid levels

A5. Beyond 2022/23, the Council's forecast expenditure was expected to exceed its anticipated income by around £33m, producing a deficit ("Budget gap") which needs to be addressed.

## **Appendix B – Collection Fund Overview**

### **Collection Fund- Council Tax and Business Rates**

- B1 The 2021/22 Collection Fund Outturn was a surplus of £32.5m due to an improvement in the position compared to the forecast made when setting the 2022/23 budget. This improvement, largely due to reduction in the Bad Debt provision needed, will be reflected in the 2023/24 budget.
- B2 The In Year position for the Collection Fund (including Section 31 Grants) is currently forecast to be a surplus of £2.9m. There are however concerns about collection rates, given the economic situation, so a close eye will be kept on the situation.
- B3 The current forecasts for 2023/24 (including Section 31 Grants) are £30.1m higher than previously shown in the MTFP, largely due to very large increases in inflation forecast compared to assumptions in February 2022, this will be kept under review as the economic situation unfolds.

### **Business Rates**

- B4 The in-year forecast has a deficit of £1.8m. Generally, a surplus or deficit on the Collection Fund impacts on the following year's budget, which in this case will be 2023/24. The deficit is mainly related to a deficit on reliefs of £1.7m (partially offset by extra Section 31 Grant).
- B5 The Business Rates forecast for 2023/24 is £26.2m higher than previously assumed. This is largely because the inflation rate in September 2022 is expected to be 9.9%, rather than 2.0% previously assumed, thus increasing the yield from business rates by c£31m.
- B6 The inflationary effect is partly offset by making a cautious assumption at this stage that the non-collection rate will be 3% as assumed in 2022/23, rather than the 2% assumed in the years before Covid. This reduced the forecast by c£5m. From 2024/25, we are assuming that the non-collection rate will return to 2%.
- B7 The forecast for 2024/25 is also £45.5m higher than previously assumed, mainly due to inflation being assumed to be 4.5% in September 2023 on top of the effect of the 9.9% assumption for September 2022. Forecasts from 2025/26 onwards are also affected by this inflation assumption. After that, inflation is assumed to return to 2%.

### **Business Rates Related Grants**

- B8 Section 31 Grants are expected to be £1.1m higher than budget in 2022/23. This will partially offset the deficit on reliefs of £1.7m mentioned above.
- B9 Section 31 Grants are expected to be £4.9m higher in 2023/24 and £7.5m higher in 2024/25, with similar increases in on-going years. This is largely related to inflationary effects in line with Business Rates.

## **Appendix B – Collection Fund Overview**

### **Council Tax**

- B10 The in-year forecast is a surplus of £3.6m. Generally, a surplus or deficit on the Collection Fund impacts on the following year's budget, which in this case will be 2023/24. The in-year surplus is mainly due to lower than forecast costs of Council Tax Support and other reliefs and discounts, although as the cost of living crisis takes hold and any evidence of a change becomes clearer, the assumption will be reviewed.
- B11 The Council Tax forecast for 2023/24 is £1.0m less than previously forecast as at this stage, we are being cautious and assuming that the non collection rate will be 3.15% as assumed in 2022/23, rather than the 2.90% assumed in the years before Covid. For years from 2024/25, we are assuming that the non-collection rate will return to 2.90%, and the forecast is in line with previous forecasts.

### **Top Up Grant and Business Rates Reset**

- B12 It was previously assumed that there would be a reset of business rates baselines in 2023/24, and that this would lead to a loss of resources of £11.3m from 2023/4.
- B13 It is now assumed that there will not be a reset of business rates baselines until 2024/25. We therefore have removed the assumed loss of £11.3m of resources in 2023/24.
- B14 However, from 2024/25, we are still assuming a loss of resources, and this loss rises from £13.3m previously assumed for 2024/25 to £15.5m, an increase in the loss of resources of £2.2m.
- B15 The Government has announced that there will be no Spending Review in 2022, with Departmental limits remaining at the level announced as provisional in 2023/24 in last years Review.



## **Appendix C – Capital Update**

- C1 Council's Capital programme was also approved as part of the budget setting process in February 2022 with planned investment of over £1.2bn in the four years to 2025/26.
- C2 The capital programme is large and complex and driven particularly by the Council Plan. Covid-19 impacted the capital programme in 2020/21 and 2021/22 resulting in significant slippage of schemes into future years, changes to a number of schemes and additional costs. The 2022/23 Capital programme is beginning to be affected by supply side issues as well as inflationary pressures and the programme is being kept under close review and reported to cabinet as part of the financial monitoring in 2022/23. The quarter 1 report presented to Cabinet in July 2022 forecast capital expenditure in 2022/23 of £694.4m. The quarter 2 position is under review and will be reported at Cabinet in November 2022.
- C3 The Council is continuing to develop a 25-year Capital Programme to provide a long-term strategic view of Capital expenditure. This will look to identify capital investment in priorities such as Council owned assets, including buildings and roads, and facilitating the growth in the Birmingham economy through major projects and supporting businesses in the city when it is considered financially viable to do so.
- C4 The Capital Strategy priorities for new projects and programmes will focus on the Council Plan driven expenditure, statutory requirements and proposals that support revenue savings, income or service transformation. Supporting the Capital Strategy are the Property Strategy and the Commercialisation Strategy.
- C5 The impact of the Gilts market on PWLB rates is being kept under review.

## Appendix D – Risks

Risk	Mitigation	Existing Reserve/Provision on £m	Residual Risk	Maximum Impact over Medium Term Financial Plan £m	Likelihood	Probability weighted medium term potential impact £m
Business Rates income reduced by re-set, non-payment, impact of recession or appeals	The Council has employed a company to identify business rates income not being recorded	20	Company actively identifying companies not recorded on the list and therefore not in current baseline. However, pandemic has caused a backlog to accrue at VAO delaying growth to baseline. Risk will always remain in the current system. Government has announced it will freeze the business rates multiplier for 2022/23. Any changes of significant scale would affect the whole of local government and would be highly likely to require government support. Currently government has delayed any change for the near future.	880	2%	18
Council Tax growth and collection rates	Council Tax growth forecasts are based on the Council's approved housing forecasts and plan. Growth has been lowered to reflect the impact of COVID. Assumption that collection rates will climb back up to pre-pandemic rates		Cost of Living Crisis and recession may impact of building and collection rates	21	10%	2

## Appendix D – Risks

Council Tax collection falls below budgeted levels producing a deficit on the Collection Fund and impact on the following years budget.	The 2022/23 budget includes an increase in collection from 96.6% in 2021/22 to 96.85% in 2022/23. Pre pandemic collection rates were set at 97.1%. So while collection rates are not yet back to pre-pandemic rates they are gradually increasing.		There remains uncertainty around collection in 2022/23.	10	20%	2
Outcome of the Government Spending Review and Relevant Needs and Resources Review	The Government has announced that there will be no spending review in 2022		Risk has been pushed out beyond 2022/23 based on government announcements during 2022, settlement maybe at assumed inflation rate of 3.3%, which would eb real terms cut in funding	51	20%	10
Inflation increases at a greater rate than planned.	Generally provided for 7.5% inflation increase in 2023/24 within the budget on expenditure items. Contracts that run at a higher rate than the general assumption have been provided for separately in MTFP		Risk that inflation is higher than budgeted for and will therefore need to call on the Financial Resilience Reserve for funding.	20	25%	5

## Appendix D – Risks

There is a risk that short-term and long-term interest rates rise above budgeted forecast	The Council has taken a more prudent view than commentators over the medium term.		There has been a steady rise in interest rates since the spring	16	50%	8
There is a risk that the new PWLB lending rules exclude BCC from accessing PWLB borrowing, and BCC will have to borrow from the market at a higher rate	Capital programme investments have been reviewed to ensure they are not primarily for yield. The Financial Plan sets out clearly a policy of not investing primarily for yield. Any acquisitions will be reviewed against PWLB guidance for compliance		Nil	0		0
There is a risk that invested treasury monies are unable to be returned e.g. Icelandic Banks/BCCI	Adoption of up to date treasury management practices, regular monitoring and advice from external advisors		Low risk	80	5%	4

## Appendix D – Risks

There is a risk of capital commitments being entered into with revenue implications that are not reflected in the Budget.	All capital commitments must go through existing Council governance processes. Due diligence strengthened during 2021/22.		Low risk	75	5%	4
There is a risk in not achieving budgeted capital grants or capital receipts to fund commitment capital schemes which results in increased prudential borrowing.	Property are required to provide a schedule of disposals and regular updates on progress. Progress has been good in 2021/22 with a target of £100m looking achievable.		Disposals for 2023/24 may not be achieved either at all or when expected as the market could be flooded with properties listed for sale.	50	25%	13
There is a risk that the Capital programme overspends in anyone year and additional prudential borrowing is required in the short term	Regular capital monitoring is undertaken, robust budget setting and robust business cases supported by good project delivery.		Due to a history of slippage this risk has a very low likelihood.	5	5%	0
There is a risk of a Cyber-attack that severely disrupts operations or holds the Council to ransom	Investment and resources put into dealing with the cyber threat		The risk remains and other Councils have suffered attacks and financial consequences.	40	20%	8

## Appendix D – Risks

Delivering the savings programme	A fundamental review of all savings proposals has been undertaken, there are some ambitious plans that need to be in place for the 1st April 2022		Not all listed savings will deliver a full year impact in 2022/23, resulting in a need to utilise some of the budget smoothing reserve.	30	20%	6
There is a risk of demand pressures in Adult Social Care causing an overspend	Annual demography is built into the budget plus additional social care market inflation. Monthly budget monitoring would identify at an early stage any overspend, and mitigations would be expected		There is a residual risk of an Adults overspend not being contained in one year, although in recent years the service has underspent and delivered its savings target. The ongoing long term impact of Covid on the service is still unknown.	80	10%	8

## Appendix D – Risks

There is a risk of demand pressures in Children's Social Care causing an overspend in the contract payments to BCT as we see a rising number of complex cases	Annual demography is built into the budget plus additional baseline budget sufficiency sum reflected in 22/23 budget refresh. Monthly budget monitoring would identify at an early stage any overspend, and mitigations would be expected		There is a residual risk of a BCT contractual overspend not being contained in one year,	20	20%	4
There is a risk that SEND and Travel Assist continue to overspend.	Work is underway with a CIPFA review to understand the budget in greater detail, with growth of over £19m built into the budget for 2022/23		Given the ongoing budget review work and demand in this service there is a risk that the growth built into the budget is not enough.	20	20%	4
There is a risk based on recent history of City Operations Department not spending within its annual budget	Monthly budget monitoring would identify any overspend and mitigation would be expected.		Given its history of overspending there remains a residual risk in this Directorate.	15	20%	3

## Appendix D – Risks

There is a risk of Property Services not delivering its income levels budgeted for	The MTFP and Financial Plan have been developed in line with service projections. Monthly budget monitoring would identify any overspend and mitigation would be expected.		However, in the current environment income levels could remain difficult to achieve	20	10%	2
There is a risk that the Highways PFI alternative arrangement will cost significantly more than the current budget provision	Re procurement is taking place now. The service is intending to re-procure within existing external funding	200	However there remains a residual risk that the Council could be required to provide additional funding	50	50%	25
Increased Pension Contributions required	The Council agreed a three-year payment plan with the pension fund to repay the pension deficit, beginning 2020/21. Any movements would be incremental from the current agreed recovery plan.		This is a tri-annual review	20	25%	5



## Appendix D – Risks

Impact of COVID 19 - potential additional cost implications	Currently no Government funding for 2022/23 identified. The last Government funding as tranche 5 allocated in early 2022/23. Any unspent monies will be ring fenced and carried forwards to 2022/23	17.5	Costs exceed the remaining funding and fall on the Council's overall budget.	10	10%	1
Impact of Brexit – potential loss of grant income	There still remains some uncertainty over the Governments replacement of European Grant funding.			5	40%	2
Industrial disputes	Continuing discussions through ACAS			6	25%	2
Exceeding the 5% VAT Partial Exemption limit	Appropriate taxation advice is taken before each decision is taken			40	5%	2
Major Contract disputes	Ensure contracts are operated in accordance with the agreed Terms and Conditions. Earmarked reserves in place			10	10%	1

Appendix D – Risks

	to mitigate impacts.					
Successful Equal Pay disputes	Provision has been set aside for outstanding Equal Pay claims.	270		0	0%	0
Total Risk						139

70% deflator to reflect not all risks will happen at same time	41.7
General Fund Reserve	38.4
Estimated Financial Resilience Reserve balance at 31 March 2023	61.2

**Reports not on the Forward Plan / Late Report / Confidential or  
Exempt Information not Notified**

## **Birmingham City Council**

**29 September 2022**



**Subject:** Cost of Living Emergency Programme

**Report of:** Richard Brooks, Director of Strategy, Equality and Partnerships

**Report author:** Greg Ward, Programme Manager

### **1) Key Decisions not on the Forward Plan / Urgent Decisions**

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.

<p><i>Reasons for Urgency / why not included on the notification</i></p>	<p>On the 6th September 2022, the Leader announced his intention for the council to declare a 'Cost of Living Emergency'. Shortly after the announcement, the country went into a national period of mourning following the Queen's death on the 8<sup>th</sup> September 2022. The first consideration of the announcement was discussed by the Council's Corporate Leadership Team on the 20<sup>th</sup> September, where it was agreed that a Cost of Living programme should be established and agreement sought from Cabinet on the governance, priorities and funding. A public commitment to bring in 'warm banks' as soon as possible and early analysis has shown that there is an immediate priority to have some areas of work delivered and in place ahead of the cold weather setting in, and most significantly ahead of the school October 2022 half term where there will be increased pressure on families to heat their homes all day. Therefore, there was agreement at the 20<sup>th</sup> September Corporate Leadership Team that a key decision on the programme and funding be brought to the 11<sup>th</sup> October 2022 (Cabinet) meeting. This would also align with the Leader's intention to announce a Cost-of-Living emergency and provide a strong response in terms of immediate support that will be put in place to support the most vulnerable and those at greatest risk.</p>
<p><i>Date Chief Executive Agreement obtained:</i></p>	<p><b>30<sup>th</sup> September 2022</b></p>

<i>Name, Date and any comments of O&amp;S Chair agreement obtained:</i>	<b>29<sup>th</sup> September 2022</b> "Yes, I agree to this going forward to Cabinet."
---	---

**2) Key Decisions 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.

<i>Reasons for Urgency / why not included on the notification</i>	[insert reasons]
<i>Name, Date and any comments of O&amp;S Chair agreement obtained:</i>	

### 3) Late Reports

To be completed for all late reports, i.e. which cannot be despatched with the agenda papers i.e. 5 clear working days' notice before meeting.

<i>Reasons for Urgency / why late</i>	[insert reasons]
<i>Date agreement obtained (Executive e.g. Leader and/or CEX):</i>	



# Birmingham City Council

## Report to Cabinet Members

11 October 2022



**Subject:** **COST OF LIVING EMERGENCY PROGRAMME**

**Report of:** **Richard Brooks**  
**Director for Strategy, Equality & Partnerships**

**Relevant Cabinet Member:** **Cllr John Cotton - Cabinet Member for Social Justice, Community, Safety, and Equalities**  
**Cllr Yvonne Mosquito - Cabinet Member for Finance and Resources**

**Relevant O & S Chair(s):** **Cllr Sir Albert Bore, Coordinating Overview and Scrutiny Committee**

**Report author:** **Greg Ward**  
**Programme Lead, Cost of Living & Levelling Up**  
**Telephone No: 07500 809620**  
**Email Address: [greg.ward@birmingham.gov.uk](mailto:greg.ward@birmingham.gov.uk)**

Are specific wards affected?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No – All wards affected
If yes, name(s) of ward(s):		
Is this a key decision?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If relevant, add Forward Plan Reference:		
Is the decision eligible for call-in?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Does the report contain confidential or exempt information?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
If relevant, state which appendix is exempt, and provide exempt information paragraph number or reason if confidential:		

## **1. Executive Summary**

- 1.1 Following the announcement of a Cost-of-Living Emergency by the Leader, this paper provides detail of the actions to be put in place to support residents and businesses over the winter months.
- 1.2 As indicated below, expeditious action will be required to ensure residents and businesses are supported through an immediate period of rapidly rising food and energy costs.
- 1.3 As detailed in the Month 5 Financial Monitoring report on the Committee Agenda it is proposed to allocate up to £5m of non-recurrent funding from the Financial Resilience Reserve to this programme. Initial priority areas for action will include: benefits and money advice; foodbanks; warm spaces; energy efficiency; and supporting our staff

## **2. Recommendations**

- 2.1. It is recommended that full Cabinet:
  - 2.1.1. notes the allocation of up to £5m of the Financial Resilience Reserve (FRR) as detailed in the month 5 Financial Monitoring Report on this Cabinet Agenda is used to fund the costs of the Cost-of-Living Emergency.
  - 2.1.2. notes the approval of the delegation of expenditure on the Cost-of-Living Emergency, as set out in in the Month 5 financial monitoring report on this Cabinet agenda, to the Director of Strategy, Equality and Partnerships and the Section 151 officer, in consultation with the appropriate Cabinet Members.
  - 2.1.3. Approves the delegation of procurement decisions to the Director of Strategy, Equality and Partnerships and the Section 151 officer, in consultation with the Assistant Director of Corporate Procurement and the appropriate Cabinet Members.
  - 2.1.4. approves the creation of a Cost-of-Living Strategic Response Group chaired by the Director of Strategy, Equality and Partnerships which will oversee the Cost-of-Living delivery workstreams including the responding to addressing immediate priority actions.

And to note that:

- 2.1.5. progress updates will be presented to future Cabinet Meetings.

## **3. Background**

- 3.1. The Cost-of-Living Emergency has profound implications for Birmingham. We have over 300,000 residents already living in poverty, with many more highly exposed to the crisis. The Prime Minister's 8th September announcement on energy prices will help mitigate further increases in costs, but the situation remains extremely serious. Colder weather fast approaches and many more



families will find their household bills unaffordable and will face acute challenges in staying warm, well-fed, safe, and healthy.

- 3.2. The Leader and Cabinet have announced a Cost-of-Living Emergency and have convened the City Partnership to address the crisis. Other public bodies and VCS organisations are quickly developing their response to the crisis and have expressed their desire to work in partnership with the Council. It is important that the Council establishes a strong and credible programme to lead this agenda, deliver rapid help for our residents, and coordinate support across the city.
- 3.3. Arrangements to oversee this programme of work will be mobilised similarly to how the Council would respond to an emergency event with rapid and quick governance and delivery however this will be done within the normal constitutional arrangements. A Strategic Response Group will be established, with membership from Chief Officers of the Council plus a small number of key external partners.
- 3.4. Our Cost-of-Living response should align with and accelerate our longer-term strategic work, for example on Early Intervention and Prevention, and Net Zero. The Strategic Response Group will provide a forum for ensuring this principle is respected, and key officers who are leading strategic programmes will also lead or be closely involved in the relevant Cost of Living operational delivery workstrands.
- 3.5. It is recommended that our programme of Cost-of-Living work focuses around four broad themes:

Theme	Outcome
People	Increase income & reduce costs
Public Sector & VCS	Collaborate rally & support our partners
Business	Protect jobs and prevent bankruptcy
Places	Increase energy efficiency

- 3.6. Within these themes, there has been some initial mapping of current and planned activity to form a view of what short, medium- and longer-term actions will be required. This exercise identifies the following areas as short-term priorities that require immediate focus and additional activity:
  - Improving the availability of advice to residents, with a focus on increasing benefit take up
  - Increasing energy efficiency, with a focus on reducing costs
  - Increasing the supply of food through foodbanks across the city
  - Ensuring the provision of a network of warm spaces across the city, starting with libraries
  - Supporting our staff.

- 3.7. The timescale required to deliver effective help this winter is short. Each workstrand will need officer leadership, working across our organisational boundaries to deliver a more effective response. They will assume a policy lead role for their strand of work and advise the Strategic Response Group on the actions needed to enable, coordinate and accelerate delivery. There will be programme management support for the lead officers to help them fulfil their role in shaping and tracking delivery. An Operational Delivery and Coordination Group will oversee the immediate priority workstrands and ensure pace of delivery, reporting regularly to the Strategic Group and escalating issues as required.
- 3.8. At present the full scale and implications of the cost-of-living crisis are difficult to project, but we can anticipate continued acute pressures well into 2023. As stated below, the cost-of-living crisis is also layered on top of continued risks from Covid and other pandemics, plus NHS system pressures that are already severe. We anticipate that the governance and supporting arrangements described here will be needed until at least April 2023.
- 3.9. Time is of the essence, as is organisational agility and flexibility. Decisions will need to be taken at the Strategic Response Group, and activity such as improved advice, warm spaces and foodbank provision will need to be underway before the cold weather arrives and the October school half term which will be a significant pressure point for families.
- 3.10. As part of the proposed governance structure attached in Annex A, there will be clear Terms of Reference drawn up for the programme and its constituent elements, which will include setting out the roles and responsibilities of officers, members and external participants.

#### **4. Options considered and Recommended Proposal**

- 4.1 Doing nothing would mean the City Council would fail to provide the additional support that residents and businesses will need over the cold winter months. Much of the support needed is only within the Council's gift. Additionally, the Council has unique convening power to bring other agencies together to create a coherent city-wide approach.

#### **5. Consultation**

- 5.1 CLT have reviewed these recommendations and there has been consultation with key Cabinet Members and Officers who have contributed to and endorsed the initial short priority actions and the immediacy to deliver these.

#### **6. Risk Management**

- 6.1 Risks have been considered as part of the development of these proposals. The main risks identified are:
- An inability to respond at the required scale and pace. This proposal is intended to accelerate our response and establish agile processes.

- A lack of a coordinated response across the city. Given the urgency, partners as well as the Council may start putting in place actions that duplicate or do not align thus reducing the impact and/or causing confusion.
- The possibility of further significant disruptive events: bad weather, new pandemics, NHS pressures, other emergencies.

## **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 consistent with a number of City Council priorities particularly on its Early Intervention and Prevention, Inclusive Growth and Net Zero strategies as well as the Council's broader aims of reducing poverty.

### **7.2. Legal Implications**

7.2.1 The Strategic Response Group will require robust terms of reference and governance arrangements in order to offer clear oversight including record of decision making, appropriate financial management and compliance with the Council's Finance, Contract and Procurement Rules.

7.2.2 It is anticipated that individual proposals considered may require legal advice and support as and when necessary.

### **7.3 Financial Implications**

7.3.1 As stated above, up to £5m of non-recurrent funding has been approved from the Finance Resilience Reserve to this programme. Proposals for drawing on this budget will come to the Strategic Response Group for consideration. Early priorities in line with the workstreams are likely to include: extending our advice services to drive benefits take up through direct provision or contracts; extending opening hours of council facilities and providing warm banks in e.g., libraries and schools; backfilling roles that are switched onto cost of living work; and funding other organisations to increase the support they offer citizens.

### **7.4 Procurement Implications**

7.4.1 It is noted that the allocation of budget is key findings of this report with details on how that spend is to be allocated yet to be determined in detail. Such spend is likely to include a range of arrangements including but not limited to, extending existing contracts, new procurement arrangements, purchasing from existing compliant frameworks, and where appropriate direct award through negotiation. Decisions will be taken following the Emergency Process in line with the Procurement and

Contract Governance Rules and delegated as set out in 2.1.3 above with the appropriate engagement of Corporate Procurement Service.

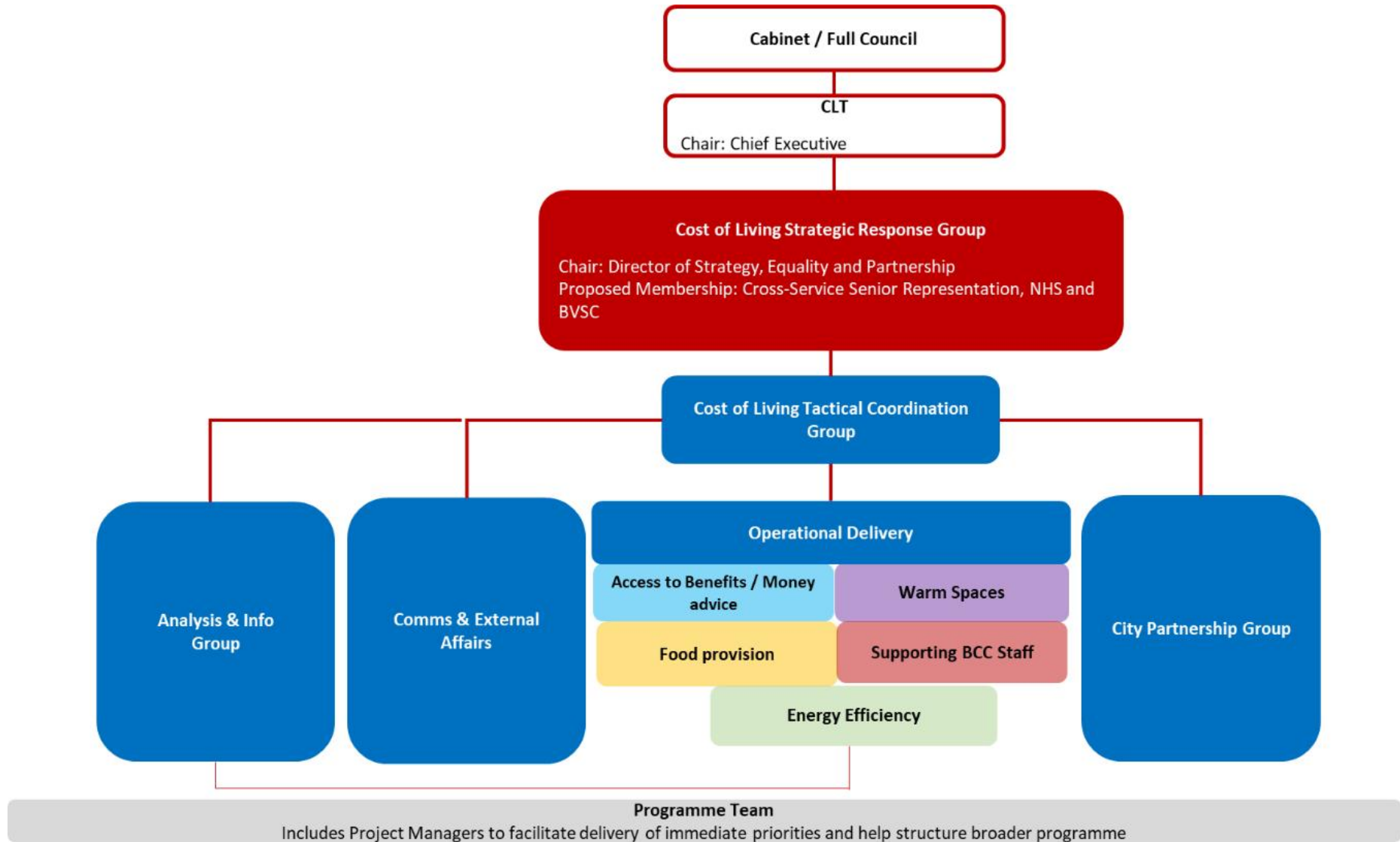
## **7.5 Public Sector Equality Duty**

- 7.5.1 The purpose of this report is to ensure the local authority can discharge its responsibilities under the Equality Act through the provision of support for the most vulnerable in the City.
- 7.5.2 The cost-of-living crisis will significantly impact those already living in poverty. Within Birmingham there is a concentration of poverty in key ethnic groups and those impacted by multiple disadvantages, including disability. The funding set out in this report seeks to reduce the impacts of the crisis on these cohorts by delivering immediate support which
- 7.5.3 An Equality impact Needs assessment has not been completed for this report due to the urgent need to approve funding. However, this will be undertaken and submitted to the Strategic Response Group as part of its role in assuring delivery.

## **8. Appendices**

- 8.1 Appendix A - Programme Governance

## Annex A: Cost of Living Programme Draft Governance Arrangements





# Birmingham City Council

## Report to Cabinet

11th October 2022



**Subject:** Development of Housing at Long Nuke Road and  
Development of Sports Pitches and Pavilion at Senneleys Park

**Report of:** Paul Kitson, Strategic Director, Place, Prosperity &  
Sustainability and Robert James, Strategic Director, City  
Operations

**Relevant Cabinet Member:** Councillor Ian Ward, Leader  
Councillor Sharon Thompson, Cabinet Member for  
Housing and Homelessness  
Councillor Yvonne Mosquito, Cabinet Member for  
Finances and Resources  
Councillor Majid Mahmood, Cabinet Member for  
Environment

**Relevant O &S Chair(s):** Councillor Aikhlaq Ahmed Resources  
Councillor Mohammed Idrees, Housing and  
Neighbourhoods  
Councillor Chaman Lal, Sustainability and Transport

**Report author:** Terry Webb, Principal Housing Development Officer  
07825 052295  
Email Address: [Terry.Webb@birmingham.gov.uk](mailto:Terry.Webb@birmingham.gov.uk)

Are specific wards affected?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No – All wards affected
If yes, name(s) of ward(s): Bartley Green		
Is this a key decision?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If relevant, add Forward Plan Reference: 008859/2021		
Is the decision eligible for call-in?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Does the report contain confidential or exempt information?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
If relevant, provide exempt information paragraph number or reason if confidential: N/A		

## **1 Executive Summary**

- 1.1 The report seeks to obtain approval for the Full Business Case (FBC) and approval of the procurement strategy for the construction of 65 new homes at Long Nuke Road (the Scheme).
- 1.2 The report also seeks authority for the construction of sports pitches and a changing pavilion in Senneleys Park.

## **2 Recommendations**

- 2.1 Approves the FBC for the Scheme, attached to this report as Appendix A, and delegates any changes up to 20% of the approved budget to the Strategic Director of Place, Prosperity and Sustainability due to the uncertainty surrounding both material price rises and availability of skilled labour to construct the properties, pavilion and pitches.
- 2.2 Approves the strategy and commencement of the procurement activity for the housing development and associated works, including the delivery of new sports pitches and the construction of a new changing pavilion in Senneleys Park, using the Homes England Dynamic Purchasing System (DPS) or an alternative procurement route compliant with the Procurement Regulations if use of the DPS is unsuccessful.
- 2.3 Delegates the approval of the contract award for the Scheme to include the delivery of the homes, the sports pitches and the pavilion to the Strategic Director, Places, Prosperity and Sustainability in conjunction with the Strategic Director, City Operations, the Assistant Director, Procurement (or their delegate), the Strategic Director of Council Management (or their delegate) and the City Solicitor and Monitoring Officer (or their delegate) subject to the costs being within the FBC approval in accordance with paragraph 2.1.
- 2.4 Delegates to the Strategic Director, Place, Prosperity and Sustainability to amend the tenure mix of open market sale and social rent properties should circumstances dictate a need to change tenure especially in light of the known facts that Help To Buy ceases to be available from April 2023 and that the current rise in interest rates will impact on the affordability of mortgages
- 2.5 Authorises the Strategic Director, City Operations to place an order not to exceed the sum of £0.99m in total for construction of a changing pavilion at Senneleys Park
- 2.6 Authorises the Strategic Director, Places, Prosperity and Sustainability to seek consent from the Secretary of State under Section 174 of Localism Act 2011, to exclude the new council properties developed through the Scheme from the Right to Buy pooling requirements, and to ensure that any capital receipts generated from any future sale of homes under the Right to Buy are retained by the Council for reinvestment in future housing delivery.



- 2.7 Authorises the Assistant Director, Transport and Connectivity to grant technical approval of the Scheme highways proposals and progress the preferred option to detailed design which will be the responsibility of the appointed contractor.
- 2.8 Authorises the Strategic Director, Place, Prosperity and Sustainability to submit and process all necessary highway closures and notices required to facilitate the Scheme highlighted in the FBC and to enter into any appropriate agreements for the creation, improvement and alterations to highway access to the sites.
- 2.9 Delegates to the Strategic Director, Place, Prosperity and Sustainability the power to amend or vary the development boundaries by up to 10% for the Scheme.
- 2.10 Delegates authority to the Strategic Director, Places, Prosperity and Sustainability to submit funding applications to Homes England (HE), West Midlands Combined Authority (WMCA), the Department for Levelling Up, Housing and Communities (DLUHC), European Regional Development Fund or any other funding agency to facilitate the scheme development where required.
- 2.11 Authorises the City Solicitor and Monitoring Officer (or their delegate) to take all steps necessary for the preparation of any documents, to negotiate, execute and complete all necessary documentation to give effect to the above recommendations.

### **3 Background**

- 3.1 The proposed development site at Long Nuke Road is located within the Bartley Green Ward, approximately 6 miles from the City Centre
- 3.2 The site was appropriated into the Housing Revenue Account (HRA) for housing development purposes in the Driving Housing Growth, Land Appropriations report to Cabinet in March 2018.
- 3.3 The scheme was identified in the Birmingham Municipal Housing Trust (BMHT) Delivery Plan 2019-2029 report to Cabinet on 14 May 2019. The Full Business Case for the scheme contained within the report is for 65 homes, 23 for social rent and 42 for outright sale and for the delivery of the sports pitches and sports pavilion in Senneleys Park. See Appendix A.
- 3.4 The site was identified as obsolete from its former use as a playing field due to its lack of changing rooms and poor drainage and had not been used for sporting purposes for approximately ten years.
- 3.5 The site within Bartley Green is close to a number of completed and currently under construction Birmingham Municipal Housing Trust schemes at Loftus Close, Bangham Pit Road and Monmouth Road and this development will complement the completed schemes and those schemes in progress by providing additional urgently needed homes for open market sale and social rent and provide additional sporting facilities for use by the wider community in Senneleys Park.

- 3.6 A planning application for the scheme was submitted and subsequently approved on 26<sup>th</sup> November 2021, the reference number is 2019/05652/PA
- 3.7 The current Planning condition No. 13 requires that the replacement pitches to be provided in Senneleys Park are completed and available for use prior to start on site for the construction of the homes.
- 3.8 Current Planning condition No. 14 requires a financial contribution to BCC City Operations to deliver the pitches required in condition 13
- 3.9 The original development restriction was that the 65 new homes would be constructed after the replacement sports pitches and changing pavilion had been constructed in Senneleys Park; two current planning conditions preclude any start on the housing development until those facilities have been provided and are available for use.
- 3.10 BCC Planning have been consulted and a minor planning amendment has been submitted to vary the conditions, which, if approved, will allow a start on site for both the pitches and the homes, in late 2023. (Planning application - 2022/06466/PA refers) Had the existing condition remained, the earliest start on site for the construction of the homes would be in late 2025 which would incur unacceptable cost increases and may be financially unviable with a loss of 65 urgently needed new homes for Birmingham.
- 3.11 Sport England have agreed that the pitches can now be delivered as part of the overall construction contract and that consequently the financial contribution set out in condition 13 will be expended directly by Birmingham Municipal Housing Trust on the sports pitches. Sport England have also agreed to support an application to vary conditions 13 and 14 to allow the delivery of the sports pitches concurrently with the delivery of the homes.
- 3.12 The specialist sub-contractor will be sufficiently qualified and experienced to deliver the replacement sports pitches and LPG will provide the landscape clerk of works service to supervise the work. Acivico Ltd has designed and acquired planning permission for the construction of a 4-changing room pavilion at Senneleys Park. A Cabinet Member report and Outline Business Case were approved in July 2021. The project was tendered on the open market; however, no tenders for the project were received. Pre-tender cost estimates for the changing room pavilion have indicated that the available budget is insufficient however additional funding was approved at Capital Board on the 14<sup>th</sup> June 2022. It is therefore intended to include the changing pavilion in the Scheme for the homes to achieve economies of scale from reduced preliminary costs and synergies from construction. The pitches also require the changing pavilion to be constructed prior to the completion of the pitches for them to be let to a prospective team.
- 3.13 As the Pavilion is being funded directly by Leisure, all ongoing maintenance and management of the Pavilion will be the responsibility of Leisure from their funding stream.

- 3.14 If the development of 65 new homes is unlikely to be delivered due to delays in starting on site and cost increases in the construction industry, the implication is that the urgently need replacement sports pitches and pavilion in Senneleys Park would also not be delivered, as well as the appropriated land set aside for the housing development would then be returned to Education for them to maintain.

#### **4 Options considered and Recommended Proposal**

- 4.1 To do nothing until the sports pitches and pavilion have been constructed which would delay the homes by at least two years– this is not an option as the scheme will contribute to the Council's target for new homes for the city and also the BMHT 10-year delivery plan. Furthermore, Housing will have no control as to when the site could be delivered and the opportunity to deliver 65 new homes would be lost due to escalating prices or the failure to deliver the pitches and pavilion.
- 4.2 To wait for Sport and Physical Activity, City Operations to deliver the Sports Pavilion so that the new changing rooms are available when the new sports pitches are ready for use. This would delay the delivery of the houses on the site for at least two years which would incur unacceptable cost increases that may make the entire delivery financially non-viable which would mean 65 urgently needed homes would not be built.
- 4.3 To develop the Scheme with the pitches and pavilion as outlined in this report through Birmingham Municipal Housing Trust (BMHT) and with resources for the development being made available through the Housing Revenue Account (HRA) business plan, and BCC Capital resources. Funding for the sports pavilion and a contribution towards the pitches will be from S106 funds assigned to City Operations; the Changing Pavilion needs to be constructed as soon as possible once a contract for the overall construction of the site is in place, in order for clubs to use the new pitches following their establishment. This is the recommended proposal.

#### **5 Consultation**

- 5.1 Please see Appendix D, Consultation Plan.

#### **6 Risk Management**

- 6.1 Please see Appendix E, Risk Register.

#### **7 Compliance Issues:**

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

- 7.1.1 The scheme is in accordance with the objectives of the housing revenue account (HRA) Business Plan 2022+.

7.1.2 The delivery of the sports pitches and pavilion in Senneleys Park will add to the high-quality sporting provision both within Bartley Green and across the City and is in line with and supports the Council's priorities.

7.1.3 The scheme is in line with the Council's Route to Zero Strategy approved by Cabinet in January 2021. The Strategy commits to reducing the city's carbon emissions and limit climate crisis.

7.1.4 The Scheme will make a direct contribution and is consistent with the Council's Plan 2018 – 2022 (as updated in 2020) priorities and outcomes as outlined below:

- A Bold Prosperous Birmingham; the Council is committed to the development of enough high-quality new homes to meet the needs of a growing city, and the proposals within this report to accelerate housing growth in the City by providing new homes for rent and will help ease pressure on the housing register.
- A Bold Green Birmingham; the new homes will be built to a high standard of energy efficiency by using the latest technologies and use a range of measures to improve the environment and tackle air pollution by using cleaner technologies and building energy efficient homes.
- A Bold Inclusive Birmingham; the new social housing will be available to any applicant on housing register.
- A Bold Healthy Birmingham; the links between health and housing are well recognised. New thermally efficient, economical to run new homes which are designed to high standards of quality and internal space standards will provide social rented housing for residents and offer a higher quality of life, leading to better health outcomes.
- A Bold Safe Birmingham; new homes will be developed which will provide a safe, warm, sustainable, and connected neighbourhood in which all communities can thrive.

#### **7.1.5 Birmingham Business Charter for Social Responsibility (BBC4SR)**

7.1.5.1 Compliance with the BBC4SR is a mandatory requirement that will form part of the conditions of this contract. The successful tenderer will submit an action plan which will be implemented and monitored during the contract period.

7.1.5.2 The social value outcomes to the benefit of the Bartley Green ward and the surrounding areas, tenderers will be required to address will include:

##### **Local Employment**

- Employment and employability opportunities for the target groups particularly young people.

- To provide a donation of £500 for every property built to support the Building Birmingham Scholarship to assist young professionals within the construction industry.
- A strong local employment offer with the focus on the hardest to reach groups particularly focused on the residents in Bartley Green Ward and the surrounding area. Based on the value of the scheme, a minimum of 14 full time equivalent employment / apprenticeship opportunities is expected.
- The provision of new high-quality sports pitches in Senneleys Park enabling local and visiting teams to play a variety of sports as well as being available for anyone in the area to use therefore increasing the opportunity for sport and physical exercise in the area.
- The delivery of the new sports pavilion will provide changing and meeting facilities for sports teams and officials enabling more organised events to be conducted in an efficient manner and for players and officials to change and shower before and after matches.

#### **Buy Local**

- Spend to be, as practically as possible, with local, small and medium enterprises as well as social enterprises within a 30-mile radius of the scheme.
- In recognition of the Council's policy to support sheltered workshops and its commitment to promote such firms who employ People with Disabilities, the tender will include a requirement for tenderers to seek a quotation from Shelforce to ensure they have the opportunity to price for this Scheme.

#### **Partners in Communities**

- Bidders and their supply chain will need to utilise their community reach and focus their outcomes on community cohesion with sensitivity to local demographics.
- Working with schools to focus on increasing attainment and employment options for those students facing disadvantage.
- A robust understanding and methodology for community engagement.

#### **Good Employer**

- Provide good employment practices to increase the staff employability and quality of employment.
- Demonstration of the provision of in-depth training for their employees in equality, diversity and inclusion.
- Good practices around areas including collective representation, zero-hour contracts, whistle blowing policies.
- The payment of the Real Living Wage down the supply chain is a mandatory requirement in accordance with the Council's policy.

### **Green and Sustainable**

- Plans for a carbon natural position and what activities they are undertaking to achieve that additional to the specification including details relating to transport, recycling, materials used and offsetting.

### **Ethical Procurement**

- The outcomes sought under this theme relate to the treatment of subcontractors in terms of payment and training.
- Evidence will be required as to how the bidder is ensuring that the materials used are sourced ethically.

## **7.2 Legal Implications**

7.2.1 As the Housing Authority, the relevant legal powers relating to the discharge of the Council's statutory function to provide its housing need are contained in Section 9 of the Housing Act 1985.

7.2.2 Section 1 of the Localism Act 2011 contains the Council's general power of competence; Section 111 of the Local Government Act contains the Council's subsidiary financial powers in relation to the discharge of its functions.

7.2.3 The City Council carries out transportation, highways and infrastructure work under the relevant primary legislation including the Town and Country Planning Act 1990, Highways Act 1980, Road Traffic Regulation Act 1984, Traffic Management Act 2004, Transport Act 2000, and other related regulations, instructions, directives, and general guidance, and the Highways Act 1980 contains the highway closures and diversions.

7.2.4 As the Birmingham Municipal Housing Trust is an integral part of Birmingham City Council, a standard Section 38 and Section 278 Highways agreement cannot be undertaken, a Memorandum of Understanding for the Section 38 and Section 278 works will be utilised in place of the standard agreements. The Memorandum of Understanding is in place and has been signed off by Legal Services and Highways as appropriate for this development to facilitate the improvement of existing areas of highway maintainable at public expense, that will be affected by the development proposals.

7.2.5 Under Section 19 of the Local Government (Miscellaneous Provisions) Act 1976, the Council has the power to provide recreational facilities such as playing pitches and changing pavilions.

### **7.3 Financial Implications**

- 7.3.1. The total estimated cost of the proposed development is £14.522 million to be completed in 2025/26, this sum includes the delivery of the replacement sports pitches but excludes the sum for the delivery of the changing pavilion in Senneleys Park and all associated design, specification and clerk of works fees for the sports pavilion. The sum for the sports Pavilion is shown as an addendum on the FBC at a cost of £991,000 and will be funded directly from Birmingham City Council capital resources. The housing scheme will be funded from HRA revenue contributions, Right to Buy one for one receipts and Affordable Housing Section 106 contributions is included in the HRA Business Plan 2022+.
- 7.3.2 The future running costs of the properties and areas of public realm retained will be met from ongoing rental income.
- 7.3.3 The financial viability of the Scheme proposal is based on the Government's social housing rent policy that rents will increase annually by the Consumer Price Index (CPI) + 1 % over a 5-year period from 2020/2021.
- 7.3.4 The new Council rented homes will be subject to the Right to Buy cost floor regulations, which mean that for the first 15 years following the completion of the new homes, any tenant purchasing their Council property through the Right to Buy will be obliged to pay the Council the full construction cost of the property, irrespective of any discount to which they may be entitled under the Right to Buy legislation.
- 7.3.5 The construction of the new Council homes should not be liable to VAT; however, VAT may be payable on other project costs. The letting of HRA homes is non-business; as are sales of such homes under Right to Buy. The Council can reclaim VAT incurred on the development and management of HRA homes, including sales under Right to Buy. Therefore, VAT should not be a cost to the project. VAT implications are detailed in the Full Business Case in Appendix A

- 7.3.6 A revenue budget is already in place for the maintenance of the park premises. It previously supported the operational costs of the now closed former changing pavilion. This will be sufficient to fund the maintenance of a new pavilion.

## **7.4 Procurement Implications**

7.4.1 It is recommended that a further competition exercise is carried out in accordance with the protocol of the Homes England Dynamic Purchasing System (DPS).

7.4.2 The DPS is specifically designed for the development of housing with a suitable breadth of suppliers and is considered to deliver better value for money than an open tender or any other framework agreement and has been used successfully for the delivery of a number of similar BMHT housing development schemes.

7.4.3 The evaluation criterion to be used is 40% quality, 20% social value and 40% price.

7.4.4 Should the tender exercise using the DPS not be successful, an alternative procurement route compliant with the Procurement Regulations will be undertaken.

### **7.4.5 Human Resources Implications (if required)**

7.4.6 The project will be staffed by the Housing Development team (Place, Prosperity & Sustainability Directorate) internally, with support from the scheme's Employers Agent, Capita (UK) Ltd.

## **7.5 Public Sector Equality Duty**

7.5.1 There are currently around 16,955 active applicants on the Council's affordable housing register. Many of these people live in overcrowded conditions across the housing sector. Evidence from allocating properties previously developed under the Birmingham Municipal Housing Trust (BMHT) banner has revealed the extent of this problem, many families being allocated from accommodation that was too small for their needs.

7.5.2 An initial Equality assessment ref: EQUA968 is attached as Appendix G. A full Equality Assessment has not been undertaken as it is considered that the proposals of this report do not have any adverse impact on the characteristics and groups protected under the Equality Act 2010.

## **8 Appendices**

8.1 Appendix A – Full Business Case

8.2 Appendix B – Site Layout Plan

8.3 Appendix C – Leisure Sports Pitch and Pavilion Design



8.4 Appendix D – Consultation Plan

8.5 Appendix E – Risk Register

8.6 Appendix F – Environment & Sustainability Assessment

8.7 Appendix G – Equality Impact Assessment

## **9 Background Documents**

9.1 Birmingham Municipal Housing Trust (BMHT) Delivery Plan 2019-2029 report to Cabinet on 14 May 2019.

Appendix B – site layout plan – Housing





Pitches site plan



Pitches and changing rooms site plan



Sports Pavilion design and floor plan



## Appendix D – Consultation plan

Consultee	Date	Comments
Bartley Green Ward Forum	19 <sup>th</sup> July 2019	Plans presented to Ward Forum by Clive French
Paul Kitson, Strategic Director, Place, Prosperity and Sustainability	15 <sup>th</sup> July 2022  15 <sup>th</sup> September 2022	Briefing note submitted and email support from Paul Kitson for the development as set out in the cabinet report received.  Cabinet report and full business case sent by email on 15 <sup>th</sup> September 2022
Councillor Ian Ward, Leader	15 <sup>th</sup> September 2022	Cabinet report and full business case sent by email on 15 <sup>th</sup> September 2022 by email to Rebecca Grant
Councillor Sharon Thompson, Cabinet Member for Housing and Homelessness	15 <sup>th</sup> September 2022	Cabinet report and full business case sent by email on 15 <sup>th</sup> September 2022
Councillor Yvonne Mosquito, Cabinet Member for Finance and Resources	15 <sup>th</sup> September 2022	Cabinet report and full business case sent by email on 15 <sup>th</sup> September 2022 by email to Jon Lawton. Email approval from Jon Lawton for Cllr Mosquito received on 15 <sup>th</sup> September 2022
Councillor Majid Mahmood, Cabinet Member for Environment	15 <sup>th</sup> September 2022	Cabinet report and full business case sent by email on 15 <sup>th</sup> September 2022 by email to Jon Lawton.
Councillor Aikhlaq Ahmed, O & S Chair, Resources	15 <sup>th</sup> September 2022	Cabinet report and full business case sent by email on 15 <sup>th</sup> September 2022
Councillor Mohammed Idrees, O & S Chair, Housing and Neighbourhoods	15 <sup>th</sup> September 2022	Cabinet report and full business case sent by email on 15 <sup>th</sup> September 2022

Councillor Chaman Lal, O & S Chair, Sustainability and Transport	15 <sup>th</sup> September 2022	Cabinet report and full business case sent by email on 15 <sup>th</sup> September 2022
Councillor Bruce Lines and Councillor Kerry Brewer	11 <sup>th</sup> August 2022  15 <sup>th</sup> September 2022	Email detailing project to date with site layout plans and explanation of the delivery of the entire project sent Email with copy of cabinet report sent on 15 <sup>th</sup> September to Cllr Bruce Lines and Cllr Kerry Brewer.
Nicholas Milton, Press and Public Relations Officer	15 <sup>th</sup> September 2022	Cabinet report and full business case sent by email on 15 <sup>th</sup> September 2022

# Appendix E – Risk register

Risk No	Risk description	Risk mitigation	Residual / current risk			Additional steps to be taken
			Likelihood	Impact	Prioritisation	
1.	Difficulty in attracting bidders for the development opportunity.	<p>The Homes England DPS Framework is a specialist route to market for housing projects with suitable suppliers for this project.</p> <p>The Homes England DPS Framework has been previously used for schemes of this size and nature and has proved to be successful.</p>	Low	Medium	Tolerable	Early market engagement to be undertaken with the framework suppliers to inform of tender opportunity.
2.	Tender pricing comes in above the pre-tender estimate.	The Employers Agent to provide a timely pre-tender estimate that reflects current market conditions prior to issuing tender documentation.	Low	Medium	Tolerable	<p>If tenders are over the pre-tender estimate, the specification will be reviewed to identify possible savings.</p> <p>If further funding is required this will be at the expense of other projects.</p> <p>If the funding is not available and no saving can be identified, the project will be reviewed</p>

						and subject to further FBC approval.
3.	Costs increase during construction period.	Ensure robust contract management process are in place.  Review and challenge all proposed cost increases.	Medium	Medium	<b>Material</b>	Costs continually reviewed in conjunction with project team.
4.	Planning / Highways Approval Delays.	Development and Planning Teams work more closely together on scheme design and objectives.	Medium	Significant	<b>Material</b>	Review on a monthly basis and escalate earlier if necessary.
5.	Covid 19 / Brexit.	Continual monitoring of the latest situation. Review contract terms and conditions to ensure relevance. Seek to transfer risk of cost increase to third parties e.g. contractor.	Medium	Significant	<b>Material</b>	Regularly review the situation.



# Appendix F – Environmental & Sustainability Assessment

<b>Project Title:</b> Building Birmingham – Long Nuke Road Development of Housing and Senneleys Park Pitches and Pavilion				
<b>Department:</b> Housing Development Team	<b>Team:</b> Birmingham Municipal Trust development team		<b>Person Responsible for assessment:</b> Terry Webb	
<b>Date of assessment:</b> 10 <sup>th</sup> August 2022		<b>Is it a new or existing proposal?</b> New Proposal		
<b>Brief description of the proposal:</b> To deliver 65 new homes for social rent and open market sale on a site in Long Nuke Road, Bartley Green which was a former unattached school playing fields not used in over ten years and to deliver new sports pitches and a new sports pavilion including changing rooms in Senneleys Park				
<b>Potential impacts of the policy/development decision/procedure/ on:</b>	<b>Positive Impact</b>	<b>Negative Impact</b>	<b>No Specific Impact</b>	<b>What will the impact be? If the impact is negative, how can it be mitigated, what action will be taken?</b>
Natural Resources- Impact on natural resources including water, soil, air			X	65 new homes will increase water usage within the area as well as increasing the wastewater removal slightly when compared to the number of homes already in the area. Water saving measures such as aerated taps and showers aim to minimise the water use.
Energy use and CO <sub>2</sub> emissions			X	The new homes will benefit from highly efficient energy saving measures including insulation, air source heat pumps and mechanical heat recovery ventilation systems and will comply with all building regulations
Impact on local green and open spaces and biodiversity	X			Replacement high quality sports pitches will be provided in the nearby Senneleys Park. Landscaping of the site will increase the diversity of the flora in the area
Use of sustainable products and equipment	X			BMHT specifications require the use of sustainable and wherever possible local products – including air source heat pumps
Minimising waste	X			Waste construction materials will be re-cycled either by industry specialists or by donations to local groups of excess materials. Waste from the site will be recycled wherever possible. Waste during the construction programme will be

				minimised by the contractors planning and purchasing of sufficient materials.
Council plan priority: a city that takes a leading role in tackling climate change	X			Energy efficient heating systems, air source heat pumps will be used maximising heat output for the homes whilst minimising energy use. EV charging points will be provided on each home encouraging the use of electric or hybrid vehicles thus reducing emissions and assisting the Route to Zero aims of BCC
Overall conclusion on the environmental and sustainability impacts of the proposal	The delivery of the new homes, sports pitches and pavilion will help reduce the urgent need for homes within Birmingham, add to the sporting provision both of the City and the local area, reduce the use of fossil fuels by providing energy efficient air source heat pumps. All the homes and pavilion will be energy efficient and use sustainable products wherever possible.			

If you require assistance in completing this assessment, then please contact: [ESAGuidance@birmingham.gov.uk](mailto:ESAGuidance@birmingham.gov.uk)

## Appendix G – Equality Impact Assessment

Title of proposed EIA	Long Nuke Road (Housing and sports facilities) EIA
Reference No	EQUA968
EA is in support of	New Function
Review Frequency	No preference
Date of first review	31/10/2022
Directorate	Inclusive Growth
Division	Housing Development Team
Service Area	
Responsible Officer(s)	<a href="#">Terry Webb</a>
Quality Control Officer(s)	<a href="#">Richard Woodland</a>
Accountable Officer(s)	<a href="#">Julia C Martin</a>
Purpose of proposal	To approve the FBC and procurement strategy for a site in Long Nuke Road
Data sources	Other (please specify)
Please include any other sources of data	Local Ward Councillors have been consulted, the proposal was put before the Bartley Green Ward Forum in 2019
<b>ASSESS THE IMPACT AGAINST THE PROTECTED CHARACTERISTICS</b>	
Protected characteristic: Age	Not Applicable
Age details:	
Protected characteristic: Disability	Not Applicable
Disability details:	
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	Not Applicable
Pregnancy and maternity details:	
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.

Please indicate whether a full impact assessment is recommended

What data has been collected to facilitate the assessment of this policy/proposal?

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)

If yes, please explain your reasons for going ahead.

The proposed development will provide employment, apprenticeship, training, opportunities as part of the build contract in line with the requirements of BCC4SR

None

NO

No

No

Initial equality impact assessment of your proposal

The report to Cabinet is initially to approve a procurement strategy and full business case for the proposed housing development at Long Nuke Road, Bartley Green Ward. However, the proposal will benefit all members of the local community by:

The housing development will provide 65 new high-quality homes for social rent and open market sale in an area where there is significant demand for affordable housing. The housing will be available to all residents of Birmingham that qualify.

The proposed development will bring an under-utilised parcel of land into use for housing development and thus improve the local environment and support the local economy.

The proposal will also deliver three new high quality sports pitches and a new sports pavilion in Senneleys Park which will benefit both the local community and the wider City by improving the opportunity for sporting matches to take place that enables people of all ages to become more active and improve their health both physical and mental especially following the impact of Covid and an extended period of lockdown which limited opportunities for socialising and group activities.

The house types are a mix of 2 bed houses as well as larger houses of 4, and 5 bedrooms. There is a significant need for larger housing across the City and this development will make a great contribution to that need to support larger families and reduce over-crowding.

The houses will be built to lifetime homes standard, secured by design standard, and also be built by following the principles of Route to Zero which help support fuel poverty. The homes will benefit from air source heat pumps and EV charging points for electric or hybrid vehicles.

The successful contractor will be a signatory of the BCC4SR and will be obliged to provide employment, training, and apprenticeship opportunities as part of the contract. A £500 contribution towards the BBS programme will also be required to support young people from disadvantaged neighbourhoods into higher education.

Consulted People or Groups  
Informed People or Groups

Summary and evidence of  
findings from your EIA

The proposals of this report do not have any adverse impact on the characteristics and groups protected under the Equality Act 2010. The proposal will help, create employment, training, and apprenticeship opportunities; boost the local economy; provide a wide range of housing options including for larger families; contribute towards reducing the Council's housing register; help reduce fuel poverty; bring an under-utilised site into use that will improve the local environment

The proposal will also add sporting facilities available to all ages to improve physical and mental health and wellbeing.

#### QUALITY CONTORL SECTION

Submit to the Quality Control Officer for reviewing?

Yes

Quality Control Officer comments

Decision by Quality Control Officer

Submit draft to Accountable Officer?

Yes

Decision by Accountable Officer

Yes

Date approved by the Accountable Officer

20 September 2022

Reasons for approval or rejection

Please print and save a PDF copy for your records

Yes

## APPENDIX

FULL BUSINESS CASE (FBC)			
A. GENERAL INFORMATION			
A1. General			
<b>Project Title</b> (as per Voyager)	Long Nuke Road, Bartley Green, development of 65 new homes for social rent and open market sale to include the delivery of replacement sports pitches in Senneleys Park and the construction of a new sports pavilion in Senneleys Park		
<b>Oracle code</b>	LV002L-029 – Long Nuke Road		
<b>Portfolio /Committee</b>	Housing	<b>Directorate</b>	Place, Prosperity & Sustainability
<b>Approved by Project Sponsor</b>		<b>Approved by Finance Business Partner</b>	
A2. Outline Business Case approval (Date and approving body)			
The scheme was identified in the Birmingham Municipal Housing Trust (BMHT) Delivery Plan 2019-2029 report to Cabinet on 14 May 2019. The Outline Business Case for the housing scheme contained within the report was for 65 homes (23 for social rent and 42 for outright sale.			
A3. Project Description			
<p>The Long Nuke Road development is to include the delivery of 65 new homes for social rent and open market sale funded by the HRA, the delivery of new sports pitches in Senneleys Park required under a planning condition funded by the HRA instead of providing a commuted sum to Leisure for the delivery of the pitches. The new sports pavilion to accompany the pitches is being funded directly by Leisure from a combination of S106 funds and a Community Infrastructure Levy grant.</p> <p>Conditions required by Sport England as planning conditions in the original planning approval for replacement pitches on the site, which was a former sports ground for education, is that the pitches are to be provided and be available for use in Senneleys Park funded by a commuted sum requirement from the HRA prior to any start on site for the housing development. Not required as a planning condition but required to serve the replacement pitches a new sports pavilion also has to be constructed prior to the pitches being available for use.</p> <p>The provision of the pavilion and sports pitches would have taken approximately two years to complete and be available for use, which would mean unacceptable cost increases for the housing development and a two year delay in delivering urgently needed homes in the Bartley Green area.</p> <p>To expedite the delivery of the homes and sports pitches. it has now been agreed with Sport England, that the pitches can be provided concurrently with the housing development and that the commuted sum required to be paid to Leisure for replacement pitches can be expended directly on the provision of the pitches by the HRA, an application has been made to vary the existing conditions attached to the existing planning approval reference No 2019/05652/PA</p> <p>A new sports pavilion to accompany the pitches is also required, for which planning approval has been granted and an unsuccessful tender process undertaken. To expedite the provision of the pavilion, sports pitches and the urgently needed homes, it has been agreed with Leisure that the funds they have available for the pavilion can be utilised to provide the pavilion under the same contract, subject to all relevant governance, and the construction of the pavilion to be undertaken as part of the overall construction contract.</p> <p>By including the homes delivery concurrently with the sports pitches and pavilion means that the homes and pitches can be provided with a start on site in early 2023 rather than in 2025 meaning that the homes which are urgently needed will be available two years earlier than if the original planning conditions and programme were adhered to.</p>			

## APPENDIX

Combining the delivery of the pitches and pavilion within the overall construction contract delivers the entire project two years earlier than was previously anticipated, provides value for money for the HRA in reducing the considerable risk of cost increases due to industry cost rises and material price increases and therefore provides urgently need homes in a timely manner as well as providing the sporting facilities in Senneleys Park earlier than anticipated therefore providing a new sporting resource for the area as soon as possible.

### A4. Scope

The Council will be undertaking the following;

- Construction of new housing
- Highway and Infrastructure: management of the provision of new infrastructure for the new development
- Delivery of new sports pitches in Senneleys Park
- Delivery of a new sports pavilion in Senneleys Park to facilitate the use of the new sports pitches

### A5. Scope exclusions

- Discharge of planning conditions

## B. STRATEGIC CASE

*This sets out the case for change and the project's fit to the Council Plan objectives*

### B1. Project objectives and outcomes

*The case for change including the contribution to Council Plan objectives and outcomes*

The project contributes to the Council Plan objectives / outcomes by:

- A Bold Prosperous Birmingham; the Council is committed to the development of enough high-quality new homes to meet the needs of a growing city, and the proposals within this report to accelerate housing growth in the City by providing new homes for rent and will help ease pressure on the housing register.
- A Bold Green Birmingham; the new homes will be built to a high standard of energy efficiency by using the latest technologies and use a range of measures to improve the environment and tackle air pollution by using cleaner technologies such as Fabric First and building energy efficient homes.
- A Bold Inclusive Birmingham; the new homes will be available to any applicant on housing register.
- A Bold Healthy Birmingham; the links between health and housing are well recognised. New thermally efficient, economical to run new homes which are designed to high standards of quality and internal space standards will be more affordable for residents and offer a higher quality of life leading to better health outcomes.
- A Bold Safe Birmingham; new homes will be developed which will provide a safe, warm, sustainable, and connected neighbourhood in which all communities can thrive.

### B2. Project Deliverables

*These are the outputs from the project eg a new building with xm2 of internal space, xm of new road, etc*

- 23 homes for social rent with associated parking and landscaping.
- 42 open market sale homes with associated parking and landscaping
- Site area 1.88 Hectares / 4.65 Acres brought back into use.
- 30 x 2bedroom 4 person houses.
- 31 x 3bedroom 5 person houses.
- 4 x 4bedroom 6/7 person houses.
- A new build sports pavilion in Senneleys Park
- New sports pitches in Senneleys Park



## APPENDIX

### B3. Project Benefits

*These are the social benefits and outcomes from the project, eg additional school places or economic benefits.*

Measure	Impact
<i>List at least one measure associated with <b>each</b> of the objectives and outcomes in B1 above</i>	<i>What the estimated impact of the project will be on the measure identified – please quantify where practicable (e.g. for economic and transportation benefits)</i>
Construction of 65 new homes	Relieve some pressure on the temporary accommodation and housing waiting list and providing employment / training opportunities through the build contract.
Land brought back into use following clearance	Provision of affordable housing and improvement of HRA funding stream through rents generated
More homes built towards achieving housing growth targets	Tenants will enjoy high quality life through provision of new housing
New sports pitches in Senneleys Park	Provision of high-quality sports pitches for use by teams at various levels of competence
New sports pavilion with changing facilities	Provision of high-quality changing rooms and facilities for use by teams and officials using the sports pitches

*For major projects and programmes over £20m:*

N/A

### B4. Benefits Realisation Plan

*Set out here how you will ensure the planned benefits will be delivered*

The council houses will be delivered by the council's well established and award-winning Birmingham Municipal Housing Trust (BMHT). The project will be managed by experienced Project management who will monitor expenditure and outturns monthly via site project meetings. Progress will be regularly reported to the BMHT Project Board as required.

The sports pitches will be constructed by the main contractor and overseen by Landscape Practice Group

The Pavilion will be constructed by the main contractor using the approved plans from Acivico Ltd.

### B5. Stakeholders

## C. ECONOMIC CASE AND OPTIONS APPRAISAL

*This sets out the options that have been considered to determine the best value for money in achieving the Council's priorities*

### C1. Summary of options reviewed at Outline Business Case

*(including reasons for the preferred option which has been developed to FBC)*

*If options have been further developed since the OBC, provide the updated Price quality matrix and recommended option with reasons.*

As per A2.

### C2. Evaluation of key risks and issues

*The full risks and issues register is included at the end of this FBC*

The sports pitch delivery is reliant on the delivery of the new pavilion prior to the pitches being available for use.

The construction of the pavilion is being funded by a combination of S106 funds some of which expire in September 2023 unless work has begun

If the pitches cannot be delivered then the delivery of the 65 new homes would not be permitted under the planning conditions, meaning that 65 urgently needed new homes will not be built, the land known as Long Nuke Road development site would have to be returned to education and the appropriation sum repaid to the HRA with a detrimental impact on the funding available for Education, as well as having security and maintenance implications for the site once returned to Education.

## APPENDIX

Delays in delivering either the pavilion or sports pitches would result in delivery costs for the 65 new homes rising sharply as industry costs for both materials and labour are increasing month on month.

Any increase in costs for the delivery of the new homes higher than those currently shown and allowed for in the Full Business Case would risk making the development financially non-viable for the HRA thus also failing to deliver urgently needed new homes.

### C3. Other impacts of the preferred option

*Describe other significant impacts, both positive and negative*

By delivering the homes, pitches and pavilion concurrently as proposed and recommended as the preferred option, this represents financial value for money for both the HRA and for Leisure by combining all phases of the construction into one main contract therefore gaining economies of scale financially for material costs, labour costs and site management costs

The delivery of the 65 new homes provides a supply of urgently needed social rent and open market sale homes in the area which eases the demand for homes across Birmingham

The new sports pitches and pavilion will provide first class sporting facilities for use by local residents, for both informal teams and organised teams

By delivering the pavilion in conjunction with the homes and pitches also ensures that S106 funds raised from other developments are utilised by Birmingham City Council to provide much needed sports facilities for recreation and leisure use instead of being returned to the relevant parties.

## D. COMMERCIAL CASE

*This considers whether realistic and commercial arrangements for the project can be made*

### D1. Partnership, Joint venture and accountable body working

*Describe how the project will be controlled, managed and delivered if using these arrangements*

N/A

### D2. Procurement implications and Contract Strategy:

*What is the proposed procurement contract strategy and route? Which Framework, or OJEU? This should generally discharge the requirement to approve a Contract Strategy (with a recommendation in the report).*

The procurement route for the construction of the scheme will be a further competition exercise using the Homes England Dynamic Purchasing System.

### D3. Staffing and TUPE implications:

N/A

**APPENDIX**

Key Inputs			
Construction		Running Costs, etc.	
Total Development costs	£14.92m	Weekly rent	2 bed £107.69, 3 bed £125.68, 4 bed £149.33
Total Sales Income	£10.04m	Rent loss - voids / arrears	2.0%
		Annual rent increase	3.0%
RTB activity assumed	None	Management Costs	£1,028
Key Outputs		Repairs Costs	£981
Revenue Surplus after 30 years	£(0.13)m	Capital Works (5-yearly)	£5,357
Capital Receipts Surplus	£(0.61)m	Annual Cost Increase	2.5% (CPI 2.0%)

HRA Extract	2021/22	2022/23	2023/24	2024/25	2025/26	Total Year 0 to Year 30
	Year 0	Year 1	Year 2	Year 3	Year 4	
	£m	£m	£m	£m	£m	£m
Rental Income	0.00	0.00	0.00	(0.06)	(0.14)	<b>(6.59)</b>
Voids and arrears	0.00	0.00	0.00	0.00	0.00	<b>0.13</b>
Repairs and Maintenance	0.00	0.00	0.00	0.01	0.02	<b>0.93</b>
Management Costs	0.00	0.00	0.00	0.01	0.02	<b>0.97</b>
Cash-backed Depreciation	0.00	0.00	0.00	0.02	0.03	<b>0.98</b>
<b>HRA Deficit / (Surplus) Contribution</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>(0.02)</b>	<b>(0.07)</b>	<b>(3.58)</b>
Revenue contributions from wider HRA (to fund capital investment shown below)	(0.11)	(0.03)	(3.30)	0.00	0.00	<b>(3.45)</b>
Net HRA Impact	0.11	0.03	3.30	(0.02)	(0.07)	<b>(0.13)</b>

Capital Account	2021/22	2022/23	2023/24	2024/25	2025/26	Total Year 0 to Year 30
	Year 0	Year 1	Year 2	Year 3	Year 4	
	£m	£m	£m	£m	£m	£m
Pre Contract Costs	0.13	0.04	0.00	0.00	0.00	<b>0.17</b>
Build Costs (including Fees)	0.00	0.00	3.49	8.17	2.79	<b>14.45</b>
POS & Infrastructure Costs (including Commuted Sum)	0.00	0.00	0.30	0.00	0.00	<b>0.30</b>
<b>Total Development Costs</b>	<b>0.13</b>	<b>0.04</b>	<b>3.79</b>	<b>8.17</b>	<b>2.79</b>	<b>14.92</b>
Capital Investment / Renewals <sup>1</sup>	0.00	0.00	0.00	0.00	0.00	<b>0.83</b>

Appendix A –Full Business Case (FBC), Building Birmingham – Long Nuke Road  
Development of Housing and Senneleys Park Pitches and Pavilion .

**APPENDIX**

Other Capital Financing (RTB 1-4-1 Receipts)	(0.02)	(0.01)	(0.49)	(1.14)	(0.39)	<b>(2.04)</b>
Revenue Contributions from wider HRA	(0.11)	(0.03)	(3.30)	0.00	0.00	<b>(3.45)</b>
Receipts/Grant	0.00	0.00	0.00	(7.13)	(2.91)	<b>(10.04)</b>
Cyclical Maintenance Reserve Release	0.00	0.00	0.00	0.00	0.00	<b>(0.83)</b>
<b>Total Capital Income</b>	<b>(0.13)</b>	<b>(0.04)</b>	<b>(3.79)</b>	<b>(8.27)</b>	<b>(3.30)</b>	<b>(15.53)</b>
<b>Capital Account (Surplus) / Deficit</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>(0.10)</b>	<b>(0.51)</b>	<b>(0.61)</b>

Balance Sheet Extract	2021/22	2022/23	2023/24	2024/25	2025/26	2051/52
	Year 0	Year 1	Year 2	Year 3	Year 4	Year 30
	£m	£m	£m	£m	£m	£m
Land & Buildings	0.00	0.00	0.00	4.60	6.40	12.17
Cyclical Investment Reserve	0.00	0.00	0.00	0.02	0.04	0.14
Capital Reserve	0.00	0.00	0.00	(4.62)	(6.44)	(12.31)
<b>Net</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

Properties	2021/22	2022/23	2023/24	2024/25	2025/26	Total Year 0 to Year 30
	Year 0	Year 1	Year 2	Year 3	Year 4	
HRA Social Rent Properties	0	0	0	17	6	23
Sale Properties	0	0	0	30	12	42
<b>Total Properties</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>47</b>	<b>18</b>	<b>65</b>

Formal approval to the ongoing capital investment / renewals programme (at a total value of £0.83 million over the coming 30 years) will be sought in due course as a part of the overall HRA capital programme as details of elemental investment needs emerge over time.

**NB – Funding for the sports pavilion is NOT currently included in this FBC and is shown below only. Clarification is being sought from finance as to where this funding should be shown but that cannot be clarified until after finance colleagues return from leave after 17<sup>th</sup> August. A revised final approved FBC will be circulated once this has been clarified.**

Funding for the sports pavilion will be provided from Birmingham City Council capital resources, including a Community Infrastructure Levy grant of £209,000, £731,756 S106 funds from Ravenhurst Playing Fields Account under planning application 2016/00074/PA and £50,000 S106 funds from Lordswood Girls School, Junior Football Pitch Account, under Planning Application 2019/04109/PA A total of £990,756

A revenue budget is already in place for the maintenance of the park premises. It previously supported the operational costs of the now closed former changing pavilion. This will be sufficient to fund the maintenance of a new pavilion.

<b>E2. Evaluation and comment on financial implications:</b>
The funding for the development has been subject to a Full Business Case Analysis by the HRA finance department
<b>E3. Approach to optimism bias and provision of contingency</b>
Allowance has been made within the FBC for increases in material costs due to market pressures, allowance for removal of trees on the site to deliver the homes and an allowance for the construction of the new sports pitches
<b>E4. Taxation</b>
<i>Describe any tax implications and how they will be managed, including VAT</i>
<p>There is no VAT associated with the build costs for the new housing , however, there is a possibility that the sheds provided in rear gardens are subject to VAT and can be claimed by the developer. The construction of new dwellings is zero rated for VAT purposes. Zero rating extends to services in the course of construction of new dwellings but does not include professional and supeAvisory services, except where those services are provided as part of a single “design and build” contract for the construction of new dwellings. Furthermore, zero rating does not extend to items that are not ordinarily incorporated in new dwellings such as domestic appliances, e.g. cookers, fridges, washing machines etc., or garden buildings, e.g. sheds. As such, BCC/BMHT will incur VAT on the acquisition and installation of such items within HRA dwellings. It is likely, therefore, that the construction of the 4 new dwellings is zero rated but some VAT may be incurred on other services/items that are not ordinarily incorporated in new dwellings.</p> <p>The letting of HRA dwellings is a statutory function of BCC and thus non-business. As such, BCC can reclaim VAT incurred on its development, provision, and management of new HRA dwellings without any adverse VAT implications for BCC. However, the VAT treatment of such income and expenditure should be confirmed prior to commencement of the project.</p> <p>The construction of pitches and the changing pavilion at Sennelys park incurs VAT at 20% that the Council will be able to recover on payments to the contractor under the normal procedures</p>

<b>F. PROJECT MANAGEMENT CASE</b>	
<i>This considers how project delivery plans are robust and realistic</i>	
<b>F1. Key Project Milestones</b>	<b>Planned Delivery Dates</b>
<i>The summary Project Plan and milestones is attached at G1 below</i>	
Contract awarded	<b>Jan 2023</b>
Started on site	<b>May 2023</b>
Site completion	<b>March 2026</b>
12 months defects	<b>March 2027</b>
<b>F2. Achievability</b>	
<i>Describe how the project can be delivered given the organisational skills and capacity available</i>	
Birmingham City Council is an award-winning developer of mixed-use residential developments through Birmingham Municipal Housing Trust (BMHT).	
BMHT was set up by the Council in 2009 to build new council homes. Since 2009, BMHT has developed over 3600 new homes for rent and sale. BMHT has a proven track record on delivery and established itself as the biggest housing developer in Birmingham by completing 25% out of all	

## APPENDIX

of the new homes built in the City since 2011.

### **F3. Dependencies on other projects or activities**

Funding for the sports pavilion is from Leisure, Birmingham City Council capital resources, to a total of £991,000 and is currently ring fenced for the pavilion delivery

### **F4. Officer support**

**Project Manager:** Terry Webb

**Project Accountant:** Andrew Healey

**Project Sponsor:** Paul Kitson

### **F5. Project Management**

*Describe how the project will be managed, including the responsible Project Board and who its members are*

The project will be managed in house by Council officers. Overall Management / monitoring shall be via the Housing Project Board attended by:

Paul Kitson – Strategic Director, Place, Prosperity & Sustainability

Andrew Healey – Finance Business Partner, Neighbourhoods

Kerry Scott – Interim Assistant Director, Housing Development

## **G. SUPPORTING INFORMATION**

*(Please adapt or replace the formats as appropriate to the project)*

### **G1. PROJECT PLAN**

*Detailed Project Plan supporting the key milestones in section F1 above*

**See F1**

### **G2. SUMMARY OF RISKS AND ISSUES REGISTER**

*Risks should include Optimism Bias, and risks during the development to FBC*

*Grading of severity and likelihood: High – Significant – Medium - Low*

N/A		Risk after mitigation:	
Risk or issue	Mitigation	Severity	Likelihood
1. Funding Shortfall	FBC allows for inflation increases	Minimal	Minimal
2. Programme not met	Realistic timescale and management of contractor	Minimal	Minimal
3. Brexit	Continuous monitoring of all Brexit related issues	Minimal	Minimal
4. Weather	Programme allows for normal and abnormal weather delays	Minimal	Minimal
5. Poor response from the market to tender invitation	Tender will be via the Homes England Dynamic Purchasing System	Medium	High
6. Contractor prices not held for sufficient time to allow BBC Contract award process to be finalised	Clauses included in ITT to cover this point.	High	Minimal

### **G3. EXTERNAL FUNDING AND OTHER FINANCIAL DETAILS**

*Description of external funding arrangements and conditions, and other financial details supporting the financial implications in section E1 above (if appropriate)*

N/A

### **G4. STAKEHOLDER ANALYSIS**

Stakeholder	Role and significance	How stakeholder relationships will be managed
Ward members	Active lead ward representative, interest of constituents/ Council - High	In house through dialogue and engagement / consultation
Local community	Residents - High	On-going resident consultation and engagement to review progress
Planning Officer	Consultant/ advisory - High	Regular design team meetings to review progress
Contractor	Delivery/Operational -High	Monthly site meetings throughout the scheme
Architect	Consultant/advisory/Designer - High	Periodic meetings, formal professional relationship
Engineers	Consultant/Advisory - High	Periodic meetings, formal professional relationship

## APPENDIX

### G5. BENEFITS REGISTER

*For major projects and programmes over £20m, this sets out in more detail the planned benefits. Benefits should be monetised where it is proportionate and possible to do so, to support the calculation of a BCR and NPSV (please adapt this template as appropriate)*

Measure	Annual value	Start date	Impact
<i>List at least one measure associated with <b>each</b> of the outcomes in B1 above</i>			<i>What the estimated impact of the project will be on the measure identified</i>
<b>(a) Monetised benefits:</b>	£		
<b>(b) Other quantified benefits:</b>			
<b>(c) Non-quantified benefits:</b>			

Other Attachments <i>provide as appropriate</i>	
• None	
•	
•	
•	



# Birmingham City Council

## Report to Cabinet

11<sup>th</sup> October 2022



**Subject:** Adoption of Edgbaston Reservoir Masterplan  
Supplementary Planning Document

**Report of:** Paul Kitson, Strategic Director of Place, Prosperity and Sustainability

**Relevant Cabinet Member:** Councillor Ian Ward, Leader

**Relevant O & S Chair(s):** Councillor Saima Suleman, Economy and Skills

**Report author:** Alice Jones, Principal Planning and Development Officer  
Telephone No: 07517 536 426  
Email Address: [alice.x.jones@birmingham.gov.uk](mailto:alice.x.jones@birmingham.gov.uk)

Are specific wards affected?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No – All wards affected
If yes, name(s) of ward(s): Ladywood and North Edgbaston		
Is this a key decision?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<i>If relevant, add Forward Plan Reference: 010150/2022</i>		
Is the decision eligible for call-in?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Does the report contain confidential or exempt information?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> 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 provides an update on the outcomes of the public consultation undertaken on the draft Edgbaston Reservoir Masterplan during 4<sup>th</sup> March to 15<sup>th</sup> April 2022 and seeks authority for the adoption of the final document, attached as Appendix 1, as a Supplementary Planning Document (SPD).

## 2 Recommendations

- 2.1 Approves adoption of the Edgbaston Reservoir Masterplan SPD, attached as Appendix 1, to guide investment and development decisions plan area.
- 2.2 Note the substantial number of consultation responses and the amendments made to the masterplan highlighted in paragraph 7.3 and set out in the Consultation Statement which forms Appendix 2 of the report.
- 2.3 Delegate authority to the Director of Planning, Transport & Sustainability in consultation with the Leader to make any typographical, grammatical, graphical, and presentational changes to the final version of the SPD prior to adoption.

## 3 Background

- 3.1 Edgbaston Reservoir is a key green and blue asset in the city. Part of the land within the masterplan boundary is a Local Nature Reserve (LNR) and Site of Importance for Nature Conservation (SINC). The LNR covers 32 hectares of land, including 24 hectares of open water. The reservoir plays an important role in providing green, open space for existing and new communities. It also has a rich and diverse history and is an important part of Birmingham's industrial heritage.
- 3.2 The Birmingham Development Plan (BDP), was adopted by the City Council in January 2017 and is part of the city's statutory planning framework. It guides decisions on development and regeneration activity. Policy Growth Area Two of the plan identifies Greater Icknield as an area for growth. It describes Edgbaston Reservoir as: 'one of the city's most significant areas of open space'. The BDP identifies Icknield Port Loop and the Tower Ballroom Site as major opportunities and allocates them to provide a mix of innovative family housing, commercial, and community uses. The SPD will provide further guidance on the BDP allocations, proving a clear vision for their delivery.
- 3.3 The purpose of the SPD is to provide a clear vision and principles to protect and enhance the natural and historic environment and inform future investment at the reservoir.
- 3.4 In summary the SPD includes:
  - A **Vision** to set out the Council's aspiration for Edgbaston Reservoir, including a number of **Opportunities** that will deliver the vision.
  - **Development Principles** to provide planning guidance and advice to developers on matters covering Activity, Character, Connectivity and Sustainability.
  - **Delivery and management** requirements to support a comprehensive, partnership-based approach.
- 3.5 The City Council undertook public consultation between 4<sup>th</sup> March and 15<sup>th</sup> April 2022 in accordance with the Council's adopted Statement of Community Involvement.

3.6 There were approximately 380 formal responses 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 version of the masterplan. There were several suggestions for alterations to the masterplan. The main points raised during the consultation are summarised below:

- Support for the vision and principles in the masterplan
- Support for the Sustainability chapter and increased emphasis on the natural environment
- Objections to the principle of housing on the former Tower Ballroom site
- Opposition to commercial uses on the former Tower Ballroom site
- Requests for affordable and social housing
- Concerns that new development will create private ownership of the site
- Requests that the building line is further set back from the waters' edge
- Concerns that future development and increased visitors will have a detrimental impact on the Local Nature Reserve
- Concerns that development will generate traffic on local road network
- Requests that public car parking is available for disabled and vulnerable groups
- Requests for more detail in the masterplan regarding the location and management of car parking
- Requests for the historic and natural environment to be protected and enhanced
- Requests that the reservoir is accessible to all
- Detailed representations from site owners requesting some amendments to the wording on projects
- Concerns that there is insufficient infrastructure (education and medical) to support increased residents

3.7 Following a review of all the representations made amendments have been proposed to the masterplan. These amendments do not alter the strategy within the document but rather strengthen and highlight the existing strategy, to respond positively to several of the representations. This has resulted in a stronger masterplan overall. Where representations have requested changes to the masterplan that have not been implemented, the Consultation Statement (Appendix 2) sets out the reasons behind this decision. The main amendments to the masterplan can be summarised as:

- Amendments to the context chapter to reflect policies that have been adopted since the previous consultation.
- Amendments to the proposed design of the Osler Park and Osler Place (former Tower Ballroom Site) to set the building line further back from the waters' edge to create a wider public walkway with increased green infrastructure and deliver a public square.

- Amendment to reopen the existing car park at the reservoir to deliver a reduced number of spaces in a secure and well-managed way.
- Amendment to guidance regarding Biodiversity Net Gain to ensure the SPD aligns with latest national guidance.
- Addition of definition of short, medium and long-term in the Delivery and Management chapter to inform future delivery.

#### **4 Options Considered and Recommended Proposal**

- 4.1 Option 1 – **Do nothing** - Should the Council decide not to adopt the masterplan as an SPD, it would result in a lack of strategic direction and vision for the Edgbaston Reservoir area and would fail to support the policy direction identified in the Birmingham Development Plan. This would impact on the Council's ability to deliver inclusive growth, including the Council-owned site of the former Tower Ballroom and optimise potential investment.
- 4.2 Option 2 - **Recommended Option** – Adopt the masterplan as a formal SPD. This will provide a clear vision and strategy for the Edgbaston Reservoir area and show a commitment to deliver the masterplan. Once adopted, the SPD will provide a greater level of direction that the BDP does not provide and will be a material consideration in the determination of planning applications.

#### **5 Consultation**

- 5.1 The City Council undertook public consultation for twelve weeks from 3rd May to the 26th July 2019. A Community Consortium formed in response to the public consultation and submitted a community-led 'alternative' vision for the reservoir as a formal representation. After the consultation period closed, following requests for the Council to work more closely with the community and water sport clubs, the Council decided to set up a Community Partnership Forum with representatives of the Community Consortium who submitted an alternative plan. The purpose of the forum was/is to enable the Council to work with the community to better align the vision of the Draft Masterplan SPD with the vision of the alternative plan.
- 5.2 The City Council also undertook a second round of six-week public consultation between 4th March and 15th April and 2022 to enable the wider community and other interested parties (beyond the forum), to make representations on the redrafted plan. The consultation document was published online and all those who had responded to the first public consultation and those on the Planning Policy Consultation Database were notified. The City Council social media was used to promote the consultation including a ten-minute YouTube video which provided an overview of the masterplan and explained the changes made since the previous consultation. The video was viewed over 530 times. Physical copies of the documents were available to view in the Library of Birmingham, Spring Hill Library, Woodcock Street, Ladywood Health and Community Centre and on request.

- 5.3 A drop-in consultation event was held at Ladywood Health and Community Centre, this was attended by approximately 50 members of the public. During the event consultation materials were available to view which provided information on the masterplan content and explained how to respond to the consultation. Planning Officers were present to answer questions and printed copies of the document were available to take away. The event was advertised on by letter, poster, on our website and through social media.
- 5.4 Approximately 380 representations were submitted to the consultation. This included 83 questionnaires completed online and 295 emails, letters or postcards submitted. Further details on the consultation process and outcomes are included in Appendix 2. This includes a detailed overview of all the representations and how these have informed the final version of the masterplan.
- 5.5 Local Ward Councillors have received regular briefings during the plan-making process and have provided insight and input. They have been briefed on the outcomes of the consultation and the proposed amendments to the masterplan.
- 5.6 Officers from across the Place, Prosperity, and Sustainability Directorate have been engaged in the development of the masterplan and this report. The Parks service and Cohesion and Equalities team have also contributed.

## **6 Risk Management**

- 6.1 Once adopted, there is a risk the masterplan is not effective in delivering appropriate new development and enhance the reservoir, especially given the current economic context. In order to mitigate this risk, the Council's Property Services have been involved throughout the production of the masterplan to ensure that the proposals for Council-owned sites are aspirational and deliverable. The Council has also worked continuously with external stakeholders at the reservoir, including the Canal & River Trust and Sport England, along with the existing water sport providers and community groups such as Birmingham Settlement. This is to ensure the plan is realistic and deliverable, especially regarding the future provision of water sports and community activity at the site. This approach will continue and be developed further following the adoption of the masterplan. The Delivery and Management section of the plan will be used as an outline strategy for delivery.
- 6.2 Given the level of public interest and continued objections from some members of the public to the development of housing at the reservoir, one risk is the SPD will not be supported by all stakeholders and the public. This risk has been significantly reduced by the involvement of the forum, existing water users and landowners in the production of the draft masterplan, and the amendments to the plan following consultation, as set out in Appendix 2. Whilst it is recognised that universal support may not be achievable, the redrafted masterplan better reflects the aspirations of the community and water users at the reservoir with several important stakeholders supporting the adoption of the masterplan.

6.3 A risk register is attached at Appendix 3.

## **7 Compliance Issues:**

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

7.1.1 The SPD will contribute towards the vision contained in the City Council Plan: Outcome 4: Birmingham is a great, clean and green city to live in – Priority 8: we will enhance our status as a city of culture, sports and events. The SPD is in line with and supports the delivery of the Birmingham Development Plan.

### **7.2 Legal Implications**

7.2.1 The relevant legal powers for preparing and undertaking public consultation on the draft SPD are set out in 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), and the Birmingham Statement of Community Involvement. The consultation period was six weeks which meets the requirement to publicly consult on SPDs for a minimum of four weeks before adoption. The SPD is consistent with the National Planning Policy Framework and the Birmingham Development Plan.

The City Council has carried out a screening assessment of the draft SPD, under the Environmental Assessment of Plans and Programmes Regulations 2004 and concluded that a Strategic Environmental Assessment is not required. Natural England, the Environment Agency and Historic England all agreed with this conclusion. The screening assessment has been updated and will be made publicly available as part of the adoption process (Appendix 4).

### **7.3 Financial Implications**

7.3.1 The SPD process, including public consultation, has been undertaken using existing Planning and Development staff resources. Direct costs to undertake the public consultation on the draft SPD have been funded from approved revenue budgets within Planning and Development. The adoption of the SPD has no direct financial implications; delivery of the SPD will require further business cases and financial implications will be assessed and approved through the Council's financial governance processes, which may require Cabinet making subsequent investment decisions in fulfilment of the plan.

### **7.4 Procurement Implications (if required)**

7.4.1 There are no procurement implications arising from the recommendations of this report. Any subsequent projects related to the SPD that have procurement implications will be the subject of separate reports in compliance with the Council's Procurement and Contract Governance rules.

### **7.5 Human Resources Implications (if required)**

7.5.1 N/A

## **7.6 Public Sector Equality Duty**

- 7.6.1 An Equality Analysis has been undertaken and is attached in Appendix 5. The assessment found that the SPD will have no specific impacts on protected characteristics. The developments will lead to improvements for the local population including improved leisure facilities and new homes.

## **8 Appendices**

- 8.1 Appendix 1– Edgbaston Reservoir Masterplan SPD
- 8.2 Appendix 2 – Edgbaston Reservoir Masterplan SPD Consultation Summary
- 8.3 Appendix 3 – Risk Assessment
- 8.4 Appendix 4 – Strategic Environmental Assessment Screening for Edgbaston Reservoir Masterplan
- 8.5 Appendix 5 – Equalities Analysis
- 8.6 Appendix 6 – Adoption Statement

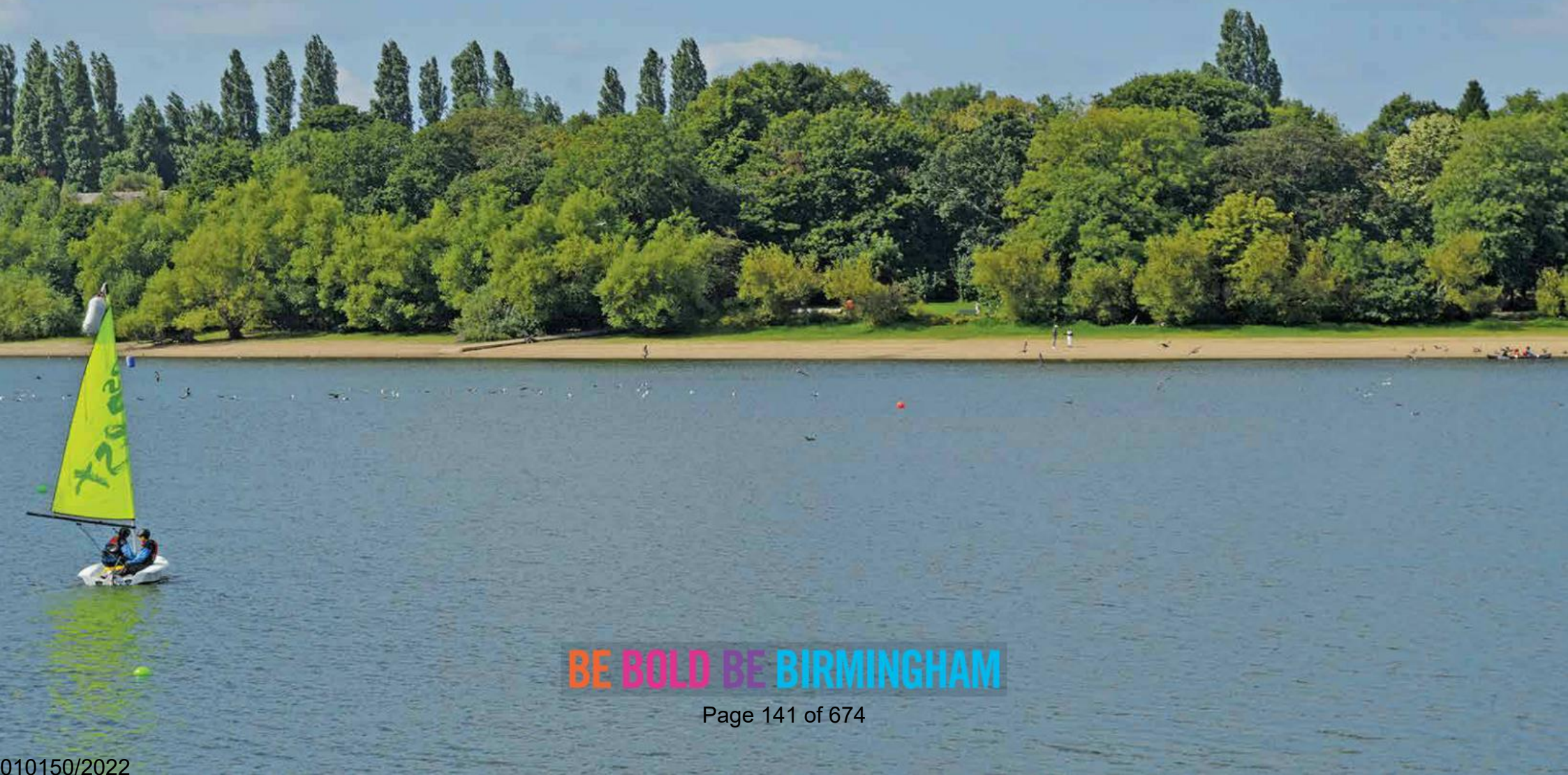
## **9 Background Documents**

- 9.1 Birmingham Development Plan 2017
- 9.2 Greater Icknield Masterplan 2016
- 9.3 Draft Edgbaston Reservoir Masterplan Consultation Document April 2022





# OurFuture Edgbaston Reservoir CityPlan



**BE BOLD BE BIRMINGHAM**





A plan for the sustainable future of  
*Edgbaston Reservoir*  
Supplementary  
Planning Document  
October 2022

# Contents

	Foreword	p2
1	Introduction	p4
2	Context	p8
3	Vision	p18
4	Development Principles Activity Character Connectivity Sustainability	p20
5	Opportunities Osler Park and Osler Place Reservoir Loop Reservoir View Reservoir Link Natural Parkland Edgbaston Waterworks Celebrating the Reservoir	p36
6	Delivery and Management	p74



# Foreword

I am delighted to launch the Edgbaston Reservoir Masterplan - an exciting vision to safeguard and enhance one of Birmingham's most-loved open spaces for generations to come.

This document is very much a collaborative effort and I want to thank local community and water-user group representatives, who together with the Canal & River Trust and Sport England, have worked closely with Birmingham City Council to produce and refine the masterplan.

To ensure ongoing engagement with the community and user groups at the reservoir, this masterplan includes a set of Community Principles that will inform future planning and investment decisions.

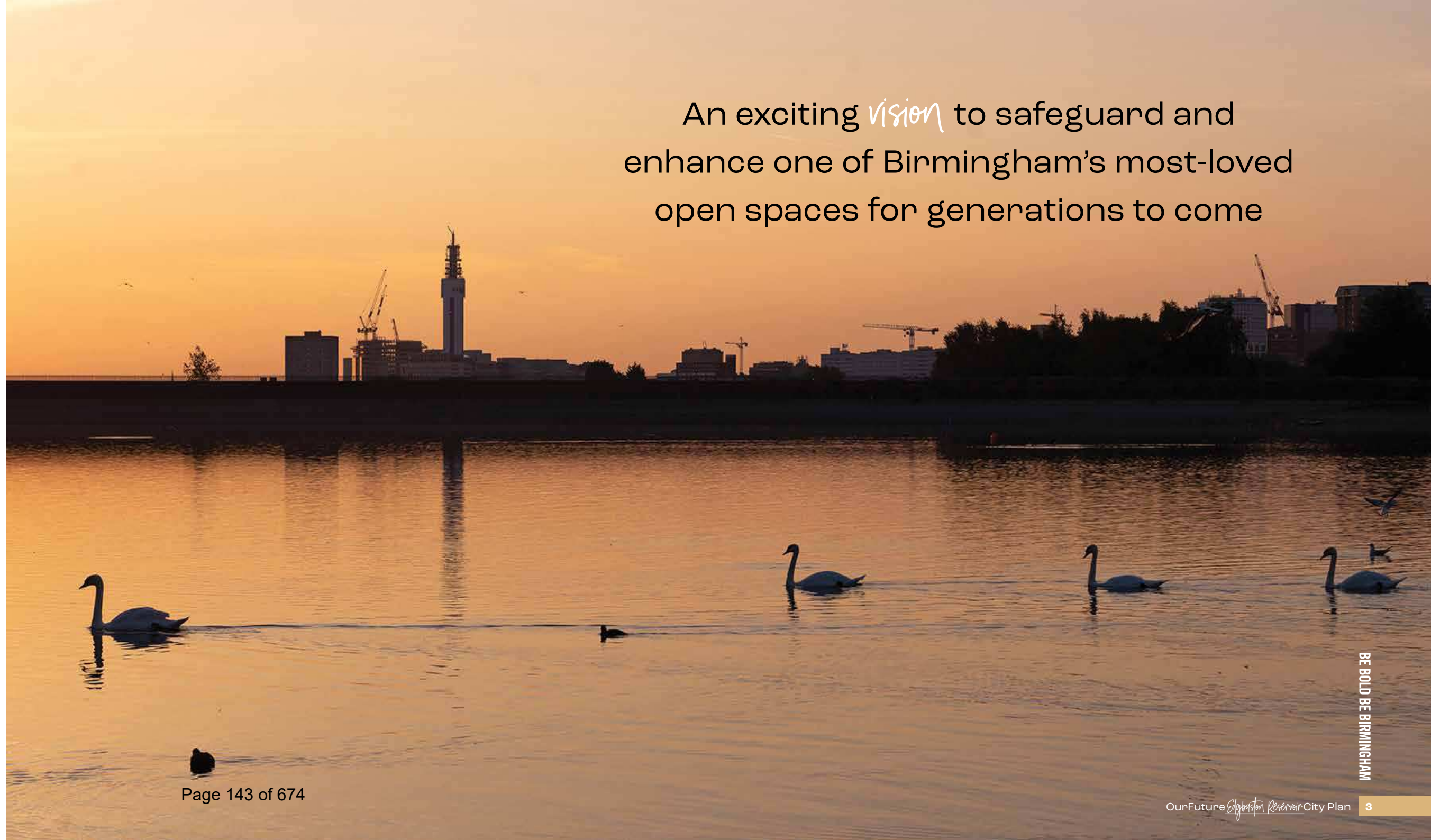
There are huge opportunities to enhance Edgbaston Reservoir as a public open space, while improving its offer as a leisure destination that provides opportunities for communities to come together. In addition, the Local Nature Reserve will be protected and enhanced to ensure the reservoir continues to play its important role as a valuable natural habitat for wildlife and visitors to enjoy.

Birmingham is a growing city, and this masterplan aims to optimise the social, health and environmental benefits of the reservoir, while also delivering much-needed homes and prosperity for our citizens.

**Councillor Ian Ward**  
Leader  
Birmingham City Council



An exciting *vision* to safeguard and enhance one of Birmingham's most-loved open spaces for generations to come





# 1

## Introduction

Edgbaston Reservoir is a unique open space, a designated Local Nature Reserve, and the second largest body of water in the city. It provides experience of nature and wildlife with natural beauty, expansive skies and views and tranquil surroundings. It serves a wide range of communities and offers a retreat from city living and is home to long established water sports clubs and diverse land-based uses.

The reservoir has played an important role in Birmingham's development history and it provides an opportunity for innovation in sustainability as the city moves to become carbon neutral.

The purpose of the masterplan Supplementary Planing Document (SPD) is to establish the future vision for the reservoir and define how the combination of unique sport and recreation, community, heritage, and natural environment can be protected and enhanced by setting clear principles for development.

The masterplan is informed by consultation with a wide range of stakeholders. Formal consultation took place in 2019 and 2022, and the council has engaged with the community and water-user group representatives throughout the plan making process. Alongside this, a Community Partnership

Forum was established as a means for Birmingham City Council to engage with representatives from the local community on the masterplan redraft with the aim of better aligning the council's aspirations with those of the community. The forum brought together council officers and members from the Edgbaston Reservoir Community Consortium, a group formed in response to the 2019 consultation to submit a community-led vision for the reservoir.

This masterplan has also been produced in partnership with key delivery partners: the Canal & River Trust and Sport England.

As part of the commitment to continuous engagement with the community and user groups at the reservoir, the council has endorsed a set of Community Principles that were put forward by the Edgbaston Reservoir Community Consortium. These principles have been incorporated throughout the masterplan and will be considered in planning and investment decisions made within the plan area.

The reservoir  
has played an  
important role  
in *Birmingham's*  
development  
history



*Natural environment  
at the reservoir*





An example of the reservoir's engineering heritage

### Community Principles

The Community Principles were agreed as the priorities of local people and ensure future development benefits both people and the environment.

Developments and proposals within the masterplan boundary will be expected to show how they will:

1. Complement the Local Nature Reserve and status of Birmingham as a Biophilic City by protecting and enhancing the natural environment.
2. Maximise environmental sustainability and make responsible use of resources in how developments are built, their operation and how they interact with their natural surroundings.
3. Actively support and encourage social cohesion to ensure that the reservoir continues to belong to everyone.
4. Encourage personal development for all and provide facilities for life-long learning.
5. Enhance physical and mental health and well-being opportunities by improving access to social, cultural and sporting facilities.
6. Build on the current ways people access and use the reservoir by improving connections to other assets and the wider green network.
7. In line with the Localism Agenda, provide opportunities for meaningful engagement and collaborative working with the community.
8. Support community-based water users to continue to develop high-quality water sports and widen access to these activities.

### Purpose of the masterplan

The masterplan sits within the context of the plans for the city centre and the Greater Icknield area. Both areas are seeing major change, delivering new homes, jobs and infrastructure, and attracting greater numbers of visitors.

The reservoir offers an escape from the bustle of the city and a place where all communities can meet to enjoy the unique water setting. It is important the masterplan protects the natural, community and heritage assets, as well as the operational and functional integrity of the reservoir infrastructure. The masterplan must also enable the area to evolve to meet the needs of the city's growing population through the provision of new family homes, water-focussed leisure, and community facilities in line with the Birmingham Development Plan.

Covid-19 highlighted the need to prioritise physical and mental health well-being. Access to high-quality open space is crucial, especially for households without private gardens. Physical exercise and connecting with nature and water are proven to contribute towards well-being. As such, there is increased recognition of the need to protect and enhance open space. The role communities have played in response to Covid-19 and supporting places recover has demonstrated that investing in communities is crucial to develop resilient neighbourhoods.

The masterplan provides a strong framework for decision-making to ensure proposals and developments in the masterplan boundary deliver the vision for the sustainable future of the reservoir. In line with the National Planning Policy Framework, this masterplan SPD will add detail and guidance to the statutory Birmingham Development Plan.

This masterplan sets out several opportunities and provides clear development and community principles that maximise the important role of the reservoir, guide development, and deliver the highest-quality environment for the future. It provides flexibility to allow developers, water users and diverse communities to provide innovative ways to deliver the vision and respond positively to changes over the plan period. Detailed plans for individual sites will be determined through the planning application process.

The endorsement of the Community Principles within the draft masterplan ensures community perspectives and aspirations are taken into account in how any future development within the masterplan boundary is delivered and managed. This masterplan, including the Community Principles, will be a material consideration for all planning applications determined within the boundary along with other adopted planning policies and relevant material planning considerations.



# 2

## Context

The masterplan area is located to the west of the city centre and is located within the North Edgbaston and Ladywood wards. It is within walking and cycling distance of significant employment, leisure and retail opportunities and has bus links to the city centre.

Most of the masterplan area was nationally designated as a Local Nature Reserve in 2010 and is locally designated as a Site of Importance for Nature Conservation. The Local Nature Reserve covers approximately 32 hectares with 24 hectares of open water. The Local Nature Reserve designation is based on the biodiversity and importance of this open space because of its urban location. It acts as a steppingstone for wildlife in Birmingham, linking core ecological areas together. A variety of woodland, grassland and wetland habitats surround the open water.

The reservoir is a key open space and natural asset that serves a wide community. There are a range of opportunities for community, leisure and recreational activity. Today, one of the reservoir's additional functions is as an established centre for water sports, including Midland Sailing Club, Birmingham Rowing Club and TS Vernon Sea Cadets.

Birmingham Rowing Club and Midland Sailing Club provide training and racing opportunities throughout the year as well as annual regattas. Both clubs have community outreach programmes and several affiliate clubs. Midland Sailing Club is a Sailability Centre with boats specially designed for people with disabilities and runs programmes for children and adults with physical and learning disabilities. Nowka Bais, a community interest company, also run their annual boat race at the reservoir. TS Vernon Sea Cadets run a range of

shore-based and water activities for young people in the local community teaching teamwork, respect, commitment and self-confidence.

The reservoir serves as an important natural resource for local people and visitors. Several active community groups undertake water and land-based activities. These include running and cycling groups, social support and creative arts groups, as well as independent runners, walkers, cyclists, anglers and dog walkers.

The reservoir can be accessed along the Birmingham Mainline Canal. It is approximately a twenty-minute walk to the city centre and the Roundhouse which provides a key focus on the canal. The reservoir also connects to several other open spaces in the city's wider green network including Summerfield Park, Osler Street Park and the Harborne Walkway.

The reservoir is a  
key open and natural  
asset that serves  
a wide *community*

*People walking around the reservoir*



*View across the water to the dam wall and city centre*





The reservoir is on the doorstep for many residents in Ladywood and North Edgbaston. There are also several planned residential developments underway including Port Loop and Soho Wharf to the north of the reservoir. As such, the reservoir will need to continue to cater for diverse communities and provide accessible spaces for people to come together to meet, sit, relax and contemplate the natural environment.

In recent years, the reservoir has hosted and inspired a series of community-generated arts and cultural activities. These have been facilitated through various collaborations between arts and social support organisations including Artscoop, Bertz Associates, Eat Make Play, and Birmingham Settlement. The events are part of an ongoing programme enabling local communities to celebrate and share how important the reservoir is to them.

The Canal & River Trust are the 'undertaker' of the reservoir and have statutory duties under the Reservoirs Act, to ensure the operational and functional integrity of the reservoir, dam and its ancillary structures. Any development or projects within the masterplan boundary should not risk the safety of the dam.

The Canal & River Trust also have a statutory duty to provide safe water navigation and protect the biodiversity and water quality of the wider canal network. The water levels within the reservoir fluctuate depending on the need of the canal system. On occasions the water may need to be significantly lowered or drained for maintenance, operational and safety requirements.

The reservoir will need to cater for diverse communities and provide accessible spaces for people to come *together*

### PLAN 1 Context

Key

- Masterplan boundary
- Canal network
- West Coast rail line
- Greater Icknield Growth Area
- Local Nature Reserve



© Crown Copyright. All rights reserved. Birmingham City Council 100021326 (2022).



Historic context

Completed in 1829, Edgbaston Reservoir is an important part of Birmingham’s industrial heritage, having been designed by Thomas Telford. The reservoir’s original purpose was to refill Birmingham’s canals, and that important function continues today. The improvements Telford made to the canal network between Birmingham and the Black Country were principally to accelerate the delivery of coal for the steam-driven machinery that was turning Birmingham into a world-renowned manufacturing centre.

Historically the reservoir also performed cultural and public health functions. In the Victorian era, illnesses such as tuberculosis, and increased levels of pollution in the city, led to great importance

placed on access to fresh air and open space. During the early part of the twentieth century, a masterplan was produced for an extensive Pleasure Garden at the reservoir. These plans were never fully realised, however, the area continued to serve the population as an escape from inner city life.

The reservoir’s heritage is reflected in the range of historic assets across the site including the Grade II listed Reservoir Lodge and depot buildings, as well as the locally listed dam, reservoir, and ancillary structures. Other historic buildings of interest within the area include Perrott’s Folly and Edgbaston Waterworks Tower. These towers are thought to have influenced JRR Tolkien to write ‘The Two Towers’ in the Lord of the Rings series.

The Tower Ballroom, to the south of the reservoir, has played a key role in providing space for people to come together. Originally built in 1827 as a roller-skating rink, it became a hugely popular venue for various forms of culture including dance, music, boxing matches and a venue for weddings. More recently, it hosted performances by the Birmingham Opera Company. The reservoir has attracted famous visitors including Charles Blondin the tight-rope walker of Niagara Falls fame, Jack Turpin the first black British World Champion boxer, Muhammad Ali Heavyweight Boxing World Champion and Ellen MacArthur, the record-breaking round-the-world sailor.

An event at the reservoir towards the end of the 19th century

William Haywood’s 1918 scheme for the Pleasure and Zoological Gardens

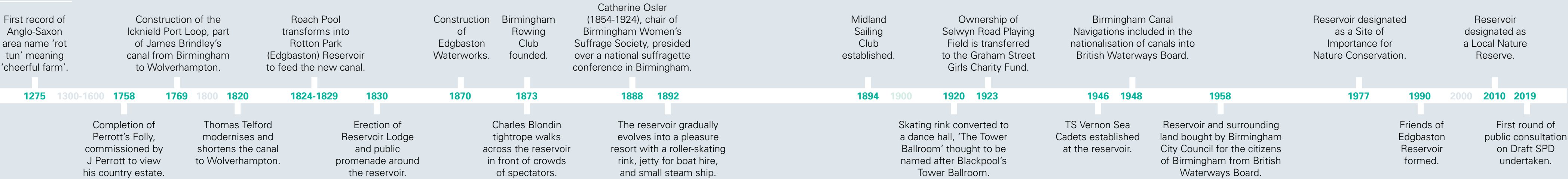


The original Victorian entrance to the reservoir



William Haywood’s 1918 masterplan for the central area of Birmingham

Timeline



BE BOLD BE BIRMINGHAM

BE BOLD BE BIRMINGHAM



**Policy context**

This masterplan document sits in context with several other documents and plans prepared by Birmingham City Council including the following:

**Birmingham Development Plan**

When adopted, this masterplan will add detail to the Birmingham Development Plan (BDP). The BDP was adopted in 2017 and forms part of the statutory development plan that guides decisions on planning and regeneration. The city’s population is projected to grow by an additional 150,000 people by 2031. The BDP provides a strategy for addressing the challenges of growth across the city, with particular reference to climate change, the natural environment, quality of life, infrastructure and an inclusive economy.

The boundary of this masterplan is located within Policy Growth Area Two (GA2) of the BDP. This policy relates to the Greater Icknield area which is anticipated to provide 3,000 new homes for the city’s growing population. This policy allocates the Tower Ballroom site and Icknield Port Loop as key development sites to support future growth in the area:

*‘As the largest development opportunity in the area their transformation will provide innovative family housing close to the city centre along with a mix of commercial and community uses including a new swimming pool’.*

Policy Growth Area Two (GA2) also allocates Severn Trent Waterworks for residential use: *‘Severn Trent Waterworks will be brought forward mainly for new residential development’.*

The masterplan needs to demonstrate how these identified development opportunities (Tower Ballroom Site, Icknield Port Loop and Edgbaston Waterworks) can deliver family housing along with community and commercial uses, to ensure it is in general conformity with the BDP. The main function of the masterplan therefore is to build on these housing allocations to ensure the reservoir is protected as a natural asset and a facility for all of the community.

As required by the BDP, housing provided within the masterplan area will need to include a wide choice of housing sizes, types and tenures to meet community needs in accordance with BDP Policy

TP31 ‘The type, size and density of new housing’. This includes homes for families, the elderly and appropriate levels of affordable housing. BDP Policy TP30 ‘Affordable housing’ seeks 35% affordable homes as a developer contribution on residential developments of fifteen dwellings or more. Affordable housing should be fully integrated within the proposed development and any proposals that are unable to meet the 35% requirement will need to evidence why this is not possible using a viability assessment.

**Greater Icknield Masterplan**

The Greater Icknield Masterplan (2016), which formed part of the evidence base for the Birmingham Development Plan, identifies the Tower Ballroom and the Waterworks Site as development opportunities. It also recognises the role the reservoir plays in biodiversity and recreation stating that it should be promoted and enhanced.

View of the former Tower Ballroom



New family housing at Port Loop  
Port Loop Development Image Copyright: Urban Splash



Rowing boats at the reservoir



Sailing at the reservoir

Cyclist using the upgraded section of footpath around the reservoir







The reservoir is a unique green asset within the city



South Loop Park  
Image Copyright: Shaw & Shaw Photography and Port Loop  
(Urban Splash, Places for People, Canal & River Trust and Birmingham City Council)

### Birmingham Transport Policy

The council is committed to delivering an efficient, fair, green, sustainable and healthy transport system. The Birmingham Transport Plan, adopted in October 2021, sets a vision for a sustainable, inclusive, travel anywhere network. This will be achieved through a fully integrated and accessible public transport system that will support sustainable and inclusive economic growth, tackle climate change and promote the health and well-being of Birmingham's communities.

Connectivity via public transport will be improved, through new bus priority and investment in tram and rail. Active travel will become the mode of choice for short trips, as more destinations and activities become accessible by walking or cycling. The Birmingham Walking and Cycling Strategy was adopted in January 2020 and aims to make walking and cycling an everyday choice for local journeys and leisure activities. It identifies opportunities to improve safety and better-connect existing networks.

The masterplan reflects these adopted policies by prioritising improvements to walking and cycling connectivity to ensure the reservoir is an accessible and sustainable destination.

The Birmingham Design Guide emphasises that transport needs must be an integral part of every development. Designs should ensure all users can access and utilise a range of transport modes to link with their surroundings and beyond, in a safe and sustainable way. As such, development

within the masterplan area must seek to: make legible, accessible places that are easy to navigate, support access to public transport, accommodate the transport needs of people with disabilities, and provide appropriate levels of cycle and motorcycle parking and facilities that are convenient, safe and secure.

The Birmingham Parking SPD (2021), sets out updated parking standards for development and seeks to support sustainable modes of travel and efficient use of land, whilst providing an appropriate amount of parking that is well-integrated, high-quality and in secure locations.

The masterplan sets out the principle of providing sufficient levels of parking in safe locations for those who need to access the reservoir by car. Well-located and designed electric vehicle charging points and car club bays should be included in future car parking provision. The amount of car parking and its future layout will be determined through planning applications in accordance with the Birmingham Parking SPD.

### Birmingham Design Guide

The Birmingham Design Guide (2022) sets out the design aspirations of the city. It includes guidance to ensure all development aids the creation of high-quality; people-focused places that are resilient, innovative and healthy. This document is the primary planning guidance used to assess and guide the design of all development across the city.

### The Climate Emergency and 'Route to Zero'

Birmingham City Council declared a climate emergency in June 2019. The ambition was set for the council and city to become net zero carbon by 2030, or as soon as possible thereafter as a 'just transition' allows. A 'Call to Action' action plan, approved by Full Council in January 2021, set out an initial set of actions the council would take to achieve 'Route to Zero (R20)'. New development will be here for decades to come, so it is important any new development is climate resilient and supports our climate emergency declaration. The council will work with communities, developers and partners on a wide range of projects, policies and initiatives, to support carbon emission reduction and improve the city's resilience to climate change.

### City of Nature

As part of a project between the city council, local organisations and voluntary groups, a 25-year City of Nature Delivery Plan (2022) has been produced. This delivery plan changes the way Birmingham treats its natural environment and how it thinks about the future of its parks and green spaces. The plan has a strong focus on how green spaces impact human life and will involve the whole council and its core third-sector partners through a City of Nature Alliance.

Biophilic Cities is a global network of cities that work collectively to pursue a vision of a 'natureful' city. Birmingham has been a Biophilic Cities member since 2013 and has declared its intention to be a green and sustainable city and improve connections between health and nature. As a unique green asset, the reservoir has an important role to play in delivering this commitment.

Birmingham has also adopted an Urban Forest Masterplan (2021). It sets out a 30-year vision for Birmingham to have 'More trees that deliver benefits for health, nature, and climate change, for all the communities within the city, now and in the future, as part of an inclusive and sustainable urban forest'.

### Localism in Birmingham

The Working Together in Birmingham's Neighbourhoods White Paper (January 2019), sets out a clear commitment to work with local neighbourhoods and communities to empower them to have more influence over services and decisions that affect their lives. This commitment has been reflected in the approach to the masterplan, which has been produced by extensive work with local communities and water users through the Community Partnership Forum.



# 3

## Vision

Edgbaston Reservoir will be protected and enhanced as a tranquil oasis in the heart of the city, set within an ecologically-rich Local Nature Reserve.

It will provide a destination where local residents and visitors can enjoy a mix of land and water-based leisure and recreation activities with a strong community and family focus. The reservoir will be connected to a wider network of green and blue open spaces and be accessible to everyone. It will be celebrated as a safe distinctive place that supports the improved health and well-being of all.

New development will demonstrate high-quality sustainable design that reflects the unique

character of the reservoir as a natural landscape, heritage site, and social and cultural asset for a diverse range of communities.

The transformation of key opportunities around the reservoir will provide new homes and activity for community engagement that complement the water setting. Opportunities will be provided for new and existing residents to come together, to improve citizens' quality of life and enhance the visitor experience.

Innovative design solutions, flexible usage, and collaborative working with communities will safeguard the reservoir for future generations.

Opportunities will be provided for new and existing residents to come *together*



Illustrative artist's sketch demonstrating the vision at Osler Park and Osler Place



# 4

## Development Principles

The following development principles will guide future development to ensure it delivers the vision:

- Activity
- Character
- Connectivity
- Sustainability

These Development Principles are reflected under each of the Opportunities listed in the masterplan to demonstrate how they will contribute to delivering the vision.

*Reservoir Lodge, a key heritage asset making a positive contribution to the character of the reservoir*





Example of water activation  
Image Copyright: Ackers Adventure



Example of cycling  
Image Copyright: Sport England



Example of school trip to learn  
about the natural environment.  
The Wildlife Trusts  
Image Copyright: Penny Dixie



Sailing at the reservoir  
Image Copyright:  
Midland Sailing Club



Pontoon with purpose built wet area, integrated storage and  
viewing platform used to support water sports activities.  
Floating Kayak Club, Vejle Fjord, Denmark. FORCE 4 Architects  
Image Copyright: Soren Agaard

## Activity

Edgbaston Reservoir is an important leisure and learning destination. A mix of land and water-based activities will be encouraged to create a sustainable destination for Birmingham's residents and visitors. Activities should encourage leisure and creative arts, interaction with nature and support physical and mental health and well-being. New homes will bring life to the reservoir and help meet the housing need.

All activity will be required to protect and enhance the Local Nature Reserve setting. The Local Nature Reserve Management Plan (2021) for the reservoir provides further guidance and has recently been revised by the Birmingham and Black Country Wildlife Trust. The document sets out details on the ecology and natural environment at the reservoir and how it can be managed and enhanced in the future.

Land-based activities including walking, running, cycling and bird watching are popular at the reservoir and will continue to be encouraged. The reservoir and surrounding land provide an important open space for visitors to enjoy and

interact with nature. Additional activities should enhance this where possible, for example through the sensitive development of nature walks, bird hides, wildlife education and accessible outdoor spaces.

A broad range of activities will be encouraged to meet the needs of the diverse population. Other additional uses could include outdoor gyms, play equipment or shared spaces for communal gardening. Appropriate temporary events to facilitate sporting, community and leisure activities will be supported. Facilities such as public toilets will be required to enable visitors to spend more time at the reservoir.

Multi-functional spaces will be encouraged to enable spaces to be used for a variety of activities. This will help future-proof development and improve economic and social sustainability.

The existing water sport clubs play a key role activating the water and encouraging participation. To support their work, the clubs in conjunction with Sport Birmingham, have produced a Community

Water Sports Activity Plan. It aims to widen access to water sports and increase participation levels in all parts of the community, creating a hub of water sports activity for the city that is a partnership between water sports groups. The council will continue to work with the clubs and support their ongoing outreach work with local communities.

Additional water activity will be supported where it meets the vision for the reservoir and encourages broader participation. Access to the water is managed by Birmingham City Council; the Water Users Agreement will be reviewed as necessary to ensure the water is used efficiently. New and existing activities should, where possible, use the reservoir throughout the weekdays and evenings to optimise water use.

Fluctuations in water levels, from natural weather patterns and the use of the reservoir to support the canal network, have a direct impact on the natural environment as well as the level of water sports activity able to take place at the reservoir.





Historic features including the engineering heritage of the reservoir should be celebrated



The natural environment is a fundamental part of the reservoir's character

### Character

The unique character, history and natural environment of the reservoir will be protected and enhanced. As a designated Local Nature Reserve, the natural environment is a fundamental part of the reservoir's character. Its sense of place and value as an escape from busy city life provides an opportunity for all to experience nature, heritage and water.

The role the reservoir played in the city's industrial heritage leaves a legacy of historic features with a story to tell. Sustainable uses will be sought for historic buildings including Reservoir Lodge (Grade II listed), Reservoir House and Reservoir Cottage

(both locally listed). Where appropriate, these buildings will be integrated with sympathetically-designed new development. Other historic features such as the dam wall and sluice gate gears should be celebrated.

Water is fundamental to the reservoir's sense of place. It is the reason many people visit, to enjoy the landscape setting and to take part in water-related activities. Opportunities will be taken to enhance paths and spaces, and could potentially include a floating structure, to allow visitors to feel closer to the water.

Views are also an important feature of the reservoir and an integral part of the visitor experience. These are shown on the 'Views' plan opposite. This includes both vistas across the water and views out from the dam wall towards landmarks in the wider area, such as the Buddhist Vihara Peace Pagoda, St Augustine's Church spire, Edgbaston Waterworks Tower, Perrott's Folly, Port Loop and the city centre skyline beyond.

Development will be expected to respect key views and positively add to existing vistas and landmarks through high-quality design.

### PLAN 2 Views

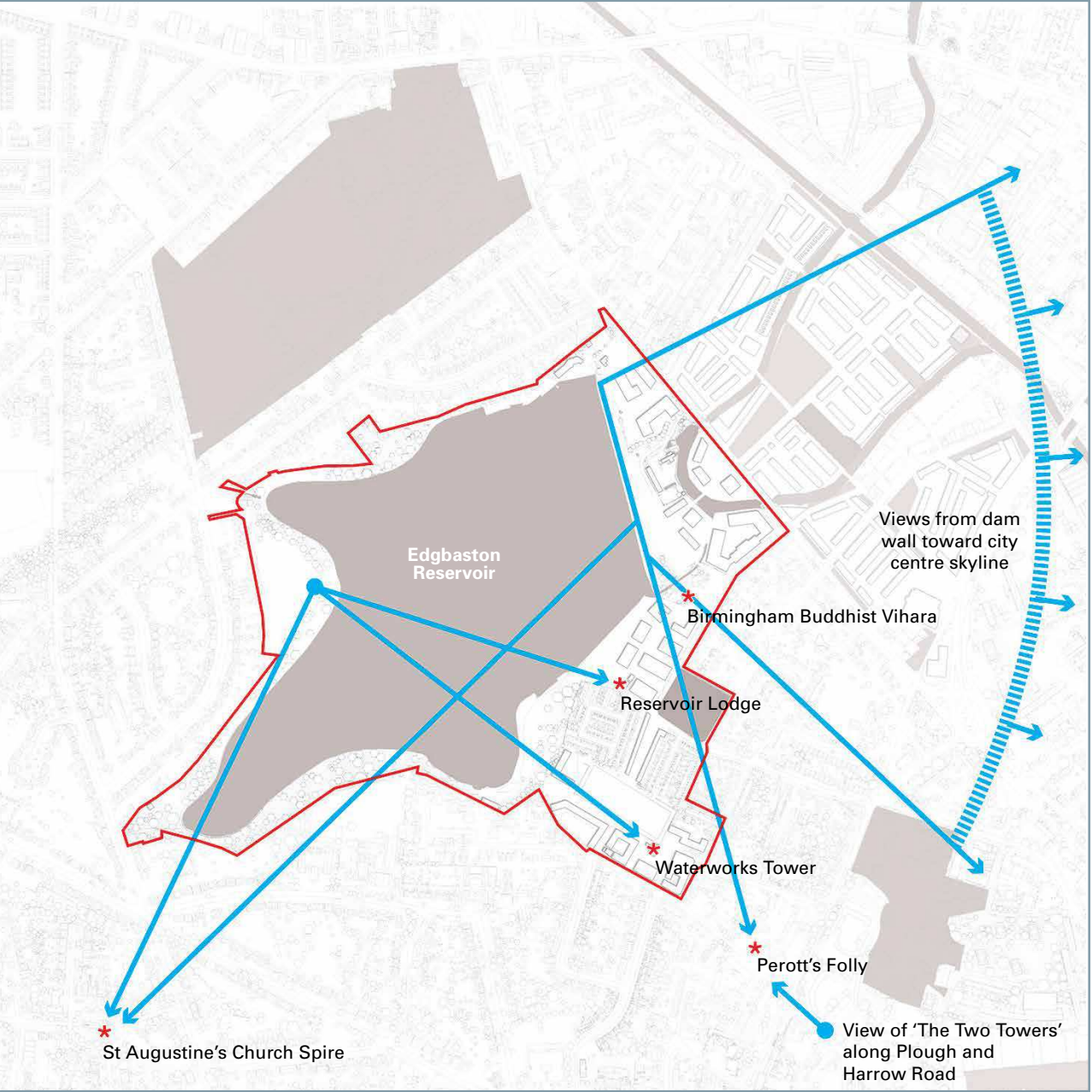
#### Key

- Masterplan boundary
- Key viewpoint
- Key landmark



NORTH

© Crown Copyright. All rights reserved. Birmingham City Council 100021326 (2022).







Activity on the water adds to the unique character of the area

Development at Edgbaston Reservoir will be high-quality and reinforce the reservoir's distinct character and identity, including its natural environment and waterside location. It should embody the principles of sustainable design (see page 32) and embrace the potential for innovation that sets a benchmark for future design in the city.

New development will recognise the role the reservoir plays as an active water sport location. Activity on the water adds to the unique character of the area and should be celebrated. Any development close to the water will need to demonstrate exceptional and innovative design that addresses its setting and adds to the quality of place. Activity at ground level will provide uses that complement the water setting and bring a

mix of people to the reservoir. Residential uses at upper levels will help create a safe environment by increasing natural surveillance and levels of activity in the evening.

Building height, scale, form and density will be required to be appropriate to its context and development should be welcoming and suitable for all. New development will contribute to the setting of the reservoir, with shared public spaces and strong physical and visual links to the water.

Potential pressure to provide buildings with views over the water must be balanced with the primary need to protect the reservoir's unique character, historic features, natural environment and significant views. Proposals for development

around the reservoir should carefully consider key vistas highlighted in the view plan (see page 25) and ensure these views are protected where appropriate.

New buildings and spaces should be designed to enhance views out from the reservoir. 3D massing models and computer-generated imagery visualisations should be used as necessary to assess impacts of proposed development on key views.

Public art will contribute to the reservoir's clear identity. Opportunities should be taken to engage with the local community to develop clearly marked entrances, signage and temporary and permanent artwork across the site.

### PLAN 3 Character

Key

- Masterplan boundary
- Opportunity site
- - - New connection
- - - Existing connection
- - - - Existing connection to be improved
- . . . . Reservoir Loop - proposed upgrade
- . . . . Reservoir Loop - complete
- Entrance - existing/improved
- Entrance - new
- ✱ Key landmark
- Park/parkland/greenspace
- New building
- Existing building
- Historic building with enhancement works
- Private residential amenity



NORTH

© Crown Copyright. All rights reserved. Birmingham City Council 100021326 (2022).





Connectivity

The reservoir provides opportunities for all communities to come together to enjoy the waterside location and natural environment. A key part of the masterplan vision is to ensure the reservoir is accessible to all to promote health and well-being. Priorities include connecting the reservoir to existing and new communities in the surrounding area and ensuring visitors can access the reservoir using a range of sustainable transport modes. Improved walking and cycling routes, alongside the creation of a high-quality public realm and managed vehicular access, will enhance the area. Future development will be designed to minimise the need to travel by private car, and maximise opportunities for walking, cycling and public transport.

Improvements to the footpath around the water’s edge will encourage greater use and activity and contribute to a safer environment. Communities should be able to access the reservoir on foot and by bike through new and improved entrances that are clearly marked and create a welcoming environment. Pedestrians will have priority and

any potential conflict between pedestrians and cyclists at the reservoir should be managed through signage and the design of pathways. Cycle parking facilities should be provided at appropriate entrance points, and cycle hire facilities will be supported at suitable locations.

There is potential for a Mobility Hub to be provided at Osler Place. This could include bike and e-scooter hire, tools for cycle maintenance, electric vehicle charging point, parcel lockers and public transport information. Existing pedestrian and cycling connections to nearby neighbourhoods will be strengthened and enhanced. This will include links to the Harborne Walkway, Summerfield Park, Ladywood Leisure Centre and the canal network via Port Loop. A new pedestrian crossing will be delivered at Icknield Port Road to ensure pedestrians can cross safely. The dam wall presents a visual and physical barrier between the reservoir and the wider canal network via Port Loop. Improved connectivity between Port Loop and the reservoir will be essential and innovative

design solutions that respect the function and heritage of the dam wall will be explored to address this.

Links to the city centre, the Roundhouse, Summerfield Park and Ladywood Leisure Centre will be improved and promoted. Walking and cycling will be encouraged from the city centre along the canal network and other sign-posted routes. Work to improve these routes has started, the Canal & River Trust has delivered an initiative called Revolution Walk, a 4.5 mile section of the Birmingham Canal Navigations from the Roundhouse to Chance Glassworks in Smethwick. The walk recently received Green Flag status and celebrates the Brindley and Telford canals, railways and roads. Further improvements to the canal will be sought and the ambition for the reservoir to gain Green Flag status will be supported. There will be improved access and signage on existing bus connections on local roads and via key transport hubs, such as the planned Metro and Sprint stops on Hagley Road.

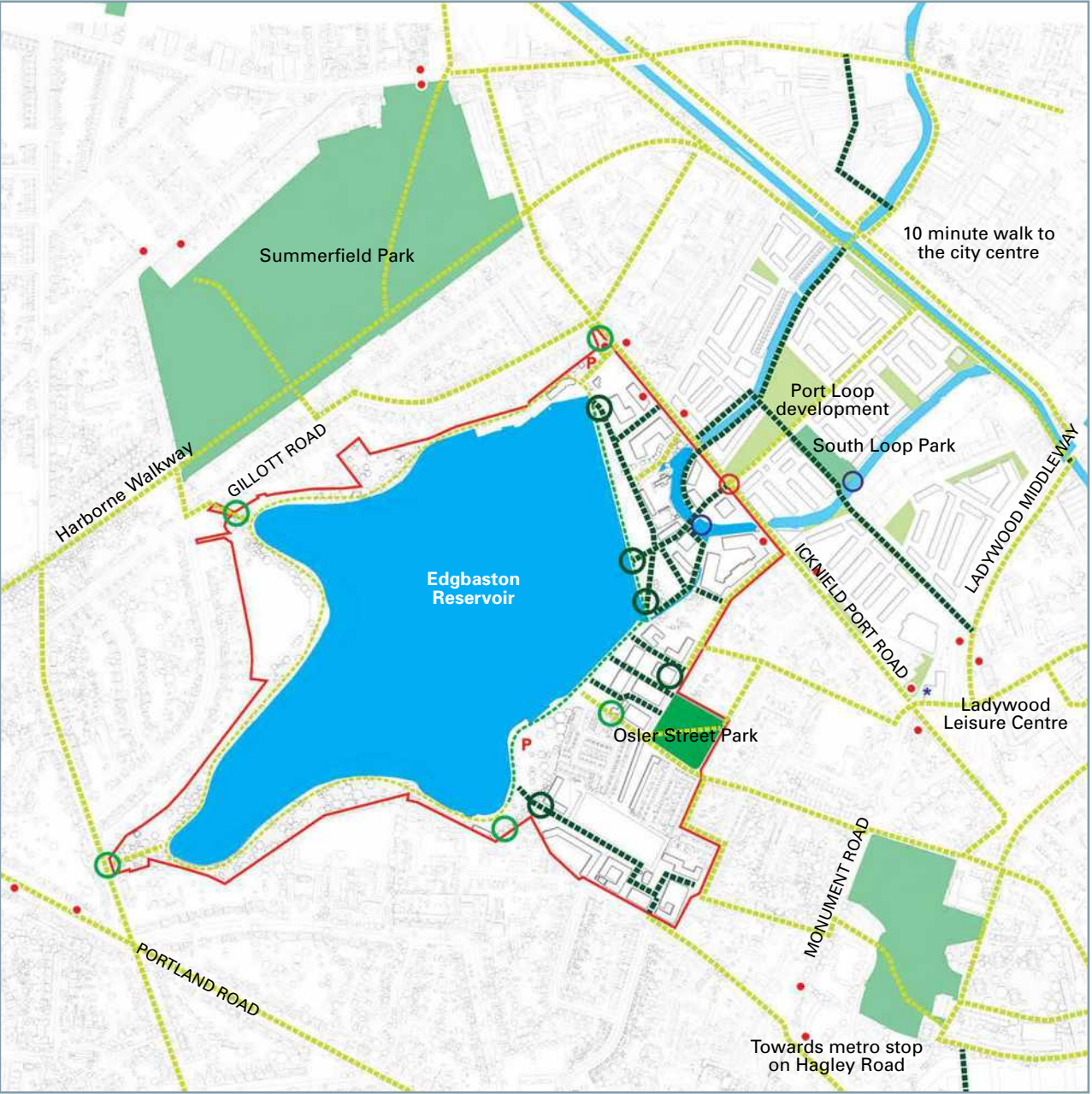
PLAN 4 Connectivity

- Key**
- Masterplan boundary
  - New pedestrian and where appropriate cycle connection
  - Existing key walking and cycling connection\*
  - Reservoir Loop\*\* - proposed upgrade
  - Reservoir Loop\*\* - recent upgrade
  - Entrance - existing/improved
  - Entrance - new
  - New pedestrian road crossing
  - Water taxi stop
  - Bus stop
  - Parking facilities

\* Informed by the Birmingham Walking and Cycling Strategy 2020  
\*\* Reservoir Loop includes pedestrian and cycle access



© Crown Copyright. All rights reserved. Birmingham City Council 100021326 (2022).







An Interconnect navigation totem aiding wayfinding around the city



Cycling infrastructure integrated into the public realm. Wapping Wharf. Alec French Architects  
Image Copyright: Simon Doling



Waterside walk with regular vantage points. Bondi to Bronte Coast Walk Extension, Sydney, Australia. Aspect Studios  
Image Copyright: Florian Groehn



Kayaking on the canal, Port Loop  
Image Copyright: Shaw & Shaw Photography and Port Loop (Urban Splash, Places for People, Canal & River Trust and Birmingham City Council)

Visitors will be encouraged to use sustainable modes of transport. Safe and secure car parking is required for those who need to access the reservoir via car. It is recognised that many people with a disability rely on the private car as their primary mode of transport. To ensure the site is accessible, provision will need to be made for well-located designated disabled parking bays in line with the Birmingham Parking SPD and Birmingham Design Guide.

Parking will need to be coordinated and shared across the site. This approach is supported by the updated city-wide Car Parking Supplementary Planning Document which states that Edgbaston Reservoir falls within the Zone B 'Edge of City Centre' area. This means parking 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.

The Parking SPD identifies the reservoir as being within an area of high public transport accessibility which is reflected in the parking standards with a high provision of cycle parking and car share facilities.

It is recognised there may be a need for occasional additional parking to support events hosted at the reservoir. Provision for boat, trailer and minibus facilities will need to be delivered to meet the needs of activity providers. The design of parking and servicing should make efficient use of land, and be well-managed to minimise impacts on the reservoir and create a pedestrian-friendly environment.

Specific details of the amount of car parking and how it is managed for each of the opportunities within the masterplan will be determined once the mix of uses and number of residential homes are finalised. This will therefore be agreed through the planning application process in line with policy described above.



## Sustainability

Edgbaston Reservoir is an integral part of Birmingham's natural environment. It is designated as a Local Nature Reserve and a Site of Importance for Nature Conservation. It has a broad range of habitats including marginal vegetation and willow scrub which are not common in Birmingham and the Black Country.

The reservoir plays a key role as a foraging and nesting resource for birds, including summer and winter migrants, and bat populations. It acts as a stepping stone for wildlife in Birmingham, linking core ecological areas together, as highlighted by the Birmingham and Black Country Nature Improvement Area Ecological Strategy (2017-2022).

All development and proposals at the reservoir should support the biodiversity objectives and targets set out in the Edgbaston Reservoir Local Nature Reserve Management Plan. Development

should strengthen connections to open space and wildlife corridors in the wider area, including Summerfield Park, Birmingham Canal and the Harborne Walkway. The Local Nature Reserve Management Plan should be read in conjunction with this masterplan.

All projects and development within the plan boundary need to meet the challenges of the climate emergency and contribute positively to the sustainability of the Local Nature Reserve. All qualifying development will be required to deliver a minimum of 10% (or higher if set by subsequent adopted policy), biodiversity net gain upon implementation of the Environment Act 2021, anticipated to take place in winter 2023. Development will be encouraged to deliver biodiversity net gain ahead of the legislative requirement coming into effect and will also be encouraged to deliver a higher percentage in reflection of the Local Nature Reserve setting.

Biodiversity net gain delivers measurable improvements for biodiversity by creating or enhancing habitats in association with development. The first preference is to deliver biodiversity net gain on-site, within the red line boundary of the planning application. This provides the maximum benefit within the locality of the development. Where it is not possible, biodiversity net gain can be delivered off-site.

In addition to the biodiversity net gain requirements, development will be expected to meet the policy and guidance for sustainability standards. The creation of climate resilient, sustainable developments should be in accordance with BDP policies TP1 and TP2 and will involve measures that reduce energy and water consumption, minimise waste and use sustainable, locally-sourced building materials.



*The reservoir has a broad range of habitats*



*Example of education with nature.  
The Wildlife Trusts  
Image Copyright: Penny Dixie*



*Examples of floating habitat installations  
Image Copyright: Biomatrix Water*



Development should be designed and constructed in ways which maximise energy efficiency and use low carbon energy in accordance with BDP Policies TP3 and TP4. This could include the use of passive solar gain and incorporate low or zero carbon energy generation technologies. Non-residential developments of a certain threshold will be expected to meet Building Research Establishment's Environmental Assessment Method (BREEAM) standards (BDP Policy TP3). BREEAM is an assessment of the environmental, social and economic sustainability performance of a development. Proposals which go further and achieve net zero carbon emissions or achieve Passivhaus accreditation will be welcomed. The application and certification of WELL Building Standards is also encouraged to assess how buildings impact and influence human behaviours related to health and well-being.

Outdoor spaces should be designed to take account of sun, wind and shelter to create microclimates that maximise their positive use. Opportunities should also be taken to include green infrastructure within the plan boundary.

Buildings and features of historic value should be retained and celebrated where possible. The re-use of existing buildings of historic character at the reservoir will be supported where it will help deliver the vision of the masterplan. All developments that involve the demolition of buildings will be expected to recycle building materials in line with current guidance.

Measures to enhance the Local Nature Reserve need to respond to the objections set out in the Local Nature Reserve Management Plan and could include habitat creation, provision of floating islands, bird and bat boxes and screen bird hides. Any activity at the reservoir will need to work in harmony with the natural environment and support the vision to increase green links between the Local Nature Reserve and wider green network. Activity and development that has a demonstrated adverse impact on the Local Nature Reserve will not be supported.

The reservoir is managed and maintained by Birmingham City Council. The Edgbaston Reservoir Local Nature Reserve Committee has a key role to

play in monitoring the implementation of the Local Nature Reserve Management Plan and facilitating community volunteering to enhance biodiversity. There is an opportunity for increased community stewardship and participation in managing the open space surrounding the reservoir. This includes potential for education about the natural environment.

Securing green flag status for the reservoir and surrounding open space should be an aspiration. This would mean the reservoir would be recognised for achieving a high standard of its management and maintenance.

All proposals should include uses that are economically sustainable to optimise the potential of the reservoir. Developments should be flexible in their design and use to ensure they can adapt to change in demand over time. Developments should support the social sustainability of the area by providing opportunities for community capacity building, jobs and training for residents, and uses that support the local community.

### PLAN 5 Sustainability

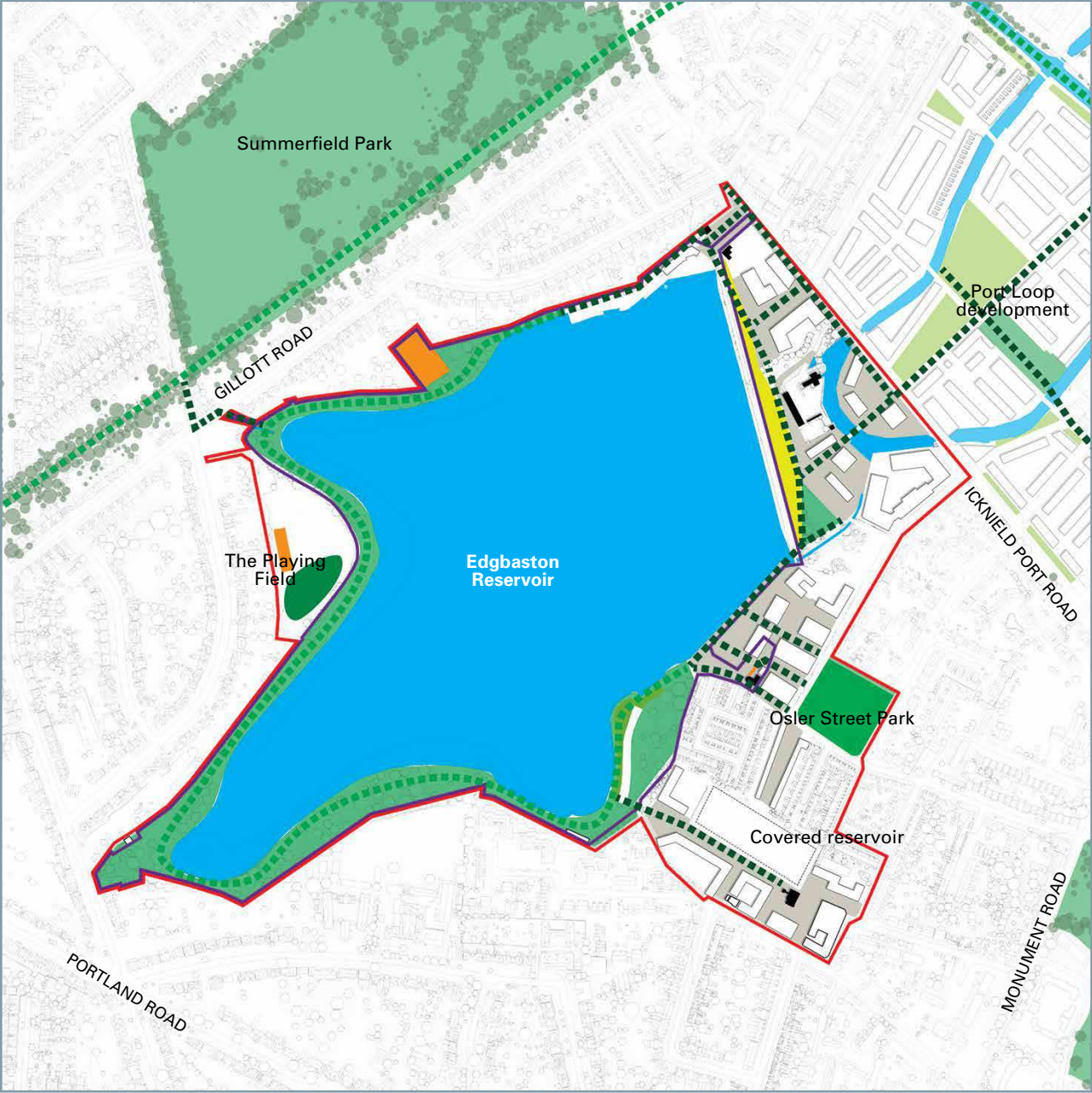
#### Key

- Masterplan boundary
- Local Nature Reserve boundary
- - - New green link\*
- - - Existing improved green link
- Park/parkland/greenspace
- Woodland tree planting
- Greening of waterfront
- Potential wildflower planting
- Community food growing space or orchard (additional locations to be confirmed)
- Public realm with greening
- Historic building with enhancement works

\*Predominately multifunctional walking and cycling routes that link green areas together and contain different types of green infrastructure such as tree planting, low level planting, wildflower planting, green boundary treatments, permeable surface treatments, verges, swales or green walls.



© Crown Copyright. All rights reserved. Birmingham City Council 100021326 (2022).



# 5

## Opportunities

The vision for Edgbaston Reservoir will be delivered through the following opportunities:







- Osler Park and Osler Place
- Reservoir Loop
- Reservoir View
- Reservoir Link
- Natural Parkland
- Edgbaston Waterworks
- Celebrating the Reservoir

Each opportunity area includes guidance to explain how the four development principles of the masterplan should be delivered. This includes how to protect and enhance the natural environment and characteristics that make the reservoir a unique location.

It also sets out the opportunities to make best use of the existing built form at the reservoir and provide uses to complement and activate the water setting.

### PLAN 6 Opportunities

#### Key

-  Osler Park and Osler Place
-  Reservoir Loop
-  Reservoir View
-  Reservoir Link
-  Natural Parkland
-  Edgbaston Waterworks

Celebrating the Reservoir encompasses the masterplan boundary and beyond



NORTH

© Crown Copyright. All rights reserved. Birmingham City Council 100021326 (2022).





# Osler Park and Osler Place

Osler Street Park will be protected and enhanced as an important open space. Osler Place will provide new homes and visitor facilities with strong green links between the reservoir and Osler Street Park. High-quality contemporary buildings and public spaces will complement the reservoir's historic environment to positively add to its character and create a focal place.

This opportunity comprises redevelopment of two sites, the former Tower Ballroom Site adjacent to the reservoir and Tower Mount off Reservoir Road. Improvements to Osler Street Park open space will also be delivered. Future development should be complementary and ensure a joined-up approach to public realm improvements and treatment of the park.

## PLAN 7 Osler Park and Osler Place Opportunity Site

### Key

- Masterplan boundary
- Opportunity site
- New connection
- Existing connection to be improved
- Reservoir Loop - proposed upgrade
- Existing landmark
- Main vehicular access point
- Entrance - existing/improved
- Entrance - new
- Tree planting
- New building
- Existing building
- Historic building with enhancement works
- Play equipment
- Park
- Community garden/grow space
- Public square
- Street with traffic calming measures
- Public realm with greening
- Public walkway with active building frontages
- Private gardens



© Crown Copyright. All rights reserved. Birmingham City Council 100021326 (2022).





Community pocket park. Derbyshire  
Street Pocket Park, London, UK.  
Greysmith Associates  
Image Copyright: Luke Greysmith



Osler Street Park



Sea cadets undertaking a water-based training exercise  
Image Copyright: Sea Cadets



Existing entrance to the reservoir  
from Reservoir Road

### Osler Street Park

Osler Street Park open space plays a crucial role in the local community. It provides a safe and welcoming place for children and young people and should be protected and enhanced. The park is suitable for a range of ages with play equipment and a multi-use games area and is extremely popular.

Opportunities for improvements to the play equipment and the natural environment at Osler Street Park will be sought. The position of the park provides an opportunity to use the park as an extension of the reservoir in terms of green space for wildlife and members of the public. As such, the park could be enhanced with features such as fruit trees and wildflower grassland areas. These could be incorporated with a natural play trail to create a semi-natural play area for children and provide a further resource for birds and invertebrates. Any proposed changes to the park will be developed in collaboration with the local community.

Residential development at Osler Place will improve public safety through natural surveillance, whilst new landscaped walkways will improve visual and pedestrian links between Osler Street Park and the reservoir. Vehicle access and parking at Osler Place will need to be designed and managed to benefit movement of pedestrians around the park.

### Tower Mount site

The site is underutilised and should be redeveloped to provide family housing to meet the needs of the local population and add to the vibrancy of the area. New housing should reflect the layout, scale and massing of adjacent traditional houses; however, the opportunity to create interesting contemporary homes that add to local character should be explored. Housing should provide a distinctive frontage to Reservoir Road and face Osler Street Park to improve natural surveillance and safety.

### Tower Ballroom area

The site includes the former Tower Ballroom building, the Grade II listed Reservoir Lodge, the TS Vernon Sea Cadets and car parks south and east of the Tower Ballroom building. This building has been vacant since 2019 and is due to be demolished prior to its redevelopment. The site is allocated in the Birmingham Development Plan to provide innovative family housing with a mix of commercial and community uses.

Redevelopment should provide new homes and a range of accessible facilities for the local community and visitors. A mix of types and

tenures of homes will be required to meet local need. Development on the site should deliver a wide public walkway adjacent to the reservoir that connects with the circular footpath (Reservoir Loop) and creates a space for visitors to enjoy. Buildings fronting the reservoir should incorporate active, publicly accessible ground floor uses that contribute to a safe, welcoming environment. The Grade II listed Reservoir Lodge building should be brought back into positive use, with potential for community and visitor facilities.

TS Vernon Sea Cadets have planning consent to develop a new regional facility in their current location which will bring further life and activity to the site. There is potential for a new publicly accessible pontoon that extends over the water to provide boat storage and the opportunity for visitors to better-connect to the water.

Improved pedestrian entrances and connections to public transport will ensure most visitors can access the reservoir without requiring car parking facilities. This, in combination with careful management of vehicular movement and car parking on the site will reduce conflict between vehicles and pedestrians and create an environment that is safe for all.



### Activity

- Create a mix of uses that positively contribute to the vision of the masterplan and enhance the unique character of the reservoir.
- New homes that respect the scale of housing in the surrounding area will be provided fronting Osler Street. There is opportunity for increased height fronting the waterfront due to the topography of the site.
- There will be an appropriate mix of housing types and tenures to provide homes for families including potential for town houses with flexible live-work spaces, and apartments above non-residential uses on the waterfront. As set out in the Policy Context section, housing will be expected to meet the affordable housing provision requirements.
- Non-residential uses could include community, cultural, commercial, cafe, leisure, and educational facilities on the ground floor of buildings along the waterfront. These uses should support activity at the reservoir and help meet the needs of the community and visitors. Buildings should be multi-functional and flexible to enable a variety of activities to take place.
- A new public square is proposed in front of Reservoir Lodge. It will provide a focal point for people to meet at the heart of the site. This high-quality public realm should accommodate green infrastructure. There is the potential to utilise site topography by including a landscaped amphitheatre to provide seating and an informal performance space.
- Landscaped green pedestrian routes will link the reservoir with Osler Street Park.

- A public walkway will be delivered adjacent to the reservoir with a combination of hard and soft landscaping to provide places to sit, walk, cycle and to watch activity on the water. It will incorporate green infrastructure that will help integrate this area of the reservoir with the Local Nature Reserve.
- The potential for a publicly accessible pontoon extending over the water will be further explored. It could provide boat storage for water users and/or improved access to the water to enable visitors to feel better-connected to the reservoir. It would need to be secured sufficiently and designed to accommodate the rise and fall of water levels.
- TS Vernon Sea Cadets will redevelop their existing building to provide modern, expanded facilities.
- Reservoir Lodge will be brought back into a positive community or commercial use that supports the overall vision of the reservoir. There is potential for the building to provide space to celebrate the heritage and natural environment of the reservoir. A contemporary extension to the building that complements the historic listing would be supported where it facilitates the vision in the masterplan. There is potential for outdoor spill out space to connect the building with its surroundings and possibly provide community growing space.
- Osler Street Park play and sport facilities will be improved and better-connected with the reservoir. The potential for more creative play that connects to the unique character of the reservoir should be explored. Any changes to the park should be in collaboration with local people and park users.

### Character

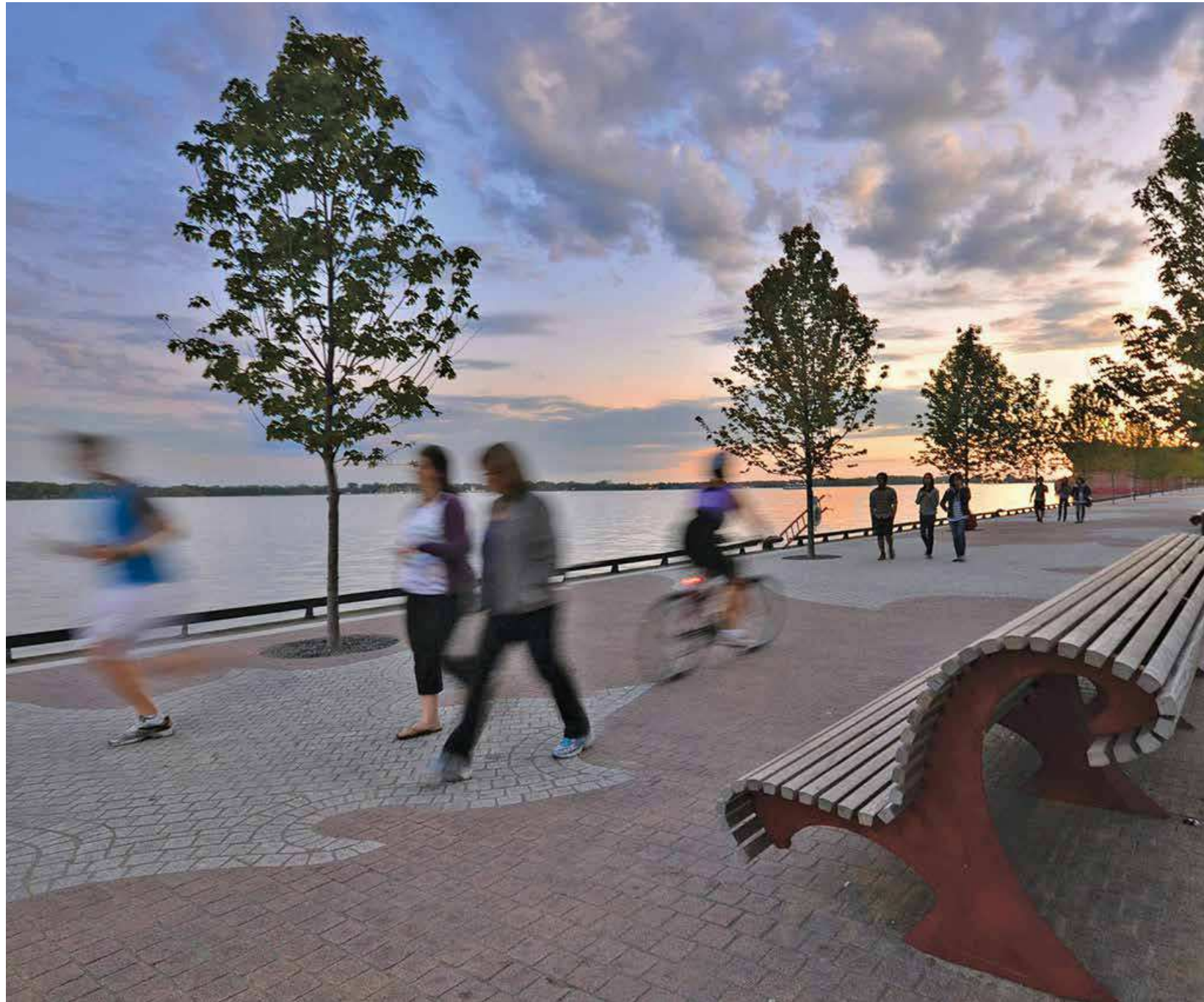
- Development should respect and add to the reservoir's historic character through modern high-quality design.
- The new public walkway between the water and new development will be expected to deliver sufficient space for the public to walk, cycle, and enjoy the waterside location. It is expected to be around twenty to thirty-five metres width, varying to accommodate the shape of the reservoir and deliver a linear building line.
- Buildings fronting the water will be a variety of heights up to a maximum of four storeys. They should be designed to make the most of their outlook over the water and to sit comfortably in the landscape when seen from viewpoints around the reservoir.
- Houses on the higher land at the rear of the site will be no taller than three storeys with the possibility of four storeys facing Osler Street Park if appropriately designed. This will provide an appropriate scale fronting Osler Street and Osler Street Park and relate well to Reservoir Lodge.
- The historic relationship between Reservoir Lodge and the reservoir will be maintained so that the building's distinctive canted frontage will continue to look out over the public square and water beyond.
- Public realm should be consistently high-quality throughout the site and designed as distinctive spaces that add to the reservoir's positive character.

- Green infrastructure will be integral to the design of streets and spaces. This will include new links to Osler Street Park and new planting on the walkway and public square.
- The appearance of Osler Park will be enhanced to embed its status as an important greenspace within the local area.
- Built form will protect existing key views and create new vistas towards Edgbaston Waterworks Tower, Perrott's Folly, the Buddhist Vihara Temple and the water itself, to reinforce the local sense of place.



Example of Passivhaus housing using high-quality materials and detailing. Goldsmith Street, Norwich, UK. Mikhail Riches Architects  
Image Copyright: Tim Crocker





Example of a walkway with high-quality materials and detailing. Toronto Waterfront. West 8 and DTAH  
Image Copyright: Chris Hillier

### Connectivity

- New physical and visual connections will be made between Osler Street Park and the reservoir.
- The new walkway will be publicly accessible and form part of Reservoir Loop, a circular walking and cycling route around the reservoir.
- Streets within the development will be prioritised for pedestrians and cyclists.
- Edgbaston Reservoir is located within an area of high public transport accessibility, and it is expected that many trips locally will be made by public transport or walked and cycled. Car share facilities could be made available for specific journeys which may require a motor vehicle.
- There is potential for a Mobility Hub to be provided at Osler Place to encourage and support users to access the reservoir via sustainable transport modes. This could include bike and e-scooter hire facilities, tools for cycle maintenance, electric vehicle charging, parcel lockers and public transport information.

- The existing car park adjacent to the water will be reopened in a secure and managed way to provide a limited number of spaces. The land directly adjacent to the water will be greened to provide a pleasant waterside location and contribute to the natural environment.
- Car parking should be prioritised for those who are unable to access the reservoir by walking, cycling or public transport.

Changes in ground levels across the former Tower Ballroom site create the opportunity for waterfront buildings to be serviced at basement level and to provide residential parking below buildings in under crofts or basements.

### Sustainability

- Development should make use of passive solar gain and incorporate low or zero carbon energy generation technologies that are appropriate to the site. This could include ground or air-source heat pumps or photovoltaic panels on suitably designed and oriented roofs as well as water source heat pumps, using the reservoir and local canals. Buildings should be highly energy-efficient, constructed using sustainable materials and waste should be minimised.
- Outdoor spaces should be designed to take account of sun, wind and shelter and use sustainable materials and green infrastructure to create attractive microclimates that maximise their use.
- The public spaces will incorporate green landscaping with opportunities for planting, trees and natural habitats that contribute towards the overall biodiversity of the reservoir and Local Nature Reserve.



Opportunity

# Reservoir Loop

To enhance the circular route around the perimeter of the reservoir. This will provide the opportunity for everyone to explore the reservoir, including space to pause and enjoy the reservoir's character.

Much of the pathway has been sympathetically enhanced to improve accessibility and stay in keeping with the Local Nature Reserve setting. The walkway proposed as part of the development at Osler Place will provide a high-quality section of the route and create space for people to walk, sit and enjoy the reservoir. Hard and soft landscaping will help integrate the new development into the Local Nature Reserve setting.

## PLAN 8 Reservoir Loop Opportunity Site

### Key

- Masterplan boundary
- Reservoir Loop - proposed upgrade
- Reservoir Loop - complete
- Existing exit from Reservoir Loop
- New exit from Reservoir Loop



NORTH

© Crown Copyright. All rights reserved. Birmingham City Council 100021326 (2022).





### Activity

- The footpath around the reservoir will create a continuous high-quality pedestrian and cycling route for all.
- The path will be a shared surface with signage to reduce conflict between pedestrians and cyclists.
- The use of the loop for adaptive bikes for disabled cycling would be welcomed.
- Increased activity due to the former Tower Ballroom site being redeveloped will contribute to improved public safety. At other entrance points around the reservoir it is proposed to introduce lighting to enhance safety, being aware that any lighting should minimise light spill and must not cause an adverse impact on wildlife.

### Character

- The site of the former Tower Ballroom building is an uninviting environment for pedestrians with poor visibility. It will be demolished, and the site redeveloped to deliver a wide publicly accessible walkway that completes the loop. This will include improved public realm with spaces for people to stop and enjoy the water setting.
- The route will also be enhanced where it runs behind Midland Sailing Club, to make this a more welcoming environment.
- The path over the dam wall allows visitors to enjoy dual aspect views of the water and city centre skyline. There is an opportunity to replace all or part of the palisade fencing over the dam wall with a boundary treatment that improves visibility and better complements the character of the reservoir. Signage that highlights buildings of interest in the skyline and heritage features associated with the reservoir would be supported. The dam wall provides an important practical function and any alterations will need to protect the integrity of the structure.

### Connectivity

- Reservoir Loop will improve connections with the city's wider walking and cycling networks, including a direct link with the canal over the dam wall. This will encourage more people to use active travel to access the reservoir and enjoy the health and well-being benefits it has to offer.
- Entrances to the reservoir will be improved to ensure they are accessible to all and include features that make the reservoir welcoming such as clear signage and artwork that reflects the identity of the reservoir.

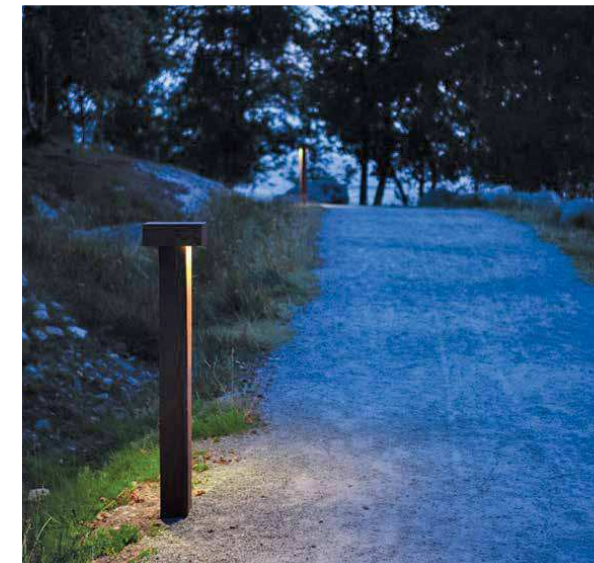
### Sustainability

- Opportunities should be explored to green the pathway, especially in areas outside of the Natural Parkland where there are fewer trees. This could include planting and habitat creation.

Example of family friendly environment  
Image Copyright: Sport England



The footpath around the reservoir



Example of sensitively integrated lighting.  
Jorpelandsholmen, Norway. Light Bureau  
Image Copyright: Light Bureau



Example of signage at Perry Hall Park



Opportunity

# Reservoir View

To provide a welcoming gateway to the reservoir with complementary uses that create activity and utilise the potential of the heritage buildings Reservoir House and Reservoir Cottage.

Reservoir View, to the north of the reservoir, is a gateway for pedestrians and cyclists accessing the reservoir from Icknield Port Road and the canal network. It also provides the main entrance to Midland Sailing Club. Reservoir House and Reservoir Cottage are locally listed and owned by the Canal & River Trust. Reservoir House is currently unoccupied, and Reservoir Cottage and part of the adjoining land is currently leased to Midland Sailing Club.

Midland Sailing Club has been based at the reservoir for over 125 years. It runs sailing, windsurfing and paddle-boarding activities throughout the year. This includes 'Sail Birmingham' a community outreach programme that provides activities for children and adults with disabilities and a wide range of open-access sessions for the local community.

In recent years, the club has improved their facilities by investing in new equipment, installing a disabled access lift, outdoor viewing balcony, new changing rooms, indoor and outdoor boat storage and a pontoon. In the medium term the club's ambition is to improve the energy efficiency

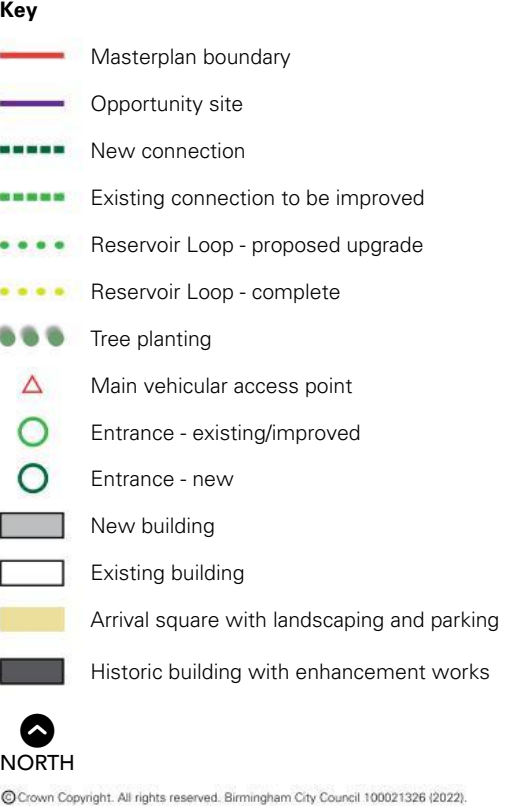
of its building and is developing an Environmental Sustainability Plan to inform its next steps. The club currently leases Reservoir Cottage and adjoining land from the Canal & River Trust. There is an aspiration to renovate, modernise and improve the environmental energy efficiency of the building. Any future proposals for the building will need to maximise its use and celebrate its industrial heritage and support water activity.

Careful management of car parking will be required to ensure the area is not dominated by cars. Parking will be shared with priority given to those user groups who need designated car parking to partake in activities at the reservoir.

The existing pathway behind Midland Sailing Club creates an uninviting environment. Measures should be taken to improve the visitor experience. These could include additional lighting and windows to improve safety and onlooking, and public art to create a welcoming environment and celebrate the reservoir. The rear brick wall of the club's main storage shed could provide an opportunity for a mural to be created in conjunction with young graffiti artists. This would encourage community ownership and minimise vandalism. Low level planting next to the path and along the boundary with the houses that back onto the reservoir would enhance the natural environment and improve the overall appearance of this stretch of the pathway.

The club is also working with the Local Nature Reserve Committee to improve the boundary of the boat storage with high-quality fencing to improve views across the water.

PLAN 9 Reservoir View Opportunity Site

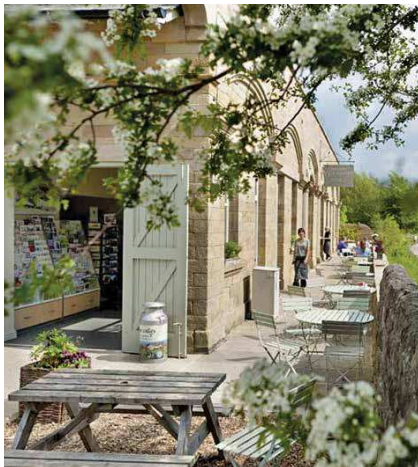




Example of cafe in heritage building  
Image Copyright: The Wildlife Trusts



Example of a repurposed heritage asset including a cafe and cycle hire workshop.  
Hassop Station, Peak District National Park  
Image Copyright: Hassop Station Ltd



View of the Midland Sailing Club and Reservoir Cottage from the dam wall



Midland Sailing Club boat storage area



Example of an information board.  
Image Copyright: Canal & River Trust



Example of a mural used to improve the appearance of a building. Digbeth

### Activity

- Future uses for Reservoir House and Reservoir Cottage could include leisure, community, commercial and educational facilities that support activity at the reservoir. Activity should complement proposed uses at Port Loop, The Playing Field and the former Tower Ballroom Site.
- Opportunities for the sailing club to build on their offer and expand their work with the local community will be supported.

### Character

- The entrance to the reservoir and sailing club from Icknield Port Road should be prominently marked and redesigned as an attractive public space that provides a welcoming, safe environment for pedestrians and cyclists. Opportunities should be taken to introduce clear signage and information for visitors.
- The setting of Reservoir House and Reservoir Cottage should be enhanced. Any ongoing or future use of the buildings will need to animate the area and protect their heritage value. Modifications to the non-listed elements of the two buildings may be supported where they enhance the overall character of the building and facilitate their use.

- Reservoir House and Reservoir Cottage should retain a visual link to the water and their entrances should be activated. There is potential for future uses at Reservoir House to take advantage of views directly over the reservoir.
- The buildings could be part of a sign-posted heritage walk, with a point of interest being the view along the dam wall to Perrott's Folly.
- There is potential to further upgrade the appearance of the sailing club building and associated boat storage as an asset to the reservoir setting and to give it more presence from the Icknield Port entrance.

### Connectivity

- The entrance from Icknield Port Road should be clearly marked and prioritise pedestrians and cyclists.
- Vehicular access and priority parking needs to be carefully managed and designed to ensure the area is not dominated by cars. Parking should be shared by all users and prioritise those who are unable to access the reservoir by foot, bike or public transport. Opportunities for prioritisation to support water activation should be explored.

- The section of Reservoir Loop running behind the sailing club should be enhanced to improve the visitor experience. Steps should be taken where possible to maximise visibility from the path through the boundary treatment of the club to the water.
- If the sailing club site were to be reconfigured in the future, consideration should be given to relocating the public footpath that forms part of Reservoir Loop from behind the sailing club to run along the water's edge to improve visitor experience. This is a long-term aspiration of the council who would work with the sailing club to address any potential issues to ensure this proposal did not have an adverse impact on the club's ability to operate.

### Sustainability

- Opportunities to increase the level of green infrastructure in this area of the reservoir should be sought.
- Improvements to the environmental sustainability of all buildings will be supported.
- Reservoir House will be brought back into a sustainable use.



Opportunity

# Reservoir Link

Reservoir Link will connect the reservoir, canal and Port Loop together, addressing the visual and physical barriers of the dam wall. It will maximise the canal side location and heritage assets to deliver high-quality housing-led development.

Reservoir Link consists of three development opportunities that lie between the reservoir dam and the loop canal: the H Suite site, canal basin (part of Port Loop), and the former Auto Services site off Osler Street.

Future development in this area should take a joined-up approach that integrates these sites with the reservoir, canal and wider Port Loop development through improved linkages, and complementary uses. Development is expected to deliver a mix of homes to meet local need with other uses that activate the canal side.

Development must be based on high-quality place making, where well-designed buildings and spaces respect the character of the reservoir, complement the historic environment and protect key views from the dam wall and from around the reservoir.

New pedestrian routes will connect the reservoir with the canal, Icknield Port Road and Osler Street.

## H Suite and adjacent land

The site is located immediately south of Reservoir House. It is currently occupied by a banqueting suite and day nursery, with car parking to the rear and several units fronting Icknield Port Road. There is potential for the site to deliver a housing-led scheme that is comprehensive, makes efficient use of land and complements heritage features.

## Osler Street (Former Auto Services site)

Outline planning permission was granted (subject to a legal agreement) in December 2020 to redevelop the land fronting Icknield Port Road and Osler Street for up to 260 residential apartments in buildings of three to nine storeys. A gym is also proposed adjacent to a new publicly accessible canal side space. A new pedestrian route will be created alongside the boundary with the Buddhist Vihara Temple. This will connect Osler Street to the Port Loop canal basin development and to the reservoir.

## Canal Basin

This site is centred on the loop of the Birmingham Canal Old Line and includes the Grade II listed Icknield Port Yard. At one time, the site was busy with wharfs but is now largely vacant and has underused land to both sides of the waterway. It forms a later phase of the on-going Port Loop redevelopment and will become a focal place within the new neighbourhood incorporating the main pedestrian connection to the reservoir. Development should deliver a mix of high-quality housing, commercial and community uses to create a hub of activity that animates the canal side and provides facilities for residents and visitors.

## PLAN 10 Reservoir Link Opportunity Site

### Key

- Masterplan boundary
- Opportunity site
- New connection
- Reservoir Loop - proposed upgrade
- Main vehicular access point
- Entrance - new
- Tree planting
- Park/parkland/greenspace
- New building
- Historic building with enhancement works
- Public realm with greening
- Private residential amenity



© Crown Copyright. All rights reserved. Birmingham City Council 100021326 (2022).





### Activity

- Commercial uses at Reservoir Link should complement and not compete with Dudley Road local centre and carefully consider proposals for Port Loop and the former Tower Ballroom site.
- Icknield Port Yard is a historic maintenance yard owned by the Canal & River Trust. As a working yard, it is an important part of the Birmingham canal network and operations. There may be potential to develop its role as an asset for the area through activities such as public open days.
- The Canal Basin will be a focus of activity providing facilities for residents and visitors. The canal side will be opened up by commercial and residential frontages, providing opportunities for moorings, water taxis and temporary water markets.
- Development at the H Suite should be predominantly residential. This could be as apartments, houses or a mix of typologies. It should include buildings and uses that front onto and animate Icknield Port Road and should provide natural surveillance to create safe public spaces and routes within the site.

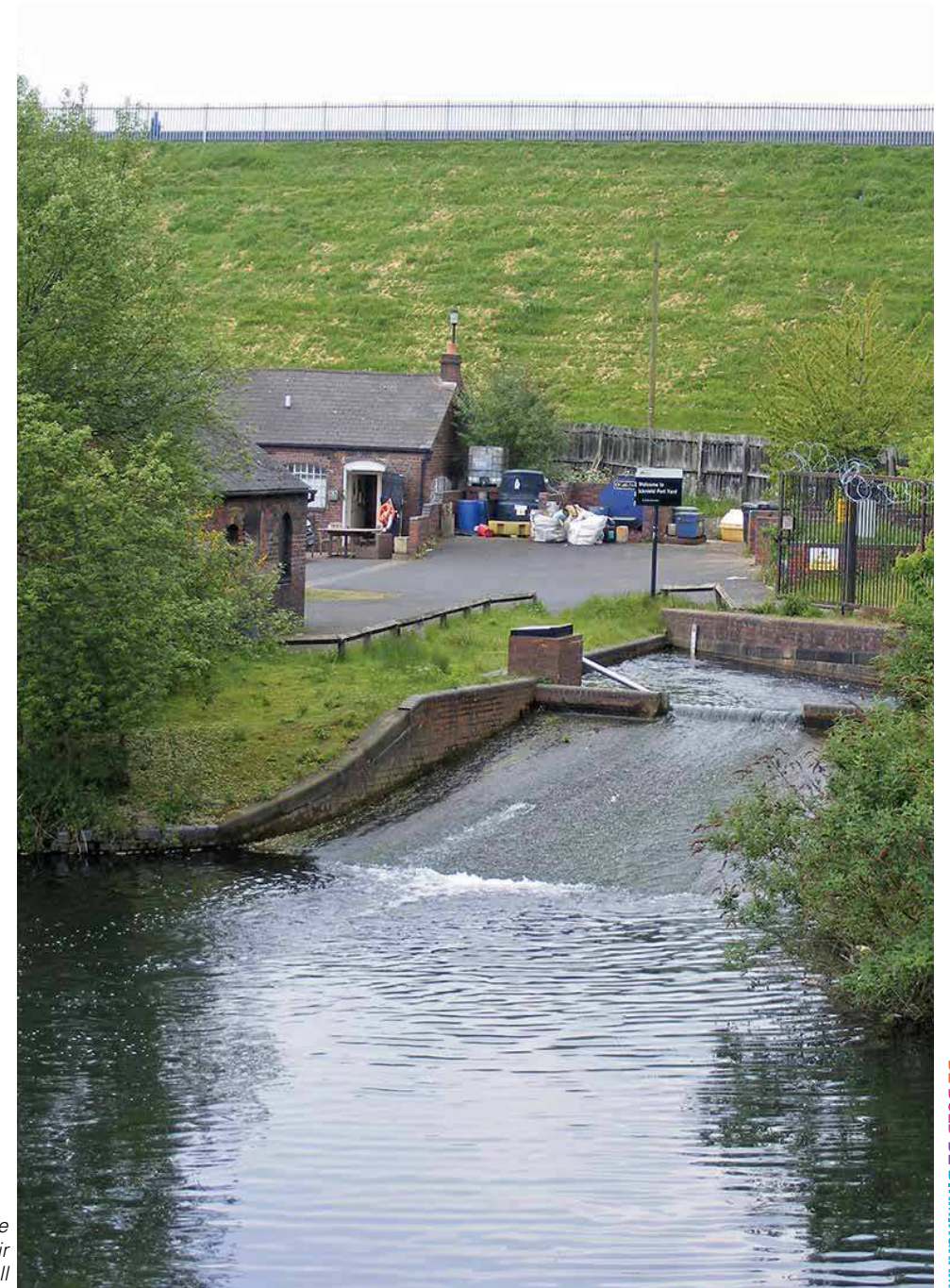
### Character

- All development must be of high-quality, contemporary design to protect and enhance the character of the reservoir and dam, and the setting of heritage assets.
- The open character of the path along the top of the dam and the long-distance views out, particularly towards the city centre skyline, are important aspects of the reservoir experience that should be protected.
- Proposals for buildings taller than the dam wall will only be allowed where they do not unduly detract from openness and views and make a positive contribution to local character. Visual impacts will need to be demonstrated through appropriate 3D models and computer visualisations at the planning application stage.
- Proposals will be required to demonstrate that wind shadowing effects would not have undue adverse impacts on water sport activity.
- Opportunities should be taken to enhance views of the dam wall as a feature within the wider area.

- The roofscapes of buildings need to be carefully considered. Roof top infrastructure and equipment should be sensitively designed with regards to the visual amenity of users of the reservoir and roofs overlooked from the dam wall should be green to enhance views and promote biodiversity.
- At Osler Street, the site furthest from the dam, planning permission has been granted for development of buildings of three to nine storeys.
- The H Suite site lies immediately below the lowest part of the dam. It is considered development here should generally be two to three storeys to remain below the top of the dam wall.
- At the Canal Basin there is potential for a range of building heights and forms, subject to respecting both the historic character of the canal yard and retaining views from the reservoir to the city centre and wider area. Outline planning permission for Port Loop allows for buildings of a range of heights from two to ten storeys high.

- Development across all the sites should contribute to making Icknield Port Road an attractive environment for pedestrians. Development at the H-Suite site should create a strong built frontage. At the Canal Basin, buildings and public spaces should open up the waterfront and maximise the canal's contribution to the character of the area.
- The pump house and feeder chamber at the base of the dam within the H-Suite site are heritage assets that are part of the function and history of the reservoir. They should be enhanced and integrated into public space and could form part of a heritage walk.
- An existing area of trees below the southern end of the dam should be retained and integrated with new green infrastructure.
- All development proposals should be developed in discussion with the Canal & River Trust to ensure features such as the feeder channel, sluice chamber and dam structure are protected and accessible to the Trust.

*Icknield Port Yard illustrating the level change between the reservoir and the base of the dam wall*







Example of residential development with active frontage at ground floor. Wapping Wharf. Alec French Architects  
Image Copyright: Simon Doling

Example of cantilevered, sculptural staircase. Vlooyberg Tower, Tielt-Winge, Belgium.  
Architects/Engineers: Close to Bone  
Image Copyright: Kris van den Bosch



Green roof providing amenity space and harvestable garden. The Commonground at Eskenazi Health, Indianapolis, USA.  
David Ruben, LAND Collective  
Image Copyright: David Ruben, LAND Collective, 2018



Example of repurposed heritage asset and new footway integrated into the public realm. Wapping Wharf.  
Alec French Architects  
Image Copyright: Simon Doling

## Connectivity

- A new pedestrian bridge over the loop canal at the Canal Basin site will connect the reservoir with the Port Loop development, public transport connections on Icknield Port Road and the main line canal towpath to the city centre. The new bridge and associated walking infrastructure should be designed to enhance the distinctive character of the area.
- This new walking route should form part of an expanded network of pedestrian and cycle-friendly routes that include: opening up access to the canal side as part of the Port Loop scheme, a secondary public route between Icknield Port Road and the reservoir through the H Suite site, the new route connecting Osler Street with the canal basin proposed by the former Auto Services site development, and a new path along the base of the dam.
- Development at the Canal Basin should explore the potential of creating a direct link to the reservoir over the dam wall. This should be a distinctive feature of innovative design and local character that protects the heritage and structural integrity of the dam wall.

- A secondary public route connecting Icknield Port Road with the reservoir should be created through the centre of the H Suite site and be focussed on the Pump House. An existing ramped path to the rear of the site could be adapted to connect to the top of the dam by Reservoir House.
- The proposed development on the former Auto Services site has limited public access to the canal. The opportunity to provide further access should be explored.
- Vehicle access and parking should be carefully designed and managed to ensure vehicles are subsidiary to buildings and well-screened from the public realm. Where appropriate, undercroft or basement parking should be considered.
- The use of water taxis will be encouraged.

## Sustainability

- Green infrastructure should be a key element of development, informed by tree and ecological surveys of the site. It should add visual and ecological value by incorporating features such as wildflower meadows and trees. Any green infrastructure on or near the dam wall will need to be discussed with the Canal & River Trust to ensure it does not impact the integrity of the structure.

- Significant trees should be retained and integrated into development proposals.
- The potential to include fruit trees and connect to the wider network of community orchards should be explored.
- Green roofs that promote biodiversity and sustainability should be provided to low and mid-rise buildings, especially where they can be seen from the dam wall.
- Development should make use of passive solar gain and incorporate low or zero carbon energy generation technologies that are appropriate to the site. This could include ground or air-source heat pumps or photovoltaic panels on suitably designed and oriented roofs as well as water source heat pumps, using the reservoir and local canals. Buildings should be highly energy-efficient, constructed using sustainable materials and waste should be minimised.



# Natural Parkland

The natural environment will be protected and enhanced to create a tranquil setting for the local community and visitors. This family-friendly environment will broaden the reservoir offer and ensure biodiversity is protected.

## PLAN 11 Natural Parkland Opportunity Site

### Key

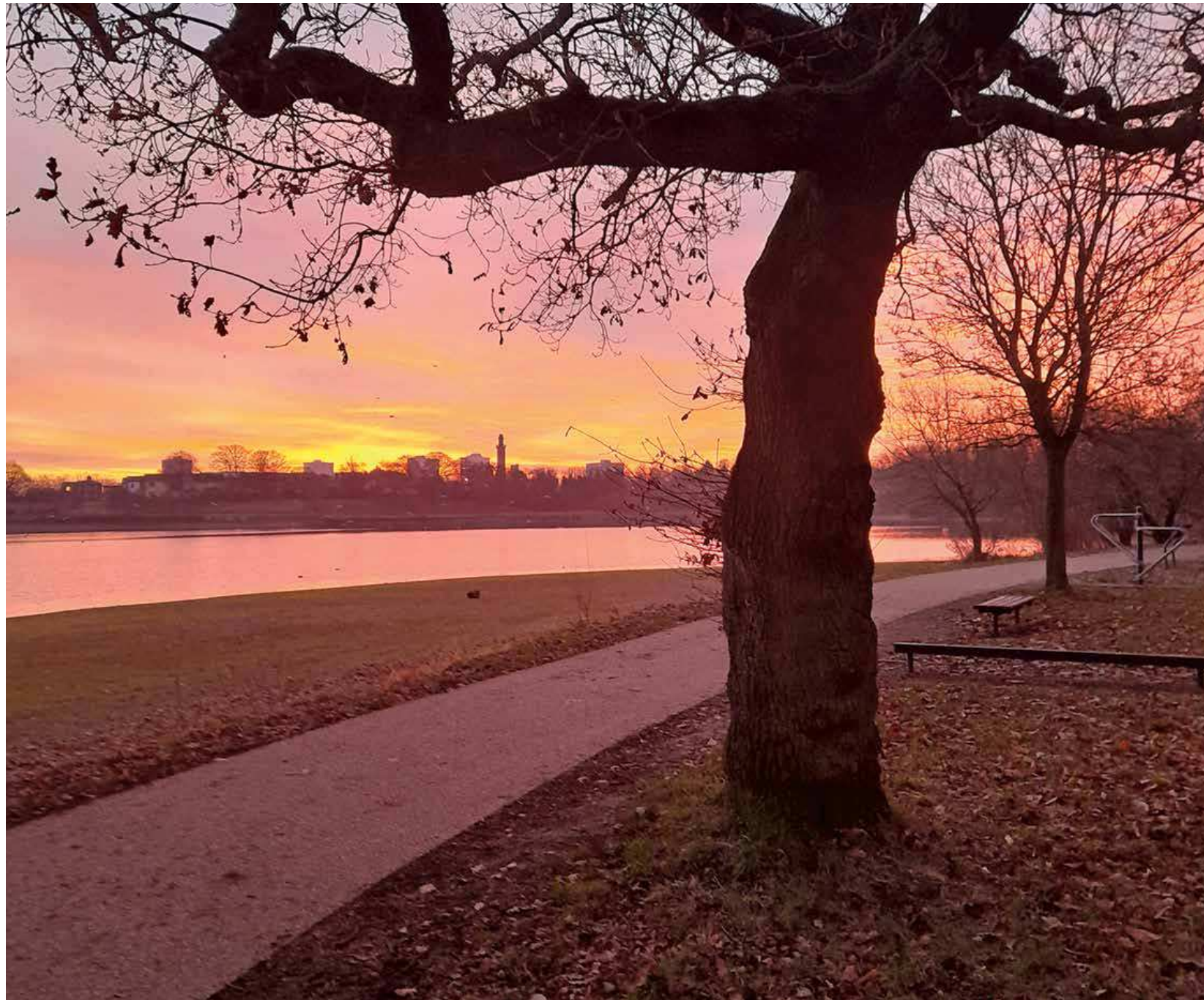
- Masterplan boundary
- Opportunity site
- Reservoir Loop - proposed upgrade
- Reservoir Loop - complete
- Existing connection to be improved
- Entrance - existing/improved
- Entrance - new
- Existing building
- Natural parkland
- Greening of waterfront
- Birmingham Settlement
- Parking facilities



© Crown Copyright. All rights reserved. Birmingham City Council 100021326 (2022).







Sunset at Edgbaston Reservoir  
Image Copyright:  
Birmingham Settlement

### Local Nature Reserve

The natural environment will be protected and enhanced to ensure activity and development at the reservoir does not have a detrimental impact on the Local Nature Reserve.

### Rangers Bungalow

The Rangers Bungalow has been vacant for several years. There is an opportunity to convert the building for a new use that supports activity at the reservoir. Appropriate uses could include leisure, community, commercial and educational facilities. Activity should complement plans at the Birmingham Settlement Playing Field, Port Loop and the former Tower Ballroom Site. If an appropriate viable use does not come forward for the building it should be demolished and returned to nature.

### Birmingham Rowing Club

Birmingham Rowing Club sits within the Natural Parkland area at the eastern edge of the reservoir. It was established at Edgbaston Reservoir in 1873 and plays a vital role in activating the water. It runs courses for beginners of all ages and caters for racers and recreational rowers. The club is home to the charity B-Row that runs access to rowing programmes for the local community and young people. Several other clubs use the facilities, these

include Aston University Rowing Club, Birmingham Canoe Club, Birmingham City University Rowing Club and the University of Birmingham Boat Club.

The club's existing facilities are no longer fit-for-purpose and need to be replaced. Proposals by the club to upgrade their facilities and invest in a new premises at their existing location will be supported. This would help create a welcoming facility that better meets the club's needs, attracts new members and supports community outreach work. Investment in facilities should also improve the environmental sustainability of the building. Vehicular access should be provided for the drop off and collection of boats and associated parking to support the running of the club as part of the reopened public car park.

### The Playing Field

The charity Birmingham Settlement owns the three-acre Playing Field that borders the reservoir to the west. The Settlement has recently developed a small eco-friendly Well-being Centre for community use which will provide a safe, sheltered space for people to meet and engage. The Playing Field will provide activities to support and encourage learning, leisure and social interaction including environmental learning and awareness, arts, crafts, sports, and opportunities to learn about the history and heritage of the reservoir, canals and surrounding area.

Further plans are being developed to provide an activity building, performance area, orchard, and growing areas in line with the history and natural heritage of the site. These developments will create additional community spaces in line with the Settlement's ambition for the field to become a space to learn, relax, and enjoy with flexible, multi-purpose spaces to improve mindfulness and well-being while meeting the interests and needs of differing communities.

Improvements to access should be delivered to ensure the Playing Field is accessible to all and is well-integrated with the wider reservoir site. The Playing Field is adjacent to the Local Nature Reserve and will be expected to make a positive contribution to the sustainability and biodiversity of the reservoir site overall.

### Car park

In the medium to long-term, the existing car park at the reservoir will be reopened in a safe, secure, and managed way to deliver a limited number of spaces for those who need to access the site by private car. The land directly adjacent to the water will be landscaped to improve the biodiversity offer and provide additional seating for reservoir users. Plans will come forward as part of the delivery of Osler Place and design detail will be developed in partnership with key stakeholders including West Midlands Police.



### Activity

- This area of the reservoir should be protected and enhanced for biodiversity in line with the Local Nature Reserve Management Plan.
- Activity should complement and celebrate the natural environment and provide opportunities for people to enjoy connecting with nature.
- Education and recreation activity will be supported, particularly where it promotes interaction with the natural environment.
- Birmingham Rowing Club will be supported in their existing location as long as their building and activities remain in keeping with the character of the Local Nature Reserve.
- The Rangers Bungalow could be sensitively re-used rather than be demolished.

### Character

- The redevelopment of existing buildings within the Local Nature Reserve that are beyond their current footprint is unlikely to be supported unless it can be demonstrated it is needed for operational purposes and is in accordance with the masterplan vision. Proposals will need to demonstrate there will not be a detrimental impact on the Local Nature Reserve.
- Buildings should reflect the surrounding natural setting.

### Connectivity

- Vehicular access and priority parking needs to be carefully managed and designed to ensure the area is not dominated by cars. Parking should be shared by all users and prioritise those who are unable to access the reservoir by foot, bike or public transport. Opportunities for prioritisation to support water activation should be explored.
- The existing car park on the water's edge will be reopened in a secured and managed way.
- Pedestrian and cycle links to the Playing Field should be enhanced.
- Entrances to the reservoir will be improved.

### Sustainability

- The environmental sustainability of this area of the reservoir will be enhanced in line with the Local Reservoir Management Plan (2021), this could include:
  - Creating natural bank edges and marginal planting.
  - Infilling hedgerows with native species.
  - Creating meadow-type grassland areas and insect-friendly wildflower strips.
  - Reed bed creation.
  - Installing hedgehog and bat boxes.
  - Creating features that support nesting, roosting and hibernation. Planting native trees and shrubs.

Example of bespoke, natural play feature  
Image Copyright: Earth Wrights



The reservoir shoreline

The existing outdoor exercise equipment adding to the activity at the reservoir



Birmingham Rowing Club activity

People walking around the reservoir



The Red Shed, Selwyn Road Playing Field  
Image Copyright: Birmingham Settlement



# Edgbaston Waterworks

Subject to the site becoming available for development, Edgbaston Waterworks will deliver high-quality housing-led development that protects and enhances heritage assets.

Edgbaston Waterworks is located on the eastern side of the reservoir. It is owned and operated by Severn Trent and incorporates operational facilities including a covered reservoir. It also features important historic buildings and landmark structures including the Grade II listed Waterworks Tower (pumping station incorporating engine house, boiler house and chimney). The building dates from 1862 and represents an important part of the City's industrial heritage as well as having cultural associations with JRR Tolkien.

The site is allocated in the Birmingham Development Plan for a residential-led development and should the site no longer be required by Severn Trent, it has the potential

to provide high-quality housing designed to complement historic buildings with direct access to the reservoir.

The site is a functioning waterworks facility operated by Severn Trent and, although some of the land and buildings are underused with potential for future redevelopment, facilities such as the covered reservoir are likely to remain in-situ for some time. The site is therefore a long-term opportunity and consideration will need to be given to how it can be redeveloped whilst retaining any required waterworks functions.

On-site improvements to support Severn Trent's operations will be supported, as long as they protect and enhance the setting of historic buildings within the site. In the shorter-term, the site could form part of a trail or other activity that provides information on heritage and the importance of water as a resource.

## PLAN 12 Edgbaston Waterworks Opportunity Site

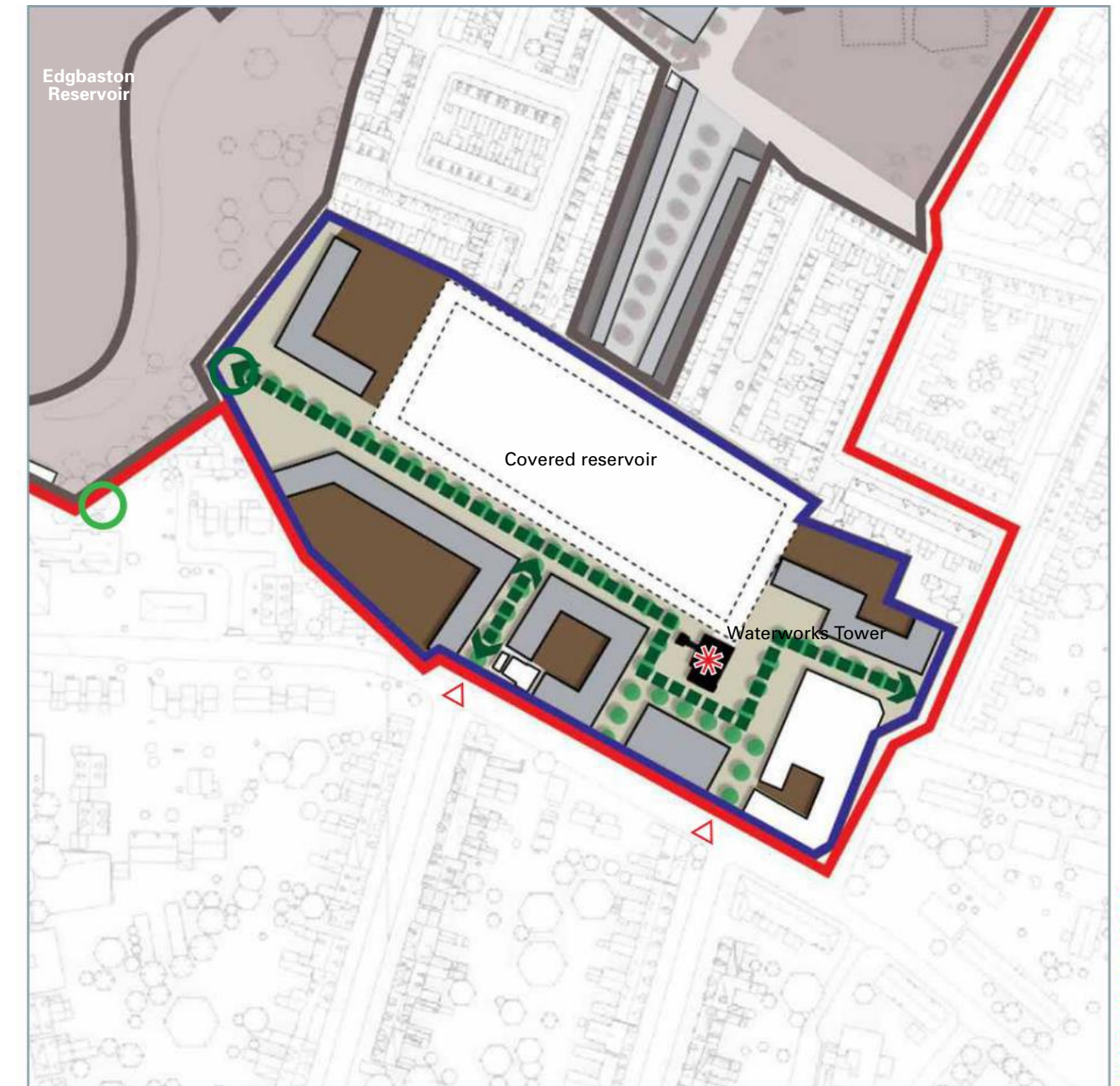
### Key

- Masterplan boundary
- Opportunity site
- New connection
- Existing landmark
- Main vehicular access point
- Entrance - existing/improved
- Entrance - new
- Tree planting
- New building
- Existing building
- Historic building with enhancement works
- Public realm with greening
- Private residential amenity



NORTH

© Crown Copyright. All rights reserved. Birmingham City Council 100021326 (2022).





### Activity

- Increased operations of Severn Trent at the site should bring activity and life to this area of the reservoir through an increased workforce and presence.
- The Waterworks Tower is an important local attraction and there are opportunities to provide information about local history with a 'water theme'. The Tower could also form part of a heritage trail around the reservoir.
- In the longer-term, if the site is no longer required for operational use, it could be an exciting place with a mix of new homes and commercial uses around contemporary public spaces.

### Character

- The Waterworks Tower, as well as other heritage assets including the 1930s building marking the corner of Harold Road and Waterworks Road and the Victorian cottage fronting Waterworks Road should be reused, safeguarded and their setting enhanced.
- New buildings will respect the setting of the site's heritage assets and existing housing to the north and south.
- Buildings should generally be three to four storeys high.
- Trees along the western edge of the site should be retained but allow a new, safe walking link to the reservoir.

### Connectivity

- Development will provide high-quality public streets and spaces within the site forming attractive pedestrian and cycle connections between Waterworks Road and the reservoir. This will contribute to a sign-posted walking route to the water from the tram stop on Hagley Road.
- If redeveloped, enhanced pedestrian linkages should be provided through the site to Edgbaston Reservoir and the wider area.
- Improved walking and cycling links between Edgbaston Reservoir and Waterworks Tower, Perrott's Folly and surrounding residential neighbourhoods will be encouraged.

### Sustainability

- There is potential to better support biodiversity on the site through the introduction of green infrastructure in particular green roofs.
- The site has several historic and interesting buildings that should be sensitively re-used, safeguarded and enhanced.
- Development should make use of passive solar gain and incorporate low or zero carbon energy generation technologies that are appropriate to the site. This could include ground or air-source heat pumps or photovoltaic panels on suitably designed and oriented roofs as well as water source heat pumps, using the reservoir and local canals. Buildings should be highly energy-efficient, constructed using sustainable materials and waste should be minimised.
- Consideration should be given to whether sustainable drainage can be designed to maximise its location next to the reservoir.
- Green infrastructure should be incorporated as part of the main route through the site connecting to the reservoir.

The Edgbaston Waterworks Tower





## Opportunity

## Celebrating the Reservoir

The rich character, history and natural environment of the reservoir will be celebrated through art, walking trails, information and cultural activity.

*An example of the reservoir's engineering heritage which positively contributes to the rich character of the area*





### Activity

- Building on work already undertaken by the community in collaboration with the Roundhouse a sign-posted walking trail could celebrate the heritage and culture at the reservoir and provide a key visitor attraction. The route could connect the reservoir to the historic Roundhouse in the city centre along the canal network. The Roundhouse is a collaboration between the Canal & River Trust and the National Trust to develop a creative hub (visitor centre, café, exhibition and office space) and the base for a range of city and canal tours based in a Grade II\* Listed former Birmingham Corporation stables and stores.
- The proposed walking trail will encourage movement between buildings such as Perrott's Folly and Edgbaston Waterworks Tower. These towers are thought to have influenced JRR Tolkien to write 'The Two Towers' in the Lord of the Rings series. This could also help to highlight the historic features of the reservoir and important role the reservoir played in the industrial history of the city.
- Information boards will provide material on the natural environment, habitats and species found at the reservoir. This could be expanded to provide information on the function of the reservoir and its relationship with the canal. There is potential to link to the role of water more widely, connecting with Severn Trent who own the Edgbaston Waterworks site.

- Trails and information boards should, where possible, celebrate the social history, people and communities that have shaped the reservoir as well as the built and natural assets.
- The former Tower Ballroom site and the Playing Field will provide opportunities for communities, local groups and visitors to come together and celebrate the reservoir through culture, art and learning. This could include spaces and facilities that enable neighbouring communities to continue engaging in creative and cultural activities focused on the social significance of the reservoir.
- Opportunities to celebrate and promote the role of the reservoir as a location for water sports will also be encouraged and supported.

### Character

- Improvements to entrances, signage and information boards will be expected to enhance the reservoir and reflect its character.
- Opportunities for new public art that celebrates the reservoir and its unique character should be explored in collaboration with reservoir users. This could include relocating the Charles Blondin Statue that depicts his tightrope walk across the reservoir in 1873.

- There are potential locations for murals, street art and other forms of public art that celebrate the reservoir and the activity that takes place in this unique location. This could include the public square at Osler Park and Osler Place and walls at Midland Sailing Club and the wall next to Birmingham Rowing Club. The use of temporary hoardings as part of development opportunities for public art, street art or to display information of the reservoir will also be supported. Any such projects should bring the community together in their creation and involve young people from surrounding communities.

### Connectivity

- The introduction of trails and signage in and around the reservoir should support improved connectivity to the surrounding area. This will encourage visitors to access the reservoir via walking, cycling and public transport.

### Sustainability

- Features and activities that promote education on sustainability and nature conservation will be supported. This could include space for learning such as forestry schools, information boards or public art that reflects nature.
- There is the potential to expand fruit tree planting around the reservoir area, linking to a linear orchard along the canal.



Example of community growing activity  
Image Copyright: Shaw & Shaw Photography and Port Loop (Urban Splash, Places for People, Canal & River Trust and Birmingham City Council)

The Charles Blondin statue



Example art mural, Perry Park



Perrott's Folly



# 6

## Delivery and Management

Delivering the vision and principles of this masterplan will require a comprehensive, partnership-based approach.

### Partnerships

The long-term success of the site will be dependent upon continuing engagement with stakeholders, local residents and reservoir users. This will include partnership working with the Canal & River Trust, Sport England, landowners and the existing water user groups.

The management of the natural area within the Local Nature Reserve boundary will be managed in line with the Local Nature Reserve Management Plan. This provides guidance on the long-term maintenance and enhancement of the natural environment. The Local Nature Reserve Committee are anticipated to play an increased role in the management of the natural environment, providing the structure to facilitate increased community participation and stewardship at the reservoir in order to maintain and enhance the natural environment.

Opportunities for partnership working with Homes England, West Midlands Combined Authority and Transport for West Midlands, West Midlands Police and others will be explored to support growth in the area.

### Funding

The masterplan will provide a basis for the council and partners to bid for funding for projects to improve the reservoir. To date, the council has secured Section 106 funds which have been used to support infrastructure investment, including pathway improvements at the reservoir. The masterplan will be used to guide how further Section 106 money is spent if more becomes available as a result of future development.

Planning proposals that state the reservoir contributes to their open space provision in order to meet the requirements set out in BDP Policy TP9 and the Public Open Space in New Residential Development SPD, will be expected to financially contribute to the enhancement of the reservoir. Contributions will be used to deliver the vision and

The long-term *success* of the site will be dependent upon continuing engagement with stakeholders, local residents and reservoir users

Waterside walkway. Paprocany Lake Waterfront, Tychy, Poland. RS+ Robert Skiteck Architects  
Image Copyright: Tomasz Zakrzewski



Examples of award winning housing projects, integrating innovative architecture, high-quality materials, detailing and green spaces

Accordia, Cambridge, UK. Feilden Clegg Bradley Studios  
Image Copyright: Tim Crocker



Goldsmith Street, Norwich, UK. Mikhail Riches Architects  
Image Copyright: Tim Crocker

proposals within this masterplan. As mandated through the 2021 Environment Act, Biodiversity Net Gain will be delivered on-site or off-site and will be funded through developer contributions.

Other public sector funding will also be explored to deliver the vision for the reservoir. The council will work with partners, including the community and existing water user groups, to unlock funding at the reservoir.

### Infrastructure

As the communities in the masterplan area grow and change over time, their needs will also change. Ongoing assessment across the masterplan area and more widely will identify needs, and plan for delivery of new and improved healthcare, medical and well-being, and education facilities. When new infrastructure is needed, innovative models for delivery and service provision should be explored. This work will require collaboration with delivery partners responsible for each of the different types of infrastructure, spaces, and facilities.



Waterside walkway. Paprocany Lake Waterfront, Tychy, Poland. RS+ Robert Skiteck Architects  
Image Copyright: Tomasz Zakrzewski

Opportunities

The council will actively work with stakeholders in the area to deliver the vision for the reservoir and secure high-quality development. Early engagement will be essential throughout the planning process. As set out in the Community Principles developers will be expected to explore opportunities to work in collaboration with the community and existing water user groups.

The council will utilise its land assets to maximise regeneration benefits and secure the overall masterplan vision. A partner(s) will be secured to bring forward a comprehensive redevelopment of

the former Tower Ballroom Site. The development partner(s) will be required to work closely with the community and demonstrate how the vision, and development and community principles of the masterplan, can be achieved in order to deliver a high-quality place. The redevelopment will need to integrate the proposals for the Sea Cadets’ site, and the creation of the walkway and public open spaces within the overall scheme.

The following table summarises the opportunities identified within the masterplan as projects and highlights who would be responsible for delivering the project, including where partnership working

will be required to achieve an optimal result. The table also outlines potential methods to deliver the projects and is ordered by the suggested timescales.

Timescales are defined as follows:

- Short-term - 1 to 5 years.
- Medium-term - 5 to 10 years.
- Long-term - 10 years plus .

All projects will require further design and/ or technical studies and, in many cases, public consultation throughout the process.

Opportunity area	Project	Proposed delivery partners	Proposed method/ funding source	Timescale for delivery
Reservoir Loop	Pathway improvements work Phase 1 and 2.	Birmingham City Council.	S106 funding.	Short-term.
Reservoir Link	Improve design of dam wall fence.	Canal & River Trust.	Landowner delivery.	Medium-term.
Reservoir Link	Rubber Works site - residential scheme.	Landowner and developer partnership.	Landowner and developer partnership.	Short-term.
Reservoir View	Improvements to pathway behind the building and the environmental sustainability of the building.	Midland Sailing Club, Sport England, Birmingham City Council, Canal & River Trust, Severn Trent.	Sport England funding for first stage of improvements to building. S106 funding.	Short-term.
Osler Park and Osler Place	Reactivate Reservoir Lodge.	Birmingham City Council, occupier, Historic England.	Partnership between Birmingham City Council and future occupier.	Short-term.
Osler Park and Osler Place	Improvements to facilities at Sea Cadets.	Birmingham City Council, Sea Cadets, Sport England.	Sea Cadet funded redevelopment of existing site.	Short-term.

Opportunity area	Project	Proposed delivery partners	Proposed method/ funding source	Timescale for delivery
Natural Parkland	Secure Green Flag status for the reservoir.	Birmingham City Council, Canal & River Trust, Local Nature Reserve Committee, Wildlife Trust, Severn Trent.	Environmental/biodiversity project funding sources.	Short-term.
Natural Parkland	Birmingham Settlement Well-being Centre.	Birmingham Settlement.	Funded by Birmingham Settlement.	Short-term.
Celebrating the Reservoir	Art/culture/history trail/promoting water sports/ information boards and public art etc.	Birmingham City Council, Canal & River Trust, Severn Trent, Urban Splash, community groups, National Trust, existing water clubs.	Art/cultural/sports project funding sources.	Short to medium-term.
Natural Parkland	Reactivate the Rangers Bungalow and find a use that supports the masterplan vision.	Birmingham City Council, future occupiers.	Potential partnership between Birmingham City Council, future occupier and/or developer.	Medium-term.
Natural Parkland	Reopen the existing car park in a secure and managed way.	Birmingham City Council, West Midlands Police.	Potential partnership between Birmingham City Council, future occupier/ developer.	Medium-term.
Natural Parkland	Improvements to facilities at Rowing Club.	Birmingham Rowing Club, Birmingham Canoe Club, Sport England, Universities.	Community sport funding sources.	Medium-term.
Reservoir Link	H Suite - residential led redevelopment.	Birmingham City Council, Canal & River Trust, developers, landowners.	Landowner/leaseholder delivery.	Medium-term.
Reservoir Link	Deliver a new pedestrian crossing at Icknield Port Road.	Birmingham City Council, Urban Splash.	Urban Splash.	Medium-term.
Reservoir Link	Canal Basin - residential led redevelopment.	Birmingham City Council, Canal & River Trust, Urban Splash.	Partnership between landowner and developer.	Medium-term.
Reservoir View	Optimise the use of Reservoir Cottage and Reservoir House.	Canal & River Trust, Midland Sailing Club, future occupiers, other partners subject to detailed plans for the future use of the site.	Partnership between Canal & River Trust and existing/ future occupiers.	Medium-term.



Opportunity area	Project	Proposed delivery partners	Proposed method/ funding source	Timescale for delivery
Osler Park and Osler Place	Redevelop Tower Ballroom site to provide a residential, community and commercial mixed-use scheme.	Birmingham City Council, Social Housing Providers, Birmingham Rowing Club, Sea Cadets, Sport England.	Developer partnership.	Medium-term.
Osler Park and Osler Place	Walkway and public realm.	Birmingham City Council, developer partner.	Developer partnership/ contributions.	Medium-term.
Osler Park and Osler Place	Deliver new homes on Tower Mount site.	Birmingham City Council, landowner.	Landowner and developer partnership.	Medium-term.
Osler Park and Osler Place	Improve facilities at Osler Street Park.	Birmingham City Council, others depending on the nature of the scheme.	Developer contributions.	Medium-term.
Reservoir Link	Deliver pedestrian connections between the reservoir and canal.	Birmingham City Council, Canal & River Trust, Urban Splash.	Landowner and developer partnership.  Infrastructure funding.	Some medium and some long-term.
Connectivity	Optimise accessibility of the reservoir by pedestrian, cycle and public transport routes and delivery of a Mobility Hub.	Birmingham City Council, Transport for West Midlands, Midland Trains, Canal & River Trust, Sport England, landowners.	Infrastructure funding.	Some medium and some long-term.
Reservoir Link	Protection and enhancement of Icknield Port Yard.	Canal & River Trust.	Canal & River Trust investment with potential for historic or cultural funding sources.	Long-term.
Edgbaston Waterworks	Residential scheme.	Severn Trent.	Landowner and developer partnership.	Long-term.



Sunset at the reservoir

# Contact

**Birmingham City Council**

**Web:**  
[www.birmingham.gov.uk/edgbaston-reservoir-spd](http://www.birmingham.gov.uk/edgbaston-reservoir-spd)

**E-mail:**  
[planningandregenerationenquiries@birmingham.gov.uk](mailto:planningandregenerationenquiries@birmingham.gov.uk)

**Post:**  
North West Development Team  
Birmingham City Council  
PO Box 28  
Birmingham  
B1 1TU

If you require this document in an alternative format please contact us. Requests for the document in alternative formats will be considered on a case by case basis including large print, another language and typetalk.

© Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings. Birmingham City Council. Licence number 100021326, 2022.





OurFuture Edgbaston Reservoir CityPlan

**BE BOLD BE BIRMINGHAM**

October 2022



Page 183 of 674





# Birmingham City Council

## Edgbaston Reservoir Masterplan SPD

### Consultation Statement

---

#### 1. Introduction and purpose of the Consultation Statement

Birmingham City Council consulted on the Revised Edgbaston Reservoir Masterplan Draft Supplementary Planning Document (SPD) from 4th March to the 15th April 2022. This statement sets out the engagement strategy, describes the level and type of responses received, the main issues raised and how they have been addressed in the redrafted masterplan. The statement demonstrates that the process has been in accordance with the adopted Birmingham Statement of Community Involvement (SCI).

#### 2. Consultation frontloading

##### Public Consultation and Engagement

The Council undertook a first round of public consultation for twelve weeks from 3rd May to the 26th July 2019.

A “Community Consortium” formed in response to the public consultation and submitted a community-led ‘alternative’ vision for the reservoir as a formal representation. After the consultation period closed, following requests for the Council to work more closely with the community and water sport clubs, the Council set up a Community Partnership Forum with representatives of the Community Consortium.

The council worked closely with the Community Partnership Forum, sharing drafts of the masterplan and incorporating their suggested changes where appropriate and feasible. Details of the Community Partnership Forum can be found in Annexe A.

The first round of consultation, and the work with the Community Partnership Forum, informed the document which has now been consulted upon.

Further details of the first round of consultation and of the work of the Community Partnership Forum were included in a Consultation Statement which formed part of the Executive Report which gave authority for the second round of consultation, and was published as part of the consultation material. This can be viewed at:

[https://www.birminghambeheard.org.uk/people-1/revised-edgbaston-reservoir-masterplan/supporting\\_documents/Consultation%20Statement.pdf](https://www.birminghambeheard.org.uk/people-1/revised-edgbaston-reservoir-masterplan/supporting_documents/Consultation%20Statement.pdf)

##### Strategic Partner engagement

During the production of the Draft Masterplan SPD an Edgbaston Reservoir Masterplan Steering Group was set up. The group consists of the Birmingham Parks and Planning Department as well as the Canal & River Trust and Sport England due to their role in land ownership and delivery. The group meets regularly to shape the masterplan and will continue to work together to deliver the masterplan vision.

### **3. Formal Public Consultation**

A second round of public consultation that built on the frontloading discussions and addressed where appropriate the representations made at the previous formal consultation, was held for six weeks from 4th March to 15th April 2022. The consultation followed the principles set out in the Birmingham Statement of Community Involvement (SCI). Consultation materials consisted of:

- The revised Draft Masterplan (available at [https://www.birminghambeheard.org.uk/people-1/revised-edgbaston-reservoir-masterplan/supporting\\_documents/Revised%20Edgbaston%20Reservoir%20Masterplan%20Draft%20Supplementary%20Planning%20Document.pdf](https://www.birminghambeheard.org.uk/people-1/revised-edgbaston-reservoir-masterplan/supporting_documents/Revised%20Edgbaston%20Reservoir%20Masterplan%20Draft%20Supplementary%20Planning%20Document.pdf))
- Exhibition material shown at a public consultation event (further details in section 4 below)
- Notification letter (Annexe B(i)) sent to all addresses (homes and businesses) within the plan shown in Annexe B(ii)
- 10 posters that set out how to access the plan, the details of the consultation event, and the lead planning officer's contact details (see Annexe C(i)) put up around the reservoir (see Annexe C(ii))
- A Frequently Asked Questions document (available at [https://www.birminghambeheard.org.uk/people-1/revised-edgbaston-reservoir-masterplan/supporting\\_documents/Edgbaston%20Reservoir%20Masterplan%20FAQs%20March%202022%20.pdf](https://www.birminghambeheard.org.uk/people-1/revised-edgbaston-reservoir-masterplan/supporting_documents/Edgbaston%20Reservoir%20Masterplan%20FAQs%20March%202022%20.pdf))
- Online questionnaire on Be Heard (see Annexe D)
- A paper questionnaire (see Annexe E)
- A 12-minute video which explained the changes made to the previous masterplan, provided an overview of the vision, development principles and opportunity sites and explained how consultation responses could be submitted, available at <https://youtu.be/tqNTjft7EHA>
- Press release and social media posts signposting the public to the consultation material including a video from the Leader of the Council encouraging people to read the masterplan and submit feedback.

Emails and/or letters were also sent to all those who responded to the first round of public consultation and all contacts on the Planning and Development Consultation Database, including but not limited to:

- Residents' associations
- Community groups
- Neighbourhood forums
- Ward councillors
- Local Members of Parliament
- Local educational institutions



- West Midlands Combined Authority
- Neighbouring local authorities
- Chambers of commerce
- Local Business Improvement Districts (BIDs)
- Greater Birmingham and Solihull Local Enterprise Partnership
- Disability user groups
- Landowners
- Developers and agents

Paper copies of the Draft Masterplan SPD and questionnaire were available at the locations listed below. A freepost address was also provided for consultees to submit comments.

- The Library of Birmingham
- Spring Hill Library
- Woodcock Street Offices
- Ladywood Health and Community Centre (available for the last four weeks of the consultation)
- Red Shed, Selwyn Playing Field (available for the last four weeks of the consultation)

Members of the public and other stakeholders were able to respond to the consultation via the online questionnaire, email or letter. Printed copies of the document and a response form were also made available on request, including more than 30 copies shared with representatives of community organisations.

#### **4. Consultation Event**

A drop-in event was held at Ladywood Health and Community Centre on Tuesday 15<sup>th</sup> March between 3pm and 7pm.

Consultation materials were available to view which provided information on the masterplan content and explained how to respond to the consultation. These materials comprised a series of exhibition posters – one for each ‘chapter’ or section of the masterplan, and one which explained the changes made as a result of the first consultation and the work with the Community Partnership Forum.

Planning Officers were present to answer questions and printed copies of the document were available to take away. Contact slips were also available for the public to take away. These set out details of how to contact the planning team and the masterplan website.

Approximately 50 people attended over the course of the drop-in event and several issues were raised and discussed, including:

- Support for the amendments made to the previous draft masterplan
- Opposition to housing development and / or commercial uses on the former Tower Ballroom site
- Concern about privatisation of public space
- Support for the retention and improvement of Osler Street Park

- Creative restoration/reuse of the existing Tower Ballroom would be more environmentally friendly
- Requests for affordable and social housing
- Requests the building line of development on the Tower Ballroom site is further set back from the waters' edge
- Concerns future development and increased visitors will have a detrimental impact on the Local Nature Reserve
- Concerns new development will destroy existing views around the reservoir including from the dam wall
- Concerns proposals will intensify traffic issues on the local road network
- Requests for more detail in the masterplan regarding the location and management of car parking

Stakeholders had the opportunity to submit written comments during the event on the consultation materials that were on display. These are set out in Annexe F.

## **5. Consultation undertaken by Edgbaston Reservoir Collaborative (ERCO)**

It is understood that ERCO organised several activities during the consultation period including:

- Producing and handing out postcards at the reservoir encouraging people to respond to the consultation
- Running an event with a presentation to discuss the masterplan
- Producing and sharing a template consultation response to be submitted to the council

## **6. Key findings from the formal consultation**

Approximately 380 representations were submitted to the consultation. This included 83 questionnaires completed online and 128 emails and letters and 167 postcards submitted. It should be noted that some individuals may have responded multiple times through different channels. Overall, the council's 12-minute video explaining the masterplan has been viewed over 530 times.

The main points raised during the consultation are summarised below:

- Support for the vision and principles in the masterplan
- Support for the Sustainability chapter and increased emphasis on the natural environment
- Objections to the principle of housing on the former Tower Ballroom site
- Opposition to commercial uses on the former Tower Ballroom site
- Requests for affordable and social housing
- Concerns that new development will create private ownership of the site
- Requests that the building line is further set back from the waters' edge
- Concerns that future development and increased visitors will have a detrimental impact on the Local Nature Reserve
- Concerns that development will generate traffic on local road network
- Requests that public car parking is available for disabled and vulnerable groups

- Requests for more detail in the masterplan regarding the location and management of car parking
- Requests for the historic and natural environment to be protected and enhanced
- Requests that the reservoir is accessible to all
- Detailed representations from site owners requesting some amendments to the wording on projects
- Concerns that there is insufficient infrastructure (education and medical), to support increased residents.

Organisations as well as individuals responded to the consultation. These include but are not limited to:

- Midland Sailing Club
- Birmingham Rowing Club
- The Canal & River Trust
- Sport England
- Karis Medical Centre
- Worcester Birmingham And Droitwich Canals Society
- Historic England
- National Gird
- Natural England
- House by Urban Splash
- The Environment Agency
- Inland Waterways Association (Birmingham, Black Country and Worcestershire Branch)
- Marine Society and Sea Cadets
- Birmingham Settlement
- Push Bikes
- West Midlands Police
- Birmingham Civic Society
- Calthorpe Estate
- Severn Trent
- The Coal Authority
- Premier Living Group

## **7. Outcomes of the Consultation**

The representations received during the consultation period, from responses to the Be Heard questionnaire and letters, emails, and postcards, are summarised and responded to in a table in Annexe G. A summary of the representations received from the ERCO event, and the council's response to these, is provided at Annexe H. These tables also identify any changes to the masterplan as a result of the consultation.

The main revisions to the Draft Masterplan SPD as a result of the consultation representations are:

- Amendments to the context chapter to reflect policies that have been adopted since the previous consultation.
- Amendments to the proposed design of the Osler Park and Osler Place (former Tower Ballroom Site) to set the building line further back from the waters' edge to create a wider public walkway with increased green infrastructure and deliver a public square.
- Amendment to reopen the existing car park at the reservoir to deliver a reduced number of spaces in a secure and well-managed way.
- Amendment to guidance regarding Biodiversity Net Gain to ensure the SPD aligns with latest national guidance.
- Addition of definition of short, medium, and long-term in the Delivery and Management chapter to inform future delivery.



## **Community Partnership Forum**

After the first public consultation period had closed, following requests for the Council to work more closely with the community and water sport clubs, the council decided to set up a Community Partnership Forum with representatives of the Community Consortium who submitted an 'alternative plan'. The purpose of the forum is to enable the council to work with the community to better align the vision of the Draft Masterplan SPD with the vision of the alternative plan.

Members of the forum comprise both council officers (mainly from the Planning and Parks departments), and an individual to represent the following organisations:

- Friends of Edgbaston Reservoir;
- Midland Sailing Club;
- TS Vernon Sea Cadets;
- Birmingham Rowing Club;
- Birmingham Settlement;
- Artscoop Central;
- Eat Make Play;
- Edgbaston Reservoir Local Nature Reserve Committee; and
- Save Osler Street Park Campaign

A Terms of Reference was set written and agreed by members of the forum. It sets out the membership of the forum and was updated in June 2020 to reflect the new approach to working due to the Covid-19 pandemic.

Five forum meetings were held in person between 8<sup>th</sup> January and 6<sup>th</sup> February 2020, these covered the following topics:

- Launch and masterplan vision;
- Community Principles;
- Tower Ballroom site discussion with urban design officers;
- Connectivity with transport planners; and
- Natural Parkland with ecology officer and representative from the Birmingham and Black Country Wildlife Trust

The forum methodology was amended in light of the Covid-19 pandemic. As members of the forum were unable to meet in person, the meetings were moved online, and community members of the forum commented on and redrafted parts of the masterplan over the course of several months. Planning officers were the ultimate pen holder but worked closely with community members to reflect their additions and opinions and seek compromise where possible. Five meetings were held online using zoom to discuss masterplan content, one meeting was used to explain and discuss financial viability.

## Letter to local community re: consultation



Planning and Regeneration



Dear Sir/Madam,  
**Public Consultation on the revised draft Supplementary Planning Document for Edgbaston Reservoir.**

On 4th March 2022, Birmingham City Council launched the public consultation for the revised Edgbaston Reservoir Masterplan Draft Supplementary Planning Document (SPD).

You have been notified of this consultation because you live or work near to the reservoir.

The reservoir is an important open space for the city. It provides significant value in terms of ecology, biodiversity and heritage, and is a destination for water-based sport and recreation. Part of the land within the masterplan boundary is a Local Nature Reserve and Site of Importance for Nature Conservation.

In 2017, the Birmingham Development Plan (BDP) was adopted by the city council as part of the city's statutory planning framework, guiding decisions on development and regeneration activity. This plan identified Greater Icknield as an area for growth, and highlighted Icknield Port Loop and the Tower Ballroom Site as major opportunities. It allocated them to provide a mix of innovative family housing, commercial, and community uses. The masterplan will provide further guidance on the BDP allocations, providing a clear vision for their delivery.

The purpose of this masterplan is to provide a shared vision for the reservoir, and ensure future development adds value to the area.

In 2019, the council prepared a draft SPD for Edgbaston Reservoir and undertook public consultation between May and July. In January 2020, the council established a Community Partnership Forum to engage with representatives from the local community and existing water users on the masterplan redraft. The masterplan has now been revised to take into consideration the response to the formal consultation and the ongoing engagement with the forum and existing water clubs.

Since the previous consultation there has been several significant changes to the proposals within the draft masterplan. Therefore, a second round of focussed public consultation is now being undertaken.

[planningportal.gov.uk](https://planningportal.gov.uk) | Check if you need planning permission | make planning applications online | [birmingham.gov.uk/planning](https://birmingham.gov.uk/planning) | Comment on planning applications | search for planning applications and appeals | submit a pre application enquiry | policy information | Regeneration in Birmingham



Planning and Regeneration  
PO Box 28, Birmingham B1 1TU



The public consultation on the draft masterplan runs for six weeks. You can get involved in the public consultation by:

- Heading to [www.birminghambeheard.org.uk/people-1/revised-edgbaston-reservoir-masterplan](https://www.birminghambeheard.org.uk/people-1/revised-edgbaston-reservoir-masterplan) where you can view the draft masterplan, and submit your comments via the online survey.
- Viewing paper copies of the draft masterplan at Spring Hill Library, the Library of Birmingham, and 10 Woodcock Street, Birmingham, B7 4BL.
- You can also submit comments to [planningandregenerationenquiries@birmingham.gov.uk](mailto:planningandregenerationenquiries@birmingham.gov.uk), or North West Planning and Development Team, Birmingham City Council PO Box 28, Birmingham, B1 1TU.
- Attending our event on 15<sup>th</sup> March between 3pm and 7pm at Ladywood Health and Community Centre, 204 - 206 St. Vincent Street West, Ladywood, Birmingham B16 8RP

The public consultation on the draft masterplan closes on the **15<sup>th</sup> April 2022**. Following this, comments will be taken into consideration and the final document will be prepared. It is the intention to seek city council approval to adopt the SPD in late summer 2022 as part of the city council's planning framework.

Please contact the North West Planning team on the details below if you require any further information. I encourage you to share your views.

Yours faithfully,

Ian Macleod

**Director Planning, Transport and Sustainability – Inclusive Growth**

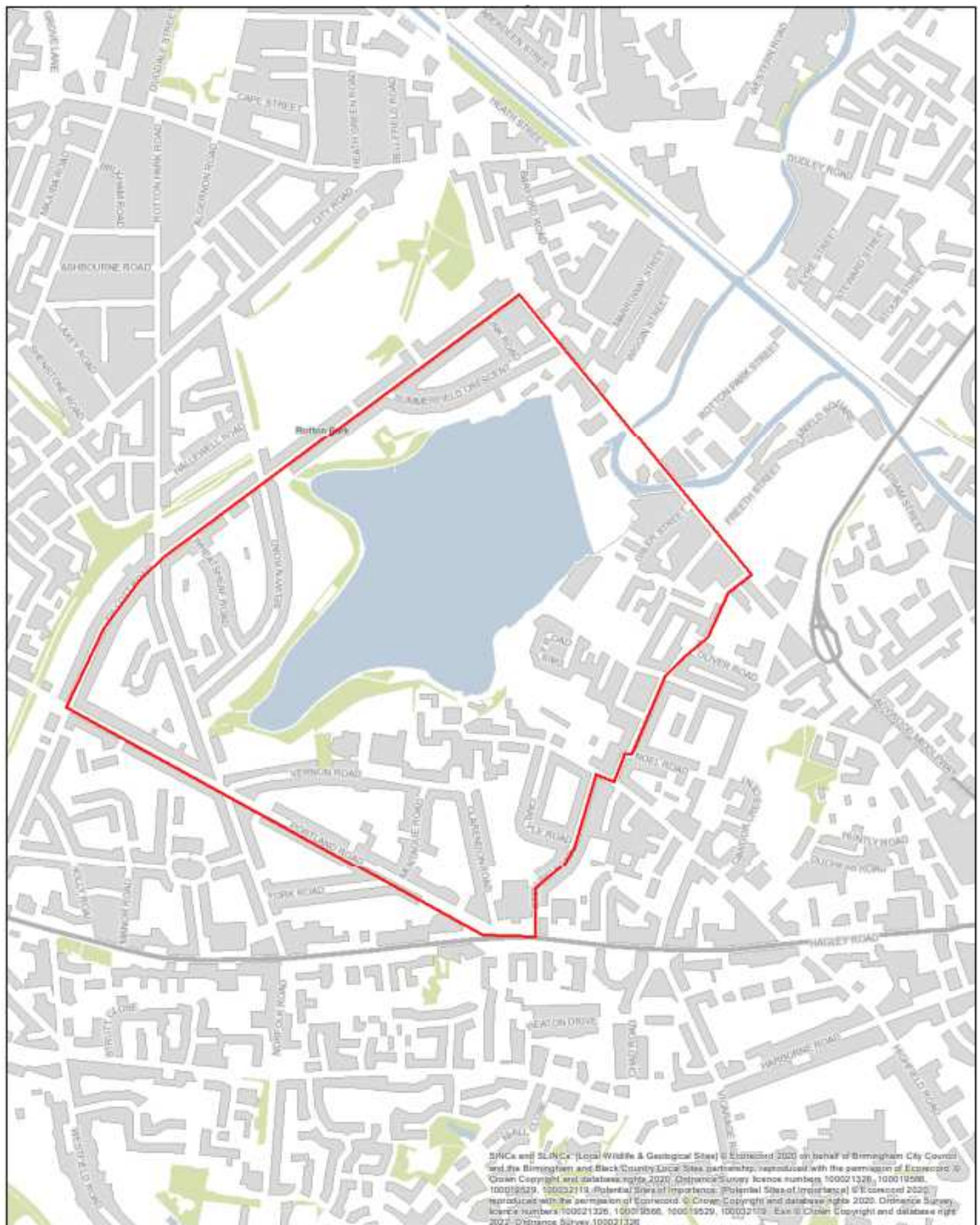
**North West Planning Team Contact Details:**

Alice Jones, Senior Planning and Development Officer,  
Telephone No: 07517 536 426

Email Address: [alice.x.jones@birmingham.gov.uk](mailto:alice.x.jones@birmingham.gov.uk)

[planningportal.gov.uk](https://planningportal.gov.uk) | Check if you need planning permission | make planning applications online | [birmingham.gov.uk/planning](https://birmingham.gov.uk/planning) | Comment on planning applications | search for planning applications and appeals | submit a pre application enquiry | policy information | Regeneration in Birmingham


## Notification Area




Site notice poster

**Birmingham**  
City Council

Planning and Regeneration

Have you visited yet? Search Services ONLY  
[birmingham.gov.uk](http://birmingham.gov.uk)



## Consultation on the revised Edgbaston Reservoir Masterplan Draft Supplementary Planning Document

Birmingham City Council would like your views on the revised Edgbaston Reservoir Masterplan Draft Supplementary Planning Document.

**The public consultation is open from 4<sup>th</sup> March to 15<sup>th</sup> April 2022**

To have your say, you can:

**Visit** [www.birminghambeheard.org.uk/people-1/revised-edgbaston-reservoir-masterplan](http://www.birminghambeheard.org.uk/people-1/revised-edgbaston-reservoir-masterplan) to read the revised draft masterplan and complete the online questionnaire.

**Email** us your formal consultation response to [PlanningandRegenerationEnquiries@birmingham.gov.uk](mailto:PlanningandRegenerationEnquiries@birmingham.gov.uk)

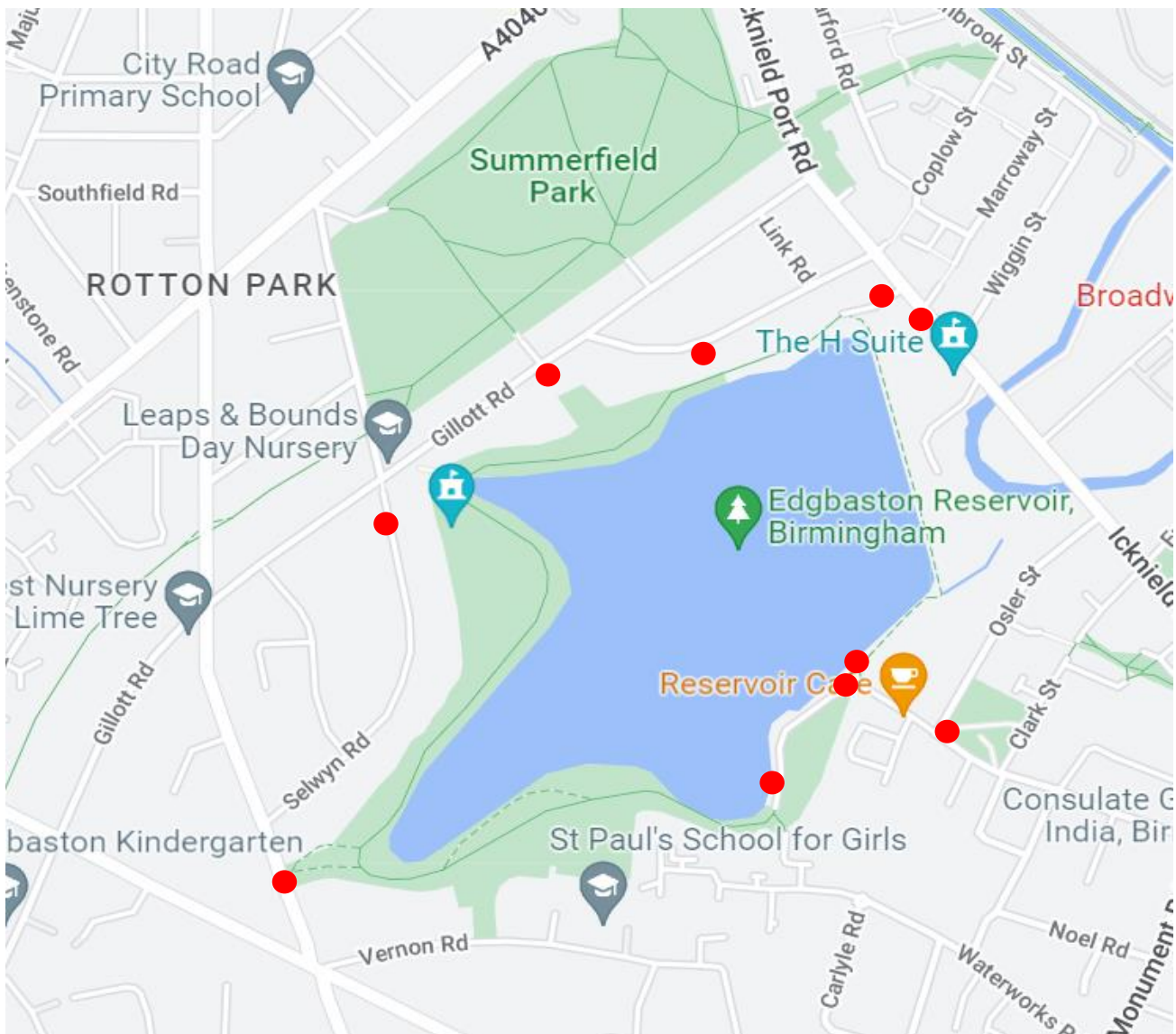
**Write** to us with your comments at: [North West](#) Planning and Development Team, PO Box 28, Birmingham, B1 1TU

**Attend** our drop-in event on 15<sup>th</sup> March between 3pm and 7pm at Ladywood Health and Community Centre, 204 - 206 St. Vincent Street West, B16 8RP

**View** the Consultation Document at Spring Hill Library, the Library of Birmingham, or 10 Woodcock Street, Birmingham, B7 4BL



### Location of site notice posters



● Location of site notice posters erected 4<sup>th</sup> March 2022

### Edgbaston Reservoir Masterplan: Be Heard Questionnaire

- 1) The first chapter of the revised masterplan provides an introduction and sets out the purpose of the masterplan.

**Does this chapter provide a useful introduction to the masterplan? Do you have any suggestions for how this chapter could be amended?**

- 2) The first chapter also introduces the Community Principles. These were put forward by the Edgbaston Reservoir Community Consortium and are a new addition to the revised masterplan.

**Do you agree with the Community Principles? If not, what amendments could be made?**

- 3) Chapter two sets the context for the reservoir including its history. A new section has been added to the revised masterplan to provide further details on the planning policy framework.

**Does this chapter provide useful context to the masterplan? Do you have any suggestions for how this chapter could be amended?**

- 4) Chapter three sets out the masterplan **Vision**. The Vision has been amended since the last version of the masterplan to better-reflect the unique environment of the reservoir, the natural environment and the role of the community.

The Vision:

*Edgbaston Reservoir will be protected and enhanced as a tranquil oasis in the heart of the city, set within an ecologically-rich Local Nature Reserve.*

*It will provide a destination where local residents and visitors can enjoy a mix of land and water based leisure and recreation activities with a strong community and family focus. The reservoir will be connected to a wider network of green and blue open spaces and be accessible to everyone. It will be celebrated as a safe distinctive place that supports the improved health and well-being of all.*

*New development will demonstrate high-quality sustainable design that reflects the unique character of the reservoir as a natural landscape, heritage site, and social and cultural asset for a diverse range of communities.*

*The transformation of key opportunities around the reservoir will provide new homes and activity for community engagement that complement the water setting. Opportunities will be provided for new and existing residents to come together, to improve citizens' quality of life and enhance the visitor experience. Innovative design solutions, flexible usage, and collaborative working with communities will safeguard the reservoir for future generations.*

**Do you agree with the revised Vision? If not, what amendments could be made?**

- 5) Chapter four sets out the four Development Principles that will guide future development at the reservoir to ensure it delivers the vision. '**Activity**' is the first Development Principle and the section sets out what uses will be supported and encouraged at the reservoir.

**Do you agree with the principles set out under ‘Activity’? If not, what amendments could be made?**

- 6) In the previous version of the masterplan there was a Design Development Principle. This has been replaced by ‘**Character**’ in the amended masterplan and includes more detail on how the character of the reservoir will be protected and enhanced. The section also now includes details on the approach towards views at the reservoir.

**Do you agree with the principles set out under ‘Character’? If not, what amendments could be made?**

- 7) ‘**Connectivity**’ is the third Development Principle and this section sets out the overall approach to how the reservoir will be accessed and how people will move around the site.

**Do you agree with the principles set out under ‘Connectivity’? If not, what amendments could be made?**

- 8) The last Development Principle is ‘**Sustainability**’. This is new to the amended version of the masterplan. It provides details on how the natural environment will be protected and enhanced. It also provides an overview on how new development will be expected to deliver high-quality sustainable design and enhance the Local Nature Reserve.

**Do you agree with the new Development Principle ‘Sustainability’? If not, what amendments could be made?**

- 9) Chapter five of the masterplan sets out the **Opportunities**. Each opportunity area includes guidance to explain how the four development principles of the masterplan should be delivered.

**Osler Park and Osler Place** replaces the ‘Thomas Telford Place’ Big Move from the previous draft masterplan. This opportunity comprises redevelopment of two sites, the former Tower Ballroom Site adjacent to the reservoir and the Tower Mount Site off Reservoir Road. It also includes proposals for the enhancement of Reservoir Lodge. The revised masterplan no longer proposes to build on Osler Street Park. The vision for this opportunity is:

*“Osler Street Park will be protected and enhanced as an important open space. Osler Place will provide new homes and visitor facilities with strong green links between the reservoir and Osler Street Park. High-quality contemporary buildings and public spaces will complement the reservoir’s historic environment to positively add to its character and create a focal place”.*

The principle to demolish the Tower Ballroom building and deliver homes on the site is well-established. This has been set out in the Planning Policy section of the revised masterplan. The revised masterplan builds on the policy framework to provide a vision for the opportunity area and set principles for how the site is developed, including the design, character and mix of other uses suitable on the site.

**Do you support the vision and principles for this opportunity area? If not, what amendments could be made?**

- 10) **Reservoir Loop** replaces the ‘Promenade Loop’ Big Move from the previous draft masterplan. The vision for Reservoir Loop is:

*“To enhance the circular route around the perimeter of the reservoir for pedestrians and cyclists. This will provide the opportunity for everyone to explore the reservoir, including space to pause and enjoy the reservoir’s character”.*

**Do you support the vision and principles for this opportunity area? If not, what amendments could be made?**

- 11) The **Reservoir View** opportunity area has been updated since the previous draft of the masterplan to focus on the entrance from Icknield Port Road, Midland Sailing Club, Reservoir House and Reservoir Cottage. Following discussions with the existing water sport clubs, the revised masterplan no longer includes the option of the Midland Sailing Club relocating as part of a water sports hub. This opportunity area now includes support for the club to improve their facilities in their existing location. The vision is to:

*“To provide a welcoming gateway to the reservoir with complementary uses that create activity and utilise the potential of the heritage buildings Reservoir House and Reservoir Cottage”.*

**Do you support the vision and principles for this opportunity area? If not, what amendments could be made?**

- 12) **Reservoir Link** is a new opportunity area that includes sites previously covered by Reservoir View in the previous draft masterplan. Reservoir Link consists of three development opportunities that lie between the reservoir dam and the loop canal: the H Suite site, canal basin (part of Port Loop), and the former Auto Services site off Osler Street. The vision for the opportunity area is:

*Reservoir Link will connect the reservoir, canal and Port Loop together, addressing the visual and physical barriers of the dam wall. It will maximise the canal side location and heritage assets to deliver high-quality housing-led development.*

**Do you support the vision and principles for this opportunity area? If not, what amendments could be made?**

- 13) The **Natural Parkland** opportunity has been updated since the last draft masterplan to provide more details on how the natural environment will be protected and enhanced. It includes details of the projects Birmingham Settlement are delivering at the Playing Field. Following discussions with the existing water sport clubs, the revised masterplan no longer includes the option of Birmingham Rowing Club relocating as part of a water sports hub. This opportunity area therefore includes support for the club to improve their facilities in their existing location.

**Do you support the vision and principles for this opportunity area? If not, what amendments could be made?**

- 14) **Edgbaston Waterworks** site was included in the previous draft masterplan but has been included as its own opportunity in the revised draft. This is a long-term opportunity as its still in operation by Severn Trent. The vision for the site is:

*Subject to the site becoming available for development, Edgbaston Waterworks will deliver high-quality housing-led development that protects and enhances heritage assets.*

**Do you support the vision and principles for this opportunity area? If not, what amendments could be made?**



- 15) The final opportunity is **Celebrating the Reservoir**. This replaces 'Tolkien Walk' from the previous draft masterplan and has been expanded to cover other ways in which the character, natural environment, heritage and social history of the reservoir could be celebrated.

**Do you support the vision and principles for this opportunity area? If not, what amendments could be made?**

- 16) Chapter six is **Delivery and Management**. This has been updated to provide more detail than the previous draft masterplan. It includes a table that summarises the delivery of each of the projects within the opportunities.

**Do you agree with the delivery approach outline in the masterplan? If not, what amendments could be made?**

- 17) **Do you think there is anything missing from the document that the masterplan should address?**

- 18) The masterplan includes several precedent images from other locations and developments along with an artist's sketch of the 'Osler Park and Osler Place' opportunity area. These are all illustrative and have been included to help bring the revised vision of the masterplan to life.

**Do you have any comments to make about the images included within the revised masterplan?**

- 19) **Do you have any other comments you would like to make about the revised draft Edgbaston Reservoir Masterplan?**

## **Revised Edgbaston Reservoir Masterplan Draft Supplementary Planning Document Consultation Questionnaire**

**If you would like to comment on the masterplan, please read the draft document and complete this questionnaire. You can complete as many or as few questions as you like. If you need additional space please attach paper and continue your response, clearly setting out which question you are responding to.**

- 1) The first chapter of the revised masterplan provides an introduction and sets out the purpose of the masterplan.

**Does this chapter provide a useful introduction to the masterplan? Do you have any suggestions for how this chapter could be amended?**



- 2) The first chapter also introduces the Community Principles. These were put forward by the Edgbaston Reservoir Community Consortium and are a new addition to the revised masterplan.

**Do you agree with the Community Principles? If not, what amendments could be made?**



- 3) Chapter two sets the context for the reservoir including its history. A new section has been added to the revised masterplan to provide further details on the planning policy framework.

**Does this chapter provide useful context to the masterplan? Do you have any suggestions for how this chapter could be amended?**


- 4) Chapter three sets out the masterplan **Vision**. The Vision has been amended since the last version of the masterplan to better-reflect the unique environment of the reservoir, the natural environment and the role of the community.

**Do you agree with the revised Vision? If not, what amendments could be made?**

- 5) Chapter four sets out the four Development Principles that will guide future development at the reservoir to ensure it delivers the vision. '**Activity**' is the first

Development Principle and the section sets out what uses will be supported and encouraged at the reservoir.

**Do you agree with the principles set out under 'Activity'? If not, what amendments could be made?**



- 6) In the previous version of the masterplan there was a Design Development Principle. This has been replaced by '**Character**' in the amended masterplan and includes more detail on how the character of the reservoir will be protected and enhanced. The section also now includes details on the approach towards views at the reservoir.

**Do you agree with the principles set out under 'Character'? If not, what amendments could be made?**





- 7) **‘Connectivity’** is the third Development Principle and this section sets out the overall approach to how the reservoir will be accessed and how people will move around the site.

**Do you agree with the principles set out under ‘Connectivity’? If not, what amendments could be made?**

- 8) The last Development Principle is **‘Sustainability’**. This is new to the amended version of the masterplan. It provides details on how the natural environment will be protected and enhanced. It also provides an overview on how new development will be expected to deliver high-quality sustainable design and enhance the Local Nature Reserve.

**Do you agree with the new Development Principle ‘Sustainability’? If not, what amendments could be made?**

- 9) Chapter five of the masterplan sets out the **Opportunities**.

**Osler Park and Osler Place** replaces the 'Thomas Telford Place' Big Move from the previous draft masterplan. This opportunity comprises redevelopment of two sites, the former Tower Ballroom Site adjacent to the reservoir and the Tower Mount Site off Reservoir Road. It also includes proposals for the enhancement of Reservoir Lodge. The revised masterplan no longer proposes to build on Osler Street Park.


The principle to demolish the Tower Ballroom building and deliver homes on the site is well-established. This has been set out in the Planning Policy section of the revised masterplan. The revised masterplan builds on the policy framework to provide a vision for the opportunity area and set principles for how the site is developed, including the design, character and mix of other uses suitable on the site.

**Do you support the vision and principles for this opportunity area? If not, what amendments could be made?**



- 10) **Reservoir Loop** replaces the 'Promenade Loop' Big Move from the previous draft masterplan.

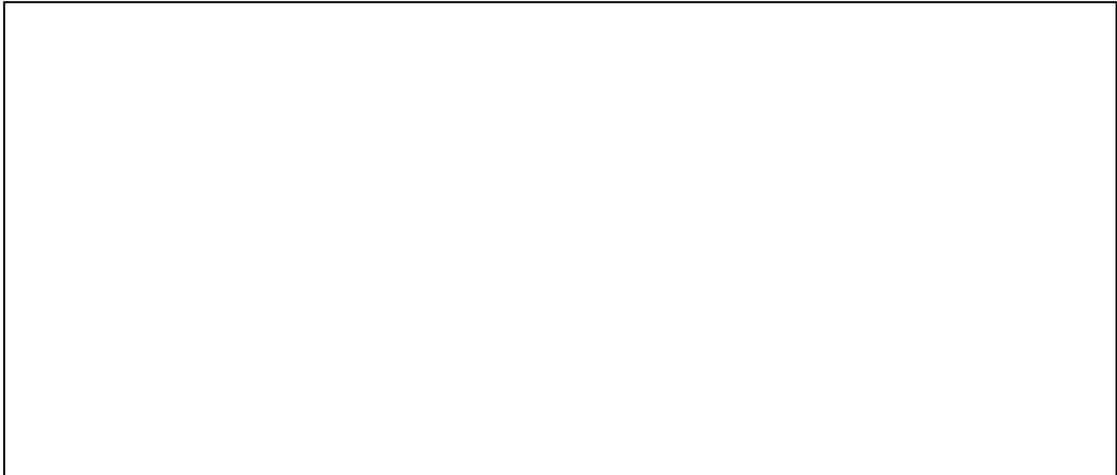
**Do you support the vision and principles for this opportunity area? If not, what amendments could be made?**



- 11) The **Reservoir View** opportunity area has been updated since the previous draft of the masterplan to focus on the entrance from Icknield Port Road, Midland Sailing Club, Reservoir House and Reservoir Cottage. Following discussions with the existing water

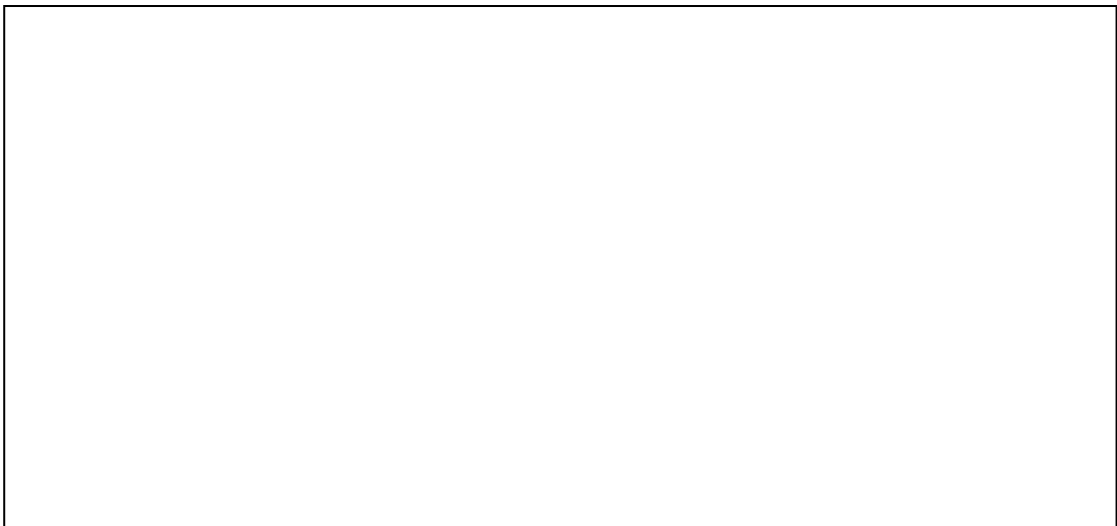
sport clubs, the revised masterplan no longer includes the option of the Midland Sailing Club relocating as part of a water sports hub. This opportunity area now includes support for the club to improve their facilities in their existing location.

**Do you support the vision and principles for this opportunity area? If not, what amendments could be made?**

A large, empty rectangular box with a thin black border, intended for a user to provide a response to the question above.

- 12) **Reservoir Link** is a new opportunity area that includes sites previously covered by Reservoir View in the previous draft masterplan. Reservoir Link consists of three development opportunities that lie between the reservoir dam and the loop canal: the H Suite site, canal basin (part of Port Loop), and the former Auto Services site off Osler Street.

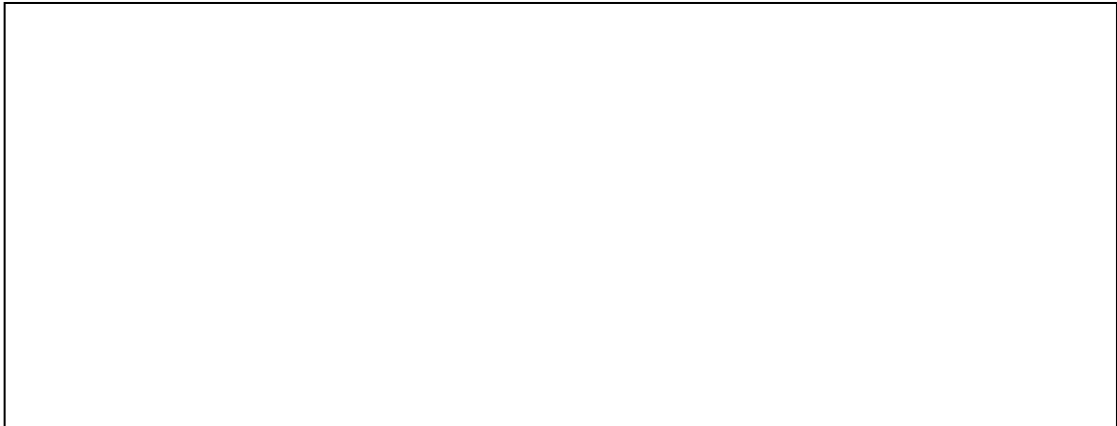
**Do you support the vision and principles for this opportunity area? If not, what amendments could be made?**

A large, empty rectangular box with a thin black border, intended for a user to provide a response to the question above.

- 13) The **Natural Parkland** opportunity has been updated since the last draft masterplan to provide more details on how the natural environment will be protected and enhanced. It includes details of the projects Birmingham Settlement are delivering at the Playing Field. Following discussions with the existing water sport clubs, the revised

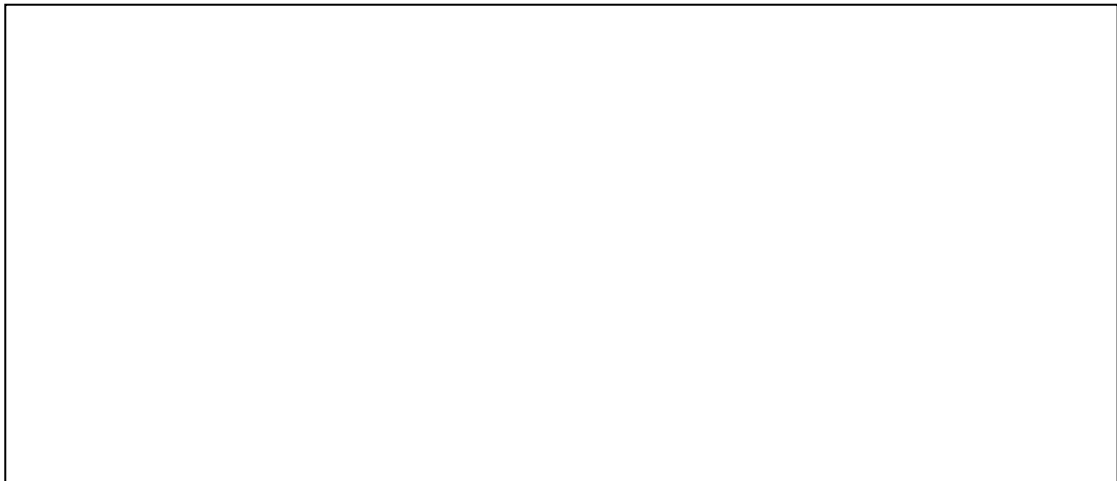
masterplan no longer includes the option of Birmingham Rowing Club relocating as part of a water sports hub. This opportunity area therefore includes support for the club to improve their facilities in their existing location.

**Do you support the vision and principles for this opportunity area? If not, what amendments could be made?**

A large, empty rectangular box with a thin black border, intended for a user to provide a response to the question above.

- 14) **Edgbaston Waterworks** site was included in the previous draft masterplan but has been included as its own opportunity in the revised draft. This is a long-term opportunity as its still in operation by Severn Trent.

**Do you support the vision and principles for this opportunity area? If not, what amendments could be made?**

A large, empty rectangular box with a thin black border, intended for a user to provide a response to the question above.

- 15) The final opportunity is **Celebrating the Reservoir**. This replaces 'Tolkien Walk' from the previous draft masterplan and has been expanded to cover other ways in which the character, natural environment, heritage and social history of the reservoir could be celebrated.

**Do you support the vision and principles for this opportunity area? If not, what amendments could be made?**



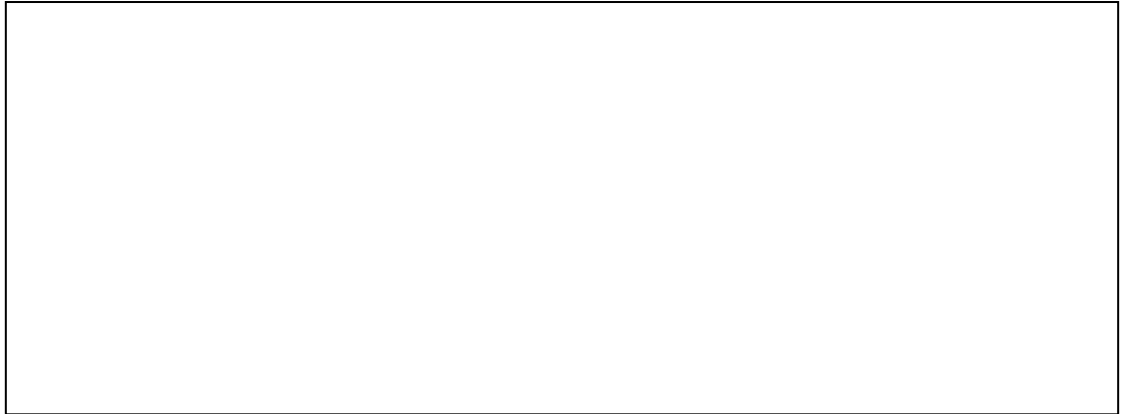


- 16) Chapter six is **Delivery and Management**. This has been updated to provide more detail than the previous draft masterplan. It includes a table that summarises the delivery of each of the projects within the opportunities.

**Do you agree with the delivery approach outline in the masterplan? If not, what amendments could be made?**



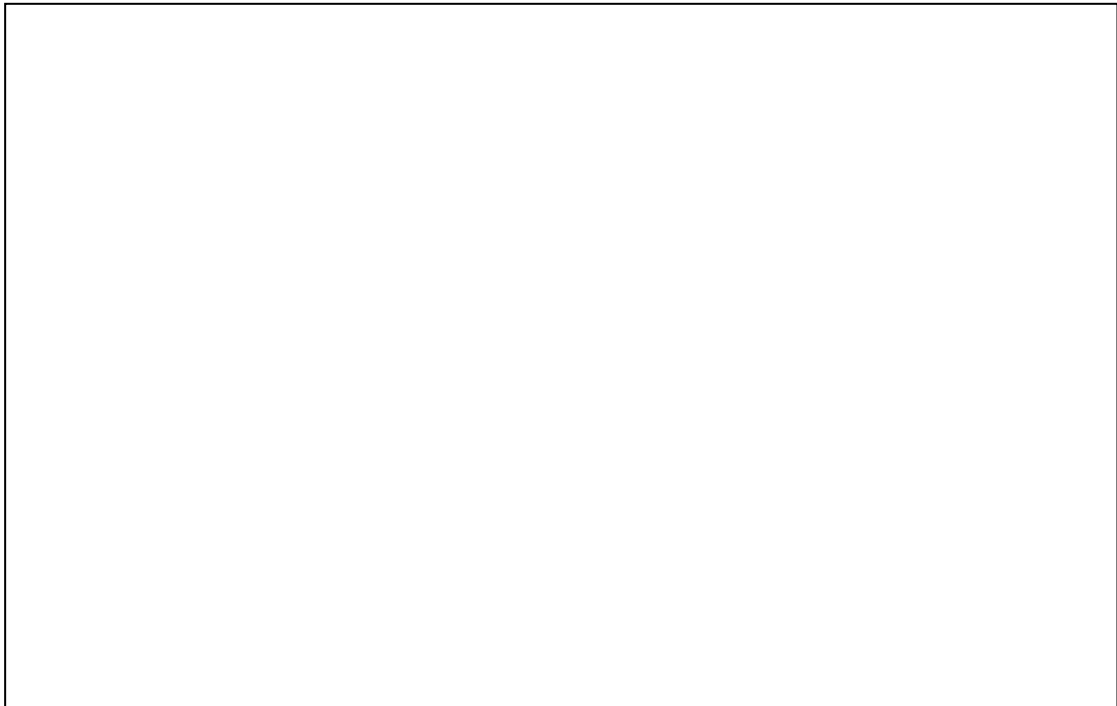
- 17) **Do you think there is anything missing from the document that the masterplan should address?**



- 18) The masterplan includes several precedent images from other locations and developments along with an artist's sketch of the 'Osler Park and Osler Place' opportunity area. These are all illustrative and have been included to help bring the revised vision of the masterplan to life.

**Do you have any comments to make about the images included within the revised masterplan?**

- 19) **Do you have any other comments you would like to make about the revised draft Edgbaston Reservoir Masterplan?**



**20) In order to make sure we capture a wide mix of views, it would be helpful if you could provide the following information. These questions are completely optional.**

**Age:** .....

**Ethnicity:** .....

**First half of postcode:** .....

**If you would like to be kept informed on masterplan, please provide your details below.**

**Name:** .....

**Email Address:** .....

**To return this questionnaire by freepost, please send to:**

**RSXB-ATZL-RTHU**

**PO Box 28**

**Birmingham**

**B1 1TU**

**If you would like to know more about the masterplan visit**

**[www.birminghambeheard.org.uk/people-1/revised-edgbaston-reservoir-masterplan](http://www.birminghambeheard.org.uk/people-1/revised-edgbaston-reservoir-masterplan)**

**Thank you.**

**Summary and response to representations collected at BCC drop-in consultation event**

Consultee	Representation summary	Officer response	Proposed changes to the SPD
1 Individual	Not in support of housing development at Osler Park and Osler Place. States the potential impacts of new housing on existing residents has not been fully considered.	Comment noted. The Tower Ballroom site was allocated for housing development under the Birmingham Development Plan (2017). Due to high projected population growth up to 2031, new homes are required to meet increased housing demand and the masterplan is expected to contribute to meeting this demand.	No change required.
1 Individual	Not in support of housing development at Osler Park and Osler Place. Or demolition of the Tower Ballroom building. Suggests the land should be used for sports and activities or events.	Comment noted. The Tower Ballroom is a brownfield (previously developed) site that is allocated for housing development in the Birmingham Development Plan. The decision to demolish the former Tower Ballroom building has been made through cabinet process. The vision for the site is for a mixed-use residential-led scheme that is set back from the waters' edge with a wide walkway in front. The retention of the Tower Ballroom building would make delivering this vision unachievable.	No change required.
1 Individual	Not in support of housing development at Osler Park and Osler Place. States the Artist's sketch on page 19 in misleading as it minimises the potential impacts for residents and the environment. Requests the Osler Park and Osler Place is used for social housing and community uses instead, as community facilities in the Ladywood are inadequate.	<p>Comment noted. The Tower Ballroom site was allocated for mixed-use residential-led development in the Birmingham Development Plan (2017).</p> <p>The sketch has been included to illustrate the vision at Osler Park and Osler Place. Non-residential uses will also be delivered on the site overlooking the water to create an active frontage and could include community, cultural, commercial, café, leisure, and educational facilities. Details will be determined at the planning application stage.</p>	No change required.



Consultee	Representation summary	Officer response	Proposed changes to the SPD
		All housing development will need to be in line with policy requirements for affordable housing and the masterplan includes references to this policy requirement.	
1 Individual	Not in support of housing development close to the water's edge at Osler Park and Osler Place. States the development will create light and noise pollution in the environment, with particular impacts for the mature trees. The site should be used for community uses instead, as facilities in the Ladywood area are currently inadequate.	<p>Comment noted. The Tower Ballroom site was allocated for housing development under the Birmingham Development Plan (2017). Due to the high rates of projected population growth up to 2031, new homes are required to meet increased housing demand and Osler Park and Osler Place is expected to contribute to meeting this demand. Non-residential uses will also be delivered on the site overlooking the water to create an active frontage and could include community, cultural, commercial, café, leisure, and educational facilities. Details will be determined at the planning application stage.</p> <p>The masterplan is clear proposals and developments should protect and enhance the natural environment and contribute to the objectives set out in the Local Nature Reserve Management Plan (2021).</p>	The masterplan has been amended to set the building line further back from the waters' edge and increase the level of greenery / soft landscaping on the walkway to soften the impact of development on the Local Nature Reserve.
1 Individual	Not in support of housing development close to the water's edge at Osler Park and Osler Place. States the reservoir should be solely a Local Nature Reserve for use by the public.	Comment noted. The Tower Ballroom site was allocated for housing development in the Birmingham Development Plan (2017). The masterplan has been amended to set the building line further back from the waters' edge and increase the level of greenery / soft landscaping on the walkway to soften the impact of development on the Local Nature Reserve.	The masterplan has been amended to set the building line further back from the waters' edge and increase the level of greenery / soft landscaping on

Consultee	Representation summary	Officer response	Proposed changes to the SPD
			the walkway to soften the impact of development on the Local Nature Reserve.
Representative from Karis Medical Centre	Holds concerns as to proposed development. States that the new residents will require GP services but that Karis Medical Centre is at full capacity and is unable to expand without additional funding. States the provision of new health infrastructure must be carefully considered.	<p>Comment noted. The masterplan states a comprehensive partnership-based approach is required for successful delivery to be achieved.</p> <p>The masterplan has been updated to include reference to ongoing assessments required to identify infrastructure needs; this is also central to Birmingham's local plan and engagement with the Integrated Care Partnership.</p>	The masterplan has been updated to include reference to ongoing assessments required to identify infrastructure needs.
1 Individual	Not in support of housing development at Osler Park and Osler Place. States that a space should be created in front of Reservoir Lodge.	Comment noted. The Tower Ballroom site was allocated for housing development under the Birmingham Development Plan (2017). The masterplan has been updated to further set buildings back from the waters' edge and to create a public square in front of Reservoir Lodge.	The masterplan has been updated to further set buildings back from the waters' edge and to create a public square in front of Reservoir Lodge.
2 Individuals	In support of proposals for improvements to the existing pathways and the creation of a link between the reservoir and Port Loop site. States that public interest in walking as an activity has increased since the Covid pandemic and that new facilities along the canal routes are required, to support increased activity e.g. café and WCs.	Support welcomed. The masterplan aims to ensure there are sufficient facilities for visitors. It also seeks to strengthen connectivity and activity along the canal pathway between the reservoir and Port Loop and the city centre.	No change required.

Consultee	Representation summary	Officer response	Proposed changes to the SPD
1 Individual	Not in support of housing development close to water's edge at Osler Park and Osler Place. States the proposed density level is too high and new homes will be unaffordable for Birmingham residents. The Local Nature Reserve (LNR) should be enhanced instead.	<p>Comment noted. The Tower Ballroom site was allocated for housing development under the Birmingham Development Plan (2017). Due to high rates of projected population growth up to 2031, new homes are required to meet increased housing demand and Osler Park and Osler Place is expected to contribute to meeting this demand.</p> <p>The masterplan has been updated to further set buildings back from the waters' edge.</p> <p>All housing development will need to be in line with policy requirements for affordable housing and the masterplan includes references to this policy requirement.</p> <p>The masterplan is clear the Local Nature Reserve should be protected and enhanced. It further states the masterplan should be read in conjunction with the updated Local Nature Reserve Management Plan (2021).</p>	The masterplan has been updated to further set buildings back from the waters' edge.
1 Individual	Not in support of housing development close to water's edge at Osler Park and Osler Place. States the proposed density level is too high and that housing numbers should be reduced, with green opens spaces retained at the water's edge.	<p>Comment noted. The Tower Ballroom site was allocated for housing development under the Birmingham Development Plan (2017). Due to high rates of projected population growth up to 2031, new homes are required to meet increased housing demand and Osler Park and Osler Place is expected to contribute to meeting this demand.</p> <p>The masterplan has been updated to further set buildings back from the waters' edge and increase the level of greenery / soft landscaping on the walkway to soften the impact of development on the Local Nature Reserve.</p>	The masterplan has been updated to further set buildings back from the waters' edge and increase the level of greenery / soft landscaping on the walkway to soften the impact of development on the Local Nature Reserve.

Consultee	Representation summary	Officer response	Proposed changes to the SPD
1 Individual	Asks if the reservoir will be accessible at night.	Comment noted. The reservoir is not gated at night so can be access in the day and at night.	No change required.
1 Individual	Not in support of proposed development. States there are multiple issues with proposals, in terms of density, constrained infrastructure, limited car parking provision, creation of noise pollution from events and potential increase in anti-social behaviours and poor accessibility for visitors with disabilities. Suggests the viability of the site for development should be re-considered.	<p>Comment noted. The Tower Ballroom site was allocated for housing development in the Birmingham Development Plan (2017). All proposals and development within the masterplan boundary will be required to protect and enhance the natural environment. Details will be determined at the planning application stage and proposals will be assessed against adopted policy.</p> <p>The masterplan seeks to create a sustainable plan to safeguard the reservoir for future generations and it is considered that the final version of the masterplan proposes a well-balanced approach to meeting a diverse range of needs. The masterplan will provide a framework for decision making and assessing planning applications that come forward for development within the masterplan area.</p>	No change required.
1 individual	Asks why Daisy Road is included in masterplan boundaries and requests confirmation from the council, that homes on Daisy Road are not to be subject to Compulsory Purchase Orders? States that Daisy Road does experience on-going issues in relation to HMOs, drug dealing, parking and general safety.	<p>Comment noted. The approach to consultation was in line with Planning Regulations and the Statement of Community Involvement. The masterplan boundary was approved in a Cabinet member report in 2019. It is important to have a coherent masterplan so that a comprehensive approach can be taken to development in the area, but it is not the case that masterplan proposals affect every property within the boundary.</p> <p>A key part of the masterplan vision is to create improve safety and accessibility for all. Increased activity at the reservoir will help address anti-social behaviour and the council will work with partners to address issues that arise.</p>	No change required.







## Consultation Summary and Responses

### Introduction:

Consultee	Representation Summary	Council response	Proposed Changes to SPD
Calthorpe Estates and 17 Individuals	General support. States the chapter provides a useful introduction to the Masterplan.	Support welcomed.	No change required.
Sport England	Welcomes reference to the plan being produced in partnership with Sport England and the Canal & River Trust.	Support welcomed. The council is committed to working with key partners and stakeholders.	No change required.
Midland Sailing Club	Supports the changes made to the plan since the previous version. States the work undertaken with the Community Partnership Forum has led to an improved document, which better-reflects Midland Sailing Club and the challenges the club faces.	Support welcomed. The council worked with the community members of the Community Partnership Forum on redrafting the masterplan to ensure that the experiences and views of the local community were better reflected in the masterplan.	No change required.
4 Individuals	Welcomes the level of detail provided in the Introduction chapter and states the aims are clear and well-balanced.	Support welcomed. The council is committed to providing accurate, concise, and informative documents that are accessible to all.	No change required.
1 Individual	Welcomes the recognition the chapter affords to the unique nature of the reservoir. Welcomes how the plan sets out the context and history of the masterplan.	Support welcomed. The council is committed to providing accurate, concise, and informative documents that are accessible to all.	No change required.
1 Individual	Welcomes the recognition of the important role of the reservoir, particularly since the Covid-19 pandemic. States the reservoir does not currently meet the needs of locals.	Support welcomed. The council is committed to protecting and enhancing the reservoir as a green asset for Birmingham's residents and visitors to enjoy.	No change required.
1 Individual	Welcomes the recognition of the important role of the reservoir during the Covid-19 pandemic. Specifically, as it is a public space	Support welcomed. The council is committed to protecting and enhancing the reservoir as a green asset for Birmingham's residents and visitors to enjoy.	No change required.

Consultee	Representation Summary	Council response	Proposed Changes to SPD
	where all societal groups can enjoy common activities (e.g., bike riding, sports, nature activities), that cut across demographics and provide unity.		
5 Individuals	Not in support of the Introduction in the plan.	Comments noted. The Introduction chapter seeks to introduce the masterplan and provide a concise overview, further detail is provided in subsequent chapters.	No change required.
1 Individual	Concerns the Community Partnership Forum is not representative of the wider community from the Ladywood side of the reservoir. Requests more engagement with these communities.	Concerns noted. The council has undertaken continued engagement with the community via the Community Partnership Forum. The second round of public consultation gave the wider community, including those not represented in the Community Partnership Forum, the opportunity to have their say on the revised masterplan.	No change required.
1 Individual	Requests the Introduction is made clearer – no further detail provided.	Comment noted. The Introduction chapter seeks to introduce the masterplan and provide a concise overview, further detail is provided in subsequent chapters.	No change required.
1 Individual	Asks why Social Housing is not referenced in the Introduction.	Comment noted. The Introduction chapter seeks to introduce the masterplan and provide a concise overview, further detail is provided in subsequent chapters.	No change required.
1 Individual	Concerns the chapter is largely focused on encouraging greater use, particularly of water sports rather than protecting the natural environment.	Concern noted. The council is committed to protecting and enhancing the Local Nature Reserve. The masterplan states increased activity will be in keeping with the character of the reservoir and the natural environment. The masterplan has been developed in discussion with the Wildlife Trust and the council's ecologist to ensure the proposals would not have a detrimental impact on the natural environment.	No change required.
1 Individual	Requests the designation of the Local Nature Reserve within the reservoir is more clearly explained.	Comment noted. The Introduction explains Edgbaston Reservoir is a designated Local Nature Reserve. Further detail is provided in the Context and Sustainability chapters.	No change required.

Consultee	Representation Summary	Council response	Proposed Changes to SPD
1 Individual	Requests the Introduction explains how the masterplan will protect and enhance the natural environment, whilst enabling the area to evolve to meet the city's growing population.	<p>Comment noted. The Introduction chapter seeks to introduce the masterplan and provide a concise overview, further detail is provided in subsequent chapters.</p> <p>The Edgbaston Reservoir Local Nature Reserve Management Plan has been updated by the Birmingham and the Black Country Wildlife Trust. It provides up to date information with clear objectives to protect and enhance the Local Nature Reserve for future generations. The masterplan states the Management Plan should be read in conjunction with the masterplan and all development and proposals at the reservoir should support the biodiversity objectives and targets set out in the Management Plan.</p>	No change required.
1 Individual	Concerns the masterplan does not adequately acknowledge the role of the water in the landscape for future development. The plan should include an integrated Water Management Plan, as there is an opportunity to integrate climate resilience into future development.	Comment noted. The Council understands the important role of water in all its forms, across the Masterplan site. The SPD seeks to protect and enhance the natural environment, that includes both blue and green infrastructure and the Local Nature Reserve Management Plan outlines an expectation for all development within the plan boundary, to meet the challenges of climate change. Whilst the formulation of a water management plan is outside the remit of the SPD, the Council will continue to work in partnership with the Canal & River Trust and Severn Trent on any water related matters.	No change required.
1 Individual	Requests the inclusion of a map detailing where development is proposed.	The masterplan shows where development is proposed on several maps throughout the plan including Plan 3, 4, 5, 7, 9, 10, and 12.	No change required.
1 Individual	Requests the provision of a bullet point summary of the changes to the document since the previous Draft SPD.	Comment noted. It would not be appropriate to include this list in a final Supplementary Planning Document. However, a list of the main changes to the plan since the previous version can be found on the Frequently Asked Questions sheet or on the consultation	No change required.

Consultee	Representation Summary	Council response	Proposed Changes to SPD
		video that provides an overview of the masterplan and explains the changes made since the previous consultation. Both can be found using the following link: <a href="https://www.birminghambeheard.org.uk/people-1/revised-edgbaston-reservoir-masterplan/">https://www.birminghambeheard.org.uk/people-1/revised-edgbaston-reservoir-masterplan/</a>	
1 Individual	Concerns the chapter reflects the aspirations of the city rather than the aspirations of the residents.	Concerns noted. The council is committed to ensuring that the local community benefits from development at the reservoir. Such benefits include the opportunity for community uses as part of the redevelopment of the Tower Ballroom and the Lodge. Improvements to the walkway, linkages and public realm will ensure the reservoir is welcoming, safe, and accessible to all.  The council worked with the community members of the Community Partnership Forum on redrafting the masterplan to ensure that the experiences and views of the local community were better reflected in the masterplan. The second round of public consultation gave the wider community, including those not represented in the Community Partnership Forum, the opportunity to have their say on the revised masterplan.	No change required.

### Community Principles:

Consultee	Representation summary	Council response	Proposed Changes to SPD
24 Individuals, Midland Sailing Club and	Support the Community Principles.	Support welcomed.	No change required.



Consultee	Representation summary	Council response	Proposed Changes to SPD
Inland Waterways Association			
Sport England	In support of principles that relate to sport and physical activity (principles 5, 6 and 8).	Support welcomed.	No change required.
2 Individuals	In agreement with Community Principles and particularly support the intention to improve community cohesion in the area.	Support welcomed.	No change required.
1 Individual	In agreement with Community Principles and state its inclusion is an improvement on the first draft of the masterplan.	Support welcomed.	No change required.
Birmingham Rowing Club	In agreement with Community Principles but suggests they could be amended to identify a preference for non-motorised water sports. These types of activities would be aligned to the current uses by the Clubs based at the reservoir and would be sympathetic to Local Nature Reserve.	Support and suggestion noted. The masterplan clearly states that all activity will be required to protect and enhance the Local Nature Reserve setting. Additional water activity will be supported where it meets the vision for the reservoir, broadens participation and does not pose any harmful impacts to the Local Nature Reserve.	No change required.
1 Individual	In agreement with Community Principles. Suggests they should include the principle of effective water management and support for increased use of blue and green infrastructure.	Support welcomed. The community principles include: <i>'build on the current ways people access and use the reservoir by improving connections to other assets and the wider green network'</i> . They also include: <i>'support community-based water users to continue to develop high-quality water sports and widen access to these activities'</i> .  The existing water sport clubs have a water user agreement and work in collaboration to manage the water with the council's Parks Department.	No change required.
1 Individual	In agreement with Community Principles. States principle no.2 infers the development is acceptable and is supported by the	Comment noted. The principles were agreed by the Community Partnership Forum to ensure future development benefits both people and the environment. Principle 2 relates to all future	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
	community. States the types of development proposed at the reservoir is housing development and the principle should have stated such.	development at the reservoir. Several sites within the masterplan boundary are allocated for residential use in the Birmingham Development Plan (BDP). The masterplan seeks to build on the policy allocation and provide guidance to ensure future development delivers high-quality housing-led development that protects and enhances natural and heritage assets at the reservoir.	
1 Individual	In agreement with Community Principles on the basis no trees are lost in the development of the reservoir.	Support welcome and comment noted. The first principle is to protect and enhance the natural environment and the masterplan outlines a commitment to protect and enhance the Local Nature Reserve. Any specific impacts on trees will be assessed as planning applications come forward.	No change required.
1 Individual	In agreement with Community Principles but finds development proposals to be in direct conflict with them. Requests existing communities are rewarded equally to new communities.	Support welcomed and comment noted. The principles were agreed by the Community Partnership Forum to ensure future development benefits both people and the environment. A key part of the vision is to ensure the masterplan is accessible for everyone this includes existing and new communities as well as visitors.	No change required.
3 Individuals	Not in agreement with Community Principles.	Comment noted. The principles were agreed by the Community Partnership Forum to ensure future development benefits both people and the environment.	No change required.
3 Individuals	Not in agreement with Community Principles due to concerns with their deliverability.	Comment noted. The principles were agreed by the Community Partnership Forum to ensure future development benefits both people and the environment. Developments and proposals within the masterplan boundary will be expected to show how they will deliver the principles	No change required.
2 Individuals	Not in agreement with Community Principles due to concerns held with issue of social cohesion.	Comment noted. The principles were agreed by the Community Partnership Forum to ensure future development benefits both people and the environment. Principle 3 states developments and proposals within the masterplan boundary will be expected to	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		show how they actively support and encourage social cohesion to ensure that the reservoir continues to belong to everyone. A key part of the vision is to ensure the masterplan is accessible for everyone this includes existing and new communities as well as visitors. Opportunities will be provided for new and existing residents to come together.	
1 Individual	Not in agreement with Community Principles. States they should include a commitment to increase green spaces to improve mental health / wellbeing.	Comment noted. The Community Principles state a commitment to the enhancement of the natural environment and to enhance mental health and well-being opportunities by improvements to social, cultural and sporting facilities.	No change required.
1 Individual	Not in agreement with inclusion of Community Principles in the masterplan. States they have only been included to counterbalance the creation of new development at the reservoir.	Comment noted. The principles were agreed by the Community Partnership Forum to ensure future development benefits both people and the environment. Several sites within the masterplan boundary are allocated for residential use in the Birmingham Development Plan (BDP). The masterplan seeks to build on the policy allocation and provide guidance to ensure future development delivers high-quality housing-led development that protects and enhances natural and heritage assets at the reservoir.	No change required.
2 Individuals	Not in agreement with Community Principles. States they fail to address the need for equality of access to open green spaces.	Comment noted. Principle 3 states developments and proposals within the masterplan boundary will be expected to show how they actively support and encourage social cohesion to ensure that the reservoir continues to belong to everyone.	No change required.
1 Individual	Not in agreement with Community Principles. States they fail to recognise development will create gentrification of the reservoir.	Comment noted. Principle 3 states developments and proposals within the masterplan boundary will be expected to show how they actively support and encourage social cohesion to ensure that the reservoir continues to belong to everyone. Improvements proposed in the masterplan will provide spaces and facilities that bring together existing and future residents.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
1 Individual	Not in agreement with Community Principles. States they do not consider existing communities.	Comment noted. The principles were agreed by the Community Partnership Forum to ensure future development benefits both people and the environment. The masterplan is clear that the reservoir belongs to everyone, and improvements proposed in the document will provide spaces and facilities that bring together existing and future residents.	No change required.
1 Individual	Not in support of Community Principles. States principle No.7 regarding the Localism Agenda has been undermined by consultation approach. States consultation was tokenistic and unsuitable venues were used.	Comment noted. The consultation undertaken met the requirements of planning regulations and the council's adopted Statement of Community Involvement.	No change required.
1 Individual	States the masterplan emphasises the establishment of new communities that will be create cohesion issues with existing diverse communities.	Comment noted. The masterplan is clear the reservoir belongs to everyone, and improvements proposed in the document will provide spaces and facilities that bring together existing and future residents. Principle 3 states developments and proposals within the masterplan boundary will be expected to show how they actively support and encourage social cohesion to ensure that the reservoir continues to belong to everyone.	
1 Individual	States there isn't any reference to social housing.	Comment noted. The principles were agreed by the Community Partnership Forum to ensure future development benefits both people and the environment. Social housing is referenced in later chapters. All housing development will need to be in line with policy requirements for affordable housing and the masterplan includes references to this policy.	No change required.
1 Individual	States Community Principles include buzzwords but are not contentious.	Comment noted.	No change required.
1 Individual	States the principles should be re-considered as inadequate attention is awarded to existing local residents and businesses and their relationship with the reservoir.	Comment noted. The masterplan is clear the reservoir belongs to everyone, and improvements proposed in the document will provide spaces and facilities that bring together existing and future residents. The masterplan also states commercial uses	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		should complement and not compete with Dudley Road local centre.	
1 Individual	Suggests the principles should be more concrete and address how new housing will be affordable and reduce car dependency.	Comment noted. The principles were agreed by the Community Partnership Forum to ensure future development benefits both people and the environment. The principles state that environmental sustainability should be maximised in new development at the reservoir. In addition, the Sustainability and Connectivity chapters emphasise the importance of increased use of sustainable modes of transport and the incorporation of energy efficiency technologies in new development.	No change required.
1 Individual	Asks that the term 'Biophilic City' be better defined.	Comment noted. Page 17 of the masterplan includes an explanation.	No change required.
Calthorpe Estates	States the principles fail to recognise the importance of the creation of connections between the reservoir and wider area.	Comment noted. Principle 6 states development and proposals should build on the current ways people access and use the reservoir by improving connections to other assets and the wider green network.	No change required.
1 Individual	Asks for greater clarity on the purpose of the Community Principles. Asks if the principles are for the community in general, or guidance for future development.	Comment noted. The principles were agreed by the Community Partnership Forum to ensure future development benefits both people and the environment. Developments and proposals within the masterplan boundary will be expected to show how they will meet and deliver the principles. As the principles form part of the SPD, which is a material consideration in determining planning applications, they will play an active role in shaping development at the reservoir and applicants will be expected to give them due consideration when submitting planning proposals.	No change required.
1 Individual	Asks how the Community Principles will be enforced.	Comment noted. As the principles form part of the SPD, which is a material consideration in determining planning applications, they will play an active role in shaping development at the reservoir and applicants will be expected to give them due consideration when submitting planning proposals.	No change required.



Consultee	Representation summary	Council response	Proposed Changes to SPD
1 Individual	States antisocial behaviour needs to be addressed in association with increased numbers of student accommodation and hostels.	Comment noted. A key part of the masterplan vision is to create improve safety and accessibility for all. Increased activity at the reservoir will help address anti-social behaviour and the council will work with partners to address issues that arise. All housing development will need to be in line with policy requirements for mix and type of housing and the masterplan includes references to this policy.	No change required.

### Context:

Consultee	Representation summary	Council response	Proposed Changes to SPD
Midland Sailing, Calthorpe Estates and 21 Individuals	General support. States the chapter provides useful context to the masterplan.	Support welcomed.	No change required.
Canal & River Trust (CRT)	General support. States the chapter recognises their statutory duty in managing the operational functions of the reservoir and provides acknowledgement that all development should not risk the safety of the dam wall.	Support welcomed. The council has worked with the Canal & River Trust on the revised masterplan to ensure appropriate wording is included regarding the function of the reservoir and dam wall.	No change required.
1 Individual	Supports Birmingham being a Biophilic City to increase biodiversity and to learn from other Biophilic Cities that are more advanced.	Support welcomed.	No change required.
7 Individuals	Not in support.	Comment noted. The masterplan states the city's population is projected to grow by an additional 150,000 people by 2031. It also explains the Birmingham Development Plan provides a strategy for addressing the challenges of growth across the city,	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		with particular reference to climate change, the natural environment, quality of life, infrastructure, and an inclusive economy. By proposing sustainable and inclusive growth, the masterplan will deliver social, health and environmental benefits for all.	
17 Individuals	Not in support. States the council must demonstrate its commitment to become a 'City of Nature' as words in the masterplan alone will not prevent potential detrimental impacts on future generations.	<p>Comment noted. The council is committed to protecting and enhancing the reservoir as a green asset for Birmingham's residents and visitors to enjoy. The masterplan references the City of Nature policy and states all projects and development within the plan boundaries need to meet the challenges of the climate emergency and contribute positively to the sustainability of the Local Nature Reserve.</p> <p>The Edgbaston Reservoir Local Nature Reserve Management Plan has been updated by the Birmingham and the Black Country Wildlife Trust. It provides up to date information with clear objectives to protect and enhance the Local Nature Reserve for future generations. The masterplan states the Management Plan should be read in conjunction with the masterplan and all development and proposals at the reservoir should support the biodiversity objectives and targets set out in the Management Plan.</p>	No change required.
1 Individual	Not in support. States the chapter fails to set the masterplan in the wider housing, social or environmental issues.	Comment noted. The chapter states the city's population is projected to grow by an additional 150,000 people by 2031. It also explains the Birmingham Development Plan provides a strategy for addressing the challenges of growth across the city, with particular reference to climate change, the natural environment, quality of life, infrastructure, and an inclusive economy.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		The Sustainability chapter provides further detail on how projects and development within the plan boundary need to meet the challenges of the climate emergency and contribute positively to the sustainability of the Local Nature Reserve.	
1 Individual	Not in support. States the chapter fails to include housing needs.	Comment noted. The purpose of the chapter is to set the present, historic and policy context. The masterplan states housing provided within the masterplan area will need to include a wide choice of housing sizes, types, and tenures to meet community needs in accordance with the Birmingham Development Plan Policy. The exact housing mix will be determined at the planning application stage.	No change required.
3 Individuals	Not in support. States the chapter fails to include environmental and sustainability factors. States the plan is currently ambiguous on this topic and a clearer commitment should be shown.	Comment noted. The masterplan states all projects and development within the plan boundary need to meet the challenges of the climate emergency and contribute positively to the sustainability of the Local Nature Reserve. The Sustainability chapter provides detail on delivering biodiversity net gain, maximising energy efficiency, solar gain and using low or zero carbon energy generation.	No change required.
2 Individuals	Not in support. States the historical context is irrelevant and doesn't contribute to the masterplan.	Comment noted. The reservoir is an important asset and has played an important role in Birmingham's industrial heritage. As such, the masterplan provides an overview of the reservoir's history.	No change required.
3 Individuals	Not in support as historical context is considered less important than how the reservoir is used today. Suggests the context could be shortened whilst keeping the historical timeline.	Comment noted. The masterplan sets out the present-day context before it sets out the historical context. Given the important role the reservoir played in Birmingham's industrial heritage, it was considered appropriate to provide an overview of the reservoir's history.	No change required.
1 Individual	Not in support. States the historical context fails to capture resulting divisions of	Comment noted. The historical context focuses on the reservoir itself rather than the surrounding areas. It also covers a relatively long timeline, as such, not all events could be included.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
	Ladywood Ward by previous interventions or reflect working-class experiences.		
1 Individual	Not in support. States the chapter provides too much historical detail and insufficient details on the proposed development.	Comment noted. The reservoir is an important asset and has played an important role in Birmingham's industrial heritage. As such, the masterplan provides an overview of the reservoir's history. Further details of proposed development are included in later chapters of the masterplan.	No change required.
5 Individuals	Not in support. States the masterplan is not aligned to other planning policy including policy TP8 of the Birmingham Development Plan regarding protection of local nature reserves or the City of Nature Plan, and the City of Nature plan. States the masterplan does not reflect the post-Covid world, where green spaces are valued.	<p>Comments noted. The masterplan is required to be in general accordance with the Local Plan. All policies in the Birmingham Development Plan (BDP) are relevant and should be read in conjunction with the masterplan SPD. BDP Policy TP8: Biodiversity and Geodiversity, states that all development should, where relevant, support the enhancement of Birmingham's natural environment, having regard to strategic objectives for the maintenance, restoration, and creation of ecological and geological assets.</p> <p>In relation to this, the Sustainability chapter of the masterplan states all qualifying development that will be required to deliver a minimum of 10% (or higher if set by subsequent adopted policy), biodiversity net gain upon implementation of the Environment Act 2021, anticipated to take place in winter 2023. Development will be encouraged to deliver biodiversity net gain ahead of the legislative requirement coming into effect and will also be encouraged to deliver a higher percentage in reflection of the Local Nature Reserve setting. This aligns with national policy.</p> <p>The masterplan acknowledges Covid-19 has increased the importance of access to high-quality open space. The masterplan therefore aims to protect and enhance the natural</p>	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		environment to ensure the reservoir continues to provide open space and facilitate community activity.	
2 Individuals	Not in support. States the policy upon which the masterplan is based has created increased urban density and population growth but reduced green spaces which are needed.	Comment noted. The masterplan is required to be in general accordance with the Local Plan. All policies in the Birmingham Development Plan (BDP) are relevant and should be read in conjunction with the masterplan. The Birmingham Development Plan provides a strategy for addressing the challenges of growth across the city, with particular reference to climate change, the natural environment, quality of life, infrastructure, and an inclusive economy. The purpose of the masterplan is to ensure the site is developed in a way that enhances and protects the existing assets, whilst delivering homes and increased activity that is accessible to all.	No change required.
Inland Waterways Association	Requests the masterplan puts greater emphasis on the relationship between the reservoir and the canal system and its function of supplying water to the canal system.	Comment noted. The masterplan states the Canal & River Trust is the 'undertaker' of the reservoir and holds statutory duties under the Reservoirs Act, to ensure the operational and functional integrity of reservoir and dam. In addition, it identifies the Trust's duty to provide safe water navigation and water quality of the wider canal network, meaning water levels in the reservoir fluctuate, depending on the need of the canal system.	No change required.
3 Individuals	States the reservoir is special and is an asset for use by the local community and wider city.	Agree. The masterplan states the reservoir serves as an important natural resource for local people and visitors. The council is committed to protecting and enhancing the reservoir as a green asset for Birmingham's residents and visitors to enjoy.	No change required.
2 Individuals	States the reservoir is linked to other green spaces in the city and these are appreciated.	Support welcomed. The masterplan states the reservoir serves as an important natural resource for local people and visitors. The council is committed to protecting and enhancing the reservoir as a green asset for Birmingham's residents and visitors to enjoy.	No change required.
1 Individual	States the inclusion of policy references is useful.	Support welcomed.	No change required



Consultee	Representation summary	Council response	Proposed Changes to SPD
1 Individual	States the description of Midland Sailing Club, infers it is a charity and this is inaccurate.	Comment noted. The masterplan does not state Midland Sailing Club is a charity.	No change required.
1 Individual	States the local area requires improvement at the earliest opportunity and non-locals should not impede action.	Comment noted. The masterplan will assist in attracting investment to the plan area and deliver the council's sustainable, inclusive growth agenda. Opportunities for new homes and an enhanced natural environment, will bring social and health benefits for local residents and visitors to the reservoir.	No change required.
1 Individual	Highlights the council's tree policy.	Comment noted. Consultation has been undertaken with the council's Tree Officers. The masterplan seeks to protect and enhance the natural environment. The Edgbaston Reservoir Local Nature Reserve Management Plan has been updated by the Birmingham and the Black Country Wildlife Trust. It provides up to date information with clear objectives to protect and enhance the Local Nature Reserve for future generations. The masterplan states the Management Plan should be read in conjunction with the masterplan and all development and proposals at the reservoir should support the biodiversity objectives and targets set out in the Management Plan.	No change required.
1 Individual	Requests the masterplan relates to the Urban Forest Plan.	Comment noted. The masterplan has been updated to reflect the current policy context on nature and environment.	The masterplan has been updated to reflect the current policy context on nature and environment.
1 Individual	Asks why the timeline includes Catherine Osler as Osler Street is named after a relative and owner of a glass works factory on Freeth Street.	Comment noted. Catherine Osler has been identified as Chair of the Birmingham Women's Suffrage Society.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
1 Individual	Asks why no mention is made of S106 funds. Asks how S106 could be used for areas surrounding the reservoir.	Comments noted. The Delivery and Management chapter refers to S106 funding. The S106 process has its own policies and procedures which will be followed at the reservoir.	No change required.
Calthorpe Estates	Asks why the chapter doesn't reference the area to the south-east of the reservoir, along Hagley Road and Five Ways, where new development is also planned. States links between the reservoir and these areas should be included in the masterplan as residents from this area will be able to access and benefit from the reservoir.	Comment noted. The masterplan focuses on the area within the plan boundary, but a key part of the vision is ensuring the reservoir is accessible to all. However, the masterplan states existing pedestrian and cycling connections to nearby neighbourhoods will be strengthened and enhanced.	No change required.
1 Individual	Requests the size of the reservoir is shown in comparison to cities such as Copenhagen.	Suggestion noted. This is beyond the scope of the masterplan.	No change required.
1 Individual	Requests a list is created by the council to detail all groups and activities that use the reservoir or have a link to it, to encourage increased community support for them.	Suggestion noted. The masterplan encourages all communities to use and engage with the reservoir however including a list of all groups and activities at the reservoir would be too much detail and is beyond the remit of the masterplan. Individual organisations and clubs currently publicise their own activities.	No change required.
1 Individual	Requests continued community engagement, following completion of the masterplan.	Suggestion noted. The masterplan incorporates the Community Principles which include a commitment to working with the community at the reservoir. The Delivery and Management section of the document also refers to the community under the partnership section of the chapter.	No change required.
1 Individual	Requests the masterplan includes definitions of the following terms:  Town and Country Planning Act S106 Biophilic	Comment noted. Biophilic Cities are explained in the masterplan on p.17 and the key planning policies that relate to the masterplan are outlined on p.14, namely the Birmingham Development Plan (2017), which the masterplan should be read alongside. It is therefore considered a definition of the Town and Country Planning Act is not required. The use of S106 funds is outlined in the Delivery and Management chapter on p.74.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
1 Individual	Requests examples from other cities are included in the masterplan.	Suggestion noted. The masterplan includes precedent images from several other locations to help bring the vision alive.	No change required.
2 Individuals	Requests the chapter better reflects the on-going development in other areas of the city and the impact they may create for the reservoir.	Suggestion noted. The masterplan focuses upon its red line boundary, but the wider context is taken into account. The masterplan explains the Birmingham Development Plan provides a strategy for addressing the challenges of growth across the city, with particular reference to climate change, the natural environment, quality of life, infrastructure, and an inclusive economy.	No change required.
1 Individual	States the reservoir already caters for a diverse community and therefore requests the following sentence is amended from:  <i>'As such, the reservoir will need to cater for diverse communities and provide accessible spaces for people to come together to meet, sit, relax and contemplate the natural environment'.</i> to <i>'The reservoir will need to <u>continue</u> to cater for diverse communities and continue to provide accessible spaces for people to come together'.</i>	Comment noted. The masterplan has been updated to better reflect that a diverse range of communities currently use the reservoir.	The masterplan has been updated to better reflect that a diverse range of communities currently use the reservoir.
1 Individual	Requests list is created detailing organisations involved in promoting health and wellbeing activities at the reservoir.	Comment noted. This is beyond the remit of the masterplan. The council promotes the important role of the reservoir and encourage its health and well-being benefits. Local community groups and individuals can promote their activities as they wish.	No change required.

Vision:

Consultee	Representation summary	Council response	Proposed Changes to SPD
18 Individuals, and organisations including: Owners of Tower Mount, Marine Society and Sea Cadets, Birmingham Rowing Club, Sama Investments Ltd, Calthorpe Estates, Inland Waterways Association, Sport England, Birmingham Civic Society	In general support. The masterplan defines a clear vision, to protect the natural environment, deliver affordable homes and encourage health and wellbeing benefits.	Support welcomed.	No change required.
Canal & River Trust (CRT)	In support. States the consultation approach has seen good engagement with CRT in the revision of the masterplan. All references to CRTs Statutory duties in relation to the	Support welcomed. CRT is central to the Partnership-based approach that the SPD advocates and will continue to be consulted on any applications that come forward for the masterplan site (that pose implications for its Statutory duties).	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
	reservoir, dam wall and surrounding waterways are welcomed.		
1 Individual	In support. States the proposals will contribute to the environmental sustainability of the city and increase housing supply. Many young people are locked-out of housing market and unless new homes are delivered, will have to leave the area.	Support welcomed. The SPD seeks to promote the important role of reservoir and define a clear vision to protect the natural environment, whilst deliver, new, affordable homes.	No change required.
1 Individual	In support. States the proposals will improve connectivity between the City Centre, Jewellery Quarter, Port Loop, and the reservoir and strengthen communities. These new centres will increase demand for local services and contribute to sustainable modes of living for future generations.	Support welcomed. The SPD outlines improvements to connections both across the reservoir to surrounding areas and from the reservoir to the City Centre. Sustainable modes of transport are encouraged for travel to and from the reservoir e.g., walking, cycling and buses.	No change required.
1 Individual	In support. States it is important for the masterplan to seek high standards of architectural design for new development, as it will make people feel proud of City.	Support welcomed. The SPD will serve as a strong framework for decision-making as applications come forward in future years. All new development will be expected to demonstrate high-quality sustainable design, that reflects the unique character of the reservoir.	No change required.
2 Individuals	In support. Pleased that revised masterplan now provides a focus on the natural environment.	Support welcomed. The masterplan has been further strengthened to ensure the role of biodiversity and ecology is recognised and enhanced through the implementation of the opportunities.	No change required.
1 Individual	In support. States revised masterplan is ambitious and forward-thinking and will deliver many benefits for the city.	Support welcomed. The SPD will serve as a strong framework for decision-making as applications come forward in future years. All new development will be expected to demonstrate high-quality sustainable design and provide opportunities for new and existing residents, as well as safeguarding the reservoir for future generations.	No change required.



Consultee	Representation summary	Council response	Proposed Changes to SPD
1 Individual	In support. It recognises the value of the reservoir, in terms of wildlife, tranquillity and associated mental health benefits and open spaces for activity. The proposal for more accessible routes, will also bring safety benefits for all these different types of users.	Support welcomed. The SPD recognises that Covid-19 has highlighted the need to prioritise physical and mental health well-being. The proposed enhancements to the walkway should enable more people to make use of the reservoir and participate in a wide range of activities.	No change required.
1 Individual	In support. States the vision proposes a good balance between the creation of new homes and valuing the natural environment, that is accessible for use by all communities.	Support welcomed. The SPD seeks to promote the important role of the reservoir and define a clear vision to protect the natural environment, whilst delivering affordable new homes.	No change required.
Birmingham Civic Society	In support. States the masterplan is ambitious and demonstrates how S106 opportunities can be used to achieve improvements can realistically be achieved.	Support welcomed. The SPD will serve as a strong framework for decision-making as applications come forward in future years. The potential use of S106 funding to support development at the reservoir is discussed in the Delivery and Management chapter.	No change required.
1 Individual	In support. States the first paragraph is correct.	Support welcomed.	No change required.
1 Individual	In support. States the vision proposes a good balance but hopes opportunities for activity are connected to the wider community and City, where many established community groups are located.	Support welcomed. The SPD clearly states that the reservoir is an open space and natural asset that serves a wide community. The Activity chapter discusses the broad range of activities that are either currently taking place at the reservoir or which the reservoir could support, and all of which should meet the needs of a diverse population.	No change required.
1 Individual	In support. States proposals to use Brownfield sites is positive and will mean sites are cleared.	Support welcomed. The Birmingham Development Plan (2017) allocated the Tower Ballroom as a development site to support future growth in the area. The city's population is projected to grow by an additional 150,000 people by 2031 and the SPD will serve as a framework, to guide new development that comes forward in future years.	No change required.
1 Individual	In support. States the proposals for a family-oriented environment should attract visitors	Support welcomed. The masterplan vision aims for the reservoir to be family-friendly and to attract visitors so the reservoir can be	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
	and help the local economy and reputation of the area, which is currently poor.	enjoyed by all. These aims should both lead to improvement in the current economy of the local area.	
1 Individual	In support. States second consultation document is an improvement on first version, as it now reflects input by the community and identifies community concerns.	Support welcomed. Following comment to the first round of consultation, a Community Partnership Forum was established in January 2020, to enable improved engagement between the City Council and local communities. From this Forum, a set of Community Principles has been endorsed and included in the SPD.	No change required.
1 Individual	In support. States the proposals may improve the local community.	Support welcomed.	No change required.
7 Individuals	Not in general support. No further details provided.	Comment noted.	No change required.
1 Individual	Not in general support. States the vision presented is biased.	Comment noted. The SPD seeks to present accurate and informative guidance for the assessment of planning applications, that come forward in future years. The version for the second round of consultation includes a set of Community Principles and a range of information on background to the reservoir, strategic issues for the City and details of key Stakeholders that have direct involvement in the operation and/or use of the reservoir. Therefore, the SPD is considered a document that presents a well-considered view of existing and future issues for the masterplan area.	No change required.
3 Individuals	Not in support of proposals. Asks that an alternate plan is formulated by local communities.	Comment noted. Following comment to the first round of consultation, a Community Partnership Forum was established in January 2020, to enable improved engagement between the City Council and local communities. From this Forum, a set of Community Principles has been endorsed and included in the SPD.	No change required.
3 Individuals	Not in support of proposals. States the vision is imbalanced, with broadly positive intentions to enhance the Local Nature	Comment noted. The SPD seeks to promote the important role of the reservoir and define a clear vision, to protect the natural environment, whilst deliver new, affordable homes. The	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
	Reserve but also supports development on multiple sites across the masterplan area.	Birmingham Development Plan (2017) allocated the Tower Ballroom as a development site to support future growth in the area. The city's population is projected to grow by an additional 150,000 people by 2031 and the SPD will serve as a framework, to guide new development that comes forward in future years. The SPD must address two key requirements, to protect the natural environment at the reservoir and respond to population growth. Following the lengthy consultation process for the SPD and the resulting different versions, it is considered that the final SPD now provides an effective balance between these two demands.	
1 Individual	Not in support of proposals. States it would detrimentally impact the historic value of the reservoir.	Comment noted. The SPD provides substantial historic context on the reservoir and explains the unique role that it has played and continues to play, in the lives of local residents and the wider city. The Celebrating the Reservoir chapter identifies the opportunity for a walking trail to be created, to encourage movement between the reservoir and historic assets in the surrounding area and also to make stronger linkages, in terms of the reservoir's contribution to the wider Canal network, by building upon collaboration with the Roundhouse (National Trust Hub on Brindleyplace).	No change required.
1 Individual	Not in support of proposals. States an alternate plan should be formulated for an entertainment destination to be created i.e., Brindleyplace.	Comment noted. The SPD must address two key requirements, to protect the natural environment at the reservoir and respond to population growth. Therefore, whilst a mix of uses is supported it is also important that the scale and nature of development reflects the location and its importance as a green and natural space.	No change required.
1 Individual	Not in support of proposals. States an alternate plan should be formulated for a wider range of leisure activities.	Comment noted. The Activity chapter discusses the broad range of activities that are either currently taking place at the reservoir or which the reservoir could support, and all of which should meet the needs of a diverse population. However, the SPD must	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		address the demands posed by projected population growth and it considered that the final SPD strikes an effective balance between the reservoir's role as a centre for water sports, the need to protect the natural environment, and creating opportunities for new activities and deliver new, affordable homes.	
2 Individuals	Not in support of proposals. State an alternate plan should be formulated to prioritise needs of Young Persons who currently use the reservoir, along with the local community.	Comment noted. The SPD outlines a variety of opportunities for Young Persons to undertaken activity, enjoy the natural environment or meet with friends/groups in an informal way at the reservoir. Osler Street Park will play a crucial role in providing a safe and welcoming space for children and young people, and the proposed non-residential space at Osler Place could also provide opportunities for young people. In addition, the Celebrating the Reservoir chapter discusses the areas of the reservoir that could be used for community events and possible arts/cultural activities, all of which should directly engage young persons.	No change required.
1 Individual	Not in support of proposals. States that no new buildings should be built but space used for Community uses, i.e., amphitheatre or spaces for general Arts	Comment noted. The SPD must address the twin demands of protecting the natural environment at the reservoir and also meeting the housing needs posed by projected population growth. Following comments received to the second round of public consultation, the Osler Place and Osler Park site will now feature a large, open, public space, within which arts or other community activities could be held. Therefore, it is now considered that the final SPD strikes an effective balance between competing demands.	No change required.
1 Individual	Not in support of proposals. Asks where is the consideration of impacts upon air quality shown?	Comment noted. The SPD is a sustainable plan, that will safeguard the reservoir for future generations. Air quality is not specifically discussed in the masterplan but a wide range of improvements and recommendations for the use of new green technologies should all contribute to an improved environment	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		for the masterplan area. The Local Nature Reserve is to be enhanced with increased numbers of trees, to extend the tree canopy and all new development should be constructed to maximise the use of low carbon energy and the increased use of sustainable modes of transport will be encouraged, to lessen car dependency. All development will need to be consistent with other policy set out in the Local Plan, and with regulations including Building Regulations, with regard to air quality.	
8 Individuals	Not in support of proposals. State that an alternate plan be formulated to protect nature and not development.	<p>Comment noted. The SPD seeks to promote the important role of the reservoir and define a clear vision, to protect the natural environment, whilst deliver new, affordable homes. The Birmingham Development Plan (2017) allocated the Tower Ballroom as a development site to support future growth in the area. The city's population is projected to grow by an additional 150,000 people by 2031 and the SPD will serve as a framework, to guide new development that comes forward in future years.</p> <p>The SPD must address two key requirements, to protect the natural environment at the reservoir and respond to population growth. Following the lengthy consultation process for the SPD and the resulting different versions, it is considered that the final SPD now provides an effective balance between these two demands.</p>	No change required.
1 Individual	Not in support of proposals. States the Council should considers an alternative plan that poses minimal construction and maintenance costs. The current masterplan will lead to community challenge and National decay.	Comment noted. The SPD seeks to promote the important role of the reservoir and define a clear vision, to protect the natural environment, whilst deliver new, affordable homes. The Birmingham Development Plan (2017) allocated the Tower Ballroom as a development site to support future growth in the area. The city's population is projected to grow by an additional 150,000 people by 2031 and the SPD will serve as a framework, to guide new development that comes forward in future years.	No change required.



Consultee	Representation summary	Council response	Proposed Changes to SPD
		The SPD must address two key requirements, to protect the natural environment at the reservoir and respond to population growth. Following the lengthy consultation process for the SPD and the resulting different versions, it is considered that the final SPD now provides an effective balance between these two demands. The SPD does not discuss development costs as this is outside its remit. All costs will be assessed, as planning applications come forward for development.	
1 Individual	Not in support of proposals. States that the vision fails to identify the key development changes for the masterplan area.	Comment noted. The SPD seeks to be an accurate and concise document, that serves as a framework to guide the determination of planning applications as they come forward. Further details on individual proposals are contained in following chapters, however the SPD is not so specific that it cannot respond flexibility to changing conditions and proposals that are presented in future years.	No change required.
1 Individual	Not in support of proposals. States the scale of the development is too large.	Comment noted. The development proposed is considered to be an appropriate scale to ensure the deliverability and long-term viability of the uses, whilst ensuring there is not a negative impact on the character of the reservoir.	No change required.
6 Individuals	Not in support of proposals. State the reservoir is a designated open space and is well used, daily for recreation.	Comment noted. The SPD recognises that the reservoir is one of Birmingham's most important open spaces and identifies the wide range of activities that are currently taking place at the reservoir i.e., water sports and informal activities. However, the SPD must address the demands posed by projected population growth and it considered that the final SPD strikes an effective balance between, building upon the reservoir's role as an open space and also deliver new, affordable homes.	No change required.
1 Individual	Not in support of proposals. States a sustainable reservoir can only be achieved by the sustainment of a natural environment.	Comment noted. The SPD provides a clear commitment to the sustainment and enhancement of the natural environment. The environmental sustainability of the reservoir will be safeguarded,	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		by all development having to support the objectives in the Edgbaston Reservoir Local Nature Reservoir Management Plan 2021. However, alongside this, the masterplan site must meet demands posed by projected population growth and deliver new, affordable homes.	
5 Individuals	Not in support of proposals. States that the Local Nature Reserve and wildlife should be protected against the light pollution that will be created by new development.	Comment noted. The masterplan states any lighting should minimise light spill and not cause adverse impacts for wildlife.	No change required.
22 Individuals	Not in support of proposals. States the development will adversely impact the existing tranquillity of the reservoir and Local Nature Reserve.	Comment noted. The masterplan provides a clear commitment to the sustainment and enhancement of the natural environment. The environmental sustainability of the reservoir will be safeguarded, by all development having to support the objectives in the Edgbaston Reservoir Local Nature Reservoir Management Plan 2021.	No change required.
3 Individuals	Not in support of proposals. States that development will impact the existing tranquillity of the reservoir and deprive City residents of a Dark Skies place.	Comment noted. The masterplan provides a clear commitment to the sustainment and enhancement of the natural environment. The environmental sustainability of the reservoir will be safeguarded, by all development having to support the objectives in the Edgbaston Reservoir Local Nature Reservoir Management Plan 2021. The reservoir is not a designated dark skies location and is surrounded by a dense urban environment.	No change required.
1 Individual	Not in support of proposals. States the changes would negatively impact upon vulnerable young people who use the reservoir, as a support for their conditions, i.e., autistic and persons with special needs.	Comment noted. The masterplan proposes additional safe spaces for all users to access, including the specific groups identified. If particular measures such as a Quiet Zone within the masterplan area were proposed, the plan would support such.	No change required.
10 Individuals	Not in support of proposals. State the reservoir is a valuable, free resource for residents from deprived communities or	Comment noted. The masterplan recognises that the reservoir is one of Birmingham's most important Open spaces and identifies the wide range of activities that are currently taking place at the reservoir or could take place in the future. The SPD states that	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
	those experiencing cost-of-living crisis. It is a free space for communities to use and enjoy.	the reservoir is an asset that serves a wide community and is an important natural resource for local people and visitors and will remain accessible to all.	
1 Individual	Not in support of proposals. States the introduction of new communities and lack of community facilities for the existing community, will create cohesion tensions between both, in future years.	<p>Comment noted. The Birmingham Development Plan (2017) allocated the Tower Ballroom as a development site to support future growth in the area. The city's population is projected to grow by an additional 150,000 people by 2031 and the SPD will serve as a framework, to guide new development that comes forward in future years.</p> <p>Community principles are identified in the masterplan. Principle 3 states: <i>Actively support and encourage social cohesion to ensure that the reservoir continues to belong to everyone.</i></p> <p>The purpose of the SPD is also to attract investment to the masterplan area, bringing benefits for the wider areas of Ladywood and North Edgbaston and offering potential for improvements to existing facilities.</p>	No change required.
1 Individual	Not in support of proposals. States the local community has championed the reservoir and sustained its over recent years. The SPD should recognise this support and prioritise the needs of existing communities, over the creation of new ones.	Comment noted. The SPD frequently acknowledges and highlights the role that the local community and local users of the reservoir play or have historically played in its 'life'. However, the reservoir is also recognised as a key open space for Birmingham as a whole and the SPD is seeking to make enhancements and improvements to it, that enable both local and other users to benefit from the many opportunities that it offers, e.g., nature, activity, heritage, social.	No change required.
1 Individual	Not in support of proposals. States that the encouragement of more users, will lead to overcrowding, particularly on pathways.	Comment noted. The SPD explains that the circular route around the perimeter of the reservoir will be enhanced for both pedestrians and cyclists. Much of the pathway has already been improved but a larger walkway will be created at the Osler Park and Osler Place section, to provide greater space, for people to	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		walk or relax in. Signage will be installed to assist in navigation of the route and the Public Realm will be enhanced, to incorporate benches and stopping places to appreciate the views.	
1 Individual	Not in support of proposals. State development will restrict access to reservoir pathway during construction period. This will impact the physical and mental health of users and prevent its overall use, as an amenity for local people.	Comment noted. The Delivery and Management chapter sets out the expectation that the delivery of masterplan will be reliant upon a range of partners, including developers, partners, and stakeholders such as local residents and reservoir users. Where construction activity has an impact on the reservoir pathway it will be coordinated to minimise impact on users, and alternatives will be provided so that the reservoir will always remain accessible and allow people to visit and support their wellbeing.	No change required.
3 Individuals	Not in support of proposals. States that changes to the reservoir could be viewed as an opportunity by criminals, to increase drug related activities and anti-social behaviours in general.	Comment noted. The purpose of the SPD is to establish a future vision for the reservoir, where new homes are established, increased activities and community uses are enabled, and investment is attracted to the masterplan area. This increase in use and the permanency of residents will make the reservoir a safer environment, in comparison to the existing conditions, where some sections of the masterplan site are isolated or redundant, with derelict buildings and spaces that attract anti-social behaviours.	No change required.
9 Individuals	Not in support of development. States that no development should be allowed. The masterplan area should remain as a Local Nature Reserve and a tranquil space.	Comment noted. The SPD seeks to promote the important role of the reservoir and define a clear vision, to protect the natural environment, whilst delivering new, affordable homes. The Birmingham Development Plan (2017) allocated the Tower Ballroom as a development site to support future growth in the area. The city's population is projected to grow by an additional 150,000 people by 2031 and the SPD will serve as a framework, to guide new development that comes forward in future years.  The SPD provides a clear commitment to the sustainment and enhancement of the natural environment. The environmental	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		sustainability of the reservoir will be safeguarded, by all development having to support the objectives in the Edgbaston Reservoir Local Nature Reservoir Management Plan 2021.	
2 Individuals	Not in support of development. State the reservoir has great potential, apart from development. i.e., destination in own right/support activities.	Comment noted. The SPD seeks to establish a sustainable plan that will safeguard the reservoir for future generations. The masterplan will attract new investment to the masterplan area and create a leisure destination that provides opportunities for communities to come together but in addition, the site must deliver new homes to meet the projected population growth up to 2031.	No change required.
6 Individuals	Not in support of development. State the value of green spaces should be better recognised and protected. The vision should not be about short-term economic gain and focused on future generations.	Comment noted. The SPD must address two key requirements, to protect the natural environment at the reservoir and respond to population growth. The SPD clearly states that it is seeking to create a sustainable plan that safeguards the reservoir for future generations.  Following the lengthy consultation process for the SPD and the resulting different versions, it is considered that the final SPD now provides an effective balance between the two demands.	No change required.
3 Individuals	Not in support of development. States that scale of growth proposed means access to and additional green spaces will be required for people to relax within. Needs to be a balance between both.	Comment noted. The SPD provides a clear commitment to the sustainment and enhancement of the natural environment. The environmental sustainability of the reservoir will be safeguarded, by all development having to support the objectives in the Edgbaston Reservoir Local Nature Reservoir Management Plan 2021.  The proposed scale of growth is in line with the Birmingham Development Plan. The masterplan proposes creation of usable public space along the frontage of Osler Place, as well as the improvement of existing space.	No change required.



Consultee	Representation summary	Council response	Proposed Changes to SPD
4 Individuals	Not in support of development. State that any changes that affect the Local Nature Reserve and wildlife in general should be carefully considered. Specific impacts upon nocturnal animals, i.e., foxes, hedgehogs and bats must be identified and any disturbance to their habitats and activities prevented.	<p>Comment noted. The SPD provides a clear commitment to the sustainment and enhancement of the natural environment. The environmental sustainability of the reservoir will be safeguarded, by all development having to support the objectives in the Edgbaston Reservoir Local Nature Reservoir Management Plan 2021.</p> <p>The Local Nature Reserve Management Plan was recently updated and it highlights the key role that the reservoir plays for foraging and nesting sites, for birds and bat populations. The Local Nature Reservoir Management Plan aims to strengthen the existing habitats and improve connections between open spaces in the wider area, to create wildlife corridors, which will better support the sustainment of wildlife.</p>	No change required.
12 Individuals	Not in support of development. States that reservoir has been a critical destination during the Covid pandemic (and in earlier years), for local people to visit and support their mental health. Many locals have limited access to outside space and the natural environment at the site should be enhanced.	Comment noted. The SPD recognises that Covid-19 has highlighted the need to prioritise physical and mental health well-being. The masterplan proposes enhancements to the public space and natural environment and identifies opportunities to deliver these enhancements.	No change required.
1 Individual	Not in support of development. States that reservoir is a calming green space, that is rare and valued. As a Person of Colour (POC) it seems the city is becoming increasingly urbanised and green spaces lost.	Comment noted. The masterplan recognises the importance the reservoir as an open space. The quantum of development and protection of green spaces across the city is guided by the Birmingham Development Plan and other local and national policy.	No change required.
1 Individual	Not in support of development. States the existing spaces should be retained, as well-used by cyclists and walkers.	Comment noted. The SPD seeks to enhance and improve existing pathways within the masterplan boundaries, to enable easier access and use by both walkers and cyclists. Improved connectivity to the wider network of cycle and walking routes is also an ambition but these must sit alongside the need to meet	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		demand for new homes, because of the projected population growth up to 20301.	
2 Individual.	Not in support of development. States that any new development must consider the needs of the local community. An accessible, open space to meet and relax, must be retained.	Comment noted. The SPD recognises that the reservoir is one of Birmingham's most important Open spaces and identifies the wide range of activities that are currently taking place at the reservoir i.e., water sports and informal activities. However, the SPD must address the demands posed by projected population growth and it considered that the final SPD strikes an effective balance between, building upon the reservoir's role as an open space and also delivering new, affordable homes. The masterplan proposes enhanced open spaces.	No change required.
2 Individuals	Ambivalent about support for development. States that principles appear acceptable, but substance is lacking, as to how the natural environment and wildlife will be protected.	Comment noted. The SPD seeks to promote the important role of the reservoir and define a clear vision, to protect the natural environment, whilst delivering new, affordable homes. The Birmingham Development Plan (2017) allocated the Tower Ballroom as a development site, to support future growth in the city. The SPD provides a clear commitment to the sustainment and enhancement of the natural environment. The environmental sustainability of the reservoir will be safeguarded, by all development having to support the objectives in the Edgbaston Reservoir Local Nature Reservoir Management Plan 2021.	No change required.
1 Individual	Ambivalent about support for development. The masterplan should provide improved clarity as to the number of new homes that will be created. This number should take account of new homes at Port Loop.	Comment noted. The masterplan area is located within the Policy Growth Area Two (GA2) in the Birmingham Development Plan (BDP, 2017). This Policy relates to the Greater Icknield area, which is anticipated to provide 3,000 new homes for the city's growing population. The size, types and density of new housing will need to be in accordance with TP31 of the BDP and will include homes for families, the elderly and appropriate levels of affordable housing.	No change required.
12 Individuals	Not in support of housing development. No further details provided.	Comment noted.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
28 Individuals	Not in support of housing development. New housing will detrimentally impact the tranquillity of the reservoir and the Local Nature Reserve.	<p>Comment noted. The SPD seeks to promote the important role of the reservoir and define a clear vision, to protect the natural environment, whilst delivering new, affordable homes. The Birmingham Development Plan (2017) allocated the Tower Ballroom as a development site to support future growth in the area. The city's population is projected to grow by an additional 150,000 people by 2031 and the SPD will serve as a framework, to guide new development that comes forward in future years.</p> <p>The SPD provides a clear commitment to the sustainment and enhancement of the natural environment. The environmental sustainability of the reservoir will be safeguarded, by all development having to support the objectives in the Edgbaston Reservoir Local Nature Reservoir Management Plan 2021.</p>	No change required.
10 Individuals	Not in support of housing development. State a new plan should be formulated to prioritise nature and the local community.	<p>Comment noted. The SPD seeks to promote the important role of the reservoir and define a clear vision, to protect the natural environment, whilst delivering new, affordable homes. The Birmingham Development Plan (2017) allocated the Tower Ballroom as a development site to support future growth in the area. The city's population is projected to grow by an additional 150,000 people by 2031 and the SPD will serve as a framework, to guide new development that comes forward in future years.</p> <p>The SPD must address key requirements, to protect the natural environment and provide opportunities for new and existing residents to come together at the reservoir and respond to population growth. Following the lengthy consultation process for the SPD and the resulting different versions, it is considered that the final SPD now provides an effective balance between these two demands.</p>	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
1 Individual	Not in support of housing development. States a new plan should be formulated to create a larger green space, with a focus on Ecology and green technologies that will deliver benefits for all.	<p>Comment noted. The SPD must address the twin demands of protecting the natural environment at the reservoir and also meeting the housing needs posed by projected population growth. Following comments received to the second round of public consultation, development at Osler Place and Osler Park (OP&amp;OP) site will now be set further back from the water's edge and include a large, open, public space, within which arts, community or environmental activities could be held.</p> <p>The SPD also advocates the use of low or zero carbon energy generation technologies and explains how outdoor spaces should be designed to take account of sun, wind, and shelter to create microclimates to maximise their positive use. Therefore, it is now considered that the final SPD strikes an effective balance between competing demands.</p>	No change required.
2 Individuals	Not in support of housing development. States a new plan should be formulated for cultural and leisure activities, to provide relaxing space and escape from busy City life.	Comment noted. The SPD seeks to create a sustainable plan to safeguard the reservoir for future generations. It will attract new investment to the masterplan area, to improve the existing offer for leisure activities and general recreation for all communities to enjoy.	No change required.
1 Individual	Not in support of housing development. States that Local Nature Reserve should be expanded to create educational facility for schools and the local community.	Comment noted. The SPD states that the natural environment will be protected and enhanced to ensure activity and new development does not have a detrimental impact on the Local Nature Reserve. Education and recreational activities within the LNR will be supported, where they promote interaction with the natural environment.	No change required.
7 Individuals	Not in support of housing development close to water. State development will impact upon the existing tranquil environment and wildlife.	Comment noted. The SPD must address the twin demands of protecting the natural environment at the reservoir and also meeting the housing needs posed by projected population growth. Following comments received to the second round of public consultation, development at Osler Place and Osler Park	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		<p>(OP&amp;OP) site will now be set further back from the water's edge and include a large, open, public space, within which arts or other community activities could be held.</p> <p>Therefore, it is now considered that the final SPD strikes an effective balance between competing demands.</p>	
1 Individual	Not in support of housing development. States new homes are contrary to the statement on page 32, regarding all development needing to respond to the Climate Change emergency.	Comment noted. Birmingham City Council declared a climate emergency in June 2019, with an ambition for the city to become net zero carbon by 2030, or as soon as possible thereafter. The SPD is aligned to this commitment, outlining an expectation that all new development should be designed and constructed in ways which maximise energy efficiency and use low carbon energies. In addition, non-residential development of a certain threshold will be expected to meet BREEAM standards.	No change required.
5 Individuals	Not in support of housing development. State housing will contradict stated aim of protecting the natural environment, as it will adversely impact tranquillity.	<p>Comment noted. The SPD seeks to promote the important role of the reservoir and define a clear vision, to protect the natural environment, whilst delivering new, affordable homes. The Birmingham Development Plan (2017) allocated the Tower Ballroom as a development site to support future growth in the area. The city's population is projected to grow by an additional 150,000 people by 2031 and the SPD will serve as a framework, to guide new development that comes forward in future years.</p> <p>The SPD must address two key requirements, to protect the natural environment at the reservoir and respond to population growth.</p> <p>Following the lengthy consultation process for the SPD and the resulting different versions, it is considered that the final SPD now provides an effective balance between these two demands.</p>	No change required.



Consultee	Representation summary	Council response	Proposed Changes to SPD
7 Individuals	Not in support of housing development. State the existing spaces should be maintained, as well-used by local community.	Comment noted. The SPD recognises that the reservoir is one of Birmingham's most important open spaces and identifies the wide range of activities that are currently taking place at the reservoir. However, the SPD must address the demands posed by projected population growth and it considered that the final SPD strikes an effective balance between, building upon the reservoir's role as an open space and also delivering new, affordable homes.	No change required.
3 Individuals	Not in support of housing development. State additional housing in Icknield Port Rd area is already increasing footfall at reservoir and adversely impacting upon birds and wildlife.	Comment noted. The SPD provides a clear commitment to the sustainment and enhancement of the natural environment. The environmental sustainability of the reservoir will be safeguarded, by all development having to support the objectives in the Edgbaston Reservoir Local Nature Reservoir Management Plan 2021.	No change required.
1 Individual	Not in support of housing development. States that the protection of wildlife should be given top priority instead. Harmful noise and light pollution will be created.	<p>Comment noted. The SPD seeks to promote the important role of the reservoir and define a clear vision, to protect the natural environment, whilst delivering new, affordable homes. The Birmingham Development Plan (2017) allocated the Tower Ballroom as a development site to support future growth in the area. The city's population is projected to grow by an additional 150,000 people by 2031 and the SPD will serve as a framework, to guide new development that comes forward in future years.</p> <p>The SPD must address two key requirements, to protect the natural environment at the reservoir and respond to population growth. Following the lengthy consultation process for the SPD and the resulting different versions, it is considered that the final SPD now provides an effective balance between these two demands.</p>	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
6 Individuals	Not in support of housing development. State too many houses/too high-density is proposed.	Comment noted. The development proposed is considered to be an appropriate level to ensure the deliverability and long-term viability of the uses, whilst ensuring there is not a negative impact on the character of the reservoir.	No change required.
1 Individual	Not in support of housing development. States the area is already too densely populated.	Comment noted. The SPD explains that the Osler Park and Osler Place (OP&OP) and Port Loop sites were designated for housing development by the Birmingham Development Plan (2017). New homes are required to meet the projected population growth of the city, with an additional 150.000 people by 2031.	No change required.
1 Individual	Not in support of housing development. States development would be too high density and may restrict Public Rights of Way across the site.	Comment noted. The development proposed is considered to be an appropriate level to ensure the deliverability and long-term viability of the uses, whilst ensuring there is not a negative impact on the character of the reservoir. The development proposed in the masterplan do not pose any impacts upon the public Rights of Way.	No change required.
1 Individual	Not in support of housing development generally. States that only the creation of Passivhaus designed schemes, without car parking would be appropriate.	Comment noted. The SPD outlines guidance for all new development to be designed and constructed to maximise energy efficiency and incorporate low or zero carbon technologies. In addition, it recommends outdoor spaces to be designed to take account of the climate and maximise its positive uses.  The SPD sets down a Transport Policy that advocates sustainable modes of transport, to lessen car dependency.	No change required.
1 Individual	Not in support of housing development. States the development would be harmful to the existing tranquil character and views across the reservoir.	Comment noted. The SPD provides a clear commitment to the sustainment and enhancement of the natural environment. The environmental sustainability of the reservoir will be safeguarded, by all development having to support the objectives in the Edgbaston Reservoir Local Nature Reservoir Management Plan 2021.	No change required.
10 Individuals	Not in support of housing development. States Social housing must be delivered rather	Comment noted. The SPD explains that the Osler Park and Osler Place (OP&OP) and Port Loop sites were designated for housing	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
	than Private housing, to address the needs in the Ladywood ward. Alongside this, the natural environment must be protected and not transferred into Private ownership.	development by the Birmingham Development Plan (2017). The new housing will need to include a variety of housing types and tenures to address housing demand within the city. As part of this housing mix, an appropriate level of Affordable housing will be provided – with a current threshold of 35% of affordable homes being required on all development sites with an excess of 15 homes.  Birmingham City Council will continue to own and manage the Local Nature Reserve (LNR), with support from the Edgbaston Reservoir Local Nature Reserve Committee.	
2 Individuals	Not in support of housing development. State that Brownfield sites, without existing community value should be used for housing development. The reservoir is a public space that encourages people to go outdoors and be part of the community.	Comment noted. The SPD explains that the Osler Park and Osler Place (OP&OP) and Port Loop sites were designated for housing development by the Birmingham Development Plan (2017). New homes are required to meet the projected population growth of the city, with an additional 150,000 people by 2031. The council regularly reviews its Brownfield register, that identifies all potential sites for new development, but land supply is constrained in the city.	No change required.
5 Individuals	Not in support of housing development. State existing housing stock, surrounding the reservoir should be renewed instead of new homes being built.	Comment noted. The enhancement of existing homes is outside the remit of the SPD, although would be supported. However, the total number of new homes which need to be developed in the city necessitates development and sites within the masterplan area have been identified to accommodate growth.	No change required.
2 Individuals	Not in support of housing development. State the existing infrastructure will be unable to support the new homes proposed.	Comment noted. The masterplan identifies the importance of monitoring requirements for new infrastructure, which is planned for through the local plan and is the subject of ongoing engagement with strategic and delivery partners.	No change required.
2 Individuals	Not in support of housing development. States the proposed design for the new homes features limited private amenity space	Comment noted. A range of new homes are envisaged with appropriate amenity space, including significant private amenity	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
	and no car parking spaces. Therefore, residents will seek to appropriate public spaces and their lifestyle will create problems for the area i.e., BBQs, late-night parties and drugs.	space. Management of public spaces will continue to be important. Car parking provision is proposed in line with policy.	
1 Individual	Not in support of housing development. States high-rise development will consume spaces that could be better shared and change the established character of the reservoir, by the introduction of urban design.	Comment noted. The SPD explains that the Osler Park and Osler Place (OP&OP) and Port Loop sites were designated for housing development by the Birmingham Development Plan (2017). New homes are required to meet the projected population growth of the city, with an additional 150,000 people by 2031. Therefore, these designated sites will address some of this housing need but the SPD seeks to strike a balance between the provision of new homes and the sustainment of the reservoir as one of the most important Open spaces in Birmingham.  Building heights are addressed in the masterplan.	No change required.
3 Individuals	No in support of housing development. States it will create an increase in existing house prices and rents in the local area. If gentrification occurs, housing will become unaffordable and existing residents are pushed out.	Comment noted. The SPD explains that the Osler Park and Osler Place (OP&OP) and Port Loop sites were designated for housing development by the Birmingham Development Plan (2017). The new housing will need to include a variety of housing types and tenures to address housing demand within the city. As part of this housing mix, an appropriate level of Affordable housing will be provided – with a current threshold of 35% of affordable homes being required on all development sites with an excess of 15 homes.	No change required.
18 Individuals	Not in support of housing development. The substantial increase in footfall around the reservoir is likely to contravene Local Nature Reserve criteria and its designation be withdrawn.	Comment noted. The Local Nature Reserve will be protected by the Local Nature Reserve Management Plan (2021). The Plan was recently updated and includes measures to enhance the LNR and the SPD states that all development within the LNE boundaries will be required to deliver biodiversity net-gain. The protection of the LNR is a key ambition of the SPD and it is envisaged that	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		the Edgbaston Reservoir Local Nature Reserve Committee will contribute to improvements, through the arrangement of community volunteers and promoting opportunities for community stewardship.	
1 Individual	Not in support. States delivery of housing at reservoir will change the community's relationship to it and to the council. The use of public funds to support Developer profits, will sully relationships in future years.	Comment noted. The masterplan does not specify the delivery mechanism for new development. There is a clear requirement for development to contribute to enhancements to the reservoir and deliver affordable housing. These elements would not be delivered without a clear vision for the area as set out in the masterplan.	No change required.
1 Individual	Not in support. States development has been 'Greenwashed', and the masterplan fails to present the reality.	Comment noted. The SPD states a clear commitment to create a sustainable plan that will safeguard the reservoir for future generations. The Local Nature Reserve will be protected by the objectives in the Local Nature Reserve Management Plan (2021) and wider targets for all new development to meet biodiversity net-gain targets is also required.	No change required.
2 Individuals	Not in support. State the masterplan fails to address those residents and communities most in need.	Comment noted. The SPD seeks to create a sustainable plan that will safeguard the reservoir for future generations and create a destination that provides opportunities for all communities to come together. The SPD states the reservoir is one of Birmingham's most important Open spaces and the attraction of new investment will bring benefits for all communities.	No change required.
1 Individual	Not in support. States the plans for Tower Ballroom site contradict the overall vision, as the development will not protect the natural environment and will impact upon tranquillity,	Comment noted. The Osler Park and Osler Place (OP&OP) site is only one element of the reservoir masterplan area. Whilst residential development is planned on this site, other areas of the masterplan area are not proposed for development but for improvements to the environment to enhance accessibility and connectivity.	No change required.
2 Individuals	Not in support. Query how the redevelopment of the Tower Ballroom will fit into the overall Vision?	Comment noted. The Osler Park and Osler Place chapter of the SPD outlines how the Tower Ballroom site is to be redeveloped	No change required.



Consultee	Representation summary	Council response	Proposed Changes to SPD
		and the contribution that it will make to achieving the overall vision for the masterplan area.	
1 Individual	Not in support. States that the sense of community is the most important issue, in association to the relationship between the local community and the reservoir.	Comment noted. The SPD recognises the importance of local communities and their relationship to the reservoir. The SPD seeks to strengthen these relationships by widening the existing offer and enhancing and improving the reservoir environment, that will make the site more accessible.	No change required.
1 Individual	Not in support. States there is contradiction between intention to create clean surroundings as an increase in people, will bring increased litter to the reservoir.	Comment noted. The SPD proposes improvement to the Public Realm, which will include the installation of new bins. The specific issue of litter is outside the remit of the SPD but this issue will be considered as applications come forward for development.	No change required.
Karis Medical Centre	Asks what consideration has been given to Primary Care Services? The Karis Medical Centre is now at full capacity and options for extension of the facility require funding and support to secure delivery. Asks for the total number of new homes to be delivered by the masterplan to be confirmed.	Comment noted. The Integrated Care Board is responsible for planning healthcare provision for the local population, and proposals for growth are identified with them. The masterplan does not specify the number of new homes, and nor should it as that is a matter for individual schemes. The Local Plan identifies the potential for some 3,000 new homes in the Greater Icknield area, but also recognises that there is a shortfall in the number planned for within the city.	No change required.
1 Individual	Asks that the masterplan better addresses the needs of Vulnerable persons and Societal groups with specific needs. Current version of plan fails to address the wide range of diversity in users, i.e., mothers and children or explain how their continued use within the new development will be assured.	Comment noted. The SPD states an ambition to improve the offer of the reservoir and create a destination that provides an opportunity for communities to come together. The masterplan confirms the importance of the reservoir as one of Birmingham's most important Open spaces but establishes a broad vision, which allows a very wide variety of activities and uses to be considered. The plan cannot reasonably reference every possible user group or specific need but does propose enhancements to the reservoir area which will benefit vulnerable people.	No change required.
1 Individual	Asks how the impacts of the long period of building works on the Children's play park will	Comment noted. The SPD clearly states the crucial role that Osler Street Park will play, in providing a safe and welcoming space for	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
	be managed? Unless carefully considered, local children will be unable to use the park for many years.	children and young people. No development is proposed within the park save for improvements to play facilities. Development across the road from the park can be managed such that its impacts are minimised and mitigated, and this will be addressed through planning applications. New residential development will improve public safety in the area through an increase in natural surveillance and improved pedestrian linkages between the park and the reservoir.	
1 Individual	Asks if the masterplan will support increased private ownership in the area? This will address issue of undesirable practices of Private landlords.	Comment noted. The new housing will need to include a variety of housing types and tenures, in line with the Local Plan.	No change required.
3 Individuals	Ask the masterplan addresses the need and demand for Social housing in the city.	Comment noted. The SPD explains that the Osler Park and Osler Place and Port Loop sites were designated for housing development by the Birmingham Development Plan (2017). The new housing will need to include a variety of housing types and tenures to address housing demand within the city. As part of this housing mix, an appropriate level of Affordable Housing will be provided – with a current threshold of 35% of affordable homes being required on all development sites with an excess of 15 homes. This may include a mix of Affordable products.	No change required.
2 Individuals	Asks safety aspects are more carefully considered by the masterplan. Proposals and measures to deter criminal behaviours should be included.	<p>Comment noted. The SPD is seeking to bring positive changes to the reservoir environment, through the enhancement of the natural environment and physical improvements. Enhancement to pathways, with low-level lighting and signage, the repurposing of derelict and isolated spaces and an upgrade to the Public Realm, will all contribute to making the space safer.</p> <p>In addition, an increase in user numbers and the permanency of residents in new homes, will create increased natural surveillance of the area.</p>	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
1 Individual	Asks that current fly-tipping problem is addressed first, before other issues are considered.	Comment noted. The reservoir is currently managed and maintained by the council but the issue of fly-tipping is outside the remit of the SPD.	No change required.
6 Individuals and 1 Elected Member	State that new facilities will be required to strengthen the existing infrastructure and support the new households, i.e., medical, schools, leisure, and youth services.	Comment noted. The masterplan has been amended to make specific reference to the monitoring – which already takes place and is guided by the Local Plan which identified infrastructure requirements – of demand for such provision.	The Delivery and Management chapter has been updated to reference the monitoring infrastructure requirements generated by growth.
1 Individual	States that any development should be set-back from the water's edge by the creation of a green perimeter boundary. The green landscaping should screen the new homes and protect views.	Comment noted. Following comment on the second round of public consultation, a new layout for Osler Park and Osler Place is now proposed. This new layout sets the housing development further back from the water's edge and removes one whole block of development, to facilitate the creation of a Public open space, which will feature green landscaping and areas for community activity and informal relaxation.	The masterplan has been updated to set development further from the waters' edge at Osler Place.
Push Bikes	States that the masterplans intention to make the reservoir a destination, may undermine its role in the City's cycle network.	Comment noted. The SPD outlines its intention to make significant improvements to connections across the reservoir and from the reservoir to other destinations. The Connectivity chapter highlights the many benefits that improved levels of connectivity can bring, particularly for fostering an increase in the use of sustainable modes of transport e.g., walking and bikes. Whilst the SPD also promotes the development of new homes and increased activities at the reservoir, its commitment to supporting cyclists is evident and early discussions have been undertaken with Travel for West Midlands (TfWM), in relation to	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		the potential installation of a Mobility Hub within the masterplan boundaries.	
1 Individual	States that the local area is dominated by HMO's and unmanaged rental properties.	Comment noted. The council is seeking to address the impact of HMOs through alternative means, and this is outside the remit of the masterplan.	No change required.
1 Individual	States the reservoir is a valuable open green space. Many local residents don't have their own garden or green space to use.	Comment noted. The SPD states that the Edgbaston Reservoir is one of Birmingham's most important open spaces and proposed further enhancement of the space.	No change required.
1 Individual	States that the vision words are positive but queries the deliverability of it all.	Comment noted. The SPD acknowledges that successful delivery will be dependent upon the support of partners, local residents and reservoir users. The key projects to drive delivery have been divided into short, medium, and long-term timelines and it is recognised that development will happen incrementally, with some projects proving challenging and requiring funding to be identified.	No change required.
1 Individual	States the council should prioritise other important issues over the masterplan, e.g., investment in road and highway safety.	Comment noted. The masterplan has been prepared as a formal Supplementary Planning Document (SPD), to provide a strong framework for decision-making on applications that come forward for development. The SPD is an important tool, to add additional guidance to the main Birmingham Development Plan (2017) and will ensure that new development is at a scale, design and type that is appropriate for the reservoir location. This activity has been undertaken whilst other Policy areas have been progressing their own priorities.	No change required.
1 Individual	States there is too much emphasis on connectivity and movement through the reservoir. Additional attention should be given to those visiting the reservoir and enhancing that experience.	Comment noted. The SPD discusses improvements to connectivity both across the reservoir and its relationship within a wider network of cycle and walking routes. Improving connectivity is an ambition, that will allow the new homes to successfully integrate with the existing community and enable easy access to the City Centre, using sustainable means of transport. However, the SPD also clearly states that the reservoir	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		is an Open space for everyone to use and benefit from and several chapters of the document discusses how improvements to the environment will increase use.	
1 Individual	Requests an amendment is be made to the headline wording on page 19, to recognise existing activity:  'Opportunities will <b>continue</b> to provide'	Suggestion noted. The headline wording is currently clear, summarising the ambition for new and existing communities to come together. In addition, the SPD does refer to the range of activities that are currently on-going at the reservoir, meaning the addition of the word 'continue' is not considered necessary.	No change required.
4 Individuals	State that the litter and waste created by the new development will need to be well-managed. With collections being enough to meet the increased volume generated.	Comment noted. The collection of waste is outside the scope of the SPD but all waste matters will be fully assessed, as applications for development come forward.	No change required.
1 Individual	States that the reservoir is unsafe. Measures should be implemented to improve the responsibilities of dog owners.	Comment noted. The reservoir is currently managed and maintained by the council but the behaviour of individual dog owners is outside its control.  The SPD is seeking to bring positive changes to the reservoir environment, through the enhancement of the natural environment and physical improvements to pathways, the repurposing of derelict space and an upgrade to the Public Realm, all of which will make the space safer.	No change required.
1 Individual	States that the management of the reservoir needs attention, as a range of anti-social behaviours are currently evident but are not addressed i.e., quad bikes, BBQs, fireworks, discarded bags with food.	Comment noted. The reservoir is currently managed and maintained by the council, with the Canal & River Trust (CRT) having responsibility for its Statutory duties as undertaker of the reservoir. However, as the masterplan site evolves by new development, the management and stewardship of area will expand and it is anticipated that the Edgbaston Reservoir Local Nature Reserve Committee may have an increased involvement in the community stewardship of open spaces surrounding the reservoir.	No change required.



Consultee	Representation summary	Council response	Proposed Changes to SPD
		Together, with increased use of the masterplan area and removal of underused spaces, the anti-social behaviours should be reduced substantially.	
1 Individual	States that graffiti and litter should be better managed at the site.	<p>Comment noted. The SPD seeks to respond to the issue of graffiti in a positive manner, outlining the potential for local artists or local community groups to create new street art / murals that celebrate the reservoir.</p> <p>The management of litter and waste is the responsibility of the Parks Department, and the SPD outlines the intention for improvements to the Public Realm, which will include the installation of new bins and signage.</p>	No change required.
1 Individual	Asks how the proposals will address the poor image of the North Edgbaston Ward, that is held by people currently?	<p>Comment noted. The masterplan area is located within both the North Edgbaston and Ladywood wards although the largest proportion is within the Ladywood ward. The SPD outlines the closeness of the masterplan site to significant employment, leisure, and retail opportunities within the City Centre, thereby presenting a positive image of North Edgbaston.</p> <p>Local perceptions of the ward are outside the remit of the SPD but it is hoped that the potential for positive changes at the reservoir will bring benefits for the surrounding areas.</p>	No change required.
1 Individual	Asks how nature at the reservoir will be enriched?	<p>Comment noted. The SPD states that all development at the reservoir should support the biodiversity objectives and targets in the Edgbaston Reservoir Local Nature Reserve Management Plan (2021). Within this Plan, the protection and enhancement of habitats for nesting birds and bats is outlined as well as increased planting of fruit and nut trees to support wildlife, in general.</p> <p>Further, an opportunity has been identified for increased</p>	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		community stewardship and participation in the management of the natural environment at the reservoir.	
1 Individual	Asks for additional details on the artist sketch on page 19, to confirm how many units are to be accommodated within each apartment block and explain how a high standard of development will be achieved?	Comment noted. Following comments submitted to the second round of public consultation, the artist's sketch has been amended. A final layout for Osler Park and Osler Place (OP&O) now removes a whole single block from the corner plot and the number of retail units reduced.  The SPD clearly states that all new development will be expected to demonstrate high-quality sustainable design.	No change required.
1 Individual	Asks if the new homes will have their own gardens?	Comment noted. The SPD doesn't provide explicit details as to the types of gardens that the new homes may feature. It is anticipated that a mixture of housing types will be built and these are likely to be non-traditional, meaning that shared gardens or terraces could be created rather than traditional rear gardens. The exact details at to the outdoor space of the new homes will be determined, as applications for development come forward.	No change required.
1 Individual	Asks for the Public realm of the surrounding streets to be improved, i.e., hanging baskets and bins. Improvements will encourage local residents to be proud of their area.	Comment noted. The SPD is focused upon the identified masterplan boundaries and cannot discuss areas surrounding it. However, one of the purposes of the SPD is to attract new investment to the reservoir and it is hoped that this then brings benefits to the wider area.	No change required.

### Connectivity:

Consultee	Representation summary	Council response	Proposed Changes to SPD
18 individuals	General support.	Support welcomed.	No change required.
14 individuals	Concerns regarding adequacy of parking provision. Some comments linked this to poor	Comments and concerns noted. The council recognises there is a need for some parking provision to be provided for those who	The masterplan has been updated to

Consultee	Representation summary	Council response	Proposed Changes to SPD
	public transport provision or to increased parking demand from housing or recreation uses. Some raise concern about impact of parking on surrounding streets.	cannot access the reservoir by foot, bike, or public transport. As such, it includes reference to parking at Reservoir View, as well as an update to state that the existing car park accessed from Reservoir Road will be reopened in a secure and managed way to provide a limited number of spaces. The land directly adjacent to the water will be greened to provide a pleasant waterside location and contribute to the natural environment. Plans will come forward as part of the delivery of Osler Place and design detail will be developed in partnership with key stakeholders including West Midlands Police to ensure it is designed to minimise anti-social behaviour wherever possible. Specific details of the amount of car parking and how it is managed for each of the sites within the masterplan will be determined at a later stage and be in line with the Car Parking SPD.	state that the existing car park will be reopened in a secure and managed way to provide a limited number of spaces. The land directly adjacent to the water will be greened to provide a pleasant waterside location and contribute to the natural environment. Plans will come forward as part of the delivery of Osler Place and design detail will be developed in partnership with key stakeholders including West Midlands Police to ensure it is designed to minimise anti-social behaviour wherever possible.
5 individuals	Suggests car parking provision should be minimised or limited to disabled parking.	Comment noted. The council promotes active travel but recognises there is a need for some parking provision to be	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
	Some suggests no parking or vehicular access to reservoir.	provided for those who cannot access the reservoir by foot, bike, or public transport.	
2 individuals	States importance of disabled parking provision, to have a reservoir view.	Comment noted. The masterplan states provision will need to be made for well-located designated disabled parking bays in line with the Birmingham Parking SPD and Birmingham Design Guide.	No change required.
2 individuals and Calthorpe Estates	Questions about what careful / sustainable management of vehicular access means and how this will be ensured.	Comment noted. Determining the management regime for parking and exact details of vehicular access is beyond the scope of the masterplan. These details would be considered during implementation. However, the masterplan has been updated to provide further clarity that the council will work with key stakeholders including West Midlands Police to ensure car parking is designed to minimise anti-social behaviour wherever possible.	The masterplan has been updated to provide further clarity that the council will work with key stakeholders including West Midlands Police to ensure car parking is designed to minimise anti-social behaviour wherever possible.
3 individuals	Questions about how car parking needs have been calculated and request to publish parking / traffic surveys.	Comment noted. Car parking levels for individual developments on the sites identified in the masterplan will be determined at the planning application stage using the Car Parking SPD. Surveys have not been undertaken of current car parking utilisation / occupancy levels nor have traffic counts been undertaken.	No change required.
1 individual	Suggests underground car park on Osler Park and Osler Place.	Suggestion noted. The masterplan states changes in ground levels across the former Tower Ballroom site create the opportunity for waterfront buildings to be serviced at basement level and to provide residential parking below buildings in under crofts or basements. Details will be agreed at the planning application stage.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
5 individuals	Comments on poor quality of buses / request for improvements to buses.	Comments noted. It isn't within the scope of the masterplan to propose amendments to local bus routes. However, the council will continue to engage with Transport for West Midlands to promote enhancement to bus services in the area. The masterplan proposes improved access and signage on existing bus connections on local roads.	No change required.
2 individuals	Requests a tram stop. Suggests the west side tram could be extended with a stop at Monument Road called 'Reservoir'.	Comment noted. At present there are no proposals to run a tram route closer to the reservoir, however the masterplan highlights the need to improve connectivity between the reservoir and the tram route along Hagley Road.	No change required.
8 individuals	States existing connections are adequate / do not support the chapter (general).	Comments noted. The masterplan identifies the existing connections in Plan 4 but seeks to strengthen these.	No change required.
4 individuals	States traffic safety concerns on surrounding roads / traffic calming needed on surrounding roads / states need to filter the corner of Reservoir and Osler Roads for traffic safety.	Comments and concerns noted. It is beyond the scope of the masterplan to consider traffic changes outside of the masterplan boundary. The proposals for Osler Park and Osler Place show traffic calming on Osler Street and Reservoir Road alongside Osler Park.	No change required.
1 individual	States permit parking is needed on surrounding roads.	Comment noted. There are controlled parking zones / residents parking zones (CPZ) in operation in several areas outside of the city centre. The Car Parking SPD recognises that there may be a need for controlled parking in areas close to the city centre. This issue will be kept under review.	No change required.
1 individual	Concerns about impact of vehicles on wildlife.	Concern noted. The masterplan states that all proposals and development within the masterplan boundary must not have a detrimental impact on the natural environment. The masterplan promotes the increased use of sustainable travel modes, e.g., walking and cycling, to lessen car dependency. New development at Osler Park and Osler Place will seek to minimise car usage and encourage new residents to car-share. These measures will minimise the impacts of vehicles on wildlife at the reservoir.	No change required.



Consultee	Representation summary	Council response	Proposed Changes to SPD
2 individuals	Concern about anti-social behaviour at car park / request for locking of car park gate outside daylight hours.	Concern and suggestion noted. The council recognises there is a need for some parking provision to be provided for those who cannot access the reservoir by foot, bike, or public transport. As such, the masterplan has been updated to state that the existing car park will be reopened in a secure and managed way to provide a limited number of spaces for those who need to access the site by private car. Plans will come forward as part of the delivery of Osler Place and design detail will be developed in partnership with key stakeholders including West Midlands Police to ensure it is designed to minimise anti-social behaviour wherever possible.	The masterplan has been updated to provide further clarity that the council will work with key stakeholders including West Midlands Police to ensure car parking is designed to minimise anti-social behaviour wherever possible.
2 individuals	States the canals are unwelcoming, unsafe and unusable at night, focus should be on dedicated cycle routes.	Comment noted. Only a small part of the Port Loop canal lies within the masterplan area. Cycle routes outside of this area are not within the scope of the masterplan. The Smethwick to Birmingham Corridor Framework SPD proposes improvements to the canal network in the area while the Dudley Road Improvement Scheme will create a dedicated new cycle route.	No change required.
2 individuals	Requests improved signage connecting the reservoir with Harborne Walkway and Summerfield Park.	Request noted. The masterplan states existing pedestrian and cycling connections to nearby neighbourhoods will be strengthened and enhanced including Harborne Walkway and Summerfield Park. The masterplan also proposes improved signage and information boards.	No change required.
3 individuals	States there is a need to improve conditions for cycling which are poor.	Comment noted. The masterplan proposes improving cycling routes within the masterplan area. Outside of the masterplan area it was recognised through the Smethwick to Birmingham Corridor Framework work that walking and cycling facilities in this area are poor at present. A central objective of the framework is to improve them.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
Midland Sailing Club, Birmingham Rowing Club and 2 individuals	States sports clubs need access to car parking due to the need to bring equipment. Midland Sailing club supports the idea of sharing parking spaces unused by members with the public.	Comment noted and support welcomed. It is understood that there is a requirement for parking for some reservoir users. The masterplan states parking should be shared by all users and prioritise those who are unable to access the reservoir by foot, bike, or public transport. Opportunities for prioritisation to support water activation should be explored. Exact parking arrangements will be clarified as applications come forward for development. All proposals with associated parking spaces will be assessed against the Car Parking SPD.	No change required.
2 individuals	States there is a lack of specifics about what the connectivity improvements will comprise.	Comment noted. It is considered that adequate detail is provided for an SPD. Further details will be firmed up as the proposals develop, and consultation carried out.	No change required.
1 individual	States at least three crossings on Icknield Port Road should be implemented. States they should be narrowed with a lower speed limit, wider pavements and segregated cycle tracks.	Comment noted. The masterplan includes a new crossing on Icknield Port Road to tie in with the Port Loop development. Further crossings and the other measures proposed in this response would be desirable and supported.	No change required.
4 individuals and Birmingham City Society	Support for improved walking and cycling links to Port Loop, canals, Harborne Walkway, and the city centre.	Support welcomed.	No change required.
2 individuals	States proposals should improve the existing walkway between Gillott Road and the reservoir.	Comment noted. The masterplan supports improvements to this entrance.	No change required.
1 individual	Concern about potential for conflict between pedestrians and cyclists.	Comment noted. The masterplan makes it clear that the walkway around the reservoir is a shared surface and proposes improved signage.	No change required.
Sama Investments Ltd	States the masterplan should reference connections to Chamberlain Gardens and Monument Road.	Comment noted. Connections to Chamberlain Gardens and Monument Road are shown on the connectivity plan 4.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
Sama Investments Ltd	States more direct pedestrian and cycling route between the reservoir's northern path and west gate to Summerfield Park should be explored.	Comment noted. The masterplan states that existing pedestrian and cycling connections to nearby neighbourhoods will be strengthened and enhanced, which includes the link to Summerfield Park.	No change required.
Push Bikes and 1 individual	States Portland Road has high traffic volumes and is hostile to cycle on. States cycle routes through the reservoir are important and wider paths should make managing conflicts with pedestrians easier.	Comment noted. The contribution that the reservoir location plays to the cycle network is recognised and the masterplan supports the enhancement of connections across the site for both cyclists and pedestrians.	No change required.
Chief Constable of the West Midlands Policy	The following wording is suggested for the Connectivity section of the masterplan: <i>'The CCWMP will be consulted about any transport and connectivity proposals to ensure that opportunities to improve safety, both on the transport system itself and in the surrounding environment, are identified and appropriate measures included to promote safe and accessible environments where crime and disorder and the fear of crime do not undermine the quality of life or community cohesion'.</i>	Comment noted. Although the council supports the objectives behind this proposed change, it is considered unnecessary as it is standard practice that CCWMP will be consulted about such proposals.	No change required.
Calthorpe Estates	States there should be a new pedestrian link to Chamberlain Gardens, New Garden Square and Hagley Road.	Comment noted. The masterplan states a commitment to strengthen and enhance the existing pedestrian and cycling connections to nearby neighbourhoods. It also states that links to the city centre will be improved but specific destinations are not identified, as there are too many to include.	No change required.

Activity:

Consultee	Representation summary	Council response	Proposed Changes to SPD
15 individuals, Sport England, Marine Society & Sea Cadets	In general support of principles for activity.	Support welcomed.	No change required.
2 individuals	Not in general support of principles for activity (no further details provided).	Comments noted.	No change required.
1 individual	In support for cafés, bars, and restaurants, to create evening activity.	Support welcomed. The proposals for the Osler Park and Osler Place (OP&OP) opportunity include non-residential uses e.g., community, cultural, commercial, leisure, and educational facilities on the ground floor of buildings along the waterfront.	No change required.
4 individuals	In support of a coffee shop or coffee van.	Support welcomed. The proposals for the Osler Park and Osler Place (OP&OP) opportunity include non-residential uses e.g., community, cultural, commercial, leisure, and educational facilities on the ground floor of buildings along the waterfront.	No change required.
5 individuals	Not in support of proposals. Opposed to housing / development (no other details provided).	Comments noted. Several sites in the masterplan boundary (including the Tower Ballroom site and The Edgbaston Waterworks site), are allocated for development by the Birmingham Development Plan (2017). The masterplan seeks to build on the policy allocation and provide guidance to ensure future development delivers high-quality housing-led development that protects and enhances natural and heritage assets at the reservoir.	No change required.
5 individuals	Not in support of proposals. States concerns some activities will lead to over-use to detriment of wildlife / LNR (including due to noise and light).	Comment noted. The masterplan states all activity will be required to protect and enhance the Local Nature Reserve setting. The Local Nature Reserve Management Plan for the reservoir provides further guidance and has recently been revised by the Birmingham and Black Country Wildlife Trust. The	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		masterplan states the Local Nature Reserve Management Plan should be read in conjunction with the masterplan and all development and proposals at the reservoir should support the biodiversity objectives and targets set out in the Management Plan.	
2 individuals	Suggests a joint café / visitor / interpretation centre.	Suggestion noted. The proposals for the Osler Park and Osler Place (OP&OP) opportunity include non-residential uses e.g., community, cultural, commercial, leisure, and educational facilities on the ground floor of buildings along the waterfront. Those uses could include a café/visitor centre.	No change required.
3 individuals	States concerns about noise from overcrowding and littering / parking problems, particularly during events, if not well managed.	Comment noted. The masterplan states all activity and development that has a demonstrated adverse impact on the Local Nature Reserve will not be supported. These issues relate to the management of the reservoir. It is recognised the local community would like to see an increased level of service. In line with the approach taken at several other parks and nature reserves across Birmingham, the council is keen to work with the Local Nature Reserve Committee to establish a greater role for community stewardship. Furthermore, the level of noise generated at potential future events cannot be controlled by the masterplan.	No change required.
1 individual	Queries where gardening would occur and how this would be managed, to avoid harm to existing plants and wildlife.	Comment noted. The masterplan states a broad range of activities will be encouraged to meet the needs of the diverse population including shared spaces for communal gardening. Details of what this could look like and how it would be managed would be considered at the planning application stage.	No change required.
Midland Sailing Club and 1 individual	States concerns over management of conflict between people and wildlife. Suggests Wardens should be on site more to educate and enforce and dogs should be kept on leads during nesting season.	Comments noted. It is recognised the community would like to see increased management of the reservoir however there are no resources to secure this service at present. In line with the approach taken at several other parks and nature reserves across	No change required.



Consultee	Representation summary	Council response	Proposed Changes to SPD
		Birmingham, the council is keen to work with the Local Nature Reserve Committee to establish a greater role for the community.	
1 individual	States support for community gardening.	Support welcomed. The masterplan states a broad range of activities will be encouraged to meet the needs of the diverse population including shared spaces for communal gardening.	No change required.
2 individuals	States no motor sport or noisy water sports should be permitted.	Comment noted. The masterplan clearly states that all activity will be required to protect and enhance the Local Nature Reserve setting. The existing water sports club play a key role in activating the water and encouraging participation. Additional water activity will be supported where it meets the vision for the reservoir, broadens participation and does not pose any harmful impacts to the Local Nature Reserve.	No change required.
1 individual	Suggests sustainable buildings and independent cafes in the derelict buildings.	Comment noted. The masterplan promotes sustainable building practices. The re-purposing of the derelict Rangers Bungalow is proposed, along with improvements to the historic buildings at Icknield Port Yard.	No change required.
1 individual	Suggests cycle hub with workshop for maintenance and repairs.	Comment noted. The masterplan seeks to increase sustainable modes of transport and lessen car dependency. As part of the second round of consultation, discussion have been had with Transport for the West Midlands (TfWM) on its concept for Mobility Hubs, where cycles/scooters can be hired and repaired in one place. Discussions are currently ongoing, but a Hub would contribute to the success of the masterplans vision. There are opportunities for a mix of uses at Osler Place which could also include the facilities suggested.	The masterplan has been amended, to include reference to potential for the creation of a Mobility Hub.
2 individuals	Suggests the water quality is improved to enable outdoor swimming.	Suggestion noted. The detail of water uses to be permitted is outside the scope of the SPD and following discussion with the council's Parks team and the existing water user groups, it has been decided that promoting open water swimming in the masterplan would not be appropriate.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
9 individuals	States the need for public toilets.	Comment noted. The masterplan states public toilets will be required to enable visitors to spend more time at the reservoir and exact arrangements will be confirmed, as applications come forward for development.	No change required.
1 individual	Requests more leisure and recreation activities.	Comment noted. The masterplan promotes opportunities for increased activities at the reservoir. It states that a broad range of activities will be encouraged, that meet the needs of the diverse population.	No change required.
6 individuals	Suggests the creation of a nature education facility and / or nature hides for wildlife watching.	Comment noted. The masterplan recognises the reservoir is an important space for visitors to enjoy and interact with nature and increased education on nature and wildlife would be supported. These uses would be in line with the masterplan vision.	No change required.
1 individual	Suggests the consolidation of water sports clubs onto one site.	Suggestion noted. The masterplan reflects the preferred options of the clubs, which is that they remain in their current locations.	No change required.
2 individuals	Not in support of consolidation of water sports clubs onto one site.	Comment noted. The masterplan reflects the preferred options of the clubs, which is that they remain in their current locations.	No change required.
3 individuals	In support of increased water sports.	Comment noted. The masterplan states that opportunities to celebrate and promote the role of the reservoir as a location for water sports will be encouraged.	No change required.
1 individual	States that Anglers' Rights should be guaranteed.	Comment noted. It is outside of the scope of the masterplan to provide commentary on fishing Rights.	No change required.
2 individuals	States a need for more informal activity for young people.	Comment noted. The masterplan states that a broad range of activities will be encouraged to meet the needs of a diverse population. It goes on to say that activities should encourage leisure and creative arts and interaction with nature, to support physical and mental wellbeing. Any of these types of activities could be enjoyed by young people.	No change required.
1 individual	States that running should be mentioned as an activity.	Comment noted. The masterplan has been updated to include reference to running.	The masterplan has been updated to include reference to running.

Consultee	Representation summary	Council response	Proposed Changes to SPD
1 individual	Requests additional places to sit.	Comment noted. The masterplan encourages the provision of seating at appropriate locations, for people to relax and enjoy the reservoir.	No change required.
1 individual	Suggests the provision of community spaces.	Comment noted. The proposals for the Osler Park and Osler Place (OP&OP) opportunity include non-residential units for community, cultural, commercial, leisure, and educational facilities on the ground floor of buildings along the waterfront. These units could be used for a wide range of community activities, depending upon community interests.	No change required.
1 individual	States support for theatrical and music events.	Support welcomed. The masterplan states activities should encourage leisure and creative arts, interaction with nature and support physical and mental health and well-being. This broad range of activities could include theatrical and music events. The masterplan has been amended to include a public space in front of Reservoir Lodge within the Osler Park and Osler Place opportunity. There is potential to include a landscaped amphitheatre which could be used for theatrical and music activity.	No change required.
1 individual	States there is a metal bike container very nearby, that is in regular use for the hiring of bikes. Will this continue?	Comment noted. The council will work with the Active Wellbeing Society and others to ensure that the reservoir can continued to be used for their activities.	No change required.
2 individuals	State that noisy activities would be better located in Summerfield Park.	Comment noted. The masterplan clearly states that any activity will be required to protect the Local Nature Reserve setting. The masterplan includes references to improving linkages to Summerfield Park so reservoir users will be able to easily move between the two spaces.	No change required.
1 individual	States concern about impact of buildings on water sports.	Comment noted. The development principles require new development to recognise the role the reservoir plays as an active water sport location. Additionally, the guidance for the Reservoir Link area states that, all proposals for buildings taller than the dam wall will only be allowed where they protect key views and	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		make a positive contribution to local character. In relation to this, proposals will need to demonstrate that wind shadowing effects would not have undue adverse impacts on water sport activities.	
2 individuals	States concern about the impact of more events and activities on local residents.	Comment noted. The masterplan seeks to create a sustainable plan to safeguard the reservoir for future generations, by attracting new investment and enabling improved access for a wider range of users. It is recognised activities will need to protect and enhance the Local Nature Reserve setting and ensure any adverse impacts on residents are minimised.	No change required.
1 individual	States the designs for new development protects the privacy of residents from the proposed increased activity.	Comment noted. The detailed design of new development will be considered at the planning application stage. Privacy will be a consideration in the assessment process, to ensure the amenity of new residents is assured and that the new development protects the amenities, currently enjoyed by existing households.	No change required.

## Character:

Consultee	Representation summary	Council response	Proposed Changes to SPD
16 Individuals and Historic England	General support of the principles that will guide future development.	Support welcomed.	No change required.
2 Individuals	States neutral support of the principles that will guide future development.	Support welcomed.	No change required.
1 Individual	In support of principles. States expectation for increased maintenance of reservoir and	Support welcomed. The council is committed to protecting and enhancing the reservoir as a green asset for Birmingham's residents and visitors to enjoy.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
	creation of green corridors to city and canal network.		
1 Individual and Birmingham Civic Society and Historic England	In support of principles to retain and repurpose existing buildings.	Support welcomed.	No change required.
1 Individual and Birmingham Civic Society	In support of principles for new development to respect key views and add to existing vistas and landmarks.	Support welcomed.	No change required.
1 Individual	In support of principles for new development to respect key views and add to existing vistas and landmarks. Suggests the west side of the reservoir could be a focus for new features such as sculptures to complement existing views.	Support and suggestion welcomed.	No change required.
1 Individual	In support of principles. Concerned with the ability of the council to deliver sustainable development and suggests greater commitment and monitoring is required to ensure high-quality development is achieved.	Support welcomed. The masterplan states that all projects and development within the plan boundaries need to meet the challenges of the climate emergency and contribute positively to the sustainability of the Local Nature Reserve. It also states all development within the Local Nature Reserve boundary that needs planning permission will be required to deliver a minimum of 10% biodiversity net gain.	No change required.
1 Individual	In support of principles. States increased density of housing will better match existing properties in the city.	Support welcomed. The masterplan states that development will be	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		high-quality and reinforce the reservoir's distinct character and identity, including its natural environment and waterside location.	
5 Individuals	Not in general support. No further details provided.	Comment noted. The masterplan provides guidance to ensure development at the reservoir will be high-quality and reinforce the reservoir's distinct character and identity, including its natural environment and waterside location.	No change required.
2 Individuals	Not in support. States proposal for housing would be harmful to existing character of the reservoir.	Comment noted. The Birmingham Development Plan allocates several sites in the masterplan boundary for housing (Tower Ballroom and Edgbaston Waterworks site). The purpose of the masterplan is to ensure the sites are developed in a way that enhances and protects the existing assets, whilst delivering homes and increased activity that is accessible to all. The masterplan states that the unique character, history, and natural environment of the reservoir will be protected and enhanced. All future schemes will be assessed against the masterplan and other adopted local plan policies. These include policies on design.	No change required.
1 Individual	Not in support. States the proposal for tall buildings could create an unsafe environment, with increased crime and a material change to the character of the reservoir.	<p>Comment noted. The Birmingham Development Plan (BDP) allocates several sites in the masterplan boundary for residential development. The masterplan seeks to build on the policy allocations and provide guidance to ensure future development delivers high-quality housing-led development that protects and enhances heritage assets. The masterplan states the unique character, history and natural environment of the reservoir will be protected and enhanced. Future development will be assessed against the masterplan and other adopted local plan policies. These include policies on design.</p> <p>A key part of the vision is to create a safe distinctive place that is accessible to everyone. Through bringing more activity and</p>	The masterplan has been amended to set the building line further back from the waters' edge and increase the level of greenery / soft landscaping on the walkway.



Consultee	Representation summary	Council response	Proposed Changes to SPD
		<p>natural surveillance from residential uses the reservoir will be safer.</p> <p>The Osler Park and Osler Place section of the masterplan has been amended to set the building line further back from the waters' edge and increase the level of greenery / soft landscaping on the walkway to soften the impact of development on the Local Nature Reserve.</p>	
1 Individual	Not in support. States the creation of luxury apartments on the water's edge will be harmful to existing character of the reservoir.	Comment noted. The Tower Ballroom is a brownfield (previously developed) site that is allocated for housing development in the Birmingham Development Plan. The purpose of the masterplan is to ensure the site is developed in a way that enhances and protects the existing assets, whilst delivering homes and increased activity that is accessible to all. The masterplan has been amended to set the building line further back from the waters' edge and increase the level of greenery / soft landscaping on the walkway to soften the impact of development on the Local Nature Reserve.	The masterplan has been amended to set the building line further back from the waters' edge and increase the level of greenery / soft landscaping on the walkway to soften the impact of development on the Local Nature Reserve.
1 Individual	Not in support. Asks that the community counterproposal is considered instead.	Comment noted. The council worked with the community members of the Community Partnership Forum (which includes representatives from the Community Consortium who submitted the Alternative Plan), on redrafting the masterplan. This was to ensure the experiences and views of the local community were better reflected in the masterplan. The second round of public consultation gave the wider community, including those not represented in the Community Partnership Forum, the opportunity to have their say on the revised masterplan	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
1 Individual	Not in support. Asks how the council will monitor development delivery and ensure the stated principles are achieved.	Comment noted. Future development will be assessed against the guidance in this masterplan and other planning policies.	No change required.
1 Individual	Not in support. States the importance of blue infrastructure to the masterplan site is not shown and that water should be considered intrinsic to any development.	Comment noted. The masterplan states water is fundamental to the reservoir's sense of place. Creating a sustainable plan will safeguard the reservoir for future generations. It also states that development will be high-quality and reinforce the reservoir's distinct character and identity, including its natural environment and waterside location.	No change required.
1 Individual	Not in support. Asks what method was employed to identify key views from the reservoir (p.25, Plan 2: views). Asks why views towards the city are deemed the most important, when residents tend to value the views of the natural environment to an equal degree.	Comment noted. The masterplan states that views are an important feature of the reservoir and an integral part of the visitor experience. The council understands that the views across the reservoir to the natural environment are equally as important. Views from the reservoir towards the city centre have been referenced and considered as they could potentially be impacted by any development within surrounding areas.	No change required.
House Urban Splash	Not in support. Asks if the full extent of the view from the dam wall in the direction of the city centre warrants protection. Requests supporting evidence and justification be provided to demonstrate why the views identified in the masterplan have been selected, and their significance. Suggests an appendix could be included as part of the masterplan which provides viewpoint photography for each view plus commentary on the character and specific qualities of each of the views that have been identified.	<p>Comment noted. The masterplan recognises that the open character and long-distance views from the dam are an important part of the reservoir's sense of place. However, it does not state that these must be preserved as existing, but that "Development will be expected to respect key views and positively add to existing vistas and landmarks through high-quality design" (p.24).</p> <p>The masterplan further states there is potential for a range of building heights and forms in the Canal Basin site, subject to respecting both the historic character of the canal yard and retaining views from the reservoir to the city centre and wider area. It is anticipated 3D massing models and computer-generated imagery visualisations will be used as necessary to</p>	The masterplan has been updated to provide greater clarity on how future development should respect views to the city centre skyline.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		assess impacts of proposed development on key views. A full assessment of all key views as an appendix as requested is not considered appropriate for this masterplan. The masterplan has been updated to provide greater clarity on how future development should respect views to the city centre skyline.	
1 Individual	Not in support. States the existing skyline must not be altered and key views from the reservoir to the Vihara pagoda and St Augustine's Church must be protected for residents who enjoy them.	Comment noted. The masterplan acknowledges views are an important feature of the reservoir and an integral part of the visitor experience. Key views at the reservoir are shown on Plan 2 (p.25), including the Buddhist Vihara Peace Pagoda and St Augustine's Church spire. The masterplan states development will be expected to respect key views and positively add to existing vistas and landmarks through high-quality design.	No change required.
1 Individual	Not in support. States views from the dam wall will be spoilt by the proposed 3-9 storey high apartments on Osler St/Icknield Port Road.	Comment noted. Outline planning permission was granted (subject to a legal agreement) in December 2020 to redevelop the land fronting Icknield Port Road and Osler Street for up to 260 residential apartments in buildings of three to nine storeys. The masterplan reflects the planning consent.	No change required.
1 Individual	Not in support. States the approval of new development in the surrounding area such as the Red Shed on the Playing Fields is evidence that principles to protect existing views will not be followed.	Comment noted. Future development will be assessed against the guidance in this masterplan as well as other planning policies including those relating to design. The masterplan acknowledges views are an important feature of the reservoir and an integral part of the visitor experience. Key views at the reservoir are shown on Plan 2 (p.25). The masterplan states development will be expected to respect key views and positively add to existing vistas and landmarks through high-quality design. It also states 3D massing models and computer-generated imagery visualisations should be used as necessary to assess impacts of proposed development on key views.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
1 Individual	Not in support. States development should not be proposed for an open space which many people use for wellbeing and to improve their mental health.	Comment noted. The masterplan acknowledges the important role the reservoir plays in providing an open space to support improved health and well-being. A key part of the vision is to create a safe distinctive place that supports the improved health and well-being of all. The masterplan provides guidance that builds on the policy allocations in the Birmingham Development Plan to ensure future development at the reservoir will be high-quality and reinforce the reservoir's distinct character and identity, including its natural environment and waterside location.	No change required.
1 Individual	Not in support. States the principles are unclear.	Comment noted. The masterplan provides guidance to ensure development at the reservoir will be high-quality and reinforce the reservoir's distinct character and identity, including its natural environment and waterside location. Future development will be assessed against the masterplan and other adopted local plan policies. These include policies on design.	No change required.
1 Individual	Not in support. States the installation of lighting will encourage increased visits during the evening/night.	Comment noted. The masterplan states any lighting should minimise light spill and not cause adverse impacts for wildlife. Lighting can make the space safer for users.	No change required.
1 Individual	Not in support. States the proposed restrictions on height and design of buildings is vague, open to interpretation and likely to be ignored by the developers.	Comment noted. It is appropriate to identify factors to be considered in determining building heights whilst allowing scope for creative design. Guidance included in the SPD will be used to assess proposals at planning application stage along with other policies.	No change required.
1 Individual	Not in support. States the wording in the masterplan on the protection of views is inadequate and would be open to interpretation by developers. Requests the masterplan is more explicit regarding the protection of views from the reservoir.	Comment noted. The masterplan acknowledges views are an important feature of the reservoir and an integral part of the visitor experience. Key views at the reservoir are shown on Plan 2 (p.25). The masterplan states development will be expected to respect key views and positively add to existing vistas and landmarks through high-quality design.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		It also states 3D massing models and computer-generated imagery visualisations should be used as necessary to assess impacts of proposed development on key views. Future development will be assessed against the masterplan and other adopted local plan policies. These include policies on design.	
8 Individuals	Not in support. States principles will be contradicted by the proposed development as it will adversely impact the established character.	Comment noted. The masterplan provides guidance to ensure development at the reservoir will be high-quality and reinforce the reservoir's distinct character and identity, including its natural environment and waterside location. Future development will be assessed against the masterplan and other adopted local plan policies. These include policies on design.	No change required.
1 Individual	Not in support. States any development would be harmful to the existing character unless it is one-storey and incorporates operations to maintain the reservoir and improve accessibility to it.	Comment noted. The Birmingham Development Plan (BDP) allocates several sites in the masterplan boundary for residential development. The BDP provides a strategy for addressing the challenges of growth across the city, with reference to climate change, the natural environment, quality of life, infrastructure, and an inclusive economy. The masterplan seeks to build on the policy allocations and provide guidance to ensure future development delivers high-quality housing-led development that protects and enhances heritage assets. The masterplan states the unique character, history and natural environment of the reservoir will be protected and enhanced. Future development will be assessed against the masterplan and other adopted local plan policies. These include policies on design.	No change required.
1 Individual	Not in support. States construction works will be harmful to the wildlife and the existing character of the reservoir.	Comment noted. The impact of construction on the natural environment will be considered as part of individual schemes delivery through the planning application stage.	No change required.
1 Individual	Not in support. States proposal for floating structure is inappropriate as water should be kept for use by boats and wildlife only.	Comment noted. The masterplan explains that water is fundamental to the reservoir's sense of place. It is the reason	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		many people visit, to enjoy the landscape setting and to take part in water-related activities. Opportunities will be taken to enhance paths and spaces, and could potentially include a floating structure, to allow visitors to feel closer to the water. Any proposal would be assessed against safety policies and demonstrate it did not have an adverse impact on the natural environment.	
1 Individual	Not in support. States design of proposed development is bland.	Comment noted. The masterplan states development will be high-quality and reinforce the reservoir's distinct character and identity. Detailed design of future development will be agreed at the planning application stage where proposals will be assessed against the masterplan and other adopted local plan policies. These include policies on design.	No change required.
2 Individuals	Not in support. States proposal for contemporary design is inappropriate and design that better reflects the heritage / traditional character of the existing area should be endorsed.	Comment noted. The masterplan states development will be high-quality and reinforce the reservoir's distinct character and identity.	No change required.
1 Individual	Not in support of new development blocking views of industrial heritage.	Comment noted. It is important the masterplan protects the natural, community and heritage assets. The masterplan states sustainable uses will be sought for historic buildings. Where appropriate, these buildings will be integrated with sympathetically designed new development. It also states historic features such as the dam wall and sluice gate gears should be celebrated.	No change required.
Historic England	Requests an amendment to wording to provide clearer guidance on the council's expectation that listed buildings will be retained.	Comment noted. The masterplan has been updated to provide clearer guidance on the council's expectation that listed buildings will be retained.	The masterplan has been updated to provide clearer guidance on the council's



Consultee	Representation summary	Council response	Proposed Changes to SPD
			expectation that listed buildings will be retained.
1 Individual	Requests public art is reflective of the character of the reservoir and contributes to user's enjoyment of the space.	Comment noted. The masterplan states opportunities for new public art that celebrates the reservoir and its unique character should be explored in collaboration with reservoir users.	No change required.
2 Individuals	Requests all new development contributes to the existing character of the reservoir. States the green space and tranquil environment should remain as an area for families.	Comment noted. The masterplan provides guidance to ensure development at the reservoir will be high-quality and reinforce the reservoir's distinct character and identity, including its natural environment and waterside location. A key part of the vision is creating a safe distinctive place that is family-friendly and accessible to everyone.	No change required.
1 Individual	Asks that opportunities are used to enhance the views from the reservoir to Tolkien's 'Two Towers'.	Comment noted. The masterplan acknowledges views are an important feature of the reservoir and an integral part of the visitor experience. Key views at the reservoir are shown on Plan 2 (p.25), including Edgbaston Waterworks Tower and Perrott's Folly. The masterplan states development will be expected to respect key views and positively add to existing vistas and landmarks through high-quality design. It also states 3D massing models and computer-generated imagery visualisations should be used as necessary to assess impacts of proposed development on key views.	No change required.
2 Individuals	Requests future development architecture is iconic and unique.	Comment welcomed. The masterplan states development will be high-quality and reinforce the reservoir's distinct character and identity. It also states any development close to the water will need to demonstrate exceptional and innovative design that addresses its setting and adds to the quality of place.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
1 Individual	Asks if views could have been considered.	Comment noted. Views were a key consideration in the production of the masterplan. The masterplan acknowledges views are an important feature of the reservoir and an integral part of the visitor experience. Key views at the reservoir are shown on Plan 2 (p.25). The masterplan states development will be expected to respect key views and positively add to existing vistas and landmarks through high-quality design. It also states 3D massing models and computer-generated imagery visualisations should be used as necessary to assess impacts of proposed development on key views.	No change required.
Inland Waterways Association	Asks for the importance of the reservoir as a working asset for the canal system is emphasised.	Comment noted. The importance of the reservoir to the wider canal system is outlined in the Context chapter.	No change required.
1 Individual	Asks that the Victorian engineering achievements are included in the wider remit of the masterplan e.g., the historical background, the creation of a heritage walking trail.	Comment noted. The historic context section of the masterplan provides an overview of the industrial / engineering history of the reservoir. Furthermore, the masterplan proposes a signposted walking trail to celebrate the heritage and culture at the reservoir and provide a key visitor attraction.	No change required.

### Sustainability:

Consultee	Representation summary	Council response	Proposed Changes to SPD
15 individuals	Agree with / support the new development principle.	Support welcomed.	No change required.
3 individuals	States the objective is vague / insufficiently specific.	Comment noted. Greater specificity will be achieved at the planning application stage and in more detailed documents such as the Local Nature Reserve Management Plan.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
2 individuals	States development that has happened to date in the area has not been sustainable.	Comment noted. It is not within the scope of the Masterplan to influence / change development that has already taken place.	No change required.
2 individuals	Not in support of excluding householder development from the Biodiversity Net Gain targets.	Comment noted. The January to April 2022 DEFRA consultation on regulations for biodiversity net gain under the Environment Act 2021 sets out the government's intention to exempt householder development from the requirement to demonstrate biodiversity net gain. The council is therefore following guidance from central government. The masterplan has been amended to state 'all qualifying development will be required to deliver biodiversity net gain'. This will enable the plan to be in accordance with what central government define as qualifying development.	No change required. The masterplan has been amended to state all qualifying development will be required to deliver biodiversity net gain.
26 individuals	Concerns regarding the impact of development around the reservoir loop on the natural environment and Local Nature Reserve.	Concerns noted. The masterplan sets out how future proposals at the reservoir will be required to protect and enhance the natural environment. This impact will also be able to be assessed, in relation to individual proposals, at the planning application stage.	No change required.
3 individuals	Concerns regarding impact on water quality (including impact on aquatic invertebrates).	Comment noted. The masterplan states that all development and proposals at the reservoir should protect and enhance the natural environment and support the biodiversity objects and targets set out in the Edgbaston Reservoir Local Nature Reserve Management Plan. Potential impact on water quality from future development will be assessed as an individual scheme comes forward and be assessed by the council's Ecologists.	No change required.
4 individuals	Concerns regarding impact of litter and / or disturbance from increased footfall on wildlife.	Comment noted. This is principally a management concern. The council understands the community would like to see increased management of the reservoir. In line with the approach taken at several other parks and nature reserves across Birmingham, the council is eager to work with the Local Nature Reserve Committee to establish a greater role for the community. The management of litter across the main areas of the reservoir masterplan site is currently the responsibility of the Parks Department. The	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		management of space and collection of litter in future years will be assessed as applications come forward for development.	
1 individual	Concerns regarding the impact on the Daubenton's Bat species.	Comment noted. In accordance with the council's local validation criteria, planning applications for development around the reservoir are required to be supported by a preliminary ecological appraisal and, if necessary, phase two and / or species-specific surveys, as well as a biodiversity impact assessment. Assessments should be informed by data held by the local biological records centre. Therefore, the assessment of impact on protected species including bats and wild birds would take place at the planning application stage and be reviewed by the council's Ecologists.	No change required.
2 individuals	Concerns regarding the impact on rare bird species which use the site including, Red-Necked Grebe, Sandwich Tern, Black Redstart, Purple Sandpiper, Sanderling, Black-Tailed Godwit, Iceland Gull, Whimbrel, Common Scoter, Woodcock, Pink-Footed Goose, as well as breeding Great Crested and Little Grebes.	Concerns noted. The masterplan states that all development and proposals at the reservoir should protect and enhance the natural environment and support the biodiversity objects and targets set out in the Edgbaston Reservoir Local Nature Reserve Management Plan. In accordance with the council's local validation criteria, planning applications for development around the reservoir are required to be supported by a preliminary ecological appraisal and, if necessary, phase two and / or species-specific surveys, as well as a biodiversity impact assessment. Assessments should be informed by data held by the local biological records centre. Therefore, the assessment of impact on protected species including bats and wild birds would take place at the planning application stage and be reviewed by the council's Ecologists.	No change required.
11 individuals	Concern about impact of noise and / or light pollution on nature / specific species.	Concern noted. The masterplan states that all development and proposals should protect and enhance the natural environment. It states that any lighting should minimise light spill and must not cause an adverse impact on wildlife. Noise and light pollution will be assessed at the planning application stage as proposals come forward.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
2 Individuals	Concerns regarding the impacts on nature during the construction phase of future development at the reservoir.	Concerns noted. The impact of construction on the natural environment will be considered as part of individual schemes delivery. Any construction in the vicinity of the reservoir will need to be the subject of a Construction Ecological Management Plan.	No change required.
Midland Sailing Club and 1 individual	States successful relationship between site users and wildlife requires policing/enforcement and site management. States the masterplan does not explain how this will be achieved.	Comment noted. We understand the community would like to see increased management of the reservoir and opportunities to deliver this will continue to be explored. In line with the approach taken at several other parks and nature reserves across Birmingham, the council is eager to work with the Local Nature Reserve Committee to establish a greater role for the community.	No change required.
1 individual	Requests inclusion of heat pumps, high-level insulation, solar panels, and space to compost food waste in future developments at the reservoir.	Request noted. The masterplan states that developments should make use of passive solar gain and incorporate low or zero carbon energy generation technologies that are appropriate to the site including ground or air-source heat pumps, photovoltaic panels, and water source heat pumps. It also states buildings should be highly energy efficient, constructed using sustainable materials and waste should be minimised. The inclusion of the above will be determined through planning applications. While the council can encourage developers to go further, and will support applications which do so, it cannot currently require buildings to perform better than the target carbon emissions rates set nationally in the Building Regulations. Should regulations be amended, applications will be considered against those revised regulations.	No change required.
1 individual	Suggests creating a mini forest.	Suggestion noted. The Edgbaston Reservoir Local Nature Reserve Management Plan has been updated by the Birmingham and the Black Country Wildlife Trust. It provides up to date information with clear objectives to protect and enhance the Local Nature Reserve for future generations. The masterplan states the Management Plan should be read in conjunction with the masterplan and all development and proposals at the reservoir	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		should support the biodiversity objectives and targets set out in the Management Plan. Details of future tree planting will be set out in the Management Plan.	
2 individuals	States biodiversity net gain should be 20% or higher.	Comment noted. The masterplan is unable to request a biodiversity net gain percentage higher or lower than the 10% set out in the Environment Act 2021. As such, the masterplan has been updated to state that all qualifying development within the masterplan boundary will be required to deliver a minimum of 10% biodiversity net gain (or higher if set by subsequent adopted policy), biodiversity net gain upon implementation of the Environment Act 2021, anticipated to take place in winter 2023. Proposals that deliver a higher percentage will be welcomed. Requirements for higher percentages city-wide or in specific locations will be considered through the new local plan.	The masterplan has been amended to state that all qualifying development within the masterplan boundary will be required to deliver a minimum of 10% biodiversity net gain (or higher if set by subsequent adopted policy), biodiversity net gain upon implementation of the Environment Act 2021, anticipated to take place in winter 2023.
1 individual	Asks how green flag status will be achieved.	The process to securing green flag status will be led by the council's Parks department. It is likely to involve partnership working with stakeholders including the Local Nature Reserve Committee.	No change required.
1 individual	States reaching green flag status will be possible if the community is involved to care for the reservoir.	Comment noted. The council is committed to working with the community to deliver the masterplan vision.	No change required.
1 individual	States the Birmingham and Black Country Wildlife Trust and the Birmingham Tree	Comment noted. The council is committed to working with stakeholders and partner organisations. The Wildlife Trust for	No change required.



Consultee	Representation summary	Council response	Proposed Changes to SPD
	People should be involved to provide wildlife expertise to look after the site.	Birmingham and the Black Country are part of the Edgbaston Reservoir Local Nature Reserve Committee which meets four times per year, have led the revision of the Local Nature Reserve Management Plan, and have been engaged in the development of this masterplan	
1 individual	States the Local Nature Reserve should be left as wild as possible, and the rest of the site planted with native trees, shrubs, and wildflowers.	Comment noted. The Edgbaston Reservoir Local Nature Reserve Management Plan (2021) sets its first objective as: 'Maintain and enhance the Local Nature Reserve and Site of Importance for Nature Conservation status and protection' and its second objective as: 'Maintain and enhance the ecological habitats on-site to maximise biodiversity'. There are a number of proposals in the masterplan to enhance green infrastructure through tree and wildflower planting.	No change required.
1 individual	States commitments should be stronger and reflect increasing standards up to net zero.	Comment noted. The council cannot currently require that buildings are built to carbon emissions standards which exceed those set nationally in the Building Regulations. If the council wishes to set a higher local standard this will need to be done through the Local Plan.	No change required.
1 individual	States there is not enough strength in the statements requiring Green Infrastructure and Sustainable Urban Drainage Systems.	Comment noted. Policy TP6 of the Birmingham Development Plan requires all development to manage surface water through Sustainable Drainage Systems (SuDS). There are numerous references within the masterplan to the provision of green infrastructure within the development parcels, it is not possible to be more specific at this stage.	No change required.
2 individuals	Requests the boundary between the development and the reservoir should be made softer and more ecologically rich through increased planting of marginal / riparian vegetation.	Comment noted. The masterplan includes references to creating natural bank edges and marginal planting.	No change required.
4 individuals	Proposes nesting platform / pontoon / floating islands for swans and other breeding	Comment noted. The council is committed to working with stakeholders and partner organisations to deliver the masterplan	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
	birds. Suggests the council should consult with RSPB and the Wildfowl and Wetlands Trust.	vision. The masterplan states that all development and proposals at the reservoir should support the biodiversity objectives and targets set out in the Edgbaston Reservoir Local Nature Reserve Management Plan 2021. The management plan includes habitat creation such as the installation of floating vegetation beds.	
3 individuals	Asks what ecology assessments / surveys have been done of existing wildlife and what assessments have been undertaken of the impact of the proposals on nature.	The council has completed a Strategic Environmental Assessment screening opinion in consultation with Statutory consultees. Appropriate surveys have also been undertaken for the prior notification of demolition of the Tower Ballroom building. Any future proposals that come forward in the masterplan boundary will need to be informed by appropriate surveys.	No change required.
Calthorpe Estates	Suggests the masterplan should include a new green link from the reservoir to Osler Park and onwards towards Chamberlain Gardens.	Suggestions noted. Plan 4 (connectivity) highlights these links. A new green link beyond Osler Park would be outside of the masterplan area.	No change required.
House By Urban Splash	States that Biodiversity Net Gain should be set at 10% in line with national requirements unless and until any additional requirement is adopted through the Birmingham Development Plan review.	Comment noted. The masterplan has been updated to state that all qualifying development within the masterplan boundary will be required to deliver a minimum of 10% biodiversity net gain (or higher if set by subsequent adopted policy), biodiversity net gain upon implementation of the Environment Act 2021, anticipated to take place in winter 2023. Proposals that deliver a higher percentage will be welcomed. Requirements for higher percentages city-wide or in specific locations will be considered through the new local plan.	The masterplan has been updated to state that all qualifying development within the masterplan boundary will be required to deliver a minimum of 10% biodiversity net gain (or higher if set by subsequent adopted policy), biodiversity net gain upon implementation of the Environment Act 2021, anticipated to

Consultee	Representation summary	Council response	Proposed Changes to SPD
			take place in winter 2023.
Chief Constable of the West Midlands Police	Requests an additional sustainability principle: 'The need to design out crime and ensure its continued maintenance in all new developments is a cornerstone to successful sustainable communities.'	Suggestions noted. The principle of designing out crime is embedded in Birmingham Development Plan Policies PG3 and TP37 with additional guidance in the emerging Birmingham Design Guide. It is therefore not necessary to repeat those objectives in the masterplan.	No change required.
1 individual	States there should be more reference to climate change adaptation and resilience.	Comment noted. The council agrees that climate change adaptation is an important issue. The masterplan states it is important that any new development is climate resilient and supports our climate emergency declaration. It also provides guidance on how future development can be sustainable and climate resilient. The council's approach to climate change adaptation and resilience will be further addressed through the Local Plan review.	No change required.
1 individual	States green and blue infrastructure should be multi-functional not just for biodiversity but also surface water drainage, water quality management and climate change adaptation.	Comment noted. The council agrees it is important that green and blue infrastructure is multi-functional.	No change required.
1 individual	States development that is dense with minimal car parking should be provided to improve sustainability in transport terms.	Comment noted. In this location densities need to respond to the site context. Car parking provision levels will be determined as planning applications come forward and will need to be in line with the Car Parking SPD.	No change required.
2 individuals	Support for wildflower meadow, tree planting and bird and bat boxes.	Support welcomed.	No change required.
Birmingham Civic Society	Questions whether all buildings being low carbon can be achieved if external developers are used.	Comment noted. Developers for the schemes within the masterplan are yet to be determined. In any case, the council cannot currently require that buildings are built to carbon emissions standards which exceed those set nationally in the Building Regulations. If the council wishes to set a higher local standard this will need to be done through the Local Plan review.	No change required.

Appendix 2  
Annexe G

Consultee	Representation summary	Council response	Proposed Changes to SPD
3 individuals and West Midlands Bird Club	Suggests fencing sections of the periphery of the reservoir to protect breeding birds from disturbance by dogs / walkers. West Midlands Bird Club requests permission to install such fencing.	Suggestion noted. Detailed proposals will need to be discussed and agreed with the council's Parks Department and the Edgbaston Reservoir Local Nature Reserve Committee.	No change required.
1 individual	Concerns regarding predation by domestic pets of new residents on wildlife.	Concern noted. As the reservoir is within a built-up area this risk exists at present, and there is little that can be done to mitigate it.	No change required.
1 individual and West Midlands Bird Club.	Suggests screened viewing areas are installed for bird watching. West Midlands Bird Club request permission to install such fencing.	Suggestion noted. Detailed proposals will need to be discussed and agreed with the council's Parks Department and the Edgbaston Reservoir Local Nature Reserve Committee.	No change required.
West Midlands Bird Club	Recommends planting of a minimum twenty metre block of Common Reed along one section of shoreline to greatly enhance nesting and feeding opportunities for a number of species. The Bird Club are willing to source and supply Common Reeds at their own expense and have volunteers willing to plant them at the Rotton Road end of the reservoir.	Recommendation noted. Detailed proposals will need to be discussed and agreed with the council's Parks Department and the Edgbaston Reservoir Local Nature Reserve Committee.	No change required.
West Midlands Bird Club	Proposes a 20m long woven Willow or other suitable screen on shoreline next to the western shore to section off a section of shoreline for passage wading birds.	Comment noted. Detailed proposals will need to be discussed and agreed with the council's Parks Department and the Edgbaston Reservoir Local Nature Reserve Committee.	No change required.
West Midlands Bird Club	Offer to meet officers on site to provide wildlife conservation advice / assistance.	Offer welcomed. The council is committed to working with organisations to protect and enhance the natural environment. An introduction to the council's parks team has been made.	No change required.
1 individual	States buildings should be carbon neutral to avoid expensive later retrofitting.	Comment noted. It is not within the scope of the masterplan to set standards for the carbon performance of buildings. This is primarily done by government through the Building Regulations	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		(with changes made in June 2022). Local authorities are able to set additional local standards, but only through their local plans. The council will welcome proposals which deliver higher standards, and in particular there may be an opportunity for the council to seek higher sustainability performance on sites where it is the landowner.	

### Osler Park & Osler Place:

Consultee	Representation summary	Council response	Proposed Changes to SPD
11 Individuals and Inland Waterway Association (Birmingham Black Country and Worcestershire Branch)	Supports proposals within the chapter.	Support welcomed.	No change required.
1 Individual	Support. States the proposals in the plan will benefit the area.	Support welcomed.	No change required.
3 Individuals and Midland Sailing Club	Supports proposals and the demolition of the Tower Ballroom building.	Support welcomed.	No change required.
1 Individual	Supports demolition of the Tower Ballroom building.	Support welcomed.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
1 Individual	States previous activities at the Tower Ballroom caused noise pollution late at night and impacted residents. Requests future activity at the proposed development does not generate noise pollution.	Comment noted. The masterplan seeks to serve as a framework to guide future development within the masterplan boundary. It states that all proposals and development within the boundary will be required to protect and enhance the natural environment. All development that comes forward will be carefully assessed against a variety of policies at the planning application stage including those relating to noise pollution.	No change required.
1 Individual	Requests the site includes a park adjacent to the water with outdoor amphitheatre, public pavilion, sculptures, and pop-up events.	Comment noted. The masterplan has been amended to set the building line further back from the waters' edge and increase the level of greenery / soft landscaping on the walkway to soften the impact of development on the Local Nature Reserve. A landscaped public square has also been included in front of Reservoir Lodge.	The masterplan has been amended to set the building line further back from the waters' edge and increase the level of greenery / soft landscaping on the walkway to soften the impact of development on the Local Nature Reserve. A landscaped public square has also been included in front of Reservoir Lodge.
2 Individuals	Supports buildings being set back from the waters' edge as illustrated in the artists impression.	Support welcomed. The masterplan has been updated to further set the proposed building line back from the waters' edge.	The masterplan has been updated to further set the proposed building line back from the waters' edge.



Consultee	Representation summary	Council response	Proposed Changes to SPD
1 Individual	Supports housing proposed on the Tower Ballroom car park.	Support welcomed.	No change required.
1 Individual	Supports inclusion of green roofs.	Support welcomed.	No change required.
2 Individuals	Not in support of housing close to waters' edge.	Comment noted. The Birmingham Development Plan (2017) allocates the Tower Ballroom site for mixed-use residential-led development. The masterplan seeks to build on the policy allocation and provide guidance to ensure future development delivers high-quality housing-led development that protects and enhances heritage assets. The masterplan has been updated to further set the proposed building line back from the waters' edge.	The masterplan has been updated to further set the proposed building line back from the waters' edge.
6 Individuals	Not in support of any development on the former Tower Ballroom site.	Comment noted. The Birmingham Development Plan (2017) allocated the Tower Ballroom site for residential-led development. The masterplan seeks to build on the policy allocation and provide guidance to ensure future development delivers high-quality housing-led development that protects and enhances heritage assets. The masterplan has been updated to further set the proposed building line back from the waters' edge.	The masterplan has been updated to further set the proposed building line back from the waters' edge.
15 Individuals	Not in support of housing.	Comment noted. The Birmingham Development Plan (2017) allocated the Tower Ballroom site for residential-led development. The masterplan seeks to build on the policy allocation and provide guidance to ensure future development delivers high-quality housing-led development that protects and enhances heritage assets.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
26 Individuals	Not in support of housing requests the land becomes green space.	Comment noted. The Birmingham Development Plan (2017) allocated the Tower Ballroom site for residential-led development. The masterplan seeks to build on the policy allocation and provide guidance to ensure future development delivers high-quality housing-led development that protects and enhances heritage assets. The masterplan seeks to promote the important role of the reservoir and define a clear vision, to protect the natural environment, whilst delivering new, affordable homes.	The masterplan has been amended to set the building line further back from the waters' edge and increase the level of greenery / soft landscaping on the walkway to soften the impact of development on the Local Nature Reserve.
21 Individuals	Concerns the development proposed is too dense and/or high and will have a negative impact on the reservoir.	Comment noted. The development proposed is considered to be an appropriate level to ensure the deliverability and long-term viability of the scheme, whilst ensuring there is not a negative impact on the character of the reservoir.	No change required.
20 Individuals	Not in support of housing facing the water or the scale of housing shown on the former Tower Ballroom site as indicated in the artists impression.	<p>Comment noted. The masterplan seeks to promote the important role of the reservoir and define a clear vision, to protect the natural environment, whilst delivering new, affordable homes. The Birmingham Development Plan (2017) allocated the Tower Ballroom as a development site to support future growth in the area. The city's population is projected to grow by an additional 150,000 people by 2031 and the SPD will serve as a framework, to guide new development that comes forward in future years.</p> <p>The masterplan has been amended to set the building line further back from the waters' edge and increase the level of greenery /</p>	The masterplan has been amended to set the building line further back from the waters' edge and increase the level of greenery / soft landscaping on the walkway to soften the impact of development on the

Consultee	Representation summary	Council response	Proposed Changes to SPD
		soft landscaping on the walkway to soften the impact of development on the Local Nature Reserve.	Local Nature Reserve. A landscaped public space has also been included in front of Reservoir Lodge.
1 Individual	Concerns the development portrayed in the illustrative sketch is too high and will negatively impact on existing properties adjacent to the site. Asks what impact assessments have been undertaken.	Concerns noted. The masterplan recognises that the reservoir is one of Birmingham's most important open spaces and states that all development and proposals within the plan boundary should protect and enhance the natural environment. The Birmingham Development Plan (2017) allocated the Tower Ballroom site for residential-led development and was subject to Sustainability Appraisal. The masterplan seeks to build on the policy allocation and provide guidance to ensure future development delivers high-quality housing-led development that protects and enhances heritage assets. The council has completed a Strategic Environmental Assessment screening opinion in consultation with Statutory consultees. A planning application will have to consider the impact of adjacent properties. Appropriate surveys have also been undertaken for the prior notification of demolition of the Tower Ballroom building. Any future proposals that come forward in the masterplan boundary will need to be informed by appropriate surveys.	The masterplan has been updated to further set the building line back from the waters' edge and removed a building block to create a public space in front of Reservoir Lodge.
15 Individuals	Not in support of housing request it should be used for community space and / or cultural art space.	Comments noted. The Tower Ballroom is a brownfield (previously developed) site that is allocated for housing development in the Birmingham Development Plan. The purpose of this masterplan is to ensure the site is developed for housing, along with other uses that will complement the water setting and provide facilities for all the community while protecting the natural environment.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
1 Individual	Not in support of housing request it should be used for a community garden.	Comments noted. The Tower Ballroom is a brownfield (previously developed) site that is allocated for housing development in the Birmingham Development Plan. The purpose of this masterplan is to ensure the site is developed for housing, along with other uses that will complement the water setting and provide facilities for all the community while protecting the natural environment.	No change required.
19 Individuals	Concerns development close to the waterfront will close the pathway for an unacceptably long length of time during construction. States it is essential for peoples physical and mental wellbeing.	Comment noted. The masterplan is clear that the pathway around the reservoir will be maintained and improved. Where construction means that access arrangements around the reservoir will be temporary restricted in parts, all effort will be made to ensure this impact is minimised. New development at the masterplan site is expected to be progressed in phases and each development proposal will be carefully assessed as applications come forward.	No change required.
1 Individual	Suggests council waits to see if there is demand for new homes at the reservoir before proposing them.	Comment noted. The Birmingham Development Plan (2017) allocated the Tower Ballroom as a development site to support future growth in the area. The city's population is projected to grow by an additional 150,000 people by 2031 and the SPD will serve as a framework, to guide new development that comes forward in future years. Therefore, the demand for new housing is already known.	No change required.
1 Individual	Not in support of development. Requests the land is used to provide the following: <ul style="list-style-type: none"> <li>• Toilets</li> <li>• Space for young people</li> <li>• Café</li> <li>• Facilities for families</li> </ul>	Comment noted. The SPD seeks to promote the important role of the reservoir and define a clear vision, to protect the natural environment, whilst delivering new, affordable homes. The Birmingham Development Plan (2017) allocated the Tower Ballroom as a development site to support future growth in the area. The masterplan states a range of accessible facilities for the local community and visitors should be delivered. The exact mix of uses will be determined through the planning application process.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
28 Individuals	Not in support of housing due to impact on the natural environment / Local Nature Reserve.  11 individuals express concerns regarding increased footfall on the Local Nature Reserve from new development.	Comment noted. The masterplan states any development or proposals will be required to protect and enhance the natural environment. Appropriate environmental assessments will be undertaken at the planning application stage. The improvements to facilities at the reservoir will increase the resilience of the area to support additional visitors.	No change required.
5 Individuals	Not in support (no further details provided).	Comment noted.	No change required.
1 Individual	Not in support of housing on the site. States there are too many houses in the surrounding area already.	Comment noted. The Birmingham Development Plan (2017) allocated the Tower Ballroom as a development site to support future growth in the area. The city's population is projected to grow by an additional 150,000 people by 2031 and the SPD will serve as a framework, to guide new development that comes forward in future years. Therefore, the demand for new housing is known and new homes must be delivered.	No change required.
Midland Sailing Club	In support of setting building's back from the waters' edge by 20m.	Support welcomed. The masterplan has been updated to further set buildings back from the waters' edge.	No change required.
4 Individuals	Not in support of housing. Concerns regarding the impact housing development will have on the character of the reservoir.	Comment noted. The site is allocated for housing development in the Birmingham Development Plan (2017). The masterplan will serve as a framework for decision-making, as applications come forward in future years. All new development will be expected to demonstrate high-quality sustainable design, that reflects the unique character of the reservoir.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
29 Individuals	Not in support of development. States noise and light pollution will have a detrimental impact on the Local Nature Reserve.	Comment noted. The masterplan is clear any development should protect and enhance the natural environment. It states that any lighting should minimise light spill and must not cause an adverse impact on wildlife. Noise and light pollution will be assessed at the planning application stage as proposals come forward.	No change required.
7 Individuals and Soho First Community Development Trust	Not in support of housing close to waters' edge. States noise and light pollution will have a detrimental impact on the Local Nature Reserve.	<p>Comment noted. The masterplan has been updated to state the public walkway is expected to be around twenty to thirty-five metres width, varying to accommodate the shape of the reservoir and deliver a linear building line.</p> <p>The masterplan is clear any development should protect and enhance the natural environment. It states that any lighting should minimise light spill and must not cause an adverse impact on wildlife. Noise and light pollution will be assessed at the planning application stage as proposals come forward.</p>	The masterplan has been updated to further set the building line back from the waters' edge.
1 individual	Not in support of commercial uses. States they will generate noise and light pollution and increase human activity which will disrupt wildlife cycles and risk the Local Nature Reserve designation.	Comment noted. The council is committed to protecting the Local Nature Reserve. The site is a brownfield (previously developed) site, that is allocated for housing development in the Birmingham Development plan (2017). The purpose of this masterplan is to ensure the site is developed for housing, along with other uses that will complement the water setting and provide facilities for all the community while protecting the natural environment. The masterplan is clear any development should protect and enhance the natural environment. It states that any lighting should minimise light spill and must not cause an adverse impact on wildlife. Noise and light pollution will be assessed at the planning application stage as proposals come forward.	No change required.
35 Individuals and Soho First Community	Not in support of housing close to the waters' edge due to a variety of reasons including access and ownership issues, impact on the	Comment noted. The masterplan states all new development will be expected to demonstrate high-quality sustainable design, that reflects the unique character of the reservoir.	The masterplan has been updated to further set buildings



Consultee	Representation summary	Council response	Proposed Changes to SPD
Development Trust	views, character and tranquillity of the reservoir and natural environment.	The masterplan has been updated to further set buildings back from the waters' edge and to clarify the walkway between the buildings and reservoir will be publicly accessible.	back from the waters' edge and to clarify the walkway between the buildings and reservoir will be publicly accessible. The masterplan has been updated to state the public walkway is expected to be around twenty to thirty-five metres width, varying to accommodate the shape of the reservoir and deliver a linear building line.
37 Individuals and Soho First Community Development Trust	<p>Not in support of housing close to the waters' edge due to access and ownership issues. The following reasons were provided:</p> <ul style="list-style-type: none"> <li>• impact on noise and residents complaining about noise restricting activities that take place at the reservoir.</li> <li>• conflict between residents and reservoir users.</li> <li>• safety of new residents if general public will be able to walk up to their homes on ground floor of walkway.</li> </ul>	<p>Comment noted. The masterplan vision is clear the reservoir belongs to everyone. The masterplan has been updated to further set buildings back from the waters' edge and to clarify the walkway between the buildings and reservoir will be publicly accessible. The masterplan has been updated to state the public walkway is expected to be around twenty to thirty-five metres width, varying to accommodate the shape of the reservoir and deliver a linear building line.</p> <p>It will provide places to sit, walk, cycle and to watch activity on the water and will incorporate green infrastructure that will help integrate this area of the reservoir with the Local Nature Reserve.</p>	The masterplan has been updated to further set buildings back from the waters' edge and to clarify the need to deliver green infrastructure on the public walkway.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		The proposed development on the Tower Ballroom site doesn't include any residential units at ground floor level on the waterfront. Details will be determined at the planning application stage and levels of privacy will be assessed.	
8 Individuals	Not in support of housing close to the waters' edge. States there should be a green buffer between the reservoir and buildings.	Comment noted. The masterplan has been updated to further set buildings back from the waters' edge and to clarify the need to deliver green infrastructure on the public walkway.	The masterplan has been updated to further set buildings back from the waters' edge and to clarify the need to deliver green infrastructure on the public walkway.
28 Individuals	Requests no building in front of Reservoir Lodge or set back 50m from the reservoir edge.	Request noted. The masterplan has been updated to further set buildings back from the waters' edge and to create a public square in front of Reservoir Lodge.	The masterplan has been updated to further set buildings back from the waters' edge and to create a public square in front of Reservoir Lodge.
1 Individual	Requests buildings are set back a minimum of 27.8m from the waters' edge. States this is the closest distance of a residential property to the waters' edge.	Request noted. The masterplan has been updated to further set buildings back from the waters' edge and to deliver a public walkway expected to be around twenty to thirty-five metres width, varying to accommodate the shape of the reservoir and deliver a linear building line.	The masterplan has been updated to further set buildings back from the waters' edge.

Consultee	Representation summary	Council response	Proposed Changes to SPD
1 Individual	Asks why more houses are needed. States existing housing stock should be improved, and derelict buildings should be used.	Comment noted. New housing stock is required to meet the projected sale of population growth up to 2031 set out in the adopted Birmingham Development Plan (2017).	No change required.
1 Individual	Not in support. States there are other buildings that could be repurposed to deliver housing.	Comment noted. The site is a brownfield (previously developed) site, that is allocated for a mixed-use residential-led scheme in the Birmingham Development plan (2017) to meet the city's housing needs.	No change required.
1 Individual	Asks how the housing policy for the former Tower Ballroom site is 'well-established' as stated in the masterplan.	Comment noted. The site is allocated in the Birmingham Development Plan for a mixed-use residential-led scheme. The principle of building new homes on the site is therefore well-established.	No change required.
1 Individual	States it is wrong to say housing on the former Tower Ballroom site is 'well-established'.	Comment noted. The site is allocated in the Birmingham Development Plan for a mixed-use residential-led scheme. The principle of building new homes on the site is therefore well-established.	No change required.
2 Individuals	Concerns future development will be expensive and non-inclusive.	Comment noted. The masterplan is clear that the reservoir belongs to everyone, and improvements proposed in the document will provide spaces and facilities that bring together existing and future residents. Details will be determined at the planning application stage, and any future proposals will be assessed against planning policy including affordable housing policy.	No change required.
1 Individual	Not in support of housing that has views of the water.	Comment noted. The site is allocated in the Birmingham Development Plan for a mixed-use residential-led scheme. The	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		principle of building new homes on the site is therefore well-established.	
1 Individual	Not in support. States there are very few places in Birmingham near the city centre that people can just be. States the Tower Ballroom space generates value for the people in the city.	Comment noted. The masterplan recognises that the reservoir is one of Birmingham's most important open spaces. The masterplan reflects the need for the tranquil atmosphere of the reservoir to be protected this includes protecting key views and the open feeling at the reservoir and ensuring there are areas for quiet reflection at the reservoir.	No change required.
1 Individual	Not in support of housing close to the water. Concerns it will reduce the space for walking and cycling.	Comment noted. The masterplan has been updated to further set buildings back from the waters' edge and to deliver a public walkway expected to be around twenty to thirty-five metres width, varying to accommodate the shape of the reservoir and deliver a linear building line.	The masterplan has been updated to further set buildings back from the waters' edge and to deliver a public walkway expected to be around twenty to thirty-five metres width, varying to accommodate the shape of the reservoir and deliver a linear building line.
1 Individual	Not in support, states the development should be mixed use and deliver community facilities.	Comment noted. The Tower Ballroom is a brownfield (previously developed), site that is allocated for mixed-use residential-led development in the Birmingham Development Plan. The purpose of this masterplan is to ensure the site is developed for housing, along with other uses that will complement the water setting and provide facilities for all the community while protecting the natural environment.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
1 Individual	Not in support of having vehicular access on the former Tower Ballroom site.	Comment noted. The council recognises there is a need for some parking provision to be provided for those who cannot access the reservoir by foot, bike, or public transport. As such, the masterplan has been updated to state that the existing car park will be reopened in a secure and managed way to provide a limited number of spaces. Future development will be designed to minimise the need to travel by private car, and maximise opportunities for walking, cycling and public transport. This will help ensure the area is not dominated by cars.	The masterplan has been updated to state that the existing car park will be reopened in a secure and managed way to provide a limited number of spaces.
1 Individual	Requests more information on the level of parking proposed on the former Tower Ballroom site.	Comment noted. The council recognises there is a need for some parking provision to be provided for those who cannot access the reservoir by foot, bike, or public transport. As such, the masterplan has been updated to state that the existing car park will be reopened in a secure and managed way to provide a limited number of spaces. Details will be determined at the planning application stage.	The masterplan has been updated to clarify the existing car park will be reopened to provide limited parking provision.
1 Individual	Suggests a wider vista of the reservoir from the Reservoir Road entrance would be better with green landscaping in front of Reservoir Lodge.	Comment noted. The masterplan has been updated to show a public square in front of Reservoir Lodge.	The masterplan has been updated to show a public square in front of Reservoir Lodge.
1 Individual	Asks what impact assessments and consultation with existing local businesses has been undertaken regarding future commercial uses on the site.	Comment noted. The masterplan has been updated to provide a new layout. This includes an element of non-residential space which could be used for a variety of purposes, although it is envisaged that the majority will respond to the specific needs of users of the reservoir. This is not a local centre location and will not become such – the masterplan notes the importance of local centres. Any new commercial activity will pose minimal impacts	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		for existing businesses in the surrounding area and an increase in visitors to the reservoir should deliver some benefits i.e. higher numbers of pedestrians/passers-by. Businesses have had the same opportunities to participate in public consultation as other local people or organisations.	
1 Individual	States the Tower Ballroom site is the best location at the reservoir for views.	Comment noted. The masterplan states that all new development will be expected to respect key views and positively add to existing vistas and landmarks. The masterplan has been updated to further set buildings back from the waters' edge and to deliver a public walkway expected to be around twenty to thirty-five metres width, varying to accommodate the shape of the reservoir and deliver a linear building line.	The masterplan has been updated to further set buildings back from the waters' edge.
1 Individual	States the former Tower Ballroom site is currently subject to anti-social behaviour. States that providing housing on the site will amplify the issues.	Comment noted. Increased activity and natural surveillance at the reservoir will help address anti-social behaviour and the council will work with partners to address issues that arise.	No change required.
1 Individual	Concerns for safety having houses so close to the water. Requests that a green buffer is provided to help combat potential safety issues.	Comment noted. The masterplan has been updated to further set buildings back from the waters' edge.	The masterplan has been updated to further set buildings back from the waters' edge.
3 Individuals	Requests the Tower Ballroom building is retained.	Comment noted. The Birmingham Development Plan (2017) allocated the Tower Ballroom as a development site, to support future growth in the Greater Icknield area. The city's population is projected to grow by an additional 150,000 people by 2031 and the SPD will serve as a framework, to guide new development that comes forward in future years.	No change required.



Consultee	Representation summary	Council response	Proposed Changes to SPD
1 Individual	Requests the Tower Ballroom building is retained and converted into community uses and housing.	Comment noted. The decision to demolish the former Tower Ballroom building has been made through cabinet process. The vision for the site is for a mixed-use residential-led scheme that is set back from the waters' edge with a wide walkway in front. The retention of the Tower Ballroom building would make delivering this vision unachievable.	No change required.
1 Individuals	Requests the Tower Ballroom building is retained and converted into community uses.	Comment noted. The decision to demolish the former Tower Ballroom building has been made through cabinet process. The vision for the site is for a mixed-use residential-led scheme that is set back from the waters' edge with a wide walkway in front. The retention of the Tower Ballroom building would make delivering this vision unachievable.	No change required.
1 Individual	Requests the Tower Ballroom is retained due to its historical importance.	Comment noted. The decision to demolish the former Tower Ballroom building has been made through cabinet process. The vision for the site is for a mixed-use residential-led scheme that is set back from the waters' edge with a wide walkway in front. The retention of the Tower Ballroom building would make delivering this vision unachievable.	No change required.
1 Individual	Asks why no other uses other than housing have been considered for the former Tower Ballroom site.	Comment noted. The Birmingham Development Plan (2017) allocates the Tower Ballroom site for mixed-use residential-led development. The masterplan is required to be in accordance with the Birmingham Development Plan. The masterplan supports the delivery of a variety of non-residential uses on the site alongside housing including community, cultural, commercial, café, leisure, and educational facilities.	No change required.
1 Individual	Not in support of any development within 35-40 metres of the water. States the land should be preserved for community use and	Comment noted. The masterplan has been updated to further set buildings back from the waters' edge and to deliver a public walkway expected to be around twenty to thirty-five metres	The masterplan has been updated to set the building line

Consultee	Representation summary	Council response	Proposed Changes to SPD
	<p>respect the socio-cultural needs of local people, especially young people and people of colour.</p> <p>States the masterplan fails to acknowledge and encourage legacy an almost 200-year history of this waterside site as a place for dancing.</p>	<p>width, varying to accommodate the shape of the reservoir and deliver a linear building line. The walkway will be publicly accessible and be a space where everyone can walk, cycle, run, sit, and relax. Furthermore, the masterplan now includes a public square in front of Reservoir Lodge. This space could support a diverse range of community interests and provide an amphitheatre.</p> <p>The masterplan highlights the opportunity for information boards that celebrate the social history, people and communities that have shaped the reservoir as well as the built and natural assets.</p>	<p>further back from the water's edge and include a public square in front of Reservoir Lodge.</p>
1 Individual	<p>Photo provided showing a person sitting on the Tower Ballroom building structure that overhangs the water. Caption included: 'Do you think there will be room for him at a waterside development of luxury apartments?'</p>	<p>Comment noted. The masterplan recognises that the reservoir is one of Birmingham's most important open spaces and a clear part of the vision is to ensure the reservoir belongs to everyone. The masterplan has been updated to further set buildings back from the waters' edge and to create a public square in front of Reservoir Lodge.</p>	<p>The masterplan has been updated to further set buildings back from the waters' edge and to create a public square in front of Reservoir Lodge.</p>
1 Individual	<p>Several photos provided showing a public demonstration outside the Tower Ballroom building.</p>	<p>Submission noted; accompanying comments have been addressed elsewhere in this document.</p>	<p>No change required.</p>
1 Individual	<p>Not in support of housing on the former Tower Ballroom site. States the area has been subject to lots of development recently and there is insufficient green space.</p>	<p>Comment noted. The Birmingham Development Plan (2017) allocated the Tower Ballroom as a development site, to support future growth in the Great Icknield area. The city's population is projected to grow by an additional 150,000 people by 2031 and the masterplan will serve as a framework to guide new development that comes forward in future years.</p>	<p>No change required.</p>
1 Individual	<p>Welcomes proposals for housing development in the masterplan. Not in support of development on the footprint of</p>	<p>Support welcomed and comment noted. The Tower Ballroom is a brownfield (previously developed), site that is allocated for mixed-use residential-led development in the Birmingham</p>	<p>No change required.</p>

Consultee	Representation summary	Council response	Proposed Changes to SPD
	the Tower Ballroom building. States it will have a negative impact on the reservoir and the well-being of Birmingham's citizens.	Development Plan. The purpose of this masterplan is to ensure the site is developed for housing, along with other uses that will complement the water setting and provide facilities for all the community while protecting the natural environment.	
6 Individuals	Concerns construction will restrict access to the site and wider reservoir / request access to the site should be retained during construction works.	Comment noted. Where the construction of proposals means that access arrangements around the reservoir will be temporary restricted in parts – all effort will be made to ensure this impact is minimised.	No change required.
1 Individual	Requests future development is of high-quality so it will last.	Comment noted. The masterplan will serve as a framework for decision-making as applications come forward in future years. All new development will be expected to demonstrate high-quality sustainable design, that reflects the unique character of the reservoir and contributes to its sustainment for future generations.	No change required.
1 Individual	Requests development is eco-friendly and innovative.	Comment noted. The masterplan provides guidance to ensure future development is sustainable and is aligned to the council's ambition for the city to become net zero carbon by 2030, or as soon as possible thereafter.	No change required.
2 Individuals	Requests future development is in keeping with the character of the area.	Comment noted. All new development will be expected to demonstrate high-quality sustainable design, that reflects the unique character of the reservoir.	No change required.
1 Individual	States the Tower Ballroom building has provided entertainment for thousands of people. Concerns future development will be exclusive.	Comment noted. The vision for the site is for a mixed-use residential-led scheme that is set back from the waters' edge with a wide walkway in front. The history of the Tower Ballroom is recognised, and opportunities are identified in the masterplan to	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		<p>celebrate this. However, the retention of the building would make delivering this vision unachievable.</p> <p>The masterplan is clear that the reservoir belongs to everyone, and improvements proposed in the document will provide spaces and facilities that bring together existing and future residents. Details will be determined at the planning application stage, and any future proposals will be assessed against planning policy including affordable housing policy.</p>	
2 Individuals	Concerns future development won't provide truly affordable housing.	Comment noted. The Birmingham Development Plan (2017) allocated the Tower Ballroom as a development site to support future growth in the area. All housing development will need to be in line with policy requirements for affordable housing and the masterplan includes references to this policy requirement.	No change required.
3 individuals	Asks what the definition of affordable is in the masterplan.	Comment noted. The policy context section of the masterplan references affordable housing provision. The definition for affordable housing is set out in the National Planning Policy Framework, and in Birmingham aligns to Policy TP31 in the Birmingham Development Plan (2017), that sets out an expectation for a wide choice of housing sizes, types, and tenures to be delivered across the masterplan area, to meet housing needs.	No change required.
5 Individuals	Requests housing is affordable / high-quality social housing is delivered.	Comment noted. All housing development will need to be in line with policy requirements for affordable housing and the masterplan includes references to this policy requirement.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
1 Individual	Requests the masterplan states a minimum of 40% of housing should be affordable.	Comment noted. All housing development will need to be in line with policy requirements for affordable housing and the masterplan includes references to this policy requirement. The Birmingham Development plan states the council will seek 35% affordable homes as a developer contribution on residential developments of 15 dwellings or more. The masterplan is in accordance with the BDP. However, opportunities to exceed this would be supported, and changes to policy locally or nationally will supersede the masterplan.	No change required.
1 Individual	<p>Requests the proposal on the former Tower Ballroom site is revised to deliver the following:</p> <ul style="list-style-type: none"> <li>• An enhanced arrival space suitable for active travel, dog-walkers, cyclists, local residents, and activities to take place simultaneously without disturbing the natural environment.</li> <li>• A higher mix of community uses</li> <li>• Youth provision on the site (toilets, shelter, bike storage, food)</li> <li>• Reduced surveillance</li> <li>• Allow events to take place that might generate noise</li> <li>• Cultural uses on the site of the Tower Ballroom, specifically the part which faces the water, in a design sensitive to the surroundings</li> <li>• Create a buffer zone around the development that extends the Local Nature Reserve</li> </ul>	<p>Comments noted. The masterplan has been amended to set the building line further back from the waters' edge and increase the level of greenery / soft landscaping on the walkway to soften the impact of development on the Local Nature Reserve.</p> <p>A landscaped public space has also been included in front of Reservoir Lodge which shows additional seating. This space could support a diverse range of community interests and provide community facilities for a range of people including young people.</p> <p>All housing development will need to be in line with policy requirements for affordable housing and the masterplan includes references to this policy requirement.</p> <p>In the Sustainability chapter, the expectation for all new development to be designed and constructed in ways, that maximise energy efficiency and use low carbon energy is outlined. It also states that non-residential units, above a certain threshold will be required to meet BREEAM standards, which is in accordance with TP3 of the BDP 2017.</p>	The masterplan has been amended to set the building line further back from the waters' edge, clarify the walkway between the buildings and reservoir will be publicly accessible, and increase the level of greenery / soft landscaping on the walkway to soften the impact of development on the Local Nature Reserve. The masterplan has been updated to state the public walkway is

Consultee	Representation summary	Council response	Proposed Changes to SPD
	<ul style="list-style-type: none"> <li>To accommodate seating, to observe the nature reserve (similar to seating on sea front)</li> <li>Asks for public ownership of the promenade land at a minimum 27.8m offset needs to be safeguarded</li> <li>Sets minimum standards for housing development</li> <li>Independent standard such as BREEAM or Passivhaus or zero-carbon new homes</li> <li>Provision for activities including BMX and roller skating</li> </ul>		expected to be around twenty to thirty-five metres width, varying to accommodate the shape of the reservoir and deliver a linear building line. A landscaped public space has also been included in front of Reservoir Lodge.
1 Individual	Concerns the masterplan does not consider replacing the Tower Ballroom as a cultural venue. Requests cultural uses are included in the masterplan. States they would be happy to work with the council in their role as chair of the Cultural Infrastructure and Investment sub-group of the West Midlands Combine Authority to consider how the Combined Authority and the wider cultural community in the city can support any future cultural infrastructure provision on the site.	<p>Comment noted. The masterplan recognises the social significance and cultural aspects of the reservoir in the Celebrating the Reservoir chapter. It promotes the varied opportunities for cultural activities to be focused on the heritage assets surrounding the reservoir, spaces for street art and also education on nature conservation.</p> <p>The masterplan is flexible to enable a variety of uses to be delivered on the Tower Ballroom site alongside housing. The detail of types of uses will come forward at the planning application stage.</p> <p>The council would welcome a meeting.</p>	No change required.
1 Individual	Asks how it can be described as open space when houses are proposed.	Comment noted. The masterplan describes Edgbaston Reservoir as an important open space that the council is committed to protecting and enhancing. The Tower Ballroom is a brownfield (previously developed) site that is allocated for housing development in the Birmingham Development Plan.	No change required.



Consultee	Representation summary	Council response	Proposed Changes to SPD
1 Individual	<p>Support principle of housing on the Tower Ballroom car park. Requests parking proposed is realistic rather than idealistic in order to reduce the impact on local roads which already struggle from on street parking.</p> <p>The Tower Ballroom site should be largely parkland with perhaps a single storey cafe and toilet block that would only be open in daylight hours to preserve the dark natural environment.</p>	<p>Support welcomed and suggestions noted. The Tower Ballroom site is allocated for mixed-use residential-led development in the Birmingham Development Plan.</p> <p>The council recognises there is a need for some parking provision to be provided for those who cannot access the reservoir by foot, bike, or public transport. As such, it states the existing car park accessed from Reservoir Road will be reopened in a secure and managed way to provide a limited number of spaces. The land directly adjacent to the water will be greened to provide a pleasant waterside location and contribute to the natural environment. Plans will come forward as part of the delivery of Osler Place and design detail will be developed in partnership with key stakeholders including West Midlands Police to ensure it is designed to minimise anti-social behaviour wherever possible. Specific details of the amount of car parking and how it is managed for each of the sites within the masterplan will be determined at a later stage and be in line with the Car Parking SPD.</p>	The masterplan has been updated to state that the existing car park will be reopened in a secure and managed way to provide a limited number of spaces. The land directly adjacent to the water will be greened to provide a pleasant waterside location and contribute to the natural environment.
2 Individuals	Supports provision of cafe and toilets on the former Tower Ballroom site.	Support welcomed.	No change required.
2 Individuals	Requests any development on the waterside is restricted to daylight hours to minimise impact on the natural habitat.	Comment noted. The masterplan is clear any development should protect and enhance the natural environment. It states that any lighting should minimise light spill and must not cause an adverse impact on wildlife. Noise and light pollution will be assessed at the planning application stage as proposals come forward.	No change required.
Marine Society and Sea Cadets	States safety concerns regarding sea cadets, volunteers, staff, and the general public sharing access between the proposed Sea Cadets building and the reservoir. Requests	Comment noted. The council has worked closely with the Marine Society and Sea Cadets throughout the development of the masterplan and will continue to do so.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
	the arrangement is kept under review and would welcome the opportunity to discuss this further with council officers should issues arise.		
1 Individual	Concerns the council is spreading false truths that people support the proposal. States they have spoken to hundreds of reservoir users who are opposed to the proposal.	Comment noted. The consultation undertaken met the requirements of planning regulations and the council's adopted Statement of Community Involvement. This Consultation Summary sets out the responses received and a council response. The Tower Ballroom is allocated for residential-led development in the Birmingham Development Plan (BDP). The masterplan must be in accordance with the BDP.	No change required.
1 individual	States the previous Consultation Summary evidences the majority of people do not support housing on the Tower Ballroom site.	Comment noted. The Tower Ballroom is allocated for residential-led development in the Birmingham Development Plan (BDP). The masterplan must be in accordance with the BDP.	No change required.
1 individual	Not in support of housing. Concerns of accessibility of proposed development for people with disabilities.	Comment noted. The council will ensure all disability regulations are met and work with disability groups to deliver schemes that are accessible to all.	No change required.
1 individual	Requests the development on the former Tower Ballroom site is no taller than two storeys. States it will have a detrimental impact on the listed Reservoir Lodge if it is any taller.	Comment noted. The masterplan has been updated to include a public square in front of the Reservoir Lodge this will protect and enhance the setting of the listed building.	The masterplan has been updated to include a public square in front of the Reservoir Lodge.
1 individual	Requests future development on the former Tower Ballroom site improves biodiversity such as green roofs and nesting sites for birds and bats.	Request noted. The masterplan is clear development will be expected to deliver biodiversity net gain in line with the Environment Act 2021.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
1 individual	Supports the proposals to protect and enhance Reservoir Lodge. Requests the view of the reservoir from the Lodge is protected.	Support welcomed and comment noted. The masterplan has been updated to include a public square in front of the Reservoir Lodge this will protect and enhance the setting of the listed building.	The masterplan has been updated to include a public square in front of the Reservoir Lodge.
1 individual	Suggests houses are built on Osler Street Park and the former Tower Ballroom development is turned into a play area.	Comment noted. The Tower Ballroom is a brownfield (previously developed) site that is allocated for housing development in the Birmingham Development Plan. The masterplan is clear Osler Street Park will be protected and enhanced.	No change required.
2 individuals	Requests the trees adjacent to Reservoir Lodge are retained.	Comment noted. The sketch has been included to illustrate the vision at Osler Park and Osler Place. Details will be determined when a planning application is submitted. Any application will be assessed against council tree policies by the council's ecologists and tree officers.	No change required.
1 individual	States the Tower Ballroom building sets a precedent for roller skating or dancing. Suggests a skateboard park should be included within the development.	Comment noted. The masterplan promotes an increased number of activities at the reservoir to support improved health and well-being. The masterplan is flexible enough that skateboarding facilities could be provided subject to proposals not having a detrimental impact on the Local Nature Reserve.	No change required.
1 individual	Requests a small venue is included in the proposals for the former Tower Ballroom site.	Comment noted. The Tower Ballroom site is allocated for mixed-use residential-led development in the Birmingham Development Plan. Non-residential units could include community, cultural, commercial, café, leisure, and educational facilities. Details will be determined at the planning application stage.	No change required.
1 Individual and Birmingham Civic Society	Support for commercial uses such as cafés along the waterfront on the former Tower Ballroom site.	Support welcomed.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
Birmingham Civic Society	Requests the heights of the development on the former Tower Ballroom site does not exceed five storeys.	Comment noted. The masterplan states buildings fronting the water will be a variety of heights up to a maximum of four storeys.	No change required.
1 individual	Not in support of housing on the former Tower Ballroom site. States the land is designated for leisure use. States there is no written evidence showing the site can be used as housing or is a brownfield site.	Comment noted. The Tower Ballroom is a brownfield (previously developed) site that is allocated for housing development in the Birmingham Development Plan. The purpose of this masterplan is to ensure the site is developed for housing, along with other uses that will complement the water setting and provide facilities for all the community while protecting the natural environment.	No change required.
2 individuals	States Reservoir Lodge should be used as it is an important gateway to the reservoir.	Comment noted. The masterplan states the Grade II listed Reservoir Lodge building should be brought back into positive use, with potential for community and visitor facilities. The masterplan has been updated to provide a public square in front of Reservoir Lodge. This will protect and enhance the setting of the listed Lodge.	The masterplan has been updated to provide a public square in front of Reservoir Lodge.
2 Individuals	Requests housing delivered on the former Tower Ballroom site and Tower Mount site should provide family housing or specialist housing for the elderly. Requests that student accommodation and Houses of Multiple Occupancy should not be allowed.	Comment noted. The masterplan is clear family housing should be delivered on the site. The Policy Context section of the masterplan discusses affordable housing provision. The definition for affordable housing is aligned to Policy TP31 in the Birmingham Development Plan (2017), that sets out an expectation for a wide choice of housing sizes, types, and tenures to be delivered across the masterplan area, that includes family housing and housing for older persons.	No change required.
1 Individual	Concerns for safety of new residents if general public will be able to walk up to their homes on ground floor of walkway.	Comment noted. The proposed development on the Tower Ballroom site doesn't include any residential units at ground floor level on the waterfront. Appropriate frontages are shown and	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		will be necessary along streets. Details will be determined at the planning application stage and levels of privacy will be assessed.	
2 Individuals	States the existing Tower Ballroom building is set back from the waters' edge and does not impinge on the pathway around the reservoir.	<p>Comment noted. The existing Tower Ballroom building overhangs the walkway and creates an uninviting environment.</p> <p>The decision to demolish the former Tower Ballroom building has been made through cabinet process. The vision for the site is for a mixed-use residential-led scheme that is set back from the water's edge with a wide walkway in front. The retention of the Tower Ballroom building would make delivering this vision unachievable.</p>	No change required.
Sport England	<p>States the opportunities the site provides to support users of the reservoir to undertake physical activity are supported, particularly the provision of a waterfront walkway to connect the loop together, and the suggestion of a pontoon where this is viable to enhance accessibility to the water space for users.</p> <p>States the site provides an opportunity to create a high-quality public space that could be used for a variety of pop-up activities in the arrival square.</p>	Support welcomed.	No change required.
2 Individuals	States the walkway shown in the artists' impression is too narrow for pedestrians and cyclists and will lead to accidents.	Comment noted. The masterplan is clear the walkway around the reservoir is a shared surface. The masterplan has been updated to widen the walkway.	The masterplan has been updated to widen the walkway.

Consultee	Representation summary	Council response	Proposed Changes to SPD
1 Individual	Requests the barrier adjacent to Reservoir Lodge remains to prevent anti-social behaviour.	Comment noted. The council recognises there is a need for some parking provision to be provided for those who cannot access the reservoir by foot, bike, or public transport. As such, it states the existing car park accessed from Reservoir Road will be reopened in a secure and managed way to provide a limited number of spaces. The land directly adjacent to the water will be greened to provide a pleasant waterside location and contribute to the natural environment. Plans will come forward as part of the delivery of Osler Place and design detail will be developed in partnership with key stakeholders including West Midlands Police to ensure it is designed to minimise anti-social behaviour wherever possible.	The masterplan has been updated to state the existing car park accessed from Reservoir Road will be reopened in a secure and managed way to provide a limited number of spaces
2 Individuals	Concerns additional housing will increase cars in the area and impact on local roads.	Comment noted. The masterplan promotes the increased use of sustainable travel modes, e.g., walking and cycling, to lessen car dependency. New development at Osler Park and Osler Place will seek to minimise car usage and encourage new residents to car-share. It is considered that this approach should reduce the demand for parking and address concerns by local residents.	No change required.
1 Individual	States the masterplan should seek to propose as many mechanisms as possible for oversight of what development goes on the site. Community benefit from any development needs to be a key part of the proposed masterplan. States community-led benefit societies and other community-led housing models should be preferred to private development.	Comment noted. The masterplan is being prepared as a formal Supplementary Planning Document (SPD), to provide a strong framework for decision making. This will ensure proposals and development in the masterplan boundary, deliver the vision for the sustainable future of the reservoir. The delivery mechanisms to achieve this is yet to be determined.	No change required.
1 Individual	Requests the masterplan reasserts the commitment to apply existing policies on affordable housing to any development.	Comment noted. All housing development will need to be in line with policy requirements for affordable housing and the masterplan includes references to this policy requirement.	No change required.



Consultee	Representation summary	Council response	Proposed Changes to SPD
1 Individual	Not in support of the council selling off public assets.	Comment noted. The Tower Ballroom is a brownfield (previously developed) site that is allocated for housing development in the Birmingham Development Plan. The delivery mechanisms to achieve this is yet to be determined.	No change required.
1 Individual	States Planet Ice are closing their ice rink in Cannock. Suggests the council discusses the potential of a new ice rink being located on the former Tower Ballroom site with Planet Ice.	Comment noted. The masterplan identifies increased opportunities for a range of activities at the reservoir. Whilst proposals for specific activities will be assessed as applications come forward, it is considered unlikely that an ice rink could be suitably accommodated whilst also delivering a policy compliant residential led scheme on the site.	No change required.
1 Individual	Support for proposals including: <ul style="list-style-type: none"> <li>• Minimising parking;</li> <li>• Providing public facilities such as toilets; and</li> <li>• Providing clear routes through the development to the reservoir.</li> </ul>	Support welcomed.	No change required.
1 Individual	Concerns the number of houses being proposed will overstretch the facilities in the area.	Comment noted. The masterplan delivers the growth agenda set out in the Birmingham Development Plan (BDP) and as part of the BDP's evidence base consideration was given to the infrastructure requirements in this area of the city, further detailed consideration on the impact to infrastructure will be considered through the planning application process.	The masterplan has been updated to include reference to ongoing assessments required to identify infrastructure needs.

Consultee	Representation summary	Council response	Proposed Changes to SPD
1 Individual	States the grassed area of the park needs to be protected from cars parking on it when there are events.	<p>Comment noted. The masterplan states all development and proposals within the plan boundary must protect and enhance the natural environment.</p> <p>The council recognises there is a need for some parking provision to be provided for those who cannot access the reservoir by foot, bike, or public transport. As such, the masterplan has been updated to state that the existing car park will be reopened in a secure and managed way to provide a limited number of spaces. There is also parking provision accessed from Icknield Port Road. It is anticipated these spaces can be used for events, but the council will continue to encourage people to access the reservoir through sustainable modes of transport.</p>	No change required.
1 Individual	Suggests low-rise, self-build homes would be most appropriate for the former Tower Ballroom site. States they could be heated from the reservoir using water source heat pumps.	<p>Comment noted. The masterplan states development should respect and add to the reservoir's historic character through modern high-quality design.</p> <p>The masterplan also outlines the requirement for all new housing development to be designed and constructed in ways which maximise efficiency and use low carbon energy.</p>	No change required.
1 Individual	States the height of the elevated buildings on the slope up to Osler Street will adversely impact upon the wind quality.	Comment noted. Following discussions with the water users wording has been included in the masterplan to require assessment on the impact from development on wind and water sports. It is not considered necessary to include an explicit reference to this at Osler Place due to the proposed heights and set back of the proposed development.	No change required.
1 Individual	Requests more information on what is meant be 'high-quality design'.	Comment noted. The masterplan explains that 'high-quality design' includes development that responds to the existing character of the reservoir and the reservoir setting. Detailed	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		design of future development will be agreed at the planning application stage where proposals will be assessed against the masterplan and other adopted local plan policies. These include policies on design.	
1 Individual	States housing should be harmonious with the local area, contemporary and original.	Comment noted. The masterplan states development should respect and add to the reservoir's historic character through modern high-quality design.	No change required.
1 Individual	Supports principle of housing on the former Tower Ballroom site. States the Tower Ballroom building has reached the end of its life and that housing near the city centre is needed.	Support welcomed.	No change required.
1 Individual	States the exhibition area formerly in Reservoir Lodge by the rangers should be reinstated and managed by the same management as other city heritage sites.	Comment noted. The masterplan states The Grade II listed Reservoir Lodge building should be brought back into positive use, with potential for community and visitor facilities. As such, the suggestion would be in-keeping with the masterplan.	No change required.
1 Individual	States any new streets should prioritise pedestrians above cyclists.	Comment noted. The masterplan includes proposals to improve pedestrian and cycle connections and is clear the walkway around the reservoir is a shared surface.	No change required.
1 Individual	Requests more information is provided in the masterplan regarding the public square shown on the former Tower Ballroom site including whether the space is public or private.	Comment noted. The masterplan has been updated to include a public space in front of Reservoir Lodge. This will provide a focal point for people to meet at the heart of the site. This high-quality public realm should accommodate green infrastructure.	The masterplan has been updated to include a public space in front of Reservoir Lodge.
1 Individual	States the masterplan needs to explain if future development on the former Tower Ballroom site is going to be gated.	Comment noted. The masterplan does not propose any gated development on the site, and this approach would not be supported. The masterplan shows new routes created though the site.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
1 Individual	Not in support of basement parking.	Comment noted. The masterplan states under-croft parking could be delivered but this will be determined at the planning application stage.	No change required.
1 Individual	Not in support of development shown in artists' impression as the design is not in keeping with existing houses around the reservoir.	Comment noted. The masterplan states new development will demonstrate high-quality sustainable design that reflects the unique character of the reservoir as a natural landscape, heritage site, and social and cultural asset. The sketch has been included to illustrate the vision at Osler Park and Osler Place. Details will be determined when a planning application is submitted. Any application will be assessed against design policies.	No change required.
1 Individual	Asks what the non-residential spaces will be used for. Concerns they will become takeaway venues.	Comment noted. The masterplan supports the delivery of a variety of non-residential uses on the site alongside housing including community, cultural, commercial, café, leisure, and educational facilities. Details will be determined at the planning application stage.	No change required.
1 Individual	Concerns the area is experiencing high levels of additional homes at Port Loop and insufficient facilities are being delivered such as schools.	Comment noted. The masterplan delivers the growth agenda set out in the Birmingham Development Plan (BDP) and as part of the BDPs evidence base consideration was given to the infrastructure requirements in this area of the city, further detailed consideration on the impact to infrastructure will be considered through the planning application process.	No change required.
2 Individuals	Concerns there is insufficient green space in the wider area to support the number of houses being proposed and delivered.	Comment noted. The masterplan recognises that the reservoir is one of Birmingham's most important open spaces and states it needs to be protected and enhanced. The Tower Ballroom is a brownfield (previously developed) site that is allocated for housing development in the Birmingham Development Plan. The masterplan is not proposing to build on designated green spaces and there is no loss of open space within the reservoir as a result of the proposals. The purpose of the masterplan is to ensure the site is developed in a way that enhances and protects the existing	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		assets, whilst delivering homes and increased activity that is accessible to all.	
3 Individuals	States brownfield sites should be used to deliver housing not the former Tower Ballroom site.	Comment noted. The Tower Ballroom site is a brownfield (previously developed) site that is allocated for housing development in the Birmingham Development Plan.	No change required.
1 Individual	Suggests the bridge over the dam wall has flower beds to create habitat.	Suggestion noted. The masterplan supports the increase of green infrastructure and planting. It also identifies an aspiration for a bridge between Port Loop and the reservoir. Details will be determined at the planning application stage.	No change required.
Premier Living Group	States they would be interested in developing housing on the Tower Mount site and would be interested in discussing the opportunity with the council.	Comment noted. The Tower Mount site is not owned by the council. The council is committed to working with partners to deliver the masterplan vision.	No change required.
Calthorpe Estates	Supports the redevelopment of the sites in this opportunity area and the improvements to Osler Street Park.  States the opportunity to improve connections from this area, via Osler Street Park onto Chamberlain Gardens and Hagley Road has been missed, requests wording is added to strengthen the connection.	Support and comment noted. The masterplan focuses on the area within the plan boundary, but a key part of the vision is ensuring the reservoir is accessible to all. However, the masterplan states existing pedestrian and cycling connections to nearby neighbourhoods will be strengthened and enhanced.	No change required.
1 Individual	Not in support of development due to the following concerns: <ul style="list-style-type: none"> <li>research shows that gentrification/ the building of expensive apartments in inner city neighbourhoods, increases crime;</li> <li>the masterplan will be manipulated by private developers for profit; and</li> </ul>	Comment noted. All housing development will need to be in line with policy requirements for affordable housing and the masterplan includes references to this policy requirement.  A variety of delivery mechanisms are being explored to achieve the proposals set out in the masterplan.	The masterplan has been updated to further set buildings back from the waters' edge and to clarify the walkway between the

Consultee	Representation summary	Council response	Proposed Changes to SPD
	<ul style="list-style-type: none"> <li>the masterplan fails to recognise that the best view of the reservoir is the vista from the Tower Ballroom side of the reservoir (Sea Cadets area) and across to the green side of the reservoir</li> </ul>	The masterplan states that views are an important feature of the reservoir and an integral part of the visitor experience. The masterplan has been updated to further set buildings back from the waters' edge and to clarify the walkway between the buildings and reservoir will be publicly accessible. The masterplan has been updated to state the public walkway is expected to be around twenty to thirty-five metres width.	buildings and reservoir will be publicly accessible. The masterplan has been updated to state the public walkway is expected to be around twenty to thirty-five metres width.
Karis Medical Centre	Welcomes the focus on health and wellbeing with the preservation of Osler Street Park and the increased opportunities for community and leisure activities at the reservoir.	Support welcomed.	No change required.
Canal & River Trust	States the illustration of development of Osler Park and Osler Place and Plan 7 is positive in principle with an engaged landscaped frontage along the edge, heights kept at four stories, interest within the architectural character and form, there also reads to be an ambition for sustainable systems and approach. States they hope the future development on the site accords with the aspirations of the masterplan.	Support welcomed.	No change required.
1 Individual	Concern excessive lighting will disrupt wildlife.	Comment noted. The masterplan states that all development and proposals should protect and enhance the natural environment. It states that any lighting should minimise light spill and must not cause an adverse impact on wildlife. Noise and light pollution will	No change required.



Consultee	Representation summary	Council response	Proposed Changes to SPD
		be assessed at the planning application stage as proposals come forward.	
1 Individual	States nature should be prioritised.	Comment noted. The masterplan is clear the natural environment should be protected and enhanced. The Edgbaston Reservoir Local Nature Reserve Management Plan has been updated by the Birmingham and the Black Country Wildlife Trust. It provides up to date information with clear objectives to protect and enhance the Local Nature Reserve for future generations. The masterplan states the Management Plan should be read in conjunction with the masterplan and all development and proposals at the reservoir should support the biodiversity objectives and targets set out in the Management Plan.	No change required.
1 Individual	Not in support of extended pontoon due to safety concerns. States the general public should sign up to one of the water sports clubs open days if they wish to experience being close to the water.	Comment noted. The masterplan states there is 'potential' for a pontoon at the reservoir. The proposal would be subject to further assessments and safety would be considered.	No change required.
1 Individual	States the pontoon extending out so far into the water will reduce the area available for water sport activity.	Comment noted. The masterplan states there is 'potential' for a pontoon at the reservoir. The proposal would be subject to further assessments to understand the impact on water sport activity.	No change required.
Midland Sailing Club	Supports the sentiments of this section but opposed to a large pontoon for the following reasons: <ul style="list-style-type: none"> <li>• It is not safe for public access unless it is very substantial with substantial railings;</li> <li>• It will also restrict sailing and rowing particularly in the summer when the water levels drop</li> </ul>	Support welcomed and comment noted. The masterplan states there is 'potential' for a pontoon at the reservoir, to support high-quality design, increase accessibility to the water and recognise that, activity on the water, contributes to its unique character. However, the SPD also recognises the need for any pontoon to accommodate the rise and fall in water levels and any specific proposals would need to consider any impacts upon the activities of the water clubs.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
	<ul style="list-style-type: none"> <li>Anything large enough to be safe for public use will not fit on Edgbaston Reservoir which is a relatively small area of water and at its lowest in the late summer can be half the area it is when full in winter.</li> </ul> <p>Requests a pontoon is parallel to the shore not perpendicular to it.</p>	The proposal would be subject to further assessments to understand the impact on water sport activity.	
1 Individual	<p>Not in support of a floating structure for the following reasons:</p> <ul style="list-style-type: none"> <li>It will encourage people to dive and swim off them in the summer;</li> <li>It will also restrict sailing and rowing particularly in the summer when the water levels drop; and</li> <li>It would not be safe to moor boats on the pontoon for fear of vandalism or people taking them out for joyrides.</li> </ul>	Comment noted. The masterplan states there is 'potential' for a pontoon at the reservoir. The proposal would be subject to further assessments and safety would be considered.	No change required.
2 Individuals	States Osler Street Park should be protected and enhanced.	Comments noted. The revised masterplan clearly states that Osler Street Park will be protected.	No change required.
1 Individual	Asks how Osler Street Park will be enhanced.	Comment noted. The masterplan states that improvements to the park could include new play equipment and the introduction of natural or semi-natural play areas. Any proposed changes to the park will be developed in collaboration with the local community.	No change required.
1 Individual	Supports the proposals to improve play equipment at Osler Street Park.	Support welcomed.	No change required.
4 Individuals	Supports changes to proposals regarding Osler Street Park in the latest version of the masterplan.	Support welcomed.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
1 Individual	Suggests the park is extended and games relating to water are included similar to Birmingham Library.	Comment noted. The masterplan states that improvements to the park could include new play equipment and the introduction of natural or semi-natural play areas this could include games relating to water. Any proposed changes to the park will be developed in collaboration with the local community.  It is not possible to extend the park as it is surrounded by road network.	No change required.
1 Individual	States that Osler Street Park needs to be upgraded to become a safe and accessible space with high-quality paving, street art and lighting.  Suggests Osler Street becomes a shared surface to give pedestrian priority and better-link Osler Street Park to the reservoir.	Comment noted. The masterplan includes proposals to protect and enhance the park. The masterplan advocates strengthening connectivity between the reservoir and the park. The exact design for surface treatment and vehicle access and parking on Osler Street will be determined at the planning application stage.	No change required.
1 Individual	Supports proposal to protect and enhance the park. States the park is very important to local children.	Support welcomed.	No change required.
1 Individual	Concerns enabling access to the reservoir at night would result in safety issues.	Comment noted. It is not possible to control access to the park at night. A key part of the masterplan vision is to create a safe environment for all and proposals to improve the park should include improvements to safety.	No change required.
1 Individual	States Osler Street Park is too small for the community and should be extended to cover the former Tower Ballroom site.	Comment noted. The revised masterplan outlines the important role that the park plays for the local community, providing a welcoming and safe place for children and young people. Improvements to the park area are proposed in the masterplan. An extension of the park to cover the former Tower Ballroom site	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		would not be policy compliant as the site is allocated for residential development in the Birmingham Development Plan (2017).	
1 Individual	Requests Osler Street Park is enhanced to increase habitat for wildlife such a wildflower meadow.	Comment noted. The masterplan states that improvements to the park could see the introduction of natural or semi-natural play areas i.e. wildflower grassland and fruit trees and new play equipment.	No change required.
1 Individual	Not in support for retaining Osler Street Park. States it is not a popular facility.	Comment noted. The revised masterplan outlines the important role that the Park plays for the local community, providing a welcoming and safe place for children and young people. It is hoped that improvements to the park will encourage increased use.	No change required.
2 Individuals	Support housing on the Tower Mount site.	Support welcomed.	No change required.
1 Individual	Not in support of proposals. States the local community needs the existing community space and lock ups.	Comment noted. The site is currently underutilised and offers the potential to accommodate new family homes to contribute towards the city's housing targets. New homes would also improve the level of natural surveillance on Reservoir Road and activate the site. The need and potential for relocation or reprovision of existing lock-up provision will need to be considered as proposals come forward.	No change required.
1 Individual	Not in support of housing on the Tower Mount site. States there is insufficient space to deliver housing and be policy-compliant with distance separation figures.	Comment noted. The Tower Mount site is one of the opportunity areas within the masterplan. The site is currently underutilised and offers the potential to accommodate new family homes to contribute to the city's housing targets.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
	Requests the building is demolished and the land given or sold to neighbouring properties for allotments.	Future development will be expected to be in accordance with planning policies and will be assessed fully at the planning application stage.  The land is not owned by the council.	
1 Individual	Asks what existing pedestrian walkways there are on the Tower Mount site.	Comment noted. The Tower Mount site doesn't currently include a pedestrian walkway. However, the masterplan seeks to strengthen the connectivity between all of the opportunity areas within the masterplan boundary to ensure development is fully integrated and accessible.	No change required.
1 Individual	States the masterplan may be out of date as the building is being demolished to deliver housing. Asks what planning approvals are in place.	Comment noted. The masterplan reflects the current position on the Tower Mount site. Consent is in place for its demolition, but no applications have been submitted for its redevelopment within the last two-year period. Discussion and/or applications for its development, that are aligned to the masterplan's vision for the site are welcomed.	No change required.
1 Individual	Requests more information on the size of development and the impact on traffic.	Comment noted. The masterplan provides guidance to inform and assess future development against. The design and scale of any development as well as the potential impact on traffic will be fully assessed at the planning application stage.	No change required.
1 Individual	Requests more information on the number of homes being proposed on the former Tower Ballroom site.	Comment noted. Exact details on housing numbers will be determined at the planning application stage.	No change required.
2 Individuals	Requests the social club building is demolished.	Comment noted. The building will need to be demolished to deliver the masterplan vision, and an application for the demolition has recently been approved.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
1 Individual	Not in support of houses on the Tower Mount site.	Comment noted. The Tower Mount site is one of the opportunity areas within the masterplan. The site is currently underutilised and offers the potential to accommodate new family homes, that are required to meet the projected high level of population growth up to 2031. New homes would also improve the level of natural surveillance on Reservoir Road and activate the site.	No change required.
1 Individual	Supports proposals to connect the Tower Mount site to Edgbaston Waterworks site.	Support welcomed. The masterplan has been updated to remove the reference to a direct connection between the two sites as the council understands Severn Trent will require access to the covered reservoir on the Edgbaston Waterworks site. A pedestrian connection across the covered reservoir is therefore undeliverable.	The masterplan has been updated to remove the reference to a direct connection between Tower Mount and Edgbaston Waterworks site.
1 Individual	States the Tower Mount site should deliver terrace houses that reflect local character and street pattern.	Comment noted. The masterplan states new housing on the site should reflect the layout, scale and massing of adjacent traditional houses; however, the opportunity to create interesting contemporary homes that add to local character should be explored. Design details will be determined at the planning application stage.	No change required.
1 Individual	Asks whether the social club is part of the masterplan and what is proposed for the site if it is included.	Comment noted. The Tower Mount site incorporates the social club building. The masterplan states the site should be redeveloped to provide family housing to meet the needs of the local population and add to the vibrancy of the area.	No change required.
Plan Associates Ltd on behalf of the owners	Supports housing proposals in the masterplan in relation to the Tower Mount Site.	Comment noted. Due to the constraints of the plot, any new development would be expected to present innovative design that responds to the site conditions. The masterplan states the site should deliver family housing that reflects the layout, scale and	No change required.



Consultee	Representation summary	Council response	Proposed Changes to SPD
of Tower Mount	States the emphasis on permeability and connectivity within the masterplan area is acknowledged. Suggests a more flexible urban design approach is required in how these aspirations can be realised, particularly where they affect development sites in the plan.	massing of adjacent traditional houses; however, the opportunity to create interesting contemporary homes that add to local character should be explored. New homes should be fully integrated to the existing neighbourhood. Details will be determined at the planning application stage.	
Plan Associates Ltd on behalf of the owners of Tower Mount	<p>Concerns the proposed layout in the masterplan for the Tower Mount site would make the delivery of an acceptable family housing scheme extremely difficult in respect of layout, scale and massing. States the proposal would:</p> <ul style="list-style-type: none"> <li>• deliver limited separation distances and amenity space for residents</li> <li>• create a poor outlook for existing residents</li> <li>• be difficult to service</li> <li>• provide very limited parking</li> </ul> <p>Suggests other forms of housing should be considered for the site including Purpose Built Student Accommodation or accommodation for Elderly/Late Living or Co-Living.</p>	<p>Comment noted. The masterplan includes a layout / design of future development that is compliant with adopted planning policies and reflects the layout scale and massing of adjacent houses. It is considered family housing could be delivered using innovative design.</p> <p>The council considers family housing to be the most appropriate form of housing given the policy context and the surrounding built environment. Any development that comes forward on the site would need to demonstrate it is policy compliant.</p>	No change required.

## Reservoir Loop:

Consultee	Representation summary	Council response	Proposed Changes to SPD
27 Individuals	General support for the proposals.	Support welcomed.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
and Birmingham Rowing Club and Inland Waterways Association			
Sport England	In support of proposals. States the Loop will help promote physical activity at the reservoir and improve connectivity to the existing blue and green infrastructure network, including the canal loop and Summerfield Park.	Support welcomed. A key part of the masterplan vision is to support the improved health and well-being of all and enable residents and visitors to enjoy a mix of land and water-based leisure and recreation activities.	No change required.
3 Individuals	In support of proposals, as it will improve lighting of the pathway and the visibility of users. This will safeguard users, particularly women and vulnerable persons.	Support welcomed. A key part of the masterplan vision is to ensure the reservoir is safe and accessible to all.	No change required.
1 Individual	In support of proposal to introduce lighting but states that wildlife should be awarded priority in all places.	Support welcomed. The masterplan states any lighting should minimise light spill and not cause adverse impacts for wildlife.	No change required.
1 Individual	In support of proposals, on basis that the new footpath doesn't alter the existing perimeter or detrimentally impacts nature or wildlife.	Support welcomed. The enhanced pathway tracks the existing route. It will create a continuous, high-quality route around the existing perimeter of the reservoir. The masterplan states it will stay in keeping with the Local Nature Reserve setting.	No change required.
1 Individual	In support of proposals on the basis the pathway is accessible to all users.	Support welcomed. The pathway has been sympathetically enhanced to improve accessibility and opportunities for further improvement will be taken. It will be a high-quality route for all.	No change required.
3 Individuals	In support of proposals on the basis the existing perimeter is maintained and the whole pathway loop remains accessible.	Support welcomed. The route of the existing footpath will be maintained but enhanced to improve conditions and create a	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		high-quality route for all. The masterplan states it will stay in keeping with the Local Nature Reserve setting.	
1 Individual	In support of proposal for a boardwalk as it will be an asset for the city.	Support welcomed.	No change required.
5 Individuals	Not in support of proposals. No additional details provided.	Comment noted. The masterplan explains that much of the pathway has already been improved. The council undertook a separate consultation on the proposed improvements to the pathways.	No change required.
1 Individual	Not in support of proposals for the pathway section on the former Tower Ballroom site. Asks that the pathway in that section, is used for wildlife and to enhance the natural landscape setting for daytime users.	Comment noted. The approach to the pathway in front of the Osler Place (former Tower Ballroom) opportunity has been amended to focus on a more natural approach, with planting, seating, and less hard surfaces.	The approach to the pathway in front of the Osler Place (former Tower Ballroom) opportunity has been amended to focus on a more natural approach, with planting, seating, and less hard surfaces.
2 Individuals	Not in support of proposals. States the existing pathway is adequate and additional sections would be harmful to the natural setting of the reservoir.	Comment noted. The existing perimeter of the pathway is to be retained but enhanced to create a continuous, high-quality route for all. The masterplan states that opportunities to green the pathway should be explored and any lighting of the pathway should minimise light spill, to protect wildlife.	No change required.
1 Individual	Not in support of proposals. States the existing pathway is adequate but cyclists should be made aware that it is a shared route.	Comment noted. The masterplan explains the pathway will be enhanced to create a shared service with signage to reduce conflict between users. The pathways around the reservoir are not wide enough to have separate cycling and pedestrian routes.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
8 Individuals	Not in support of proposals. States the shared pathway functions poorly and creates direct conflict between pedestrians and cyclists.	Comment noted. The pathways around the reservoir are not wide enough to have separate cycling and pedestrian routes. The masterplan states signage will be used to reduce conflict between pedestrians and cyclists.	No change required.
1 Individual	Not in support of proposals. States the lighting of the pathway would be harmful to wildlife and existing houses that surround the reservoir.	Comment noted. The masterplan states lighting should be introduced at entrance points to enhance safety. It also states any lighting should minimise light spill and must not cause an adverse impact on wildlife.	No change required.
1 Individual	Not in support of proposals. States that pathway should not be enhanced but space used to extend Local Nature Reserve, as an asset for the community.	Comment noted. The masterplan states much of the pathway has already been improved and the improvements included in the masterplan will enhance the circular route to provide an opportunity for everyone to explore the reservoir. The improvements to the walkway were in keeping with the natural environment and play an important role in protecting the biodiversity by ensuring the pathways are always suitable for use – therefore reducing erosion of the natural landscape caused by people looking for dryer routes around the reservoir.	No change required.
6 Individuals	Not in support of proposals. States the shared pathway is dangerous for pedestrians and pets due to an increased number of electric vehicles traveling at speed.	Comment noted. The pathways around the reservoir are not wide enough to have separate cycling and pedestrian routes. The masterplan states signage will be used to reduce conflict between pedestrians and cyclists.	No change required.
1 Individual	Requests the pathway is enhanced by the planting of trees.	Comment noted. The masterplan states that opportunities to green the pathway should be explored and new planting and habitation creation focused on areas outside of the Natural Parkland where fewer trees are found. The Local Nature Reserve Management Plan provides more detail on this.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
4 Individuals	States the pathway must remain open and accessible to all users during the development works at the site.	Comment noted. The masterplan is clear that the pathway around the reservoir will be maintained and improved. Where construction means that access arrangements around the reservoir will be temporary restricted in parts, all effort will be made to ensure this impact is minimised.	No change required.
3 Individuals	States the pathway must remain open and accessible to all users during the development works at the site. Asks if timescales are known and if there are any mitigation measures planned to limit impact.	Comment noted. The masterplan does not set the timescales for individual schemes as this can only be determined once schemes have progressed to the delivery stage. The masterplan is clear that the pathway around the reservoir will be maintained and improved. Where construction means that access arrangements around the reservoir will be temporary restricted in parts, all effort will be made to ensure this impact is minimised.	No change required.
1 Individual	States the reservoir is a popular destination but that the pathway must remain accessible to cyclists.	Comment noted. The masterplan explains that the footpath round the reservoir will create a continuous, high-quality pedestrian and cycling routes for all.	No change required.
1 Individual	Asks that the new pathway enables wheelchair access at each of the entrance points to allow wheelchair users to travel the entire loop of the reservoir. The existing wheelchair entrance on Waterworks Road is no longer safe for wheelchair use.	Comment noted. Several of the improvements already being made, such as the pathway improvements will improve accessibility. Further improvements to the access points and the walkway in front of the former Tower Ballroom site will improve accessibility further. The masterplan also looks to address the level changes between the reservoir and Port Loop. Individual proposals will be expected to design schemes that are fully in accordance with the latest accessibility requirements.	No change required.
1 Individual	Asks if the council has counted the existing daily number of visits by users to the reservoir. Asks how plans can be made for the level of increased demand that will be generated by the new development if number of visitors is unknown.	Comment noted. The council does not have a count of the existing daily number of visitors at the reservoir using the pathway. The masterplan delivers the growth agenda set out in the Birmingham Development Plan (BDP).	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
1 Individual	Asks if the council has assessed the current problems / issues at the reservoir to ensure they are understood and inform the new pathway proposals. States increased signage will not address existing conflict between pedestrians and other users.	Comment noted. The council undertook a separate consultation on the proposed improvements to the pathways. The pathways around the reservoir are not wide enough to have separate cycling and pedestrian routes. The masterplan states signage will be used to reduce conflict between pedestrians and cyclists. It is beyond the remit of the masterplan to provide specific details of approaches to management of the space.	No change required.
2 Individuals (1 Elected Member)	States the pathway is already heavily used and overcrowded at weekends. States the demand will increase with the proposed development in the area.	Comment noted. The masterplan proposes the creation of enhanced entrances and a wide, accessible walkway on the Osler Park & Osler Place section of the pathway. The improvements to the walkway were in keeping with the natural environment and play an important role in protecting the biodiversity by ensuring the pathways are always suitable for use – therefore reducing erosion of the natural landscape caused by people looking for dryer routes around the reservoir. The pathway will feature a shared surface, with signage to reduce conflict between pedestrians and cyclists. Improvements to the facilities, including the path around the reservoir, will make the space more usable and able to accommodate visitors in a more sustainable way.	No change required.
Push Bikes	Expresses safety concerns for the limited lighting of green routes in winter. States the canal towpaths are narrow in places which impacts visibility and safety.	Concerns noted. The canal towpaths to the city centre fall outside the masterplan boundary. However, the masterplan states walking and cycling will be encouraged from the city centre along the canal network and other sign-posted routes. The Canal & River Trust has an ambition to improve canal towpaths subject to funding. The potential inclusion of lighting in the future is supported subject to a need to ensure it doesn't have a detrimental impact on the natural environment.	No change required.
1 Individual	Asks that any pinch-points and sharp corners are removed from the pathway, to enable runners to share the route with pedestrians.	Comment noted. The enhanced pathway tracks the existing route. Due to existing infrastructure, it is not possible to remove all pinch-points. The masterplan states that the path will be a	No change required.



Consultee	Representation summary	Council response	Proposed Changes to SPD
		shared surface with signage to reduce potential conflict between users. A wider walkway will also be created on the Osler Park & Osler Place section of the pathway.	
2 Individuals	Requests additional public seating around the pathway.	Comment noted. The masterplan includes seating as part of the proposals for improved public realm.	No change required.
1 Individual	Asks high-quality street furniture is installed on the pathway and that this is maintained by scheduled maintenance throughout the year.	Comment noted. The masterplan includes seating as part of the proposals for improved public realm. The council recognises the need for ongoing maintenance and will be looking at a variety of ways to work with partners to manage and fund this in the long-term.	No change required.
2 Individuals	Asks that improved signage and information boards are installed around the pathway.	Request noted. The masterplan proposes the erection of clear signage and information boards at the reservoir.	No change required.
1 Individual	States no artwork should be installed around the pathway as it would introduce an urban character.	Comment noted. The masterplan states opportunities for new public art that celebrates the reservoir and its unique character should be explored in collaboration with reservoir users.	No change required.
1 Individual	States the general pathway doesn't require any changes and only the public car park requires improvement.	Comment noted. The council undertook a separate consultation on the proposed improvements to the pathways. The masterplan confirms that much of the pathway has already been improved but that this will be further enhanced by proposals for a high-quality wide walkway at Osler Park & Osler Place. Improvements to the public car park are set out in the Osler Park and Osler Place section of the Consultation Statement.	No change required.
1 Individual	States the existing pathway is adequate but that the demolition of the Tower Ballroom is needed.	Comment noted. The masterplan states much of the pathway has already been improved and further improvements will enhance the circular route to provide an opportunity for everyone to explore the reservoir. Support welcomed for proposals to demolish the Tower Ballroom building.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
1 Individual	Concerned the proposals won't be delivered.	Comment noted. The masterplan is a vision for the reservoir for the long-term, to promote its important role for the city and safeguard it, for future generations. The masterplan includes a section on Delivery and Management and explains that a partnership-based approach will be taken to achieve the vision for development.	No change required.
Midland Sailing Club	States the club is keen to work with the council to improve the pathway to the rear of its boathouse and clubhouse.	Comment noted and welcomed. The masterplan states measures should be taken to improve the visitor experience of the pathway to the rear of the club. It also states improvements could include additional lighting and windows to improve safety and onlooking, and public art to create a welcoming environment and celebrate the reservoir. The council has worked closely with Midland Sailing Club and is committed to supporting it where possible in the future, and welcomes the work already undertaken to introduce a mural on the boathouse.	No change required.
1 Individual	States a new pathway isn't required as a route around the reservoir already exists.	Comment noted. The masterplan explains that much of the pathway has already been enhanced to improve accessibility but that additional improvements are proposed to provide an opportunity for everyone to explore the reservoir.	No change required.

### Natural Parkland:

Consultee	Representation summary	Council response	Proposed Changes to SPD
23 Individuals and Midland Sailing Club and	In general support of the vision and principles to improve existing area.	Support welcomed. The masterplan seeks to protect and enhance the natural environment, to create a tranquil setting for the local community and visitors.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
Inland Waterways Association			
1 Individual	In support of proposals. Welcomes changes to the masterplan since previous draft that clearly value nature.	Support welcomed. The masterplan seeks to protect and enhance the natural environment to create a tranquil setting for the local community and visitors.	No change required.
4 Individuals	In support of development but states it is essential for the playing fields space to be accessible to all as the recent of the Red Shed has constrained access to the playing field.	Comments noted. The Playing Field site is owned by the charity Birmingham Settlement who developed the Red Shed. The council has worked closely with Birmingham Settlement and the masterplan supports the delivery of a range of activities on the site. It also states improvements to access should be delivered to ensure the Playing Field is accessible to all and is well-integrated with the wider reservoir site.	No change required.
1 individual	In support of improvements to entrances and existing pathway. Requests impact on trees is limited and opportunities are identified to maximise the landscape.	Support welcomed. The masterplan outlines its intention to protect and enhance the natural environment at the reservoir. The Edgbaston Reservoir Local Nature Reserve Management Plan has been updated by the Birmingham and the Black Country Wildlife Trust. It provides up to date information with clear objectives to protect and enhance the Local Nature Reserve for future generations. The masterplan states the Management Plan should be read in conjunction with the masterplan and all development and proposals at the reservoir should support the biodiversity objectives and targets set out in the Management Plan.	No change required.
Sport England and Birmingham Rowing Club and 3 Individuals	In support of re-development of Birmingham Rowing Club in its existing location as improved facilities are required.	Support welcomed. The masterplan acknowledges the longstanding relationship Birmingham Rowing Club has with the reservoir and that its existing facilities need replacement. The masterplan is supportive of plans to create a new club facility in its existing location.	No change required.

Appendix 2  
Annexe G

Consultee	Representation summary	Council response	Proposed Changes to SPD
2 Individuals	In support of the protection and expansion of the existing green space.	Support welcomed. The masterplan outlines its intention to protect and enhance the natural environment at the reservoir and create a tranquil setting for the local community and visitors to enjoy.	No change required.
1 Individual	States support for the protection of the natural parkland space but not for any expansion to it.	Support welcomed. The masterplan outlines its intention to protect and enhance the natural environment at the reservoir, improve the biodiversity offer and increase green infrastructure. It does not include plans to expand the Natural Parkland area.	No change required.
2 Individuals	In support of the recent development by the Birmingham Settlement. States it encourages activity on the Playing Field.	Support welcomed. The council has worked closely with Birmingham Settlement and the masterplan supports the delivery of a range of activities on the site.	No change required.
3 Individuals	Not in support of principle of development.	Comment noted. The proposals for the Natural Parkland protect and enhance the natural environment.	No change required.
3 Individuals	Not in support of principle of development. States existing space should remain open and wild and free of additional buildings.	<p>Comment noted. The masterplan seeks to protect and enhance the natural environment to create a tranquil setting for the local community and visitors.</p> <p>In relation to new buildings the masterplan states the redevelopment of existing buildings within the Local Nature Reserve that are beyond their current footprint is unlikely to be supported unless it can be demonstrated it is needed for operational purposes and is in accordance with the masterplan vision. Proposals will need to demonstrate there will not be a detrimental impact on the Local Nature Reserve. It also states buildings should reflect the surrounding natural setting.</p>	No change required.
2 Individuals	Not in support of proposed development. States funding should not be allocated to Birmingham Settlement but targeted to other facilities within the Ladywood Ward.	Comment noted. The details of how the proposals for the Natural Parkland opportunity will be funded have not been determined. The S106 process has its own policies and procedures which will be followed at the reservoir.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
2 Individuals	Not in support of proposed 'education area', as the existing building (Red Shed) is under-utilised, is an obtrusive design on the natural landscape and the space is inaccessible to the public.	Comment noted. The 'Red Shed' community building was delivered under Phase 1 of a development programme by Birmingham Settlement. At the time of the application being assessed, council Urban Design officers supported the design, finding that the materials proposed for a 'barn red' colour, would achieve its aim to create an architecturally, interesting building that is visible from public routes around the reservoir. In association to the 'Red Shed', Birmingham Settlement has outlined plans to provide an additional activity building at the site. It is anticipated this will create additional community spaces, in line with the Settlement's ambition for the field to become a space to learn, relax and enjoy by all local communities. The council has worked closely with Birmingham Settlement and the masterplan supports the delivery of a range of activities on the site. It also states improvements to access should be delivered to ensure the Playing Field is accessible to all and is well-integrated with the wider reservoir site.	No change required.
1 Individual	Not in support of any new vehicular access.	Comment noted. The SPD proposes the enhancement of the existing shared footpath and existing entrances, along with new entrances to improve access. No new vehicle access is proposed. The masterplan acknowledges Birmingham Rowing Club's existing facilities are no longer fit for purpose and states that vehicular access should be provided for the drop off and collection of boats and associated parking to support the running of the club.	No change required.
1 Individual	Not in support of Birmingham Rowing Club expanding current site due to nearness to Local Nature Reserve. States new vehicle or pedestrian access could destroy character of woodland areas.	Comment noted. Birmingham Rowing Club's existing facilities are no longer fit for purpose and need to be replaced. The masterplan states that the redevelopment of existing buildings within the Local Nature Reserve that are beyond their current footprint is unlikely to be supported unless it can be demonstrated it is needed for operational purposes and is in accordance with the masterplan vision. It also states proposals	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		will need to demonstrate there will not be a detrimental impact on the Local Nature Reserve and buildings should reflect the surrounding natural setting. The specific design and any associated impacts of a new facility will be fully assessed at the planning application stage.	
2 Individuals	Not in support of proposals for increased events as they will create additional noise and will not be properly managed.	Comment noted. The level of noise generated at potential future events cannot be controlled by the masterplan. The masterplan clearly states that any activity will be required to protect and enhance the Local Nature Reserve setting.	No change required.
1 Individual	Requests protection for the wildlife at the reservoir specifically bats and freshwater animals / species.	Comment noted. The Sustainability chapter of the masterplan recognises the key role the reservoir plays for bat populations. The masterplan also states that all development and proposals at the reservoir should support the biodiversity objects and targets set out in the Edgbaston Reservoir Local Nature Reserve Management Plan.	No change required.
5 Individuals	In support of the proposal to 'green' the existing car park and extend the natural landscape. States it will help prevent crime and anti-social behaviour returning to site.	Comment noted and support welcomed. A clear part of the masterplan vision is to ensure the reservoir is safe and accessible to all. The masterplan includes references to creating a safe environment. The council recognises there is a need for some parking provision to be provided for those who cannot access the reservoir by foot, bike, or public transport. As such, the masterplan has been updated to state that the land directly adjacent to the water will be greened to provide a pleasant waterside location and contribute to the natural environment, alongside reopening a limited number of spaces in a secure and managed way. Plans will come forward as part of the delivery of Osler Place and design detail will be developed in partnership with key stakeholders including West Midlands Police to ensure it is designed to minimise anti-social behaviour.	The masterplan has been updated to state that the existing car park adjacent to the water will be reopened in a secure and managed way to provide a limited number of spaces. The land directly adjacent to the water will be greened to provide a pleasant waterside location and



Consultee	Representation summary	Council response	Proposed Changes to SPD
			contribute to the natural environment.
1 Individual	Asks where the name 'Natural Parkland' has originated from as existing space appears neglected and not as name suggests.	Comment noted. The name of 'Natural Parkland' has been used in the masterplan as a parkland is the historic term for an area of trees. Many trees surround the reservoir and as the natural landscape doesn't currently have a specific name, one has been introduced to allow comments to be directed to this space.	No change required.
Birmingham Settlement	Asks how Birmingham Settlement will be impacted by the proposed inclusion of the playing fields in the opportunity site boundary.	Comment noted. The activity at the Playing Field aligns with the masterplan vision and the council is committed to working with Birmingham Settlement in the future.	No change required.
Birmingham Settlement	States that Plan 5 shows the Playing Field as part of the Local Nature Reserve, but Birmingham Settlement land is outside of the LNR.	Comment noted. The Playing Field does not form part of the Local Nature Reserve and the masterplan has been updated to reflect this.	The masterplan has been updated to remove the Playing Field from the Local Nature Reserve boundary.
3 Individuals	Requests existing trees be protected, and additional ones planted. States they will provide screening to surrounding properties and contribute to the natural setting.	Comment noted. The masterplan seeks to protect and enhance the natural environment. The Edgbaston Reservoir Local Nature Reserve Management Plan has been updated by the Birmingham and the Black Country Wildlife Trust. It provides up to date information with clear objectives to protect and enhance the Local Nature Reserve for future generations. The masterplan states the Management Plan should be read in conjunction with the masterplan and all development and proposals at the reservoir should support the biodiversity objectives and targets set out in the Management Plan.	No change required.
1 Individual	Request for proposals to be linked with Birmingham Settlement.	Response noted. The council has worked closely with Birmingham Settlement and the masterplan supports the delivery	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		of a range of activities on the site. It also states improvements to access should be delivered to ensure the Playing Field is accessible to all and is well-integrated with the wider reservoir site.	
1 Individual	States the amount of green space around the reservoir is limited and deteriorating. Asks if there is an 'interim plan' for improvement prior to the commencement of large-scale development.	Comment noted. The masterplan states all future development and proposals within the plan boundary must protect and enhance the natural environment. The Edgbaston Reservoir Local Nature Reserve Management Plan has been updated by the Birmingham and the Black Country Wildlife Trust. It provides up to date information with clear objectives to protect and enhance the Local Nature Reserve for future generations. The masterplan states the Management Plan should be read in conjunction with the masterplan and all development and proposals at the reservoir should support the biodiversity objectives and targets set out in the Management Plan. The council is committed to working with the Local Nature Reserve Committee to establish a greater role for the community in managing the green space.	No change required.
1 Individual	Suggests the creation of a boardwalk at the top end of the space known as 'the Creek' but sited away from nesting birds.	Suggestion welcomed. The masterplan proposes the upgrading of the existing shared footpath that encircles the reservoir. The masterplan also provides the flexibility for certain sections to be enhanced by landscaping. Any proposals would have to be in accordance with the Local Nature Reserve Management Plan.	No change required.
1 Individual	Suggests the space could be used to increase community interaction with nature by creating links to nature and / or wildlife trusts and charities.	Suggestion noted. The SPD identifies opportunities for activities in the Natural Parkland to complement and celebrate the natural environment and to connect people with nature. The masterplan also supports the creation of spaces to encourage social interaction.	No change required.
1 Individual	Suggests the natural landscape is extended to include the Tower Ballroom site and joins up with Osler Street Park.	Suggestion noted. The Tower Ballroom is a brownfield (previously developed) site that is allocated for development in the Birmingham Development Plan, this masterplan provides information on how this site and other opportunities will be	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		delivered in order to protect and enhance the reservoir. The masterplan provides guidance on how future development on the site should deliver green routes connecting the reservoir to Osler Park, include green infrastructure within the development and provide a wide green walkway to soften the development from the Local Nature Reserve.	
1 Individual	Asks what is proposed for the Rangers Bungalow. States it should not be left vacant but converted for use by the community or for education.	Suggestion noted. The masterplan states there is an opportunity to convert the building for a new use that supports activity at the reservoir. Appropriate uses could include leisure, community, commercial and educational facilities. It also states if an appropriate viable use does not come forward for the building it should be demolished and returned to nature.	No change required.
3 Individuals	Asks how the space will be managed i.e., park wardens to prevent anti-social behaviour such as, graffiti, littering, and criminal activity.	Comment noted. We understand the community would like to see a Rangers Service at the reservoir but there are no resources to secure this service at present. In line with the approach taken at several other parks and nature reserves across Birmingham, the council is eager to work with the Local Nature Reserve Committee to establish a greater role for the community.	No change required.
1 Individual	States public facilities such as toilets will be required.	Comment noted. The masterplan encourages a broad range of uses and states the need to have appropriate facilities such as toilets. Further details will come forward at the planning application stage.	No change required.
1 Individual	States provision should be made for car parking overlooking the reservoir as older persons are unable to walk the route but gain enjoyment from watching the wildlife and landscape.	Comment noted. The council supports and promotes the use of sustainable travel modes but recognises there is a need for some parking provision for those who cannot access the reservoir by foot, bike, or public transport. As such, the masterplan has been updated to state that the existing car park adjacent to the water will be reopened in a secure and managed way to provide a limited number of spaces. The land directly adjacent to the water will be greened to provide a pleasant waterside location and contribute to the natural environment.	The masterplan has been updated to state that the existing car park adjacent to the water will be reopened in a secure and managed way to provide a limited

Consultee	Representation summary	Council response	Proposed Changes to SPD
			number of spaces. The land directly adjacent to the water will be greened to provide a pleasant waterside location and contribute to the natural environment.
1 Individual	States proposals in the chapter should be part of the council's plans regardless of the reservoir masterplan.	Comment noted. The council is committed to protecting and enhancing Edgbaston Reservoir for all the community to enjoy.	No change required.

### Reservoir View:

Consultee	Representation summary	Council response	Proposed Changes to SPD
21 Individuals, Midland Sailing Club and Inland Waterways Association	In support of proposals.	Support welcomed. The masterplan outlines the intention to provide a welcoming gateway to the reservoir with complementary uses that create activity and utilise the heritage buildings.	No change required.
1 Individual	In support of proposals. Requests tree canopy is extended.	Support welcomed. The masterplan states that opportunities to increase the level of green infrastructure in the Reservoir View area would be supported.	No change required.
2 Individuals	Support proposals but not any housing development.	Support welcomed. No housing development is proposed for this area of the reservoir.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
1 Individual	In support of proposals but on the basis that the car park is well-managed.	Support welcomed. The exact details on the operation of parking in this location will come forward at the planning application stage. The masterplan states that vehicular access and priority parking needs to be carefully managed and designed to ensure that the area is not dominated by cars.	No change required.
Midland Sailing Club and 2 Individuals	In support of proposals to improve Midland Sailing Club, based on the pathway remaining behind their building.	<p>Support welcomed. The council has worked closely with Midland Sailing Club to address concerns regarding the location of the footpath. The masterplan notes that the section of Reservoir Loop running behind the sailing club should be enhanced to improve the visitor experience, and that steps should be taken where possible to maximise visibility from the path through the boundary treatment of the club to the water.</p> <p>It further states that if the sailing club site were to be reconfigured in the future, consideration should be given to relocating the public footpath that forms part of Reservoir Loop from behind the sailing club to run along the water's edge to improve visitor experience. The masterplan also explains this is a long-term aspiration of the council who would work with the sailing club to address any potential issues to ensure this proposal did not have an adverse impact on the club's ability to operate.</p>	The masterplan has been updated to state that if the sailing club site were to be reconfigured in the future, consideration should be given to relocating the public footpath that forms part of Reservoir Loop from behind the sailing club to run along the water's edge to improve visitor experience. The masterplan also explains this is a long-term aspiration of the council who would work with the sailing club to address any potential issues to ensure this proposal

Consultee	Representation summary	Council response	Proposed Changes to SPD
			did not have an adverse impact on the club's ability to operate.
6 Individuals	In support of Midland Sailing Club remaining in its existing location.	Support welcomed. The masterplan clearly states Midland Sailing Club can remain in its existing location.	No change required.
Sport England and 1 Individual	In support of proposals to improve the existing conditions to the rear of Midland Sailing Club, i.e., pathway.	Support welcomed. The masterplan states the section of Reservoir Loop running behind the sailing club should be enhanced to improve the visitor experience. Steps should be taken where possible to maximise visibility from the path through the boundary treatment of the club to the water.	No change required.
West Midlands Police	In support of proposals to improve the Midland Sailing Club. Suggests a mural is created on the rear wall of the main storage shed to encourage community ownership.	Support welcomed. The masterplan suggests that there are opportunities for murals and street art at various locations around the reservoir, to celebrate its value and the activities that it supports. The wall of the sailing club is identified as a suitable location for a mural.	No change required.
1 Individual	States it is essential Midland Sailing Club continues to have access to a car park. States the club provides activities for disabled and vulnerable groups and runs drop-in activities for city residents who will have limited options to use public transport to travel to the reservoir.	Comments noted. The masterplan states that vehicular access and priority parking needs to be carefully managed and designed to ensure the area is not dominated by cars. Parking should be shared by all users and prioritise those who are unable to access the reservoir by foot, bike, or public transport. Opportunities for prioritisation to support water activation should be explored.	No change required.
2 Individuals	Not in support of proposals.	Comment noted.	No change required.
1 Individual	Not in support of proposals. States, they will increase pollution.	Comment noted. The masterplan seeks to maximise the social, health and environmental benefits of the reservoir. The masterplan is aligned to the Route to Zero (R2O) and City of Nature plan 2021 and supports a range of measures to encourage	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		sustainable modes of travel, the use of green technologies and enhancements to the natural environment.	
1 Individual	Not in support of proposals. States it ignores the counterproposal put forward by the community.	Comment noted. The council has worked with the community members of the Community Partnership Forum on redrafting the masterplan to ensure the experiences and views of the local community were better reflected in the masterplan.	No change required.
1 Individual	In support of the heritage buildings being re-purposed.	Support welcomed. The masterplan outlines the potential for Reservoir Cottage and Reservoir House to facilitate a variety of activities to contribute to the activation of the site and protect their heritage value.	No change required.
Birmingham Civic Society	Suggests that a second 'gateway' should be created to enable improved access to the north side of the reservoir, i.e., Icknield Road.	Suggestion noted. The masterplan highlights the importance of the Icknield Port Road entrance and describes it as a gateway. It states it should be clearly marked and prioritise pedestrians and cyclists.	No change required.
1 Individual	Asks that the gates on the Icknield Port Road entrance are maintained to protect the safety of homes that back on to the reservoir.	Comment noted. The SPD states that the existing entrance on Icknield Port Road will be improved to provide a welcoming gateway to the reservoir. It is hoped these improvements, along with increased activation the site will increase the safety of homes that surround the reservoir.	No change required.
1 Individual	States the reservoir is primarily a place for pedestrians, with boating and rowing being secondary activities.	Comment noted. The masterplan acknowledges the important role the reservoir plays as a green space for pedestrians. A key part of the masterplan vision is to ensure the reservoir is safe and accessible to all.	No change required.
1 Individuals	Suggests the heritage buildings and surrounding area could be used for a wide variety of purposes, for example, music practice, art therapy, general health and well-being.	Suggestion noted. The masterplan states that Reservoir Cottage and Reservoir House could be used for a variety of uses. Using the buildings as suggested would be in keeping with masterplan.	No change required.



Consultee	Representation summary	Council response	Proposed Changes to SPD
1 Individual	Suggests the heritage buildings should be used for education regarding the structure of the dam / reservoir.	Suggestion noted. The masterplan states that Reservoir Cottage and Reservoir House could be used for a variety of uses. Using the buildings as suggested would be in keeping with the masterplan.	No change required.
1 Individual	States Midland Sailing Club need to continue to lease Reservoir House from the Canal & River Trust in order to operate some of its groups e.g., Birmingham University Windsurf Club, Nowka Bais (Bangladeshi Boat Club) and Sail Birmingham (Community outreach programme).	Comment noted. Reservoir House is owned by the Canal & River Trust. Future lease arrangements of the building are a commercial matter that is beyond the remit of the masterplan.	No change required.
1 Individual	States any future use of Reservoir House should complement the activities of Midland Sailing Club and not create any adverse impacts regarding its access to the water and financial performance.	Comment noted. Reservoir House is owned by the Canal & River Trust. The masterplan states future uses for Reservoir House could include leisure, community, commercial and educational facilities that support activity at the reservoir.	No change required.
1 Individual	States the reservoir should be prioritised as a public space rather than space being used by private clubs.	Comment noted. Water sports clubs have long-standing connections to the reservoir and the council is committed to supporting their continued activity, in particular their outreach work with local communities. A key part of the masterplan vision is to ensure the reservoir is safe and accessible to all	No change required.
2 Individuals	Requests existing graffiti on the rear wall of the sailing club building is removed. Suggests a green wall is installed to prevent graffiti returning.	Comment noted. The masterplan states the section of Reservoir Loop running behind the sailing club should be enhanced to improve the visitor experience. This could include a mural or increased green infrastructure.	No change required.
1 individual	Requests existing graffiti should not be replicated at reservoir. States existing graffiti is used as meeting point for anti-social behaviour.	Comment noted. The masterplan supports opportunities for a mural to be created on the rear of the sailing club's main storage shed to encourage community ownership and minimise vandalism. Increased activity at the reservoir will help address	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		anti-social behaviour and the council will work with partners to address issues that arise.	
1 Individual	States that space for graffiti is crucial.	Comment noted. The masterplan states there are opportunities for murals and street art at various locations around the reservoir to celebrate its value and the activities that it supports.	No change required.
1 Individual	Suggests the signage at Icknield Port Road entrance is improved.	Suggestion noted. The masterplan states the entrance from Icknield Port Road should be clearly marked and prioritise pedestrians and cyclists.	No change required.

### Reservoir Link:

Consultee	Representation summary	Council response	Proposed Changes to SPD
17 Individuals, Sama Investments Ltd, Inland Waterways Association, Birmingham Rowing Club	Support for the vision and principles.	Support welcomed. Reservoir Link will connect the reservoir, canal, and Port Loop together, addressing the visual and physical barriers of the dam wall. It will maximise the canal side location and heritage assets to deliver high-quality housing-led development.	No change required.
Sport England	Supports vision and principles for development. States the routes that connect the individual development sites will provide good opportunities for walking and cycling and improve accessibility.	Support welcomed.	No change required.
1 Individual	In support of vision and principles for development as it will remediate and re-purpose derelict buildings and land.	Support welcomed.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
1 Individual	In support of vision and principles for development in particular the proposals for a mixed-use area with water taxis and floating markets. States a link from the new Port Loop development to the reservoir will help create a larger community and contribute to a new community-based way of living that should be encouraged.	Support welcomed.	No change required.
1 Individual	Supports the vision and principles. States concerns regarding topography changes across the site.	Support welcomed. The site topography has informed development guidance. Detailed designs for future development will be assessed at the planning application stage.	No change required.
1 Individual	In support of vision and principles. Asks why development has not happened to date.	Support welcomed and comment noted. Work on some of the opportunities has already been delivered, such as the pathway improvements and the council is working on detailed delivering programmes for other elements of the masterplan.	No change required.
1 Individual	In support of development. Asks how people will get from the reservoir to the canal basin.	Support welcomed. The masterplan proposes enhanced connectivity across all parts of the reservoir. It states a new pedestrian bridge over the loop canal at the Canal Basin site will connect the reservoir with the Port Loop development, public transport connections on Icknield Port Road and the main line canal towpath to the city centre. A new route will also connect Osler Street to the canal basin through the former Auto Services site and a new pathway will be routed along the base of the dam.	No change required.
6 Individuals	Not in support of the vision and principles for development.	Comment noted. Reservoir Link will connect the reservoir, canal, and Port Loop together, addressing the visual and physical barriers of the dam wall. It will maximise the canal side location and heritage assets to deliver high-quality housing-led development. The Port Loop development is allocated for housing in the Birmingham Development Plan (2017). The masterplan provides development principles to ensure the development is	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		high-quality and will deliver improvements to the reservoir environment and users of the reservoir.	
1 Individual	Not in support of the vision and principles for development. Requests the alternative Community Plan is considered and states it has been ignored to date.	Comment noted. Following responses to the first round of consultation, the council established a Community Partnership Forum in January 2020, to engage more closely with representatives from the local community and users of the reservoir. From discussion at the Forum, the council endorsed a set of Community Principles that have been incorporated into the masterplan.	No change required.
1 Individual	Not in support of the vision and principles for development. States that no new buildings should be built.	Comment noted. The site is allocated in the Birmingham Development Plan (2017) for housing. The masterplan provides development principles to ensure the development is high-quality and will deliver improvements to the reservoir environment and users of the reservoir.	No change required.
1 Individual	Not in support of vision and principles for development. States existing derelict buildings in the area should be re-purposed instead and existing space left open as it offers physical and mental health benefits.	Comment noted. The site is allocated in the Birmingham Development Plan (2017) for housing. The masterplan provides development principles to ensure the development is high-quality and will deliver improvements to the reservoir environment and users of the reservoir. The masterplan outlines the value of the Natural Parkland space and the importance of the reservoir, remaining a public space that supports a wide range of activities that can contribute to wellbeing.	No change required.
2 Individuals	In support of proposals for housing development.	Support welcomed.	No change required.
2 Individuals	Not in support of proposal for housing development.	Comment noted. The site is allocated in the Birmingham Development Plan (2017) for housing. The masterplan provides development principles to ensure the development is high-quality and will deliver improvements to the reservoir environment and users of the reservoir.	No change required.
5 Individuals	Not in support of proposals for housing development due to concerns with height and	Comment noted. The masterplan states that buildings in the canal basin area should respect the historic character and retain views	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
	the impact upon existing views and surrounding buildings, for example Buddhist Vihara Temple.	from the reservoir to the city. It also states development on the H Suite site should be two to three storeys to remain below the dam wall.	
1 Individual	Not in support of proposals for housing development due to scale. States that if development is to be built at this site, the proposals for Osler Place should be abandoned.	Comment noted. The proposals for the Reservoir Link site are in addition to the Osler Park and Osler Place site, both of which are allocated in the Birmingham Development Plan (2017) and contribute to the masterplan for the reservoir. The exact scale of development at Reservoir Link will be determined once planning applications come forward.	No change required.
Midland Sailing Club	Not in support of any building being higher than the dam wall. States buildings taller than the dam will affect wind patterns on the reservoir.	Comment noted. The masterplan states that any proposals for buildings taller than the dam wall would only be allowed where they protect key views. In addition, any proposals would be required to demonstrate that wind shadowing effects would not have undue adverse impacts on water sport activity.	No change required.
1 Individual	Not in support of proposals for housing development. Suggests the site should accommodate a secondary school as there is high demand for school places in Edgbaston and the development will generate more demand.	Comment noted. The masterplan delivers the growth agenda set out in the BDP and as part of the BDPs evidence base, consideration was given to the infrastructure requirements in this area of the city. Further detailed consideration on the impact to infrastructure will be considered through the planning application process.	No change required.
1 Individual	Not in support of proposals for housing development below the dam. States the safety of residents would be put at risk if structural soundness of dam fails.	Comment noted. Concern noted. The council has worked closely with the Canal & River Trust in the production of the masterplan. Edgbaston Reservoir is defined as a 'large raised reservoir' under The Reservoirs Act 1975 (as amended by Schedule 4 of the 2010 Floods and Water Management Act). The Trust has a legal responsibility for maintaining all of its reservoirs in a safe condition for the protection of the general public. The Trust has a dedicated 'Reservoir Team' to ensure compliance with this reservoir safety legislation. In addition, the Trust requires buffer	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		zones to protect the toe of the dam and ancillary structures and to allow for future works.	
1 Individual	Not in support of proposals for housing development below the dam. Suggests the space should be developed into a green space with a bridge to Port Loop.	Comment noted. The principle of housing development here is set in the Birmingham Development Plan (2017) and the approved land use parameter plan under the Icknield Port Loop outline planning permission (as amended by s73 permission 2017/04850/PA). The masterplan outlines the intention for a pedestrian bridge link from the reservoir to Port Loop that will enhance the walking infrastructure in the area and the connectivity between the reservoir and the city.	No change required.
1 Individual	Not in support of proposals for housing development close to the canal edge.	Comment noted. The site is allocated in the Birmingham Development Plan (2017) for housing. The masterplan provides development principles to ensure the development is high-quality and will deliver improvements to the reservoir environment and users of the reservoir.	No change required.
1 Individual	Asks what is meant by the term 'innovative family housing'.	Comment noted. The term refers to family housing that is not a traditional type of family home. i.e. 3-bed semi-detached house with drive and rear garden. Therefore, it could include family accommodation in the form of apartments, townhouses with roof garden space, or other varieties, to achieve higher densities, or family accommodation with shared gardens and parking. Although innovative family housing would be supported the council considers an 'emphasis on innovative family housing' is not a realistic goal in view of the existing planning permissions for predominantly apartment development in this area. The masterplan has therefore been updated to reflect this.	The masterplan has been updated to remove emphasis on innovative family housing for this site.
1 Individual	In support of proposals for social and / or affordable housing development. States development should not rise above the dam wall.	Support welcomed. The exact housing tenure mix and design will come forward at the planning application stage. The building of social / affordable homes would be supported at this site.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
1 Individual	Requests more details are provided in the masterplan on the structural soundness of the dam.	Comment noted. The council has worked closely with the Canal & River Trust in the production of the masterplan. Edgbaston Reservoir is defined as a 'large raised reservoir' under The Reservoirs Act 1975 (as amended by Schedule 4 of the 2010 Floods and Water Management Act). The Trust has a legal responsibility for maintaining all of its reservoirs in a safe condition for the protection of the general public. The Trust has a dedicated 'Reservoir Team' to ensure compliance with this reservoir safety legislation. In addition, the Trust requires buffer zones to protect the toe of the dam and ancillary structures and to allow for future works.	No change required.
1 Individual	Asks how the visual and physical barriers of the dam wall will be addressed.	Comment noted. The masterplan states a development at the Canal Basin should explore the potential of creating a direct link to the reservoir over the dam wall. The exact designs for development and connectivity will be determined as planning applications come forward. The masterplan has suggested several means for improved access between the reservoir and its surroundings but all development proposals will be assessed in association with the Canal & River Trust, to ensure the dam structure is protected and remains accessible to the Trust.	No change required.
2 Individuals	Requests the existing space below the dam wall is enhanced with native trees to extend the tree canopy and that wildflower planting and wildlife are protected to increase biodiversity.	Comment noted. The masterplan states that an existing area of trees below the southern end of the dam should be retained and integrated into new green infrastructure, for example a wildflower meadow. Any new green landscaping will be discussed with the Canal & River Trust to ensure the integrity of the dam wall is not adversely affected.	No change required.
1 Individual	Asks if Icknield Port Road will be closed during construction works.	Comment noted. Impacts of works on surrounding Highways will be fully assessed once planning applications for development come forward.	No change required.



Consultee	Representation summary	Council response	Proposed Changes to SPD
Birmingham Civic Society	States canal-related activity around Icknield Port Yard should have priority over other uses.	Comment noted. The masterplan states Icknield Port Yard is a historic maintenance yard owned by the Canal & River Trust. As a working yard, it is an important part of the Birmingham canal network and operations. Any new development must safeguard this existing use.	No change required.
1 Individual	States the Icknield Port Yard is a waterways landmark of historical value and should be protected.	Comment noted. The masterplan acknowledges the important role of the historic yard and provides development principles to ensure historic assets are safeguarded.	No change required.
1 Individual	States the Icknield Port Yard is still operational and there is a risk that new residents and businesses will fail to recognise its importance. Concerns there will be conflict between different users.	Comment noted. Comment noted. The masterplan states Icknield Port Yard is a historic maintenance yard owned by the Canal & River Trust. As a working yard, it is an important part of the Birmingham canal network and operations. Any new development must safeguard this existing use.	No change required.
1 Individual	States that the masterplan does not show any visitor or permanent moorings spaces, which would generate interest. The southern side of Icknield Port Loop doesn't have any visitor spaces and visitor moorings on the north side are not signposted. Some obstructions and/or dangerous materials in this stretch of water have also been noted.	<p>Comment noted. Comment noted. No moorings are proposed on Edgbaston Reservoir itself. However, there is a water space strategy as part of plans for development at Port Loop which includes various types of moorings. This strategy will be reviewed as future planning applications come forward on the Port Loop site.</p> <p>Any safety concerns relating to the canal network should be reported to the Canal &amp; River Trust (CRT). Contact details can be found here: <a href="https://canalrivertrust.org.uk/contact-us/contacting-us-in-an-emergency">https://canalrivertrust.org.uk/contact-us/contacting-us-in-an-emergency</a></p> <p>CRT officers stated that the canal network is regularly checked, to identify obstructions and arrange their removal.</p>	No change required.
House by Urban Splash	Asks the existing wording in the masterplan be amended to remove reference to family	Comment noted. The approved land use parameter plan under the Icknield Port Loop outline planning permission (as amended	The masterplan has been amended to

Consultee	Representation summary	Council response	Proposed Changes to SPD
	<p>housing and thereby reflect the approved planning permission for Port Loop:</p> <p><i>'development in the Reservoir Link Area is expected to be residential-led, with a focus on delivering apartments located on upper floors, to enable canal side activation.'</i> because "this part of the Port Loop Site will primarily deliver apartments'.</p>	<p>by s73 permission 2017/04850/PA), shows 'high density housing 120-160 units per hectare' and non-residential uses. One small area is shown as medium-density housing. The building heights parameter plan shows mostly heights up to four storeys with one block up to ten storeys in this area. A further s73 application (2022/00690/PA) is currently awaiting determination which does not propose to significantly alter the land uses or building heights in this area.</p> <p>As acknowledged in the masterplan, also within the Reservoir Link part of the masterplan, outline planning permission (2020/03309/PA) has been granted on the former Auto Services site for erection of up to 260 dwellings. In the outline planning permission layout, scale and access are not reserved matters. Therefore, the permission establishes the principle of buildings ranging from 4 to 9-storeys in height in interconnected apartment blocks. In light of these existing permissions for mainly apartment development, the masterplan has been amended to remove reference to an emphasis on innovative family housing.</p>	<p>delete reference to innovative family housing and refer to a mix of homes to meet local need.</p>
House by Urban Splash	<p>Asks that reference to roof top infrastructure and green roof designs for buildings close to the dam wall be amended, as most rooftops from the Port Loop development will be visible from the dam wall. States council policy supports the provision of Low and Zero Carbon technologies so these should not be prevented by the masterplan. The following amended wording is suggested:</p> <p><i>'roof top infrastructure and equipment should be designed with regards to, the visual</i></p>	<p>Comment noted. The masterplan has been updated to state that roof top infrastructure and equipment should be sensitively designed with regards to the visual amenity of users of the reservoir and roofs overlooked from the dam wall should be green to enhance views and promote biodiversity.</p> <p>We agree that most if not all rooftops in the reservoir view area are going to be visible from the dam wall. We also accept that it might be necessary to install solar PV on rooftops to meet Building Regulations targets for building carbon emissions. We agree with the proposed amendment suggested.</p>	<p>The masterplan has been updated to state that roof top infrastructure and equipment should be sensitively designed with regards to the visual amenity of users of the reservoir and roofs overlooked from the dam wall</p>

Consultee	Representation summary	Council response	Proposed Changes to SPD
	<i>amenity of users of the reservoir and roofs overlooked from the dam wall should be green, where feasible and viable, to enhance views and promote biodiversity’.</i>		should be green to enhance views and promote biodiversity.
House by Urban Splash	In support of pedestrian bridge to create a direct link over the dam wall, to connect the reservoir and Port Loop. Requests an amendment is made to masterplan wording (p.59), to not be prescriptive on design. States it is unclear what design would be most suitable given the structural sensitivity of the dam wall.	Support welcomed. The masterplan wording is not considered to be prescriptive about the design of the pedestrian bridge.	No change required.
Canal & River Trust	The creation of a link to the Port Loop site will require the provision of additional details to enable determination of any resulting impacts on the embankment / headwall of the reservoir. Modelling and consideration of gradients will be critical and development must not affect operational functions and access requirements.	Comment noted and agreed. The masterplan states future development at the Canal Basin should explore the potential of creating a direct link to the reservoir over the dam wall. It states this should be a distinctive feature of innovative design and local character that protects the heritage and structural integrity of the dam wall. Further work will be required to ensure proposals do not impede access or impact the integrity of the structure. The council is committed to working with the Canal & River Trust on the delivery of the masterplan.	No change required.
1 Individual	Concerns regarding the scale of redevelopment at the former Hermetic Rubber Factory. Asks what assessment has been undertaken on the potential impacts on the heritage of the site and wider environment.	Comment noted. Outline planning permission for the development, including scale, was granted subject to conditions in May 2020 (reference 2020/03309/PA). The planning officer’s report concluded that on balance, the scale and mass of the proposals were considered to be acceptable and did not lead to any undue harm upon the significance of existing heritage assets within the site’s wider context and setting.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
1 Individual	Concerns the site will attract anti-social behaviour.	Comment noted. The masterplan is seeking to make under-used areas of the reservoir more active and thereby safer, for users and existing residents in the surrounding area.	No change required.
Sama Investments Ltd	Requests the proposed design of development on the H Suite and land that directly borders the reservoir is re-considered. Requests additional development is shown on the site plan as the existing amount shown is unviable.	Comment noted. The detailed designs for development that comes forward will be assessed at the planning application stage	No change required.
Sama Investments Ltd	In support of improved access for pedestrians from Icknield Port Road to Icknield Port Yard. States the proposed route at the bottom of the dam wall is unsuitable and will restrict development potential on the site.	Comment noted. Any future development will be required to be offset from the dam wall in accordance with the Canal & River Trust's buffer zone. As a result, it is considered a pathway could be included within this buffer zone and be carefully integrated within the design of any development proposals that comes forward.	No change required.
1 Individual	Concerns the pathway will be used by attendees at events at the H Suite and create disturbance in the reservoir.	Comment noted. The masterplan identifies the potential for the H Suite to be redeveloped for housing. Detailed designs for potential future development will be assessed at the planning application stage.	No change required.
1 Individual	Requests additional information on the future of the H Suite. Asks if it will be demolished.	Comment noted. The masterplan identifies the potential for the H Suite to be redeveloped for housing but proposals will be determined as they come forward, in conjunction with owners and occupiers, and through the planning application process.	No change required.
2 Individuals	States the re-development of the H Suite will create the loss of a nursery. Requests the nursery is retained due to high demand for nursery provision in the area.	Comment noted. The masterplan identifies the potential for the H Suite to be redeveloped for housing but exact proposals will be determined as they come forward in conjunction with owners and occupiers, and through the planning application process. It is considered that, along with housing development, the site offers potential for non-residential units and these could include a nursery and other services, that will support the day-to-day needs of both the new and existing communities.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
1 Individual	States the H Suite is part of the personal history of many local residents and that this should be recognised in the masterplan.	Comment noted. The masterplan acknowledges the important social history of the reservoir. The Celebrating the Reservoir section of the masterplan provides the opportunity for the social history of the H Suite to be celebrated through a variety of mediums.	No change required.
1 Individual	States residents should be encouraged to use the Ladywood Leisure Centre rather than the building of a new gym.	Comment noted. The masterplan states that existing pedestrian and cycling connections to Ladywood Leisure Centre should be strengthened and enhanced. Planning permission has been granted for a three-to-nine storey, residential apartment building on land fronting Icknield Port Road and Osler Street. Due to the scale of the development, Sports England has identified the requirement for additional sporting facilities in the area, meaning the creation of a new gym would not be in direct competition with the Ladywood Leisure Centre.	No change required.
1 Individual	Suggests a viewing platform should be created with skyline orientation towards the city.	Suggestion welcomed. The council appreciates views are an important feature of the reservoir and an integral part of the visitor experience. This proposal would be in keeping with masterplan guidance.	No change required.
3 Individuals	Asks how the proposed development will impact upon the existing views and skylines, for example the view from the reservoir to St Augustine's Church.	Comment noted. The masterplan states that views are an important feature of the reservoir and an integral part of the visitor experience. It further states key views to and from the reservoir shall be protected and 3D models will be required to evidence this safeguarding, at the planning application stage.	No change required.
1 Individuals	Suggests the creation of hard / physical barriers should be avoided and soft landscaping improvements used instead to benefit ecology.	Suggestion noted. The masterplan states that all development and proposals for the reservoir should support the biodiversity objectives and targets set out in the Edgbaston Reservoir Local Nature Reserve Management Plan 2021.	No change required.
1 Individual	Suggests there needs to be greater inclusion of recreation and public facilities, for	Suggestion noted. The masterplan highlights the opportunities for the space to be made more accessible for visitors, with commercial frontages and the possible introduction of temporary	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
	example, cafe, separate public toilets and leisure and recreation facilities.	water markets, water taxis and creation of moorings. It is anticipated that Osler Park and Osler Place will deliver these types of facilities.	
1 Individual	Suggests the buildings at the Icknield Port Yard could be used for educational purposes and would benefit from being linked to the Roundhouse Hub operated by the Canal & River Trust and National Trust on the canal side on Brindley Place.	Suggestion noted. The masterplan states there may be potential to develop Icknield Port Yard's role as an asset for the area through activities such as public open days. The council has worked closely with the Canal & River Trust on the production of the masterplan and will continue to do so.	No change required.
1 Individual	States new pedestrian crossings and traffic calming measures will need to be created on Icknield Port Road.	Comment noted. The impacts of development on the highway infrastructure surrounding the reservoir will be part of the assessment of applications that come forward. The original approval for the Port Loop development included a condition for the provision of a Toucan crossing on Icknield Port Road. This condition is applicable to one of the later phases of the Port Loop development.	No change required.
2 Individuals	States good connectivity to Port Loop is critical to the success of any development. States good connectivity in its broadest sense should be pursued with open access to welcoming spaces and general facilities to support community requirements. States these aren't currently available at Port Loop.	Comment noted. A key part of the masterplan vision is to create safe and accessible environments for all. The Port Loop development is being built-out in phases. Due to the large scale of the development, some facilities may take additional time to be established and become operational. The masterplan sets out how connections between the reservoir and Port Loop sites will be enhanced, with increased activity along the canal side at Port Loop, resulting from expanded pedestrian and cycle-friendly routes.	No change required.
1 Individual	States any development should avoid gentrification of the reservoir and remain accessible to all societal groups. States that Port Loop is perceived as an unwelcoming space for non-residents.	Comment noted. A The masterplan vision makes it clear that the reservoir belongs to everyone. There are numerous opportunities that will be accessible for all the community such as improved public realm, public open space and spaces for community	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		activity. key part of the masterplan vision is to create safe and accessible environments for all.	
1 Individual	States there are many problems with buildings in the area that are leasehold.	Comment. Issues with leasehold properties are outside the remit of the masterplan.	No change Required.

### Edgbaston Waterworks:

Consultee	Representation summary	Council response	Proposed Changes to SPD
13 Individuals, Calthorpe Estates, Birmingham Rowing Club, Birmingham Civic Society, Inland Waterways Association	Support the vision and principles.	Support welcomed.	No change required.
3 Individuals	Support housing development at Edgbaston Waterworks site.	Support welcomed.	No change required.
1 Individual	Supportive of housing development on the basis that new housing is both affordable and freehold. Concern future development may become Homes in Multiple Occupation (HMOs).	Support welcomed. The housing mix for the opportunity area has not yet been determined. The exact mix of uses will be determined through the planning application process. Future schemes on the site will be assessed against the masterplan and other adopted local plan policies. These include policies on housing mix and affordability. The masterplan cross references these policies to emphasise the council's commitment to delivering affordable housing at the reservoir.	No change required.



Consultee	Representation summary	Council response	Proposed Changes to SPD
1 Individual	Supportive of housing development on the basis it is social housing and is managed by Birmingham City Council.	Support welcomed. The housing mix for the opportunity area has not yet been determined. The exact mix of uses will be determined through the planning application process. Future schemes on the site will be assessed against the masterplan and other adopted local plan policies. These include policies on housing mix and affordability. The masterplan cross references these policies to emphasise the council's commitment to delivering affordable housing at the reservoir.	No change required.
2 Individuals	Support for improved connections across the site.	Support welcomed.	No change required.
Birmingham Civic Society	Requests buildings of historic value on the site be sensitively re-used and not demolished.	Comment noted. The masterplan acknowledges the value of the historic buildings at the Edgbaston Waterworks site and states the site has several historic and interesting buildings that should be sensitively re-used rather than being demolished.	No change required.
Birmingham Civic Society	Requests any future development is restricted in height to ensure the Waterworks Tower is not obscured.	Comment noted. The masterplan states the Waterworks Tower, should be reused, safeguarded and its setting enhanced. It also states that buildings should generally be three to four storeys high.	No change required.
5 Individuals	Supportive of development. States it will safeguard the architecture and character of the area, enable the restoration of historic buildings that have been neglected and improve connections between them.	Support welcomed. The masterplan acknowledges the value of the historic buildings at the site. The Waterworks Tower and Perrott's Folly are both identified as key heritage assets. The Waterworks Tower is Grade II listed and represents an important part of the city's industrial heritage. Both towers are key landmarks within the wider area and contribute to the overall setting of the reservoir.	No change required.
2 Individuals	Supportive of development as it would safeguard the historic buildings. Requests public access to historic buildings. States future development should not be gated.	Support welcomed. The masterplan states the Waterworks Tower, as well as other heritage assets including the 1930s building marking the corner of Harold Road and Waterworks Road and the Victorian cottage fronting Waterworks Road should be reused, safeguarded and their setting enhanced. The exact design will come forward at the planning application stage.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		Future proposed development will be assessed against the masterplan and other adopted local plan policies. These include policies on design, housing mix and affordability.	
Calthorpe Estates	Suggests development should improve connections between the Waterworks site and local places in the surrounding area. Opportunities to create new walking and cycling routes have been missed in previous developments plans for the area.	Comment noted. The masterplan states enhanced pedestrian linkages should be provided through the site to Edgbaston Reservoir and the wider area. It also states the site should form part of a new walking and cycling route between Edgbaston Reservoir and Waterworks Tower, Perrott's Folly and surrounding residential neighbourhoods.	No change required.
3 Individuals	Not in support of principle of development.	Comment noted. The Edgbaston Waterworks site is allocated for development by the Birmingham Development Plan (2017). The BDP provides a strategy for addressing the challenges of growth across the city, with reference to climate change, the natural environment, quality of life, infrastructure, and an inclusive economy. The masterplan seeks to build on the policy allocation and provide guidance to ensure future development delivers high-quality housing-led development that protects and enhances heritage assets.	No change required.
5 Individuals	Not in support of any housing development at site.	Comment noted. The Edgbaston Waterworks site is allocated for residential-led development by the Birmingham Development Plan (2017). The BDP provides a strategy for addressing the challenges of growth across the city, with reference to climate change, the natural environment, quality of life, infrastructure, and an inclusive economy. The masterplan seeks to build on the policy allocation and provide guidance to ensure future development delivers high-quality housing-led development that protects and enhances heritage assets.	No change required.
1 Individual	Not in support of development of student accommodation.	Comment noted. The housing mix for the site has not yet been determined. The site is allocated for residential-led development by the Birmingham Development Plan (2017). The masterplan	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		seeks to build on the policy allocation and provide guidance to ensure future development delivers high-quality housing-led development that protects and enhances heritage assets. The exact mix of houses will be determined through the planning application process. Future schemes on the site will be assessed against the masterplan and other adopted local plan policies. These include policies on housing type, mix and affordability.	
2 Individuals	States access to Waterworks site is now blocked by a 5G mast and has detrimental impacts on the setting of the Listed Tower.	Comment noted. Approval for the installation of the Phase 8/5G mast was given under application 2020/03971/PA. The council's conservation team was consulted on the application and found no objections. It was determined that whilst the mast will be visible in views of the towers, it will be 100m away from the waterworks tower and 300m away from Perrott's Folly. The mast is within the setting of both buildings, located at the top of Mariners Avenue but it was considered it will not create a harmful impact on the significance of them, as they are viewed in 'the round' from surrounding roads. Furthermore, the mast is positioned against a boundary wall of the site and does not prevent site access.	No change required.
2 Individuals	Not in support of proposed development, suggests alternative community uses instead of houses including an arts or heritage centre to bring residents together.	Comment noted. The Edgbaston Waterworks site is allocated for development by the Birmingham Development Plan (2017). The masterplan seeks to build on the policy allocation and provide guidance to ensure future development delivers high-quality housing-led development that protects and enhances heritage assets.	No change required.
3 Individuals	Not in support of principle of development due to the Severn Trent site currently being operational with recent bore holes made. States the site is needed to ensure water supply to the city.	Comment noted. The council has worked closely with Severn Trent on the masterplan. The masterplan clearly states the site is allocated in the Birmingham Development Plan for a residential led development and should the site no longer be required by Severn Trent; it has the potential to provide high-quality housing	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		designed to complement historic buildings with direct access to the reservoir.	
1 Individual	Not in support of proposed development of site as it poses detrimental impacts to water supply to the city.	Comment noted. The masterplan states the site would only come forward for residential development if it is no longer required for operational use by Severn Trent. Any future development would need to ensure it did not have a detrimental impact on water supplies.	No change required.
1 Individual	Not in support of principle of development. Requests the historic buildings and existing wildlife within them are fully considered and protected.	Comment noted. The site is allocated in the Birmingham Development Plan for residential-led development. The masterplan seeks to build on the policy allocation and provide guidance to ensure future development delivers high-quality housing-led development that protects and enhances heritage assets. All schemes will be assessed against the masterplan and other adopted local plan policies. These include policies on this historic environment and biodiversity.	No change required.
1 individual	Not in support of proposed development. Requests it becomes a green space instead.	Comment noted. The site is allocated in the Birmingham Development Plan for residential-led development. The masterplan seeks to build on the policy allocation and provide guidance to ensure future development delivers high-quality housing-led development that protects and enhances heritage assets.	No change required.
1 Individual	Not in support of proposed development. States the site is a long-term ambition and should therefore have its own plan.	<p>Comment noted. The masterplan states: subject to the site becoming available for development, Edgbaston Waterworks will deliver high-quality housing-led development that protects and enhances heritage assets.</p> <p>The site is allocated in the Birmingham Development Plan for residential-led development. The masterplan seeks to build on the policy allocation and provide guidance to ensure future development delivers high-quality housing-led development that protects and enhances heritage assets. The purpose of the</p>	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		masterplan is to guide future development to ensure the site is developed in a way that enhances and protects the existing assets, whilst delivering homes and improving accessibility.	
1 Individual	Not in support of proposed development, proposes the Waterworks Tower is designated as a local landmark, to attract visitors to the area by sustainable transport.	Comment noted. The Waterworks Tower is Grade II listed in recognition of the important industrial heritage at the site. The site is allocated in the Birmingham Development Plan for residential-led development. The masterplan seeks to build on the policy allocation and provide guidance to ensure future development delivers high-quality housing-led development that protects and enhances heritage assets. The masterplan proposes the creation of a heritage walking trail, to encourage users of the reservoir to travel to sites in the surrounding area. It also states that, visitors to the reservoir will be encouraged to use a range of sustainable transport modes.	No change required.
1 Individual	Not in support of proposed housing development due to the likelihood the new homes will be too small.	Comment noted. The masterplan site is allocated for development by the Birmingham Development Plan (2017). Details will be determined through the planning application process. Future schemes on the site will be assessed against the masterplan and other adopted local plan policies. These include policies on housing size and mix.	No change required.
1 Individual	Not in support of proposed development. States the area of public space appears very limited and lacks any defined purpose for use.	Comment noted. The site is allocated for residential-led development in the Birmingham Development Plan (2017). The design of future development, including the public realm has not been determined and will be agreed at the planning application stage.	No change required.
2 Individuals	Not in support of proposed development. Requests existing housing stock be renovated instead.	Comment noted. The site is allocated for residential-led development in the Birmingham Development Plan (2017). There are no existing houses within the site to renovate. The remediation of existing housing stock outside the masterplan boundary is beyond the plan's remit.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
1 Individual	Concerns the quality of future development will be poor. States there is potential for profitability to take precedent over quality standards.	Comment noted. The site is allocated for residential-led development in the Birmingham Development Plan (2017). The masterplan seeks to build on the policy allocation and provide guidance to ensure future development delivers high-quality housing-led development that protects and enhances heritage assets. The masterplan states new development will demonstrate high-quality sustainable design that reflects the unique character of the reservoir. The exact design will come forward at the planning application stage. Future proposed development will be assessed against the masterplan and other adopted local plan policies. These include policies on design.	No change required.
1 Individual	Requests any residential development includes adequate parking provision. States on-street parking on surrounding road network is very limited.	Comment noted. Details of parking provision will be determined at the planning application stage. Any future scheme will need to be in accordance with the council's parking policies.	No change required.
2 Individuals	States there is insufficient information in the plan to decide whether they support the proposals or not.	<p>Comment noted. The Edgbaston Waterworks area has the longest timelines in the SPD and only a high-level outline of proposals for the site can be shared at this stage. The Edgbaston Waterworks site is allocated for residential-led development by the Birmingham Development Plan (2017). The BDP provides a strategy for addressing the challenges of growth across the city, with reference to climate change, the natural environment, quality of life, infrastructure, and an inclusive economy. The masterplan seeks to build on the policy allocation and provide guidance to ensure future development delivers high-quality housing-led development that protects and enhances heritage assets.</p> <p>However, the proposals for the Waterworks site have the longest time horizons in the masterplan and will only become possible,</p>	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		should Severn Trent no longer require its retention for operational purposes.	
Severn Trent	Acknowledges the site is allocated for residential-led development in the Birmingham Development Plan and understands the masterplan needs to be written in compliance with that plan. States the redevelopment of the site is very unlikely due to the operational needs of Severn Trent, and therefore the role the site can play delivering the masterplan vision is limited. Requests the masterplan is amended to more explicitly reference Severn Trent's need to operate from the site. States they are not planning to release any parts of the site for development at this stage but are instead seeking to rationalise their operations on site to retain the operational elements whilst making the rest of the site work more effectively.	Comment noted. The council has engaged with Severn Trent on the masterplan and the document has been amended to make it clear the site is still in operation by Severn Trent and the proposals for housing are long-term and would only advance should Severn Trent no longer need the site.	The masterplan has been further strengthened to make it clear the site is still in operation by Severn Trent and the proposals for housing are long term and would only advance should Severn Trent no longer need the site.
Severn Trent	States Severn Trent are unable to support public access through the site whilst it is operational. Requests references in the masterplan to trails and / or pedestrian linkages through the site should be removed.	Comment noted. The masterplan has been amended to reflect public pedestrian access through the site should be provided if the site comes forward for redevelopment.	The masterplan has been amended to reflect public pedestrian access through the site should be provided if the site comes forward for redevelopment.



Consultee	Representation summary	Council response	Proposed Changes to SPD
Severn Trent	States Severn Trent would be open to discussing the installation of interpretation boards around the edge of the site to provide information on the heritage and role of water to recognise the history of the site and its function.	Support welcomed and Severn Trent have been listed as a potential partner to deliver the projects in the 'Celebrating the Reservoir' section of the masterplan.	No change required.
1 Individual	Asks what existing pedestrian walkways there are on the site.	Comment noted. At present there is no public access to the site as it is owned and operated by Severn Trent.	No change required.

### Celebrating the Reservoir:

Consultee	Representation summary	Council response	Proposed Changes to SPD
19 Individuals and Calthorpe Estates	In general support of the vision and principles proposed.	Support welcomed.	No change required.
Sport England	Sport England supports the commentary in the sections on activity and connectivity, to promote trails that encourage movement for all.	Support welcomed.	No change required.
Midland Sailing Club	In support of the vision and principles. Requests additional signage around the reservoir.	Support welcomed. The masterplan provides a commitment to improve signage and install information boards at entrances to the reservoir.	No change required.
1 Individual	In support of vision and principles. Requests Blue Plaques are installed to better promote sites of interest relating to Tolkien.	Support welcomed. The installation of Blue Plaques is a function of English Heritage and outside the remit of the council. The masterplan proposes a signposted walking trail to celebrate the heritage and culture at the reservoir and provide a key visitor attraction. It also states a trail will facilitate increased movement	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		from the reservoir to both Perrott's Folly and the Edgbaston Waterworks Tower.	
1 Individual	Suggests additional signage towards the city centre should be incorporated to development.	Suggestion noted. The masterplan provides a commitment to improve signage at the reservoir and strengthen connectivity to surrounding areas including the city centre.	No change required.
1 Individual	Suggests opportunities for long distance viewpoint and landmark orientations are incorporated into the development.	Suggestion noted. The masterplan states views are an important feature of the reservoir and an integral part of the visitor experience. The masterplan also supports the provision of increased signage. The proposal would therefore be in keeping with the masterplan guidance.	No change required.
2 Individuals	States excessive signage will be harmful to the natural setting and ambiance of the reservoir.	Comment noted. The masterplan states signage should reflect the identity of the reservoir.	No change required.
Calthorpe Estates	Suggests the masterplan includes connections to the wider Hagley Road area to enable visitors and residents to access the reservoir more easily.	Suggestions noted. The masterplan states links to the city centre will be improved and promoted. Specific reference is made to Hagley Road, in relation to the intention for increased signage to be created at key transport hubs on Hagley Road e.g., the planned Metro and Sprint stops.	No change required.
1 Individual	In support of vision and principles. Asks how community interest will be sustained for the long-term.	Support welcomed. The consultation on the masterplan has identified strong local community interest in the future of the reservoir. It is anticipated a high level of interest will be maintained. Groups such as the Local Nature Reserve Management Committee and the water users have a long-term relationship with the area.	No change required.
1 Individual	In support of proposals. Requests new stories and purposes are celebrated through new interpretations in addition to existing and historical ones.	Support welcomed. The masterplan is flexible enough to enable to the request to be in-keeping with masterplan guidance. The specifics will be developed as part of an individual project's delivery.	No change required.
2 Individuals	In support of proposals for walking trails in association with education on the reservoir.	Support welcomed. The masterplan promotes walking as both an activity and sustainable means of travel. The creation of a	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		heritage walking trail is also proposed to encourage users of the reservoir to visit key landmarks in the surrounding area.	
7 Individuals	Not in support of vision and principles proposed.	Comment noted. The masterplan seeks to celebrate the character, history, and natural environment of the reservoir.	No change required.
1 Individual	Not in support of proposals. States the alternative Community Plan has been ignored.	Comment noted. The council worked with the community members of the Community Partnership Forum (which includes representatives of the Community Consortium who submitted an alternative plan), to redraft the masterplan to ensure that the experiences and views of the local community are better reflected in the masterplan.	No change required.
1 Individual	Not in support. Concerns large-scale community events will have adverse impacts upon neighbouring properties.	Comment noted. The masterplan does not suggest the scale of events that could be held at the reservoir but suggests it could be a place for groups to meet and interact. The types of events that come forward are beyond the remit of the masterplan. The masterplan clearly states that any activity will be required to protect and enhance the Local Nature Reserve setting.	No change required.
1 Individual	States the proposals are inadequate and should be expanded in both scope and resourcing to secure community engagement with the Arts / Heritage and nature.	Comment noted. The specifics of any activity will be developed as part of that individual project's delivery. The Delivery & Management chapter discusses the potential avenues for funding of activities at the reservoir.	No change required.
2 Individuals	Requests proposals increase the celebration of JRR Tolkien heritage in the area.	Comment noted. The masterplan proposes a heritage walking trail to facilitate increased movement to both Perrott's Folly and the Waterworks Tower. The masterplan provides a flexible framework for proposals to come forward that could support or facilitate a wide range of uses.	No change required.
1 Individual	Suggests the walking trails should provide greater emphasis on the canal element of the reservoir heritage. In particular, the engineering achievements of Thomas Telford.	Comment noted. The masterplan is flexible and supports a wide range of activity as long as they meet the vision and do not have a negative impact on the Local Nature Reserve. The masterplan states information boards could provide material on the function	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		of the reservoir and its relationship with the canal. The Canal & River Trust have been involved in the consultation on the masterplan and its Roundhouse Hub also offers potential for increased education on all aspects of the reservoir and association to the canal network.	
1 Individual	States the walking trails appears to be heavily influenced by white male interests. Requests female and Black, Asian and Minority Ethnic people associated to the reservoir are also included.	Comment noted. A key part of the vision is to ensure the reservoir is safe, welcoming, and accessible to all. The masterplan is flexible and supports a wide range of uses, if they meet the vision and do not have a negative impact on the Local Nature Reserve. The specifics of any activity will be developed as part of that individual project's delivery.	No change required.
1 Individual	Asks that all existing trees and hedges are retained.	<p>Comment noted. The masterplan states all development and activity should protect and enhance the natural environment. It also states there is the potential to expand fruit tree planting around the reservoir area, linking to a linear orchard along the canal. The Sustainability chapter of the SPD states that all qualifying development that will be required to deliver a minimum of 10% (or higher if set by subsequent adopted policy), biodiversity net gain upon implementation of the Environment Act 2021, anticipated to take place in winter 2023. Development will be encouraged to deliver biodiversity net gain ahead of the legislative requirement coming into effect and will also be encouraged to deliver a higher percentage in reflection of the Local Nature Reserve setting.</p> <p>Biodiversity net gain delivers measurable improvements for biodiversity by creating or enhancing habitats in association with development. The first preference is to deliver biodiversity net gain on-site, within the red line boundary of the planning application. This provides the maximum benefit within the</p>	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		locality of the development. Where it is not possible, biodiversity net gain can be delivered off-site.	
1 Individual	States the reservoir would be best 'celebrated' by its preservation and no development intervention.	Comment noted. The masterplan seeks to celebrate the character, history, and natural environment of the reservoir. The Tower Ballroom and Edgbaston Waterworks sites are allocated for residential-led development in the Birmingham Development Plan (2017). The masterplan builds on the policy allocation and provides guidance to protect, enhance and safeguard the natural environment for future generations.	No change required.
1 Individual	Asks if any additional images can be shared of the south side development of the reservoir to inform own art works.	Comment noted. The masterplan is supportive of art at the reservoir; however, no further images of future development can be provided at this time. The designs for future development will be agreed at the planning application stage.	No change required.
1 Individual	In support of proposals but states this will not recompense for any other problematic issues created.	Support welcomed. The proposals for celebration are not intended to distract from any problematic issues at the reservoir. The masterplan seeks to promote community interaction and inclusion for all at the reservoir, covering a wide range of activities, interests and needs.	No change required.

### Delivery and Management:

Consultee	Representation summary	Council response	Proposed Changes to SPD
15 Individuals, Midland Sailing Club, Inland Waterways Association	In support of proposals for a partnership-based approach to delivery and management of the masterplan.	Support welcomed.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
2 Individuals	In support of proposals. States the masterplan is welcomed but what is proposed may not be delivered.	Support welcomed. The council is committed to working with partners and stakeholders to deliver the masterplan vision.	No change required.
Sport England	In support of proposals to seek developer contributions but requests additional aspects are included. States the need for open space should be expanded to state that all spaces are to be of a high-quality and facilitate sport and physical activity.	Support welcomed and comment noted. The masterplan states Edgbaston Reservoir is a key open space and should be accessible to all. The masterplan encourages a broad range of uses to support physical and mental health and well-being as long as it does not have a detrimental impact on the Local Nature Reserve.	No change required.
1 Individual	In support of stakeholder table. Requests the creation of a 'transitional development trust' to include community representation.	Support welcomed and comment noted. The council is committed to working with stakeholders and partners on the delivery and implementation of the plan. The masterplan does not set out governance around delivery. If it is considered a trust is required to support the delivery of the masterplan, the role of the community will be given full consideration.	No change required.
1 Individuals	Not in support of proposals.	Comment noted.	No change required.
1 Individual	Not in support of proposals. States the alternate community proposals should be considered instead but have been ignored.	Comment noted. Officers have worked with the Community Consortium who submitted the alternative plan, to better align the council's aspirations with the community.	No change required.
2 Individuals	Not in support of proposals. States that involvement by the local community is referenced throughout the document but is not mentioned in relation to delivery and management.	Comment noted. The council is committed to working with stakeholders and partners on the delivery and implementation of the plan. The masterplan references local residents and reservoir users as partners.	No change required.
1 Individual	Not in support of proposal for partnership-based approach. States that committee-style	Comment noted. Consideration will be given to how the reservoir can be managed and maintained in the long-term.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
	management rarely works in practice and one lead organisation should be designated.		
1 Individual	Not in support of prioritisation of Partnerships listed on p.74. States that local residents and users of the reservoir should be stated first before stakeholders.	Comment noted. The masterplan states that delivery will require a comprehensive partnership-based approach. The masterplan does not prioritise one particular group over another.	No change required.
4 Individuals and Sama Investment Ltd and Owners of Tower Mount site	Ask that timescales be better defined, e.g., short/medium/long, and start/end deadlines.	Comment noted. The masterplan has been updated to define short, medium, and long-term timescales.	The masterplan has been updated to define short, medium, and long-term timescales.
House by Urban Splash	Requests amendment is made to stated timeline for the Reservoir Link connection. States the area will be delivered in the latter phases of the Port Loop development, a long-term timescale should be stated.	Comment noted. The aim to deliver pedestrian connections between the reservoir and the canal is included in both medium and short term.	No change required.
Chief Constable of the West Midlands Police	Requests the Police are included within any list of bodies the council intends to work in partnership with to ensure that essential infrastructure is provided.	Comment welcomed. The masterplan has been amended to include reference to the West Midland Police.	The masterplan has been amended to include reference to the West Midland Police.
Chief Constable of the West	Requests wording is included in the masterplan on developer contributions towards delivering safe communities.	Comment noted. The approach towards the police receiving developer contributions is outside the scope of the masterplan.	No change required.



Consultee	Representation summary	Council response	Proposed Changes to SPD
Midlands Police			
Canal & River Trust (CRT)	States that improvements to the design of the dam wall fence is a medium-term project and not short-term as stated.	Comment noted. The masterplan has been updated to identify a medium-term timescale.	The masterplan has been updated to identify a medium-term timescale.
Canal & River Trust (CRT)	Asks that the additional text be inserted to the stated delivery project for the dam wall fence: <i>'Subject to external funding and landowner delivery'</i> .	Comment noted. The masterplan has been updated to make it clear improvements to the fence will be a landowner and developer partnership.	The masterplan has been updated to make it clear improvements to the fence will be a landowner and developer partnership.
3 Individuals	Ask how the disruption, created by the development works will be mitigated for on-going users and local residents. States the council must address detrimental impacts for wildlife, noise, travel routes and parking.	Comment noted. The impact of construction will be considered as part of individual schemes delivery. Where the construction of proposals means that access arrangements around the reservoir will be temporary restricted in parts, all effort will be made to ensure this impact is minimised.	No change required.
1 Individual	States the protection or re-purposing of heritage assets will require the involvement of English Heritage or other conservation organisations. States the masterplan should acknowledge these types of projects are challenging and difficult to achieve.	Comment noted. The council is committed to working with a range of partners to deliver the masterplan vision. Consultation on planning applications that involve any heritage assets will be undertaken in line with council's existing policies and procedures.	No change required.
2 Individuals	Requests a defined approach to the sustained management and maintenance of landscaped areas is confirmed. States without management, the spaces will quickly become neglected.	Comment noted. It is beyond the scope of the masterplan to set out a management and maintenance plan. The management of the natural areas within the Local Nature Reserve boundary will be managed in line with the Local Nature Reserve Management Plan 2021. In line with the approach taken at several other parks	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
		and nature reserves across Birmingham, the council is eager to work with the Local Nature Reserve Committee to establish a greater role for the community.	
1 Individual	States the Local Nature Reserve Committee should be the lead partner to manage and communicate with users of the reservoir.	Comment noted. In line with the approach taken at several other parks and nature reserves across Birmingham, the council is eager to work with the Local Nature Reserve Committee to establish a greater role for the community.	No change required.
1 Individual	States there are other partners that should be included in the delivery and management of the masterplan. A wider range of community groups should be included.	Comment noted. The masterplan references a number of organisations and community groups. It does not preclude the involvement of other organisations or community groups from involvement in the delivery and management of future plans. The council is committed to working with partners and stakeholders to deliver the masterplan vision.	No change required.
3 Individuals	States concerns the masterplan is undeliverable.	Comment noted. The council is committed to working with partners and exploring a variety of delivery and funding mechanisms to deliver the masterplan vision.	No change required.
1 Individual	Requests case studies are included in the masterplan (Leeds – climate innovation district), to show examples where communities have contributed to delivery and green commitments. States the speed of delivery will be critical to the success of the project and case studies could be motivational tools.	Comment noted and suggestions welcomed. The Masterplan SPD needs to be relatively concise therefore the inclusion of case studies would not be appropriate. The council has looked at examples from other locations in the UK and internationally. This will continue as the delivery of the opportunities is developed further.	No change required.
2 Individuals	Asks if S106 monies will be used to improve the existing Victorian homes in the areas surrounding the reservoir and provide new infrastructure.	Comment noted. The S106 process has its own policies and procedures which will be followed at the reservoir.	No change required.
1 Individual	Asks how Green Flag status will be funded.	Comment noted. The council will explore a variety of funding mechanisms to secure green flag status.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
1 Individual	Asks if the funding for the proposed projects is 'ring-fenced', to ensure enough monies are retained to complete all development	Comment noted. Multiple funding streams will be used to deliver the opportunities within the masterplan.	No change required.
2 Individuals	Asks who will be responsible for the management of litter across the site and surrounding areas.	Comment noted. The management of litter across the main areas of the reservoir masterplan site is currently the responsibility of the Parks Department. The management of space and collection of litter in future years will be assessed as applications come forward for development.	No change required.
2 Individuals	Asks who will manage requests to arrange and hold events and activities, e.g., a parkrun.	Comment noted. The council's Parks Department currently manage requests.	No change required.
1 Individual	Asks who will be responsible for managing any anti-social behaviours of new residents, particularly noise from parties.	Comment noted. Antisocial behaviour and noise generated from parties is beyond the remit of the masterplan. The council is committed to working closely with the police to create a safe environment for all.	No change required.
1 Individual	Asks how the longstanding problems of serious criminal activity will be managed going forward.	Comment noted. Criminal activity is beyond the remit of the masterplan. However, a key part of the masterplan vision is to create a safe and accessible environment for all. The council is committed to working closely with the police to achieve this.	No change required.
1 Individual	Asks how much money the proposed development is going to cost.	Comment noted. A variety of delivery mechanisms are being explored to achieve the proposals set out in the masterplan. Information on costs is not appropriate for inclusion in the masterplan.	No change required.
1 Individual	Asks how owners of derelict properties surrounding the masterplan site can be encouraged to engage with the masterplan and the local community.	Comment noted. The council is committed to working with stakeholders and partners to deliver the masterplan vision. The masterplan seeks to engage local communities in the development of the reservoir and ensure proposals deliver outcomes that benefit and engage all of the community.	No change required.
1 Individual	States the long-time scales for delivery will result in Osler Park being surrounding by building works for many years and will not be suitable for children to play within.	Comment noted. The important value of the park is recognised by the council. No construction is proposed immediately adjacent to the park, but during construction across the road from the park all effort will be made to ensure this impact is minimised.	No change required.

Consultee	Representation summary	Council response	Proposed Changes to SPD
1 Individual	States the Edgbaston Reservoir Community Water sports Activity Plan sets a vision to increase access to water sports and raise the profile of water sports across the city. The Council should provide support to deliver this plan.	Comment noted. The masterplan references the activity plan and states that the council will continue to work with the clubs and support their ongoing outreach work with local communities.	No change required.
1 Individual	Asks how public toilets will be funded.	Comment noted. A variety of funding mechanisms will be explored. It is likely public toilets will come forward as part of the Osler Place opportunity.	No change required.
1 Individual	States the Rowing British and the National Royal Yachting Association may provide more support for activities at the reservoir than Sport England.	Comment noted.	No change required.
1 Individual	States that the 'Two Towers' should be retained.	Comment noted. The Waterworks Tower is within the ownership of Severn Trent and is to be retained as part of their operational site. Perrotts Folly is outside the masterplan boundary. However, the masterplan references the two towers important history and seeks to protect views from the reservoir to them. It also promotes a heritage walking trail that includes the Two Towers.	No change required.
1 Individual	States the council will need to sell any proposed development to pay for debts incurred by the Commonwealth Games.	Comment noted. A variety of delivery and funding mechanisms will be explored to deliver the masterplan vision.	No change required.

Other:

Consultee	Representation summary	Council response	Proposed Changes to SPD
2 Individuals and Sama Investments Ltd	In support of second consultation document. States it provided an opportunity to obtain an improved understanding of the proposed development.	Support welcomed.	No change required.
1 Individual	In support of YouTube video created to explain the masterplan consultation process and encourage comments to be submitted.	Support welcomed.	No change required.
1 Individual	In support of second consultation document. States it is an improvement on the first document as it uses language and terms that are more respectful to the natural environment.	Support welcomed.	No change required.
2 Individuals and Soho First Community Development Trust	In support of reference to the 'Localism Agenda'. States the masterplan is the type of issue the public needs to be engaged with.	Support welcomed.	No change required.
Chief Constable of the West Midlands Police	In support of reference to the need for safe spaces. States the masterplan provides recognition for the creation of safe and distinctive spaces.	Support welcomed.	No change required.
National Grid	No specific comment to make on consultation but reminder that should development be	Comment noted.	No change required.

Appendix 2  
Annexe G

	proposed on sites crossed or close to any National Grid asset, the Policy is to retain overhead lines in situ.		
2 Individuals	Not in support of approach to consultation. States the council has already made decisions on the future development of the reservoir and consultation is tokenistic.	Comment noted. The approach to consultation was in line with Planning Regulations and the Statement of Community Involvement. The council is required to produce an SPD which will deliver the Birmingham Development Plan and is in line with both the Birmingham Development Plan and national policy and guidance. As such, there are certain elements that it is necessary to include in the plan.	No change required.
1 Individual	Not in support of approach to consultation. States the motives and actions of some politicians and officers is questionable as they have ignored and minimised community input to the consultation.	Comment noted. The approach to consultation was in line with Planning Regulations and the Statement of Community Involvement.	
1 Individual	Not in support of approach to consultation. States the council has already pre-determined what will happen and has not been honest.	Comment noted. The approach to consultation was in line with Planning Regulations and the Statement of Community Involvement. The council is required to produce an SPD which will deliver the Birmingham Development Plan and is in line with both the Birmingham Development Plan and national policy and guidance. As such, there are certain elements that it is necessary to include in the plan. The council has been clear on this matter throughout the plan-making process.	No change required.
1 Individual	Not in support of approach to consultation for the following reasons: <ul style="list-style-type: none"> <li>It failed to engage many reservoir users; particularly hard-to-reach and marginalised communities or persons</li> <li>Be Heard survey is ineffective and other consultation methods should have been used, that allowed direct communication with the local community</li> </ul>	<p>Comment noted. The approach to consultation was in line with Planning Regulations and the Statement of Community Involvement.</p> <p>The BeHeard survey was one method of consultation, but other methods have also been used as set out in this document.</p>	No change required.

Appendix 2  
Annexe G

	States some council officers are being constrained in making their real views on development known as fear consequences. This circumstance is damaging to the credibility of the council and democracy itself.		
4 Individuals	Not in support of approach to consultation. States full consultation was not undertaken with local communities, and more is required.	Comment noted. The approach to consultation was in line with Planning Regulations and the Statement of Community Involvement. Details of the consultation since 2019 are set out in this document.	No change required.
1 Individual	Not in support of approach to consultation. States that invites from the local community to meet and discuss proposals for development, were not accepted by all Ward Councillors.	Comment noted. The approach to consultation was in line with Planning Regulations and the Statement of Community Involvement. Details of the consultation since 2019 are set out in this document.	No change required.
1 Individual	Not in support of approach to consultation. States the environmental concerns of many official groups are not being heard by the council. Requests the value of the reservoir as a green space for the whole city and for wildlife must be given priority, instead of economic gain.	Comment noted. The approach to consultation was in line with Planning Regulations and the Statement of Community Involvement. A wide range of groups have been able to respond to the engagement and consultation activity. The importance of the reservoir as a green space for the whole city is identified in the masterplan.	No change required.
1 Individual	Not in support of approach to consultation. States 'Be Heard' survey prevented the public from directly commenting on proposals for housing development close to water's edge.	Comment noted. The approach to consultation was in line with Planning Regulations and the Statement of Community Involvement. The survey enabled people to make a range of comments, which have been recorded and responded to. There were also a range of other methods by which people could, and did, respond.	No change required.
1 Individual	Not in support of approach to consultation. States boundaries of the masterplan area will exacerbate existing inequalities in the	Comment noted. The approach to consultation was in line with Planning Regulations and the Statement of Community Involvement. The masterplan is clear the reservoir should be	No change required.



Appendix 2  
Annexe G

	Ladywood Ward. Little consideration has been given as to the impacts for the whole Ladywood area.	accessible for all and provide high-quality public realm and environment in which free activities take place at the reservoir - such as walking, cycling, or simply spending time sitting outside.	
2 Individuals	Not in support of approach to consultation. States the views of specific user groups and occasional visitors to the reservoir have been given precedent over the concerns of local residents.	Comment noted. The approach to consultation was in line with Planning Regulations and the Statement of Community Involvement. All users have had the opportunity to comment, with no precedent being given to any comments.	No change required.
1 Individual	Not in support of approach to consultation. States the masterplan should have acknowledged the challenges in the area and proposed imaginative but realistic solutions, rather than making aspirational statements.	Comment noted. The approach to consultation was in line with Planning Regulations and the Statement of Community Involvement. The importance of the reservoir to Birmingham, and the context set by the SPD, mean that aspiration is important so that the reservoir can continue to provide a sustainable, natural environment for people to enjoy.	No change required.
2 Individuals	Not in support of approach to consultation. States consent was not sought for inclusion of own properties within boundaries of masterplan. Requests private homes be removed from the masterplan boundary.	Comment noted. The approach to consultation was in line with Planning Regulations and the Statement of Community Involvement. The masterplan boundary was approved in a Cabinet member report in 2019. It is important to have a coherent masterplan so that a comprehensive approach can be taken to development in the area, but it is not the case that masterplan proposals affect every property within the boundary.	No change required.
1 Individual	Not in support of second consultation document. States it is conflicts with the first consultation document.	<p>Comment noted. Following assessment of responses to the first consultation round, substantial amendments and additions were made, in the drafting of the second consultation document. These changes were to show that Public and organisational views had been fully considered and listened to.</p> <p>A list of the main changes to the plan since the previous version can be found on the Frequently Asked Questions sheet or on the consultation video that provides an overview of the masterplan and explains the changes made since the previous consultation. Both can be found using the following link:</p>	No change required.

		<a href="https://www.birminghambeheard.org.uk/people-1/revised-edgbaston-reservoir-masterplan/">https://www.birminghambeheard.org.uk/people-1/revised-edgbaston-reservoir-masterplan/</a>	
1 Individual	<p>Not in support of consultation document and approach to consultation due to the following reasons:</p> <ul style="list-style-type: none"> <li>• suggests the document fails to meet the objective of the council's Equality and Diversity Objectives for Planning - 1.1 understand our diverse communities and embed that understanding in how we shape policy and practice across the council and 3.1 involve and enable our diverse communities to play an active role in civic society and put the citizens' voice at the heart of decision making</li> <li>• highlights the requirements of the Equality and Diversity Act 2010 regarding Indirect discrimination</li> <li>• highlights Bribery Act of 2010, in relation to statement on p.48, 'support of redevelopment of Tower Ballroom site is conditional to the water sport clubs being given the choice to relocate or not, with long leases provided and rent levels guaranteed'</li> <li>• the consultation process failed to consult with specific user groups of the masterplan site, for example SKATE Birmingham. This group comprises of members that are predominantly Persons of Colour</li> <li>• the consultation process failed to consult with young people - saving a local park</li> </ul>	<p>Comment noted. An Equalities Impact Assessment (EqIA) was undertaken for each consultation document in accordance with council procedure. The assessments were appendices to the Cabinet Member reports and are therefore in the public domain. The assessments would have been made available upon request. The EqIA identified no negative impacts on any protected groups.</p> <p>The statement referring to the 2010 Bribery Act appears to relate to the previous Consultation Statement. The masterplan is clear the existing water sports clubs can remain in their existing locations.</p> <p>The consultation was open to everyone who wished to participate. It was undertaken in accordance with Planning Regulations and the adopted Statement of Community Involvement. The masterplan process has been the result of consultation over a number of years and has involved a variety of methods, reaching a wide audience. The consultation reports supporting the different stages of plan making sets this out clearly.</p> <p>The consultation document was available in a number of locations including Ladywood Health and Community Centre, Spring Hill Library, the Library of Birmingham, and the council's office at Woodcock Street.</p> <p>The masterplan supports the UN's Convention on the Rights of the Child (UNCRC) in 1991. The council would welcome meeting a Young Persons and Young Persons of Colour Reservoir Partnership Forum.</p>	

	<p>(Osler Street) does not mean young people should not be consulted over the rest of the master plan.</p> <ul style="list-style-type: none"> <li>the consultation process was focused primarily on persons of White British origin. The masterplan should deliver inclusive areas but is being led by predominantly white, often cis-gendered male organisations, companies, politicians, and construction companies</li> <li>consultation documents were only hard copies of provided at a Christian Church, thereby creating access barriers to LGBTQIA+, Muslim, Jewish and non-religious persons - these groups make up a large percentage of the local population in the masterplan area.</li> <li>consultation document was only made available in English language, yet large proportion of local population has English as a second language – document should have been made available in other languages</li> <li>Questions whether the masterplan fully aligns with the UN's Convention on the Rights of the Child (UNCRC) in 1991. States regular users of the reservoir are interested in creating a Young Persons and Young Persons of Colour Reservoir Partnership Forum. Requests the council meet with them.</li> </ul>		
2 Individuals	Ask that community objections to the masterplan are listened to by the council.	Comment noted. Community objections are reflected and responded to in this Consultation Statement. The masterplan	No change required.

Appendix 2  
Annexe G

	Requests an alternative plan is formulated which better protects nature/ecology.	identifies the need to protect nature and ecology and is supported by a revised Local Nature Reserve Management Plan.	
2 Individuals	Asks that community objections to the masterplan are listened to by the council. Requests the masterplan is amended to reflect the objections that have been raised by both local residents and visitors to the reservoir.	Comment noted. Community objections are reflected and responded to in this Consultation Statement, which also sets out how the masterplan has been updated in response to all comments.	No change required.
1 Individual	Requests an alternative plan is created following further engagement with users of the reservoir and be more socially relevant, than the existing version.	Comment noted. The masterplan is seeking to create a sustainable plan for the long-term future of the reservoir, reflecting the Birmingham Development Plan. In doing this, it has considered both current and future issues that need to be embedded within it and to drive activities in the future, e.g., Climate Emergency, Route-to-Zero, support for sustainable means of transport, increased density in housing development to meet housing demand of growing population and enhanced protection for wildlife and nature via biodiversity net-gain objectives. It has been developed in consultation with users of the reservoir.	No change required.
1 Individual	Requests impact assessments are undertaken to determine effects of development on local communities, e.g., traffic, parking and noise generated from large events. States these issues are not acknowledged in the masterplan.	Comment noted. Where necessary to support planning applications, traffic assessments will be carried out. Proposals for managed parking are included in the masterplan. Large events already take place; as such, further detail about noise and events is not appropriate in the masterplan.	No change required.
1 Individual	Asks when the consultation responses via Be Heard will be publicly made available.	Comment noted. All consultation responses received throughout the public consultation (including BeHeard), have been summarised and published in this table.	No change required.
1 Individual	Asks why Leslie Road and Daisy Road are included in the masterplan. States their inclusion suggests homes are in need of	Comment noted. The approach to consultation was in line with Planning Regulations and the Statement of Community Involvement. The masterplan was approved in a Cabinet member	No change required.

Appendix 2  
Annexe G

	redevelopment. Requests these areas are removed from site boundaries.	report in 2019. It is important to have a coherent masterplan boundary so that a comprehensive approach can be taken to development in the area, but it is not the case that masterplan proposals affect every property within the boundary.	
Chief Constable of the West Midlands Police	Asks that West Midlands Police is invited to join any future partnerships related to the implementation of the masterplan.	Comment noted. No formal Partnership groups are currently planned by the council. The masterplan explains that its delivery will result from collaborative working between key Partners and that includes the long-term management of the site. Should opportunities arise for new Partnerships to be established, West Midlands Police will be kept informed.	No change required.
Birmingham Rowing Club	States the consultation document is largely the same document as presented to the Community Partnership Forum in Summer 2021.	Comment noted. This document outlines further changes as a result of consultation.	No change required.
1 Individual	States the consultation should have made more use of Neighbourhood Plans and use them as a vehicle for enabling continued community engagement.	Comment noted. No Neighbourhood Plan is currently proposed for the area.	No change required.
4 Individuals	States the masterplan fails to explain how the results from the first round of consultation have informed or changed the second consultation document. States the previous concerns have not been acknowledged in the second consultation document.	Comment noted. All consultation responses submitted to the previous consultation were recorded and reviewed. The Consultation Statement can be accessed via the following link: <a href="https://birminghambeheard.org.uk/people-1/revised-edgbaston-reservoir-masterplan/">https://birminghambeheard.org.uk/people-1/revised-edgbaston-reservoir-masterplan/</a>	No change required.
1 Individual	Concerns the proposed development could lead to water safety issues.	Comment noted. Comment noted. A key part of the masterplan vision is to create a safe environment and references to creating a safe environment are included in the masterplan. The council has worked closely with the existing water users to understand the challenges of undertaking water activity at the reservoir. Additional water activity on the reservoir would need to adhere to relevant health and safety measures and be supervised. The masterplan has been amended to further set development back from the waters' edge at Osler Park and Osler Place. Details will	No change required.

		come forward at the planning application stage where relevant officers will assess proposals against the masterplan and a range of other policies.	
2 Individuals	States planning applications are approved by the council that contravene Supplementary Planning Documents (SPD) and create bland developments, with little concern for the existing community and environment.	<p>Comment noted. The masterplan clearly states its purpose, to serve as a formal SPD, that provides a strong framework for decision-making. The SPD will add detail and guidance to the Birmingham Development Plan (2017) and along with the National Planning Policy Framework (2021), will be used to determine applications as they come forward, for development of the site.</p> <p>The principles set out in the Character chapter of the SPD, and reflected in the spatial chapters, provides strong guidance in determining planning applications.</p>	No change required.
The Coal Authority	States that as a statutory consultee, it has a duty to respond to planning applications and development orders, in order to protect the public and environment, in former mining areas. It has no comment to make on the masterplan proposals.	Comment noted.	No change required.
1 Individual	States that Perrotts Folly should receive investment to enable access to roofline and encourage more regular visitors.	Comment noted. This building is located outside of the masterplan site boundary. However, the plan does outline opportunities for a heritage trail to be created, to encourage users to the reservoir to visit key locations /landmarks in the nearby area.	No change required.
1 Individual	States the area has been allowed to purposefully decline, with an excess of Exempt Accommodation being allowed. Anti-Social behaviour has increased and house prices dropped, meaning the area will be more profitable for re-development.	Comment noted. The issue of Exempt Accommodation is outside the remit of the masterplan. The masterplan is seeking to attract new investment to the masterplan site. New funding and development should also bring benefits for the wider community, in terms of a reduction in anti-social behaviours and an improved physical and natural environment.	No change required.

Appendix 2  
Annexe G

1 Individual	States there are good examples of development around reservoirs that should be considered, e.g., Woodberry Down development in Northeast London.	Comment noted. The suggestion for a reservoir development in London to be used to inform development at the Edgbaston Reservoir is welcomed. This case study has informed discussion and ideas development in the plan-making process.	No change required.
2 Individuals	Asks how consultation was undertaken with young people and specifically, young persons of colour.	Comment noted. All reservoir users were able to partake in consultation, with the opportunity to comment or attend an event highlighted through posters located at 10 points around and in immediate proximity to the reservoir.	No change required.
2 Individuals	Ask what improvements are going to made to the existing infrastructure and homes surrounding the plan area, e.g., roads, pavements, bins and insulation.	Comment noted. Roads, pavements, and bins form part of the council's business as usual. Opportunities for improvements to building insulation in the area will be supported.	No change required.
1 Individual	Asks why only one public consultation event was arranged for the second round of consultation. States this was inadequate.	Comment noted. The approach to consultation was in line with Planning Regulations and the Statement of Community Involvement. Multiple events and opportunities for engagement have been held throughout the plan making process.	No change required.
2 Individuals	Asks why consultation responses aren't shared publicly. States comments have been sent to earlier consultation, but confirmation of receipt is not provided, or feedback given on the council website which suggests submitted comments aren't read.	Comment noted. All consultation responses submitted to the two rounds of consultation on the reservoir masterplan have been recorded and reviewed. The Consultation Statement from the first round of consultation is available via the following link: <a href="https://www.birminghambeheard.org.uk/people-1/revised-edgbaston-reservoir-masterplan/">https://www.birminghambeheard.org.uk/people-1/revised-edgbaston-reservoir-masterplan/</a>	No change required.
1 Individual	Requests the document is made easier to read. States it currently includes a large amount of information and some of it is repetitive.	Comment noted. The purpose of the masterplan is to be an accurate a concise framework. The document will formally serve as the Supplementary Planning Document (SPD) and will be used to determine planning application that come forward for development. Some elements of the plan are referred to several times throughout the document, to ensure connections between themes are made, where required and to ensure a joined-up document is presented.	No change required.



Appendix 2  
Annexe G

Sama Investment Ltd	Requests a Pre-App meeting.	Request noted. Pre-Apps are recommended, where new development is proposed, to allow early discussion on any issues which are not in alignment with policy and enable amended plans to be drawn-up. Full details of the Pre-App process are available on the council website.	No change required.
1 Individual	Asks for data to be published on <ul style="list-style-type: none"> <li>the number of housing developments within a 1.5-mile radius of the reservoir;</li> <li>number of increased residents; and</li> <li>sqm of green space that new and existing residents will have.</li> </ul>	Request noted. This information is not appropriate for inclusion in the masterplan and will be provided to the consultee.	No change required.
1 Individual	States the masterplan makes no reference to how refuse and waste will be collected and managed at the new development.	Comment noted. The purpose of the masterplan is to be an accurate a concise framework. The document will formally serve as the Supplementary Planning Document (SPD) and will be used to determine planning application that come forward for development. Therefore, specific details as to the collection and management of refuse and waste, will be determined as part of the application assessment.	No change required.

### Anything Missing:

Consultee	Overview of responses received during consultation:	How changes to the SPD respond to responses where possible:	Proposed Changes to SPD
3 Individuals	State there is nothing missing from the masterplan and no other issues that need to be addressed.	Support welcomed.	No change required.
1 Individual	States the second version of the masterplan now includes the issues that were missing from the first version.	Support welcomed.	No change required.
1 Individual	States there should be more of a focus on accessibility.	Comment noted. Following the second round of public consultation, the policy context section has been updated to reflect the current position on both Birmingham's Transport	The Transport Policy section has been updated and the

Consultee	Overview of responses received during consultation:	How changes to the SPD respond to responses where possible:	Proposed Changes to SPD
		<p>Policy and the associated issues of accessibility. The masterplan supports improvements in access, that will bring increased levels of sustainable travel and enhancements to the public realm. Improvements to the shared pathway and new signage will facilitate easier access and navigation for all users and the creation of new direct connections between Osler Play Park and Osler Park &amp; Osler Place will allow direct movement through the site.</p> <p>Car parking will be secure and managed and provide designated disabled parking bays, in close proximity to the water's edge, meaning only a short distance of travel will be required, for users to enjoy the reservoir setting.</p>	whole masterplan reviewed, to provide an integrated response on access matters across the document.
1 Individual	States the masterplan fails to provide sufficient emphasis on preserving the natural habitat. Considers the proposals for housing are prioritised and outweigh protection of the natural habitat.	Comment noted. The masterplan site was allocated for housing under the Birmingham Development Plan (2017). However, the masterplan aims are wider than housing and is intended to safeguard the reservoir for future generations and provide a clear vision to protect the natural environment. All development at the reservoir will need to support the biodiversity objectives and targets set out in the Edgbaston Reservoir Local Nature Management Plan 2021.	No change required.
1 Individual	States the issue of access to housing is missing.	Comment noted. The SPD outlines the demands of the City's growing population and seeks to support the delivery of new homes, primarily family homes. However, the Plan also recognises that a wide choice of housing sizes, types and tenures will be required and delivery will also include new homes for the elderly and appropriate levels of affordable housing.	No change required.
1 Individual	States the masterplan is missing the community counterproposal and that it has been ignored by the council.	Comment noted. Following the first round of consultation, a Community Partnership Form was established in January 2020, to engage representatives from the local community on the masterplan redraft. During the second round of consultation, the	No change required.

Consultee	Overview of responses received during consultation:	How changes to the SPD respond to responses where possible:	Proposed Changes to SPD
		Council has engaged with the community and water-user groups on the Forum and a set of Community Principles is endorsed by the Council and are part of the masterplan.	
1 Individual	<p>Not in support of the masterplan or the approach to consultation, due to the following concerns:</p> <ul style="list-style-type: none"> <li>• an Equality Impact Assessment was not provided in the consultation pack</li> <li>• no evidence of equality considerations and their potential impacts in the preparation of the masterplan was provided</li> <li>• failed to address the cultural needs and requirements of specific user groups including young people, people with disabilities, racial minorities, sex workers and the LGBTQ+ community</li> <li>• a Christian venue was used for consultation that could have excluded certain populations from responding to the consultation.</li> <li>• the loss of the Tower Ballroom and H Suite will remove important cultural venues for Desi, Africa and Hindu communities</li> <li>• Community Principles' were formulated on the premise of the first round of consultation and fail to address issues of inclusivity, equality and equity</li> <li>• lack of general disability language within the proposed masterplan. The access design at the Tower Ballroom doesn't discuss disability concerns and the</li> </ul>	<p>Comment noted. An Equalities Impact Assessment (EqIA) was undertaken for each consultation document in accordance with council procedure. The assessments were appendices to the Cabinet Member reports and are therefore in the public domain. The assessments would have been made available upon request. The EqIA identified no negative impacts on any protected groups.</p> <p>The consultation was undertaken in accordance with Planning Regulations and the adopted Statement of Community Involvement. The masterplan process has been the result of consultation over a number of years and has involved a variety of methods, reaching a wide audience. The consultation reports supporting the different stages of plan making sets this out clearly. The representation has not submitted evidence to demonstrate that specific groups were unable to engage with the consultation process or provided details on how the masterplan fails to address the cultural needs and requirements of specific user groups.</p> <p>The Planning team did not host any consultation events at a Christian venue.</p> <p>The Tower Ballroom has not been in operation for a number of years due to the lack of a viable commercial use. The masterplan provides a number of opportunities for commercial, cultural and community facilities that can be optimised to meet the needs of all local communities and any future developments led by the council will be supported by evidence. The representation has not</p>	No change required

Consultee	Overview of responses received during consultation:	How changes to the SPD respond to responses where possible:	Proposed Changes to SPD
	<p>consultation process restricted a lot of people who would wish to comment but were unable to do so. Neurodiversity in Planning is an emerging concept</p> <ul style="list-style-type: none"> <li>the masterplan must ensure decision-makers approve only development that has been fully informed by a robust Equality Impact Assessment.</li> </ul>	<p>submitted evidence to demonstrate there are specific gaps in cultural facilities for these communities or demonstrated that the proposals within the masterplan will not be suitable to meet the needs of these communities in the future.</p> <p>The principles were agreed by the Community Partnership Forum to ensure future development benefits both people and the environment. Principle 3 states: <i>Actively support and encourage social cohesion to ensure that the reservoir continues to belong to everyone.</i></p> <p>The consultation was open to everyone who wished to participate. The masterplan states, the reservoir will need to continue to cater for diverse communities and provide accessible spaces. It also states the redevelopment of the Tower Ballroom site should provide new homes and a range of accessible facilities for the local community and visitors development. Detailed design of future development will be determined at the application stage.</p>	
1 Individual	States the masterplan fails to recognise the importance of green spaces to vulnerable groups. Vulnerable persons such as, HMO residents, persons with learning difficulties, single people, LGBTQI+ people, former homeless people, sex workers and people leaving prison.	Comment noted. The masterplan states in a number of places the importance of open space to all the community. It is not felt necessary to single out specific groups within the document. The masterplan proposes no loss to public open space. One of the main purposes of the masterplan is to ensure the open space and facilities at the reservoir are accessible to all through providing public spaces, improving access and making the area safer.	No change required.
1 Individual	States that reference to maintaining the water level of the reservoir is missing.	Comment noted. The masterplan states the Canal & River Trust is the 'undertaker' of the reservoir and has statutory duties under the Reservoirs Act, to ensure the operational and functional integrity of the reservoir, dam and its ancillary structures. It also	No change required.

Consultee	Overview of responses received during consultation:	How changes to the SPD respond to responses where possible:	Proposed Changes to SPD
		explains the need to retain the function of the reservoir to top up the canal network and the impact this has on water levels.	
2 Individuals	States there should be more focus on matters of affordability in general and specifically, affordable housing for rent.	Comment noted. All housing development will need to be in line with policy requirements for affordable housing and the masterplan includes references this policy requirement.	No change required.
1 Individual	States the reservoir should be advertised as a visitor attraction /destination.	Comment noted. The overall vision for the masterplan includes reference to creating a space that is accessible for all and that brings communities together. Advertising the reservoir is beyond the remit of the masterplan, although the masterplan does not preclude this from happening.	No change required.
1 Individual	States they are in support of a play park for children or children's play area.	Comment noted. The masterplan states Osler Street Park will be retained and enhanced to provide improved facilities for local children and created direct access to the water's edge.	No change required.
1 Individual	States the masterplan fails to mention any repairs the pathway from Gillott Road to the reservoir, that would enable a connection of green spaces i.e., Summerfield Park to the reservoir.	Comment noted. The masterplan includes a Connectivity chapter and discusses the many opportunities to strengthen the usage of existing connections and facilitate additional linkages. Links from the reservoir to Summerfield Park is referenced and Plan 4: Connectivity highlights the intention for the existing entrance on Gillott Road to be improved.	No change required.
1 Individual	States the masterplan is missing a reference to the requirement for schools. Suggests that a strategy is required to meet the requirement for additional school places, as people move into the area.	Comment noted. The masterplan delivers the growth agenda set out in the Birmingham Development Plan (BDP) and as part of the BDP's evidence base consideration was given to the infrastructure requirements in this area of the city, further detailed consideration on the impact to infrastructure will be considered through the planning application process. The has been updated to refer to the ongoing monitoring of forthcoming demand for school places based on growth projections.	The masterplan has been updated to include reference to ongoing assessments required to identify infrastructure needs.
2 Individuals	States the masterplan is missing an explanation as to how increased parking will	Comment noted. The masterplan has been amended following consultation to state that the existing car park accessed from Reservoir Road will be reopened in a secure and managed way to	The masterplan has been updated to state that the

Consultee	Overview of responses received during consultation:	How changes to the SPD respond to responses where possible:	Proposed Changes to SPD
	be provided, to meet the increased number of visitors.	provide a limited number of spaces. The land directly adjacent to the water will be greened to provide a pleasant waterside location and contribute to the natural environment. It also identifies car parking at Reservoir View, and some car parking as part of Osler Place, which would be considered in detail through a planning application and would need to align with the Car Parking SPD.	existing car park will be reopened in a secure and managed way to provide a limited number of spaces. The land directly adjacent to the water will be greened to provide a pleasant waterside location and contribute to the natural environment.
Chief Constable of the West Midlands Police (CCWMP)	The CCWMP requests the SPD includes specific reference for car parking to meet the Police endorsed Park Mark design standards, to be achieved in consultation with West Midlands Police Design out Crime Officers.	Comment noted. The masterplan refers to engagement with stakeholders including West Midlands Police to ensure it is designed to minimise anti-social behaviour wherever possible. Further detail would not be appropriate for the masterplan. Any car parking provided will be in accordance with the latest planning policy and guidance.	No change required.
Chief Constable of the West Midlands Police (CCWMP)	The CCWMP requests the SPD includes a requirement for applicants to consult at both pre-application and planning application stage with the centrally based Design Out Crime Officers (DOCOs) who have extensive knowledge of security measures and 'Designing Out Crime'.	Comment noted. Other council documents i.e., the Design Guide will address issues such as Designing out Crime in detail and as such there is no need to duplicate this in the masterplan. Consultation will be undertaken in line with council's existing policies and procedures.	No change required.
1 Individual	States the masterplan is missing sufficient reference to trees: <ul style="list-style-type: none"> <li>Woodland Trust</li> </ul>	Comment noted. The masterplan includes references to integrated green infrastructure such as tree planting. It recommends the planting of native trees in the Natural Parkland	No change required.

Consultee	Overview of responses received during consultation:	How changes to the SPD respond to responses where possible:	Proposed Changes to SPD
	<ul style="list-style-type: none"> <li>Tree Council</li> <li>Birmingham Tree Policy</li> </ul>	<p>opportunity and for new trees to be planted within the public spaces in Osler Park &amp; Osler Place. The Edgbaston Reservoir Local Nature Reserve Management Plan has also been updated to provide up to date information with clear objectives to protect and enhance the Local Nature Reserve for future generations.</p> <p>The masterplan is unable to reference all policies that are relevant however it notes that other local plan and supplementary planning documents may be relevant, and this SPD does not reiterate these.</p>	
1 Individual	States the masterplan is missing reference to how enhancing green spaces would improve the water quality of the reservoir.	<p>Comment noted. BCCs Parks department responds to incidents of pollution through report to The Environment Agency but regular checks on general water quality are not made. Water user groups are expected to ensure the water is fit for their activity.</p> <p>The masterplan is seeking to improve the natural habitats that surround the reservoir, by the creation of natural bank edges and marginal planting. These measures may contribute to an improved water environment but no reference to water quality is to be stated in the masterplan.</p>	No change required.
1 Individual	States the masterplan is missing 'people's stories', to explain how and why people currently use the reservoir.	<p>Comment noted. The masterplan will serve as a Supplementary Planning Document (SPD), providing clear and concise guidance for decision-making. The masterplan has attempted to explain both the historical background to the development of the reservoir and its existing character and due to its formal purpose as an SPD, the inclusion of broader social associations wouldn't be appropriate.</p> <p>However, the SPD does highlight the opportunities for 'Celebrating the Reservoir', through means of art, walking trails</p>	No change required.



Consultee	Overview of responses received during consultation:	How changes to the SPD respond to responses where possible:	Proposed Changes to SPD
		and cultural activities. As the community events and/or groups are established in future years, it is hoped their connection to the reservoir will be shared and celebrated.	
1 Individual	States reference to the shops on Monument Road is missing. Asks if these shops can be bought into the masterplan boundaries, as they are an important gateway into the reservoir and require improvement.	Comment noted. The masterplan boundary is now fixed and cannot be amended. However, it is hoped that the masterplan will support and encourage development to both the reservoir site and the wider, surrounding areas in North Edgbaston (that would include Monument Road).	No change required.
1 Individual	States the masterplan is missing reference to funding.	Comment noted. The Delivery and Management chapter of the masterplan outlines funding opportunities to support development at the reservoir. Section 106 funds have been secured to date and the masterplan will be used to guide how monies are spent in the future, should additional Section 106 money become available.	No change required.
1 Individual	States the masterplan is missing a map to show where development currently exists, in relation to the new development that is proposed.	Comment noted. The masterplan includes both an introduction and context chapter, that detail the existing site context. Plan 1: context diagram is also provided, to visually show the individual elements within the masterplan and key buildings/facilities that exist in the surrounding area.	No change required.
1 Individual	States the masterplan should include opportunities for paid community champions on decision-making partnerships who represent local residents and users of the reservoir.	Comment noted. Following feedback from the first round of consultation, a Community Partnership Forum was established to enable the community and council to align their visions for the reservoir and for everyone to work together. As development at the masterplan site progresses, volunteering opportunities may be created and community groups may seek to expand on this.	No change required.

## Images:

Consultee	Representation summary	Council response	Proposed Changes to SPD
3 Individuals	In support of sketch of Osler Park and Osler Place. The sketch enables the proposed development to be visualised and is of a high-quality.	Support welcomed.	No change required.
1 Individual	In support of sketch of Osler Park and Osler Place and use of precedent images. States the inclusion of these images suggest the development has been well considered and will complement the reservoir landscape.	Support welcomed.	No change required.
1 Individual	In support of sketch of Osler Park and Osler Place. States the waterfront would look equally good without the housing development.	Support and comment noted. The site is allocated in the Birmingham Development Plan for a mixed-use residential-led scheme. The principle of building new homes on the site is therefore well established.	No change required.
1 Individual	In support of sketch of Osler Park and Osler Place. States it shows that the reservoir is a beautiful place, with skylines and wildlife that must be protected.	Support welcomed. The council is committed to protecting and enhancing the Local Nature Reserve. The Edgbaston Reservoir Local Nature Reserve Management Plan has been updated by the Birmingham and Black Country Wildlife Trust. It provides up to date information with clear objectives to protect and enhance the Local Nature Reserve for future generations. The masterplan states all projects and development within the plan boundary need to contribute positively to the sustainability of the Local Nature Reserve.	No change required.
1 Individual	Not in support of sketch of Osler Park and Osler Place. States there are too many apartments in the city and that this type of housing would introduce an urban character	Comment noted. The sketch has been included to illustrate the vision at Osler Park and Osler Place. Details will be agreed when a planning application is submitted.	No change required.

Appendix 2  
Annexe G

	to the reservoir, with the natural landscape being lost.	The Birmingham Development Plan (BDP) allocates the site for mixed-use residential led development. The exact mix of housing types will be determined at the planning application stage. All schemes will be assessed against the masterplan and other adopted local plan policies. These include policies on housing mix and affordability. The masterplan states that housing provided within the masterplan area will need to include a wide choice of housing sizes, types and tenures to meet community needs in accordance with BDP policies.	
2 Individuals	Not in support of sketch of Osler Park and Osler Place (no further details provided)	Comment noted.	No change required.
1 Individual	Not in support of sketch of Osler Park and Osler Place. States the concept of gated living is not shown.	Comment noted. Gated living is not proposed for Osler Park and Osler Place and the masterplan outlines its intention for the site to remain accessible to all users of the reservoir. The exact mix of housing types and designs will be determined as applications come forward. It is anticipated that the mix will include both apartments and family homes. The masterplan states that housing provided within the masterplan area will need to include a wide choice of housing sizes, types and tenures to meet community needs in accordance with BDP policies.	No change required.
1 Individual	Not in support of sketch of Osler Park and Osler Place. States the transition between the development and the landscape looks too harsh and needs to show better integration between these elements.	<p>Comment noted. The masterplan states all projects and development within the plan boundary need to contribute positively to the sustainability of the Local Nature Reserve. The sketch has been included to illustrate the vision at Osler Park and Osler Place. Details will be agreed when a planning application is submitted.</p> <p>The sketch has been amended to show development further set back from the water's edge and the walkway has been further greened to soften the boundary between the building line and waters' edge.</p>	The sketch has been amended to show development further set back from the water's edge and the walkway has been further greened to soften the boundary between the building line and waters' edge.

Appendix 2  
Annexe G

1 Individual	Not in support of sketch of Osler Park and Osler Place. States it is misleading but of a high-quality.	Comment noted. The masterplan states the sketch is an 'illustrative artist's impression' and is not a detailed plan for the Osler Park and Osler Place site. Further detail will come forward at the planning application stage.	No change required.
1 Individual	Not in support of sketch of Osler Park and Osler Place. States it is misleading and fails to show a realistic impression.	Comment noted. The masterplan states the sketch is an 'illustrative artist's impression' and is not a detailed plan for the Osler Park and Osler Place site. Further detail will come forward at the planning application stage.	No change required.
1 Individual	Not in support of sketch of Osler Park and Osler Place. States it is misleading, showing the site to be single level but the site has an incline.	Comment noted. The masterplan states the sketch is an 'illustrative artist's impression' and is not a detailed plan for the Osler Park and Osler Place site. Further detail will come forward at the planning application stage. The sketch has been amended to better-reflect site topography.	The sketch has been amended to better-reflect site topography.
1 Individual	Not in support of sketch of Osler Park and Osler Place. States it is misleading and seeks to 'greenwash' the development proposals.	Comment noted. The masterplan provides clear commitments to sustainable development at the reservoir, for example, the reduction of car dependency, use of low carbon energy, measures to enhance the Local Nature Reserve and requirements for all areas of the site to achieve biodiversity net gain.  The masterplan states the sketch is an 'illustrative artist's impression' and is not a detailed plan for the Osler Park and Osler Place site. Further detail will come forward at the planning application stage.	No change required.
1 Individual	Not in support of sketch of Osler Park and Osler Place. States the inclusion of housing serves to present a predetermined outcome for the site, with housing being the key concern for many people.	Comment noted. The site is allocated in the Birmingham Development Plan for a mixed-use residential-led scheme. The principle of building new homes on the site is therefore well established.	No change required.
1 Individual	Not in support of sketch of Osler Park and Osler Place. States the site looks overcrowded with units and would impact negatively upon the Local Nature Reserve.	Comment noted. The Birmingham Development Plan (BDP, 2017) allocates the former Tower Ballroom site for mixed-use residential-led development. The masterplan needs to demonstrate how the site can deliver family housing along with community and commercial uses, to ensure it is in general	No change required.

Appendix 2  
Annexe G

		conformity with the Birmingham Development Plan. The main function of the masterplan therefore is to build on the housing allocation to ensure the reservoir is protected as a natural asset and is a facility for all the community. Detail of individual development sites including the mix and density of housing, will be decided at the planning application stage.	
1 Individual	Not in support of images. States they suggest a high-density housing development.	Comment noted. The masterplan is a Supplementary Planning Document and guides future development. Detail of individual development sites including the mix and density of housing, will be decided at the planning application stage. Some of the images included in the masterplan are precedent images with the purpose of bringing the vision alive.	No change required.
1 Individual	States the images shown from Australia, Denmark and Canada are misleading as they are unlikely to be delivered at the reservoir.	Comment noted. The masterplan is a Supplementary Planning Document and guides future development. Detail of individual development sites will be decided at the planning application stage. The precedent images included in the masterplan have been carefully selected to show the level of quality of design that would be acceptable.	No change required.
1 Individual	Not in support of images of Port Loop. States the claim that the buildings are repurposed is misleading. States the progress of the site is currently on-going and the small 'pocket' park is not the 'green oasis' implied.	Comment noted. The masterplan has been updated to remove reference to re-purposed buildings on the image description.	The masterplan has been updated to remove reference to re-purposed buildings on the image description.
1 Individual	Not in support of images. States no development should be allowed. Also states the images contribute to the creation of distrust between the public and the council.	Comment noted. The Birmingham Development Plan (BDP, 2017) allocates the former Tower Ballroom site for mixed-use residential-led development. It also allocates the Severn Trent Waterworks Site for residential use. The masterplan needs to demonstrate how these identified development opportunities can deliver family housing along with community and commercial uses, to ensure it is in general conformity with the Birmingham Development Plan. The main function of the masterplan therefore is to build on these housing allocations to ensure the	No change required.

		<p>reservoir is protected as a natural asset and is a facility for all the community.</p> <p>The precedent images included in the masterplan have been carefully selected to show the level of quality of design that would be acceptable and to help bring the vision of the reservoir alive.</p>	
1 Individual	Asks for the sketch and images to show the proposed pathways and cycle routes more clearly.	Comment noted. The Osler Park and Osler Place sketch is to provide a general illustration of development. Additional details on general connectivity are provided in Plan 4 and Plan 8. The Reservoir Loop chapter discusses the proposals for enhancements to the shared footpath and intended use by both pedestrians and cyclists.	No change required.
1 Individual	Asks for additional images to show water-sport activities.	Comment noted. The masterplan includes several images of water sports and water-based activities. A variety of activities takes place at the reservoir and the images have been selected to reflect the variety. The masterplan also emphasises the important contribution blue infrastructure makes to the site.	No change required.
2 Individuals	Ask for additional precedent images and artist sketches to show what development is to be developed at the site and similar development, that has been successfully delivered elsewhere.	Comment noted. The masterplan is a Supplementary Planning Document and guides future development. Detail of individual development sites will be decided at the planning application stage. The masterplan includes a wide selection of precedent images and plans as well as an artists' sketch to help bring the vision of the reservoir alive. It is not considered further images and sketches would be appropriate. The council has looked at successful examples from other locations in the UK and internationally. This will continue as the delivery of the opportunities is developed further.	No change required.
2 Individuals	Ask for additional CGI and/or maps, to enable the proposals to be better understood.	Comment noted. The masterplan is a Supplementary Planning Document and guides future development. Detail of individual development sites will be decided at the planning application stage. The masterplan includes a wide selection of precedent	No change required.

Appendix 2  
Annexe G

		images and plans as well as an artists' sketch to help bring the vision of the reservoir alive.	
1 Individual	Asks for computer-aided design images to be included in the masterplan.	Comment noted. The masterplan is a Supplementary Planning Document and guides future development. Detail of individual development sites will be decided at the planning application stage. The masterplan includes a wide selection of precedent images and plans as well as an artists' sketch to help bring the vision of the reservoir alive.	No change required.
1 Individual	Asks for the masterplan to provide additional details on each of the separate sites to be developed. States the inclusion of measurements and photographs of each existing site would be helpful to enable the public to better consider the proposals for new development.	Comment noted. The masterplan is a Supplementary Planning Document, to guide future development. All new development will be fully assessed through the planning application process during which far more detail will be necessarily provided and subject to public consultation. It would not be appropriate to include this level of detail in the masterplan.	No change required.
1 Individual	States concerns as to the deliverability of the public realm improvements that are shown in the images.	Comment noted. The masterplan sets out clear intentions for improvements to the public realm and the Delivery and Management chapter discusses how these ambitions will be achieved, by a partnership-based approach. Further details will come forward at the planning application stage where all schemes will be assessed against the masterplan and other adopted local plan policies. These include policies on design.	No change required.
1 Individual	States that they encountered difficulties in accessing the images – no further details provided.	Comment noted. The masterplan was available to view online, and hard copies were available for the public to view at a number of publicly accessible locations. The masterplan includes contact details for the planning team and states that requests for alternative documents formats would be considered on a case-by-case basis.	No change required.





**Representations received from an ERCO event**

Consultee	Representation summary	Council response	Proposed changes to SPD
13 Individuals	Not in support of proposal for housing development close to water's edge.	Comment noted. The Tower Ballroom site is allocated for housing development in the Birmingham Development Plan. The masterplan seeks to build on the policy allocation and provide guidance to ensure future development delivers high-quality housing-led development that protects and enhances natural and heritage assets at the reservoir. The masterplan has been amended to show development further set back from the waters' edge with a wider public walkway consisting of soft and hard landscaping.	The masterplan has been amended to show development further set back from the waters' edge with a wider public walkway consisting of soft and hard landscaping.
2 Individuals	In support of demolition of Tower Ballroom.	Support welcomed.	No change required.
1 Individual	Not in support of demolition of Tower Ballroom. States the building should be repaired and used as a venue for hire in order to retain it as a local landmark.	Comment noted. The decision to demolish the former Tower Ballroom building has been made through cabinet process. The Tower Ballroom is a brownfield (previously developed) site that is allocated for housing development in the Birmingham Development Plan. The vision for the site is for a mixed-use residential-led scheme that is set back from the waters' edge with a wide walkway in front. The retention of the Tower Ballroom building would make delivering this vision unachievable.	No change required.
1 Individual	In support of commitment for Local Nature Reserve to be retained and recognition of importance of tranquil spaces.	Support welcomed.	No change required.
1 Individual	In support of recognition given in masterplan, to the reservoir being an important place for the whole city.	Support welcomed.	No change required.
1 Individual	In support of masterplan recognising the range	Support welcomed.	No change required.

Appendix 2  
Annexe H

Consultee	Representation summary	Council response	Proposed changes to SPD
	of water-based activities and water-based uses, that are supported at the reservoir.		
1 Individual	In support of intention for Green Flag status to be achieved. States this will lead to improvements at the site.	Support welcomed.	No change required.
1 Individual	Not in support of proposals. States proposed development for Osler Park and Osler Place is unimaginative.	Comment noted. The artist's sketch include in the plan is an illustrative sketch to demonstrate the vision for the Tower Ballroom site. Future development will be assessed against the guidance in this masterplan as well as other planning policies including those relating to design.	No change required.
2 Individuals	Requests greater involvement from Ward Members.	Comment noted. Ward Members have been involved in the masterplan process.	No change required.
1 Individual	Asks for clearer contact details for the council to be provided and methods to allow views of locals to be expressed.	Comment noted. The consultation undertaken met the requirements of planning regulations and the council's adopted Statement of Community Involvement. Contact details including an email address, phone number and postal address were provided in consultation material and responses could be submitted via, post, email, online questionnaire or telephone.	No change required.
1 Individual	Not in support of design of housing development at Osler Park and Osler Place. States it should be limited to two-storeys, face inwards and be further set back from the water's edge.	Comment noted. The Tower Ballroom site is allocated for housing development in the Birmingham Development Plan. The masterplan seeks to build on the policy allocation and provide guidance to ensure future development delivers high-quality housing-led development that protects and enhances natural and heritage assets at the reservoir. The masterplan has been amended	The masterplan seeks to build on the policy allocation and provide guidance to ensure future development

Consultee	Representation summary	Council response	Proposed changes to SPD
		<p>to show development further set back from the waters' edge with a wider public walkway consisting of soft and hard landscaping. It has also been amended to include a public square in front of Reservoir Lodge.</p> <p>Future development will be assessed at the planning application stage against the guidance in this masterplan as well as other planning policies including those relating to design.</p>	<p>delivers high-quality housing-led development that protects and enhances natural and heritage assets at the reservoir. The masterplan has been amended to show development further set back from the waters' edge with a wider public walkway consisting of soft and hard landscaping. It has also been amended to include a public square in front of Reservoir Lodge.</p>
1 Individual	Asks what new infrastructure is planned to support the new housing development.	The masterplan delivers the growth agenda set out in the Birmingham Development Plan (BDP) and as part of the BDPs evidence base consideration was given to the infrastructure requirements in this area of the city, further detailed consideration on the impact to infrastructure will be considered through the planning application process.	
1 Individual	Asks how the parking demand will be met.	Comment noted. The masterplan takes a balanced approach towards providing some car parking to support those who have no alternative way to access the site and the promotion of sustainable transport in line with the council's Transport Plan. A key theme of the masterplan is strengthening walking, cycling and public	The masterplan has been updated to include proposals in the longer-term to reopen the existing

Consultee	Representation summary	Council response	Proposed changes to SPD
		transport connections. The masterplan has been updated to include proposals in the longer-term to reopen the existing car park to provide a reduced parking provision that is secure and well-managed.	car park to provide a reduced parking provision that is secure and well-managed.
4 Individuals	States development will have a detrimental impact on wildlife due to noise and light pollution.	Comment noted. The masterplan states the natural environment will be protected and enhanced to ensure activity and development at the reservoir does not have a detrimental impact on the Local Nature Reserve. Future development will be assessed at the planning application stage against the guidance in this masterplan as well as other planning policies including those relating to the natural environment.	No change required.
4 Individuals	States the council is not listening to the views and concerns of the community.	Comment noted. The consultation undertaken met the requirements of planning regulations and the council's adopted Statement of Community Involvement. The council worked with the community members of the Community Partnership Forum (which includes representatives from the Community Consortium who submitted the Alternative Plan), on redrafting the masterplan. This was to ensure the experiences and views of the local community were better reflected in the masterplan. The second round of public consultation gave the wider community, including those not represented in the Community Partnership Forum, the opportunity to have their say on the revised masterplan.	No change required.
2 Individuals	Requests more green spaces are created with additional trees.	Request noted. The masterplan seeks to protect and enhance the natural environment. The Edgbaston Reservoir Local Nature Reserve Management Plan has been updated by the Birmingham and the Black Country Wildlife Trust. It provides up to date information with clear objectives to protect and enhance the Local Nature Reserve for future generations. The masterplan states the Management Plan should be read in conjunction with the masterplan and all development and proposals at the reservoir	No change required.

Consultee	Representation summary	Council response	Proposed changes to SPD
		should support the biodiversity objectives and targets set out in the Management Plan.	
1 Individual	States the Osler Park & Osler Place site should be used for multi-use activities and general community activities including art.	Comment noted. The vision for the site is for a mixed-use residential-led scheme that is set back from the waters' edge with a wide public walkway in front. The masterplan states non-residential uses on the site could include community, cultural, commercial, leisure, and educational uses. It further states these uses should support activity at the reservoir and help meet the needs of the community and visitors. Buildings should be multi-functional and flex	No change required.
2 Individuals	States the proposed development will remove a public open space that is a valuable community benefit for local residents.	Comment noted. The Tower Ballroom site is allocated for housing development in the Birmingham Development Plan. The masterplan seeks to build on the policy allocation and provide guidance to ensure future development delivers high-quality housing-led development that protects and enhances natural and heritage assets at the reservoir. The masterplan has been amended to show development further set back from the waters' edge with a wider public walkway consisting of soft and hard landscaping. It has also been amended to include a public square in front of Reservoir Lodge.	The masterplan has been amended to show development further set back from the waters' edge with a wider public walkway consisting of soft and hard landscaping. It has also been amended to include a public square in front of Reservoir Lodge.
1 Individual	States the housing development will create access issues as new residents will not want to share the reservoir with the general public.	Comment noted. The masterplan has been updated to further set buildings back from the waters' edge and to create a public square in front of Reservoir Lodge.	The masterplan has been updated to further set buildings back from the waters' edge and to create a public square in front of

Appendix 2  
Annexe H

Consultee	Representation summary	Council response	Proposed changes to SPD
			Reservoir Lodge.
1 Individual	States housing development should be moved from Osler Park & Osler Place site to the car park space.	Comment noted. The Tower Ballroom site is allocated for housing development in the Birmingham Development Plan. The masterplan seeks to build on the policy allocation and provide guidance to ensure future development delivers high-quality housing-led development that protects and enhances natural and heritage assets at the reservoir. The masterplan has been amended to show development further set back from the waters' edge with a wider public walkway consisting of soft and hard landscaping.	No change required.



### Appendix 3 – Edgbaston Reservoir Masterplan Risk Assessment

Risk No	Risk description	Risk mitigation	Residual / current risk			Additional steps to be taken
			Likelihood	Impact	Prioritisation	
1.	Failure to adopt Edgbaston Reservoir Masterplan.	<p>The cabinet report sets out clearly the benefits of adopting the masterplan.</p> <p>Stakeholders and local councillors have been engaged throughout the masterplans production and are fully informed on the vision and proposals within the masterplan.</p> <p>The consultation period was undertaken in accordance with the adopted Statement of Community Involvement. The Consultation Report clearly sets out how the consultation representations have influenced the final masterplan.</p>	<i>Low</i>	<i>Medium</i>	<i>Tolerable</i>	
2	Failure to implement the strategy set out in the masterplan.	The masterplan's production was facilitated by planning, design and Birmingham Property Services who ensured that the strategy and	<i>Medium</i>	<i>Medium</i>	<i>Tolerable</i>	The Council will continue to maintain strong partnership working at the reservoir using the Delivery and

Risk No	Risk description	Risk mitigation	Residual / current risk			Additional steps to be taken
			Likelihood	Impact	Prioritisation	
		<p>opportunities identified are aspirational and deliverable.</p> <p>The Council has also worked continuously with external stakeholders at the reservoir, including the Canal &amp; River Trust and Sport England. The existing water sport providers at the Sailing and Rowing Club have been continuously involved in the masterplans production and amendments made to the final masterplan to ensure the vision for the future of the clubs is a shared one that is deliverable. Community groups such as Birmingham Settlement have also been involved in the plans production to ensure, where possible the masterplan reflects the future plans of active community interests. Engagement with stakeholders reduces the risk that the plan will not be delivered.</p>				<p>Management section of the plan as an outline strategy for delivery.</p> <p>Having the masterplan adopted will strengthen funding bids and the involvement of key organisations in the delivery of the strategy.</p>

Risk No	Risk description	Risk mitigation	Residual / current risk			Additional steps to be taken
			Likelihood	Impact	Prioritisation	
		<p>Delivery of some of the opportunities in the plan is already underway, including the improved walkway around the reservoir, enhanced facilities at the playing fields and the planning permission for the redevelopment of the Sea Cadets facility. This demonstrates that the proposals within the masterplan are realistic and deliverable.</p> <p>The Delivery and Management section of the masterplan includes each of the opportunities identified along with details on potential delivery partners and timescales.</p>				
3	<p>Objections to the adoption and delivery of the masterplan.</p> <p>Given the level of public interest and continued objections from some members of the public to the development of housing at the reservoir one risk is the SPD will not</p>	<p>This risk has been reduced by the involvement of the Community Partnership Forum, existing water users and landowners in the production of the masterplan. Further details of this engagement are included in Appendix 2 of the adoption cabinet report.</p>	<i>High</i>	<i>Low</i>	<i>Tolerable</i>	<p>The Council is committed to ongoing communication and engagement with the community, existing water users and landowners within the boundary of the masterplan. Where feasible and productive, the Council will work with interested community groups in</p>

Risk No	Risk description	Risk mitigation	Residual / current risk			Additional steps to be taken
			Likelihood	Impact	Prioritisation	
	be supported by all stakeholders and the public.	Whilst it is recognised that universal support may not be achievable, the redrafted masterplan better reflects the aspirations of the community and water users at the reservoir with several important stakeholders supporting the adoption of the masterplan.				collaboration on the delivery of the opportunities within the masterplan.  The Council will deliver a 'you said, we did' meeting for key stakeholders to explain the changes made to the masterplan following the second round of public consultation.

**Measures of likelihood/ Impact:**

Description	Likelihood Description	Impact Description
High	Almost certain, is expected to occur in most circumstances. Greater than 80% chance.	Critical impact on the achievement of objectives and overall performance. Critical opportunity to innovate/improve performance missed/wasted. Huge impact on costs and/or reputation. Very difficult to recover from and possibly requiring a long term recovery period.
Significant	Likely, will probably occur in most circumstances. 50% - 80% chance.	Major impact on costs and objectives. Substantial opportunity to innovate/improve performance missed/wasted. Serious impact on output and/or quality and reputation. Medium to long term effect and expensive to recover from.
Medium	Possible, might occur at some time. 20% - 50% chance.	Waste of time and resources. Good opportunity to innovate/improve performance missed/wasted. Moderate impact on operational efficiency, output and quality. Medium term effect which may be expensive to recover from.
Low	Unlikely, but could occur at some time. Less than 20% chance.	Minor loss, delay, inconvenience or interruption. Opportunity to innovate/make minor improvements to performance missed/wasted. Short to medium term effect.

**Prioritisation:**

<b>Severe</b>	Immediate control improvement to be made to enable business goals to be met and service delivery maintained / improved
<b>Material</b>	Close monitoring to be carried out and cost effective control improvements sought to ensure service delivery is maintained
<b>Tolerable</b>	Regular review, low cost control improvements sought if possible

## Edgbaston Reservoir Masterplan Supplementary Planning Document SEA Screening August 2022

### 1. Introduction

- 1.1 This screening report has been produced to consider whether the Edgbaston Reservoir Masterplan Supplementary Planning Document ('the SPD') prepared by Birmingham City Council should be subject to a Strategic Environmental Assessment ('SEA') in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended) ('SEA Regulations').
- 1.2 Birmingham City Council ('the council') as a responsible authority under the SEA Regulations must carry out a screening to determine whether plans or programmes are likely to have significant environmental effects, and hence whether SEA is required.

### 2. Strategic Environment Assessment

- 2.1 SEA is a requirement of the SEA Regulations which transposed into English law European Union Directive 2001/42/EC.
- 2.2 The SEA Regulations were made under section 2(2) of the European Communities Act 1972 which means they are 'EU Derived Domestic Law' within the meaning of section 1B(7) of the European Union (Withdrawal) Act 2018. Under section 2(1) of that Act EU Derived Domestic Law continues to have effect in domestic law after 31 December 2020 (the end of the implementation period under the EU Withdrawal Agreement) as it did immediately before that day.
- 2.3 Detailed guidance of the SEA Regulations can be found in the government publication 'A practical Guide to the Strategic Environmental Assessment Directive' (ODPM, 2005) and the Planning Practice Guidance (PPG): <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> .
- 2.4 Regulation 5(6) of the SEA Regulations states "environmental assessment need not be carried out—(a)for a plan (...) which determines the use of a small area at local level (...) unless it has been determined (...) that the plan, programme (...) is likely to have significant environmental effects."
- 2.5 Sustainability Appraisal ('SA') is a separate requirement of s.19(5) of the Planning and Compulsory Purchase Act 2004. SA considers the social, environmental and economic impacts of a plan.
- 2.6 SA is not required to be carried out for SPDs. The Planning Practice Guidance states: *'Supplementary planning documents do not require a sustainability appraisal but may in exceptional circumstances require a strategic environment assessment if they are likely to have significant environmental effects that have not already been assessed during the preparation of the relevant strategic policies'*.

### 3. Consultation on draft screening opinion

- 3.1 In accordance with Regulations 9 and 4 of the SEA Regulations on 4 March 2022 the council sent Historic England, Natural England and the Environment Agency ('the consultation bodies') a copy of the draft SPD and its draft screening opinion. The consultation bodies were asked to respond by 8 April 2022. Responses were received from all three of the consultation bodies. All three consultation bodies advised that they

do not consider the SPD likely to have significant environmental effects in relation to their respective areas of concern.

#### 4. Screening for likely significant environmental effects

- 4.1 The table below sets out the council's assessment of the SPD against the criteria in Schedule 1 of the SEA Regulations for determining the likely significance of effects on the environment.

Criteria (from Annex II of SEA Directive and Schedule I of the SEA 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.	<p>The SPD amplifies the existing policies of the Birmingham Development Plan ('BDP'), in particular policy GA2, and provides further guidance for the masterplan area.</p> <p>BDP Policy GA2 (and the adopted policies map) allocates the Tower Ballroom, Icknield Port Loop and Waterworks Road sites for residential development.</p> <p>The BDP has been subject to a SA, incorporating the SEA Regulation requirements.</p> <p>Once adopted the SPD will be a material consideration in the determination of planning applications.</p> <p>The framework for projects within the masterplan area is already set by the higher tier plan.</p>
(b) The degree to which the plan or programme influences other plans and programmes including those in a hierarchy.	<p>The SPD supplements policies contained within the BDP and must not conflict with the BDP. As such, it is influenced by higher level plans. The SPD will be a material consideration in the determination of planning applications.</p>
(c) The relevance of the plan or programme for the integration of environmental considerations, in particular with a view to promoting sustainable development.	<p>The SPD will promote sustainable development at Edgbaston Reservoir, including by providing guidance on how the natural environment should be protected and enhanced.</p> <p>The SPD promotes sustainable development in the plan area. It references the need to protect and enhance the Local Nature Reserve, introduce additional green infrastructure and increase the level of sustainable travel to the reservoir.</p> <p>The SPD provides guidance rather than specific policy and will therefore not have a significant effect on environmental considerations which have not already been considered.</p>
(d) Environmental problems relevant to the plan or programme.	None.

(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).	None.
<b>Characteristics of the effects and of the area likely to be affected</b>	
(a) The probability, duration, frequency and reversibility of the effects.	<p>The guidance set out in the SPD will promote sustainable development and does not conflict with the BDP. It is therefore unlikely that any significant environmental effects will arise from the SPD which have not been considered as part of the production of the BDP, which met the requirements for SEA.</p> <p>Future major development will be required to go through a separate approval process (i.e. planning applications subject if necessary to Environmental Impact Assessment). This will provide an opportunity for any significant environmental impacts to be identified and the effects mitigated.</p>
(b) The cumulative nature of the effects	<p>Significant environmental effects are unlikely to arise from the SPD. It is therefore unlikely that any cumulative impacts will arise. Future major development will be required to go through a separate approval process (i.e. planning applications subject if necessary to Environmental Impact Assessment). This will provide an opportunity for any significant environmental impacts to be identified and the effects mitigated.</p>
(c) The trans-boundary nature of the effects	<p>No trans-boundary (i.e. affecting other nation states) effects are likely to arise. The SPD covers part of Birmingham City Council's administrative area. As noted above, the environmental effects of projects within SPD area have been assessed in higher tier plans.</p>
(d) The risks to human health or the environment (for example, due to accidents)	<p>There are no significant risks to health or the environment arising directly from the SPD. It is therefore unlikely that any risks to human health or the environment impacts will arise. If these effects were likely to arise, the council will, through the planning process, ensure such issues are appropriately addressed, including through ecology, water quality, and flood risk assessments.</p>
(e) The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	<p>The SPD applies to Edgbaston Reservoir, and covers 32 hectares, including 24 hectares of open water. It sits within two council wards: Ladywood and North Edgbaston. The reservoir is located within the Greater Icknield Growth Area (GA2), identified in the BDP. It is also adjacent to the Port Loop development, which will deliver approximately 1,150 houses. This application for the Port Loop development was subject to an Environmental Impact Assessment.</p> <p>The SPD sets out a vision and development principles (activity, connectivity, sustainability and character) for future development of the reservoir. These are in line with policies in the BDP. It is considered that any effects not previously considered as part of the BDP will be limited in magnitude.</p>



<p>(f) The value and vulnerability of the area likely to be affected due to:</p> <p>i) Special natural characteristics or cultural heritage;</p> <p>ii) Exceeded environmental quality standards or limit values;</p> <p>iii) Intensive land-use.</p>	<p>i) National and locally listed heritage assets;</p> <p>ii) Local Nature Reserve and Site of Importance for Nature Conservation;</p> <p>iii) None</p> <p>These destinations would have been taken into consideration as part of the SEA undertaken for the BDP. The SPD does not propose development beyond the scale of growth allocated in the BDP. Impact on important habitats and locally listed buildings are considered in the SPD, in line with the policies contained within BDP. The draft SPD does not replace other statutory considerations in this regard, such as the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>A Local Nature Reserve Management Plan has been updated alongside the production of the masterplan. This was in order to support the details within the SPD that look to protect and enhance the natural environment.</p> <p>The impact of any special characteristics will be assessed through the relevant policies as set out in the NPPF, BDP, and other adopted planning policy.</p>
<p>(g) The effects on areas or landscapes which have recognised national, Community or international protection status.</p>	<p>No significant effects are considered to arise on the adoption of the SPD in line with BDP policies.</p>

## 5. Screening outcome

- 5.1 Having reviewed the SPD against the above criteria, it is concluded that it is not likely to have significant environmental effects and accordingly should not be subject to Strategic Environmental Assessment.

Title of proposed EIA	Edgbaston Masterplan SPD
Reference No	EQUA987
EA is in support of	New Policy
Review Frequency	Six Months
Date of first review	20/02/2023
Directorate	Inclusive Growth
Division	Development Planning
Service Area	
Responsible Officer(s)	<input type="checkbox"/> Alice X Jones
Quality Control Officer(s)	<input type="checkbox"/> Richard Woodland
Accountable Officer(s)	<input type="checkbox"/> Simon Delahunty-Forrest
Purpose of proposal	The purpose of the masterplan is to establish the future vision for the reservoir and define how the combination of unique sport and recreation, community, heritage, and natural environment can be protected and enhanced by setting clear principles.
Data sources	Consultation Results; relevant reports/strategies; relevant research
Please include any other sources of data	N/A
ASSESS THE IMPACT AGAINST THE PROTECTED CHARACTERISTICS	
Protected characteristic: Age	Service Users / Stakeholders; Wider Community
Age details:	<p>The masterplan includes proposals that will help improve the accessibility of the site, which will ensure the reservoir is accessible for all users including those with mobility issues.</p> <p>A mix of housing including housing suitable for families and young children will be provided in the plan area. The plan does not subscribe the exact mix as this will be determined through the planning application stage, however the mix of housing will be required to be in accordance to Birmingham Development Plan (BDP) policies TP30 and TP31.</p> <p>The masterplan includes opportunities for new community spaces and</p>

facilities to support community activities, along with improved public realm. These proposals provide spaces to bring all the community together and could help tackle social isolation, which can be an issue amongst the elderly.

Educational uses focusing on nature conservation are encouraged in the SPD, however this is not specific to a particular age group and would be for the provider to determine the service offered.

The proposals to redevelop the play park have been removed from this revised masterplan which means that potential negative impacts on children and young people have been addressed. The masterplan includes several proposals that could provide improved opportunities for children and young people including improvements to the park, spaces for community facilities and the support of active community groups such as the Sea Cadets and Birmingham Settlement.

Consultation on the masterplan draft SPD was published online and all those on the consultation database were notified. The database includes a wide range of volunteers covering voluntary, ethnic background, people of religious and non-religious belief, disability, environmental and businesses groups, statutory bodies and other key stakeholders.

The risk of an online consultations negatively impacting on older citizens ability to engage was reduced through the availability of hard copies of the document and the response form being available at the local library and on request.

In regard to the SPD consultation 83 responses were received via the council online BeHeard system. This online questionnaire asked some

voluntary equalities questions to capture details on who responded to the consultation. Overall 26 of the respondents were under 50 years and 41 were over 50 years. The remaining respondents declined to give details on their age. Given the age profile of Ladywood and North Edgbaston wards, which has a very high proportion of residents aged 18-44, a response level from under 50s would have been preferable.

However, this response level from younger generations reflects other planning consultations throughout the city, with younger people being generally less likely to get involved.

Efforts were made to mitigate the lower level of responses from younger generations throughout all the stages of consultation. In the previous consultation's schools and universities were contacted and asked to get involved, and workshops undertaken with members of a local scout group. Social media was also used throughout the process to promote the consultation, with the aim of engaging with younger people.

Protected characteristic: Disability

Service Users / Stakeholders; Wider Community

Disability details:

Representations received in the first public consultation requested the reservoir to be accessible for all, especially disabled people. The revised plan states that development will be required to be accessible to all and encourages the use of adaptive bikes at the reservoir. Technical guidance matters are addressed in other SPDs including the 'Access for People with Disabilities SPD'.

The draft masterplan included a proposal to shut the existing car park near the waterfront. Some representations received during the consultation raised this as an issue, requesting that parking spaces were



made available close to the water for those with limited mobility. The revised masterplan now proposes to retain this car park allowing for accessible car parking spaces close to the waters' edge.

Out of the 83 individuals who responded on BeHeard, 11 individuals responded to confirm they considered themselves to have a disability, 18 people declined to answers and 54 selected no.

Consultation on the masterplan draft SPD was published online and all those on the consultation database were notified. The database includes a wide range of volunteers covering voluntary, ethnic background, people of religious and non-religious belief, disability, environmental and businesses groups, statutory bodies and other key stakeholders.

Protected characteristic: Sex

Service Users / Stakeholders; Wider Community

Gender details:

No adverse impacts to this protected group have been identified and no issues were raised through the consultation. Improvements to access and public facilities at the reservoir will ensure this public space is accessible to all.

Consultation on the masterplan draft SPD was published online and all those on the consultation database were notified. The database includes a wide range of volunteers covering voluntary, ethnic background, people of religious and non-religious belief, disability, environmental and businesses groups, statutory bodies and other key stakeholders.

Out of the 83 individuals who responded on BeHeard 36 selected male and 38 female, 11 individuals did not identify their gender in their response. This represents a good split.

Protected characteristics: Gender Reassignment

Service Users / Stakeholders; Wider Community

Gender reassignment details:

No adverse impacts to this protected group have been identified and no issues were raised through the consultation.

The need for publicly accessible toilets has been identified in the masterplan. In regard to gender neutral toilets, the onus is on the provider to make sure the appropriate provision is made. Consultation on the masterplan draft SPD was published online and all those on the consultation database were notified. The database includes a wide range of volunteers covering voluntary, ethnic background, people of religious and non-religious belief, disability, environmental and businesses groups, statutory bodies and other key stakeholders.

Protected characteristics: Marriage and Civil Partnership

Not Applicable

Marriage and civil partnership details:

Protected characteristics: Pregnancy and Maternity

Service Users / Stakeholders; Wider Community

Pregnancy and maternity details:

No adverse impacts to this protected group have been identified and no issues were raised through the consultation. Improvements to access and public facilities at the reservoir will ensure this public space is accessible to all.

Consultation on the masterplan draft SPD was published online and all those on the consultation database were notified. The database includes a wide range of volunteers covering voluntary, ethnic background, people of religious and non-religious belief, disability, environmental and businesses groups, statutory bodies and other key stakeholders.

Protected characteristics: Race

Service Users / Stakeholders; Wider Community

## Race details:

No adverse impacts to this protected group have been identified. The masterplan vision looks to ensure the reservoir is a space that belongs to everyone and includes opportunities for uses and activities that will foster strong community.

The equalities data suggests that the response to the consultation does not fully reflect the diversity of the wards with 55 out of the 83 individuals selecting white British. However North Edgbaston ward has a smaller Black Asian and minority ethnic share of the population compared with other areas of the city.

Consultation on the masterplan draft SPD was published online and all those on the consultation database were notified. The database includes a wide range of volunteers covering voluntary, ethnic background, people of religious and non-religious belief, disability, environmental and businesses groups, statutory bodies and other key stakeholders. The council worked with the community through the community forum which helped to promote the consultation throughout the community, including through channels such as resident associations within Ladywood.

## Protected characteristics: Religion or Beliefs

Service Users / Stakeholders; Wider Community

## Religion or beliefs details:

No adverse impacts to this protected group have been identified. The masterplan vision looks to ensure the reservoir is a space that belongs to everyone and includes opportunities for uses and activities that will foster strong community.

The majority of respondents who completed the equalities data selected Christian (20) followed by no religion at (37).



Consultation on the masterplan draft SPD was published online and all those on the consultation database were notified. The database includes a wide range of volunteers covering voluntary, ethnic background, people of religious and non-religious belief, disability, environmental and businesses groups, statutory bodies and other key stakeholders.

Protected characteristics: Sexual Orientation

Service Users / Stakeholders; Wider Community

Sexual orientation details:

No adverse impacts to this protected group have been identified and no issues were raised through the consultation.

In response to the equalities data 48 respondents selected heterosexual, 4 as Gay or Lesbian, 3 as Bisexual and 25 selected that they would prefer not to say.

Consultation on the masterplan draft SPD was published online and all those on the consultation database were notified. The database includes a wide range of volunteers covering voluntary, ethnic background, people of religious and non-religious belief, disability, environmental and businesses groups, statutory bodies and other key stakeholders.

Socio-economic impacts

The masterplan proposes to bring vacant and underused sites into positive uses that will support the socio-economic sustainability of the area. The masterplan will also have a positive socio-economic impact by delivering affordable housing. Several of the opportunities include the potential for community, leisure and commercial uses that could provide jobs and opportunities for the local community. The masterplan also supports existing local groups that are active in their community such as the

water users and Birmingham

Settlement. The potential provision of community spaces at the reservoir, and the support for existing groups, will help provide an environment that supports the local community thrive. The masterplan will also create accessible environments and improve connectivity and accessibility to blue and green infrastructure.

Please indicate any actions arising from completing this screening exercise.

No further action is necessary. The adopted masterplan will be monitored through the existing monitoring framework of the Birmingham Development Plan. Further work is required on individual projects and where these involve the City Council more detailed equalities impact assessments can be undertaken to assess the impact of proposals within the masterplan on specific groups.

Please indicate whether a full impact assessment is recommended

NO

What data has been collected to facilitate the assessment of this policy/proposal?

The adopted Birmingham Development Plan and background evidence has been used to inform the masterplan along with other policy documents including the Birmingham Transport Plan and the Greater Icknield Masterplan. The updated Edgbaston Reservoir Local Nature Reserve Management Plan has also informed the assessment.

Consultation analysis

A six-week public consultation on the first masterplan Draft SPD was undertaken between May and July 2019. Approximately 400 individual representations were submitted. Each formal representation from the public consultation has been considered during the masterplan revision.

In January 2020, the council established a Community Partnership Forum to engage with representatives from the local community on the masterplan redraft. The Forum represents a wide range of community

and user-group interests. The aim of the Forum is to better align the council's aspirations with those of the community to establish a clear vision for the reservoir. The Forum has ensured local information and experience has fed into the masterplan.

There were approximately 400 formal responses to the consultation. The Consultation Statement, contains further details on the engagement that was carried out, the main issues raised and how they have been addressed in the final version of the masterplan. There were several suggestions for alterations to the masterplan. The main points raised during the consultation are summarised below:

- Supports the vision and principles in the masterplan
- Supports the Sustainability chapter
- Opposition to housing on the former Tower Ballroom site
- Opposition to commercial uses on the former Tower Ballroom site
- Requests for affordable and social housing
- Concerns new development will create private ownership of the site
- Requests building line is further set back from the waters' edge
- Concerns future development will have a detrimental impact on the Local Nature Reserve
- Concerns new development will destroy existing views around the reservoir including from the dam wall
- Concerns increased visitors and residents will have a negative impact on the Local Nature Reserve and
- Concerns development will increase noise and light pollution
- Concerns development will generate traffic on local road network
- Requests more detail in the masterplan regarding the location and management of car parking



car parking

- Requests public car parking is available for disabled and vulnerable groups
- Requests for the historic and natural environment to be protected and enhanced
- Requests the reservoir is accessible to all
- Detailed representations from site owners requesting some amendments to the wording on projects
- Concerns there is insufficient infrastructure (education and medical), to support increased residents.

Following a review of all the representations made, amendments have been proposed to the masterplan. These amendments do not alter the strategy within the document but rather strengthen and highlight the existing strategy, to respond positively to several of the representations. This has resulted in a stronger masterplan overall. Where representations have requested changes to the masterplan that have not been implemented, the Consultation Statement sets out the reasons behind this decision. The main amendments to the masterplan can be summarised as:

- Amendments to the proposed design of the Osler Park and Osler Place (former Tower Ballroom Site) opportunity to set the building line further back from the waters' edge and deliver a public square.
- Amendment to reopen the existing car park at the reservoir in a secure and well-managed way.
- Amendments to the context chapter to reflect policies that have been adopted since the previous consultation
- Amended wording in Introduction to reflect current context in relation to Covid 19.
- Addition of definition of short, medium and long-term in the Delivery and Management chapter to inform future delivery.

Further details on the consultation, responses and how these have influenced the final masterplan are available in the Consultation Summary that support the adoption cabinet report.

Adverse impact on any people with protected characteristics.

No adverse impacts were identified. Further delivery work is needed on the individual proposals which will allow this to be considered further.

One representation received raised several issues that relate to equalities including arguing that:

- the masterplan and consultation failed to address the cultural needs and requirements of specific user groups including young people, disabled people, racial minorities, sex workers and the LGBTQ+ community.

These concerns haven been noted, however the respondee has not submitted evidence to demonstrate that specific groups were unable to engage with the consultation process or provided details on how the masterplan fails to address the cultural needs and requirements of specific user groups. The consultation was undertaken in accordance with Planning Regulations and the adopted Statement of Community Involvement. The masterplan process has been the result of consultation over several years and has involved a variety of methods, reaching a wide audience. The consultation reports supporting the different stages of plan making set this out clearly. The EqlA identified no negative impacts on any protected groups. The development of council-owned sites will be subject to further EqlA processes if Cabinet approval is needed and planning applications will assess the impact of individual proposals of specific user groups at the reservoir.

- the loss of the Tower Ballroom and H Suite will remove important cultural venues for Desi, Africa and Hindu communities.

As above, the respondee has not submitted evidence to demonstrate there are specific gaps in cultural facilities for these communities or demonstrated that the proposals within the masterplan will not be suitable to meet the needs of these communities in the future. The Tower Ballroom has not been in operation for several years due to the lack of a viable commercial use, demonstrating a lack of demand for the current type of facility in this format. The masterplan provides several opportunities for commercial, cultural and community facilities that can be optimised to meet the needs of all local communities and any future developments led by the council will be supported by evidence on demand for facilities to meet community needs.

- the masterplan fails to recognise the importance of green spaces to vulnerable groups. Vulnerable persons such as, HMO residents, persons with learning difficulties, single people, LGBTQ+ people, former homeless people, sex workers and people leaving prison.

The criticism that the masterplan does not recognise the importance of green space is challenged, the masterplan states in several places the importance of open space to all the community. It is not felt necessary to single out specific groups within the document. The masterplan proposes no loss to public open space. One of the main purposes of the masterplan is to ensure the open space and facilities at the reservoir are accessible to all through providing public spaces, improving access and making the area safer.



- the Equality Impact Assessment was not provided in the consultation pack. Stating that no evidence of equality considerations and their potential impacts in the preparation of the masterplan has been given.

The EqIA was published as part of the Report seeking approval for consultation as in accordance with Council procedure.

Could the policy/proposal be modified to reduce or eliminate any adverse impact? Not necessary as no adverse impacts were identified. Further delivery work is needed on the individual proposals which will allow this to be considered further.

How will the effect(s) of this policy/proposal on equality be monitored?

When the Draft SPD becomes adopted it will form part of the local development plan and will be monitored by the City Council through the annual monitoring of the Birmingham Development Plan.

What data is required in the future?

None.

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

A full assessment is not required as no negative impacts have been identified. This consultation has been carried out in accordance with the Statement of Community Involvement, an adopted City Council policy. The approach to public consultation was informed by the community profile of the two wards the site is located within, (ensuring protected characteristics inform the approach such as Age, Gender and Race). Relevant organisations with an interest in equalities were also be consulted.

An engagement strategy set out how the public consultation will be carried



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

Reasons for approval or rejection

Please print and save a PDF copy for your records

Yes

Content Type: Item

Version: 33.0

Created at 20/09/2022 08:35 AM by ☐ Neil Holly

Last modified at 26/09/2022 11:19 AM by Workflow on the Edgbaston Masterplan

Page 434 of 674

14/15

Close





**Planning and Compulsory Purchase Act 2004 (as amended)**

**Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)**

**Edgbaston Reservoir Masterplan Supplementary Planning Document**

**ADOPTION STATEMENT**

In accordance with Regulation 14 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), Birmingham City Council hereby gives notice that the Edgbaston Reservoir Masterplan Supplementary Planning Document (SPD) was adopted on 11 October 2022.

The SPD provides supplementary guidance and detail, to support Policy Growth Area Two (GA2) of the Birmingham Development Plan 2031.

The adopted Edgbaston Reservoir Masterplan 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/edgbaston-reservoir-spd](http://www.birmingham.gov.uk/edgbaston-reservoir-spd)

Any person aggrieved by the adoption of the Edgbaston Reservoir Masterplan 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 Edgbaston Reservoir Masterplan SPD.



# Birmingham City Council

## Report to Cabinet



11<sup>th</sup> October 2022

**Subject:** Street Naming & Numbering Policy revision

**Report of:** Paul Kitson, Strategic Director Place, Prosperity and Sustainability

**Relevant Cabinet Member:** Councillor Liz Clements – Transport

**Relevant O &S Chair(s):** Councillor Chaman Lal – Sustainability and Transport  
Councillor Akhlaq Ahmed – Resources

**Report author:** Philip Edwards – Assistant Director, Transport and Connectivity  
Tel: 0121 303 6467 Email: philip.edwards@birmingham.gov.uk

Are specific wards affected?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No – All wards affected
If yes, name(s) of ward(s):		
Is this a key decision?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If relevant, add Forward Plan Reference: 009249/2021		
Is the decision eligible for call-in?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Does the report contain confidential or exempt information?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

## 1 Executive Summary

- 1.1 Street Naming and Numbering (SNN) policy was ratified by the former Transportation and Technical Services Committee meeting on 1<sup>st</sup> October 1997. This policy is due for review in the light of current best practice and the variety and complexity of modern development layouts.

## 2 Recommendations

That Cabinet: approve the revised policy for SNN

### **3 Background**

- 3.1 The primary purpose of good addressing is to enable properties to be located quickly and efficiently, ensuring that each address is unique. This is particularly important when emergency services are required to access an incident quickly.
- 3.2 Building design has undergone massive change over the past 30 years including repurposing of buildings, complex layouts and conversions.
- 3.3 Increased use of the Internet for goods and services requires that addressing must be unique, accurate and capable of being processed digitally. Utility companies and financial institutions routinely verify Clients' credentials by matching address details. The favoured format for digital processing of addresses is BS\_7666. Addressing must comply with this standard in order for goods and services to be provided and delivered efficiently.
- 3.4 Street naming and numbering (SNN) has had to evolve to cope with new layouts and design standards and was recently subject to development of National Code of Practice incorporating legal advice on statutory powers and duties in the light of BS\_7666.
- 3.5 In addition, under the Equalities Act 2010 local authorities are now required to foster good relations between people who share a protected characteristic and those who don't. The National Code of Practice recommends that where a street is to be named after a person no longer living, that person should have been deceased for more than 50 years. This is due to reputational damage caused to bodies commemorating people who subsequently fell into disrepute many years after their death. Birmingham City Council wishes to comply with the Equalities Act by the introduction of street names using names of people from our newly settled diverse communities who have died more recently than the recommended period. New procedures are recommended to facilitate this. The proposed policy allows new street names to be considered for specific developments within the statutory one-month period, to be named after people deceased for more than 25 years. Furthermore, names after people no longer living can be considered at an earlier time for inclusion on a list for non-specific sites, allowing more time for research. The Equalities Impact Assessment is at Appendix B.
- 3.6 To incorporate recent developments in the built environment and cultural change within Birmingham the SNN policy has been revised as attached at Appendix A.
- 3.7 The revised policy incorporates BS\_7666 National Code of Practice as developed by the SNN Best Practise Working Party facilitated by GeoPlace LLP, Custodian of the National Address and Streets Gazetteers. Variations have been added to ensure that Birmingham City Council can reflect the nature of its newly established diverse communities.

### **4 Options Considered and Recommended Proposal**

- 4.1 To retain the existing SNN policy.



Due to the changing nature of developments, increased number of building conversions and changes of use, and complexity of current designs, the existing SNN policy is no longer fit for purpose.

#### 4.2 To adopt National Code of Practice

This would result in fully-compliant addresses for the purposes of BS\_7666 however it would not take advantage of the opportunity to promote good relations between people who share a protected characteristic and those who do not.

#### 4.3 Adoption of National Code of Practice with additional processes to allow the use of names of people deceased more than 25 years for specific developments;.

This results in fully compliant BS\_7666 addresses with the added advantage of promoting good relations. The additional process will further be used to produce a pre-approved list of street names relevant to specific areas for use by developers with less local knowledge which are unable to suggest suitable street names for their developments. The current pre-approved list is at Appendix E

### 5 Consultation

#### 5.1 Consultation has been carried out with all elected Members. The results are held in Appendix C. The draft policy was reviewed in the light of comments received during the consultation process and responses included in Appendix C.

### 6 Risk Management

#### 6.1 There is a potential risk to the Council's reputation where it is subsequently found that a person after whom a street has been named was an unsuitable candidate. The procedure includes consultation with Members for street names proposed for inclusion on the pre-approved list. All names commemorating a person no longer living will be subject to an Equalities Impact Assessment as described in the report at Appendix B. Where such names are in respect of a person who has been deceased less than 25 years the relevant Ward Member(s) will be asked to comment on that person's suitability for such commemoration. This will enable the Council to represent the diverse nature of its communities whilst mitigating the risk of reputational damage.

### 7 Compliance Issues:

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

7.1.1 It is proposed that the revised policy replace that approved by the Transport Committee on 1st October 1997.

#### 7.2 Legal Implications

7.2.1 The revised policy is compliant with the Public Health Act 1925 and West Midlands County Council Act 1980 which have been adopted by the Council in relation to its SNN duties.

### **7.3 Financial Implications**

The report covers the review of the Street Naming & Numbering Policy to ensure it remains current and fit for purpose. There are no financial implications as a result of the recommendation in the report.

### **7.4 Procurement Implications (if required)**

7.4.1 N/A

### **7.5 Human Resources Implications (if required)**

7.5.1 N/A

### **7.6 Public Sector Equality Duty**

7.6.1 The revised policy allows improved recognition of Birmingham's younger and more diverse communities.

7.6.2 Due to the need for clear, logical addressing throughout enabling properties to be located swiftly in case of emergency, it is recommended that numbers no longer be dropped for cultural or superstitious reasons. Whilst this fails to reflect the differences of various cultures, no cultures will be reflected in the policy in this instance; this means that no culture is given any greater recognition than any other.

### **7.7 Sustainability Issues**

7.7.1 This Policy relates to an existing statutory duty and there is no adverse effect on sustainability issues arising from its implementation.

## **8 Appendices**

### **8.1 List of Appendices accompanying this report:**

Appendix A – Proposed Street Naming & Numbering Policy

Appendix B – Equality Analysis

Appendix C – Consultation Outcome

Appendix D – Street Naming & Numbering process Flow Diagram

Appendix E – Approved list of Street Names

## **9 Background Documents**

### **9.1 Addressing flow diagrams from National Code of Practice**





# Birmingham City Council

## Street Naming and Numbering Policy

### Draft

## 1. Contents

1.	Contents.....	1
2.	Introduction .....	2
3.	Legislation .....	2
4.	Street Naming .....	3
4.1.	Street Naming Policy .....	3
4.1.1.	The current policy states: .....	3
4.1.2.	Proposed additions to Policy .....	3
4.2.	Street Naming Procedure.....	4
4.2.1.	Applications for a new Street Name.....	4
4.2.2.	Naming after a Person no longer living .....	4
4.2.3.	Alteration of an existing Street Name .....	5
4.2.4.	Alteration of a Street Name due to Redevelopment .....	6
4.3.	Approved list of Street Names .....	6
4.4.	Recording of Street Name Decisions .....	7
5.	Property numbering.....	7
5.1.	Property Numbering Policy .....	7
5.1.1.	Numbering Sequences.....	8
5.2.	Property Numbering Procedure.....	8
5.2.1.	Applications .....	8
5.2.2.	New-build developments .....	9
5.2.3.	Flats and Apartments .....	9
5.2.4.	Commercial buildings .....	10
5.2.5.	Industrial buildings .....	10
5.2.6.	Public Buildings.....	10
5.2.7.	High-Rise buildings .....	10
5.2.8.	Building Conversions .....	10
5.2.9.	Naming of Buildings.....	11
5.3.	Recording of Numbering Decisions .....	11
6.	Fees.....	11

## 2. Introduction

The primary aim of good Street Naming and Numbering Policy (SNN) is to enable properties to be located quickly and easily. Birmingham City Council follows the [Data Entry Convention \(DEC\) to BS 7666-2:2006](#) for Addressing in discharging its powers and duties to name streets and number properties. The contents of the National Best Practice for Street Naming and Numbering will also be incorporated into Birmingham's practices as it is released.

The policy enables new addressing to be created in a format which ensures the provision of unique and clear addresses which can be used to deter and combat fraud and are compatible for electronic processing (where permitted under Data Protection laws).

## 3. Legislation

Birmingham City Council has adopted the [Public Health Act 1925 \(PHA\)](#) for the purposes of Street Naming and Numbering. This is supported by Section 9 of the West Midlands County Council Act 1980 (WMCCA) for numbering and other means of identification of properties.

Section 17 of the [Public Health Act 1925 \(PHA\)](#) sets out minimum procedures for proposal of a street name to the Local Authority. The Council may object to the proposed name within one month of service of notice. The proposed name cannot be brought into use until the objection is removed. The proposer may appeal to the Magistrates Court against the objection within 21 days.

Section 18 of the [Public Health Act 1925 \(PHA\)](#) sets out procedure for a Local Authority to alter the name of a street, or part of a street, or to name a new street, by Order. This procedure requires notices to be displayed on site for 1 month and allows 21 days for any objections to be lodged with the Magistrates Court. This timescale is often too lengthy for the developer's programme of works, so Birmingham requests that developers suggest new street names.

Section 19 of the [Public Health Act 1925 \(PHA\)](#) requires the Authority to ensure that all street names are marked. The developer is required to erect signage according to BCC's specification.

## 4. Street Naming

### 4.1. Street Naming Policy

Birmingham City Council uses the Data Entry Convention (DEC) to BS 7666-2:2006 for Addressing in discharging its powers and duties to name streets. The contents of the National Code of Practice for Street Naming and Numbering will also be incorporated in Birmingham's practices as it is released.

In the following sections, policy is shown in bold. Additional explanation is given in italics.

#### 4.1.1. The current policy states:

- **Street Names must have a local connection which is historically, geographically, or culturally relevant.**
- **Names of living people must not be used.**
- **Names cannot be duplicated within Birmingham, within Sutton Coldfield, or the same postcode district.**
- **Street names must not serve any commercial interest.**
- **Street names should not sound similar to existing street names in the same area or be deemed easily misspelt or confusing.**
- **Repetition of a street name with a different suffix in the same locality is not normally recommended.**

#### 4.1.2. Proposed additions to Policy

It is proposed that the policy be supplemented with following criteria

- **Suggested street names should be inclusive and may be used as a vehicle to promote community cohesion.** *This measure can be used particularly, but not exclusively, in the choice of names after a person no longer living and should represent the local community/ies*
- **Where a street is to be named after a person no longer living this cannot be introduced within 25 years of that person's death. Applications should clearly identify the individual, give their date of birth and death and the reason for naming the street after that person.** *There have been a small number of isolated cases where the naming of a street after a person has resulted in significant reputational damage. This delay is expected to ensure that any unfavourable revelations have materialised.*
- **Where it is approved that a street be named after a person no longer living, the surname will form the street name, plus an appropriate suffix.**



- **Street name suffixes will be applied according to the Oxford English Dictionary (OED) definition unless the name is in a foreign language or there is a cultural reason for the naming of the street in which case the relevant translation will be considered.** *Common suffixes include “Road”, “Street” and “Boulevard” but we are occasionally requested to use more unusual suffixes such as “Rise” on a hillside, “Halt” which might indicate a station or “Meadow” on a green-field site.*
- **New street names must not include punctuation or abbreviations with the only exception of St for Saint.** *Punctuation can be misinterpreted by automatic processing.*

## 4.2. Street Naming Procedure

Applications may be made on an [electronic](#) or a paper form and submitted by post or email.

Applications will be checked for completeness, compliance with policy and acknowledged. An expected date of supply of addresses will be given.

Names for new Streets can be proposed by The Council or Developers. If The Council proposes a new name, notices must be posted on site for one month and anyone can object within 21 days of the end of the month. This extends the addressing process which may cause delays in the developer being able to order utility connections. To save time, the Council requires developers to suggest new street names where they are required. The Council has one month to object to names suggested by developers.

### 4.2.1. Applications for a new Street Name

Local Ward Councillors will be consulted on suggested street names where a new name is required. If Local Ward Councillors have no objection to the suggested name/s the decision to accept the suggested names will be delegated to the Address Custodian and Team except where the application is for naming of a street after a person no longer living or for renaming of an existing street.

### 4.2.2. Naming after a Person no longer living

This decision will be delegated to the Assistant Director, Transport & Connectivity.

The Applicant must supply details to enable that person to be clearly identified: i.e. date of birth and death, full name and title where applicable. Detailed evidence of character and the reason for the suggestion must also be supplied. This information will be verified and assessed in accordance with criteria in the Equalities Impact Assessment Report reference [EQUA740](#) dated June/2022 in advance of consultation with the local Ward Councillor(s).

If the initial equalities impact assessment discovers any reason for further consideration a detailed assessment specific to the application will be carried out. A detailed assessment is likely to require an extended period for consideration so any such cases will be rejected at this point and the developer/applicant requested to allow additional time for consideration, should they wish to continue with that suggested name.

A report for Delegated Authority to name the street in accordance with the Ward Councillor(s) preference is prepared and passed to Legal Services and Finance for approval before final approval from the Assistant Director, Transport & Connectivity

This is a change from current procedure in that reports currently are placed with the Cabinet Member for Transport. The change is proposed to rationalise procedure and speed the process as report approval can be lengthy. There are no financial implications for the addressing of properties as the developer is responsible for erecting street name plates. Adoption of new streets has already been considered under the planning application.

#### 4.2.3. Alteration of an existing Street Name

The Public Health Act 1925 states the authority may alter the name of any street or part of street or may assign a name to any street to which a name has not been given. A Notice shall be posted at each end of the street or part of the street affected not less than one month before the making of a Street Renaming Order. Any person may appeal to the Magistrates Court within twenty-one days of posting of the notice.

This decision will be delegated to the Assistant Director, Transport & Connectivity.

No additional criteria are proposed to be added to renaming an existing street.

Applications to rename an existing named street cause severe inconvenience to owners and occupiers of properties as all contacts and contracts holding that address must be notified and changed. Businesses must change stationery and web sites. In some instances, this is recorded as a change of address which may affect an individual's credit rating. For this reason, two-thirds of the interested parties must agree to the change of an existing street name.

Applications to rename an existing named street must give detail of the reason for the change and evidence actual problems caused by the current street name. Such applications must be accompanied by written evidence of the agreement of two-thirds of people resident, managing a business, or with a legal interest in property, on that street.

The local Ward Councillor(s) will be consulted on the suggested new name for the street.

A report for Delegated Authority to name the street in accordance with the Councillor(s) preference (if a choice is available) is prepared and passed to Legal Services and Finance for approval before final approval from the Assistant Director, Transport & Connectivity.

#### 4.2.4. Alteration of a Street Name due to Redevelopment

The most common reason for renaming part of a street is where a redevelopment scheme changes the existing road layout and position of junctions. Under the British Standard for Addressing, BS\_7666, properties must be addressed into the street last used to gain access. Generally street names change at a junction. If the junction moves, then it no longer makes sense for the original street name to be used. Due to the legal status of streets, an Order must be made to rename in these instances. An example is shown at Appendix B

### 4.3. Approved list of Street Names

Occasionally suggestions are received for names on non-specific schemes. A process is proposed for the recording, checking, consultation and approval of such suggestions which will be added to a list of pre-approved street names, appropriate for use in specific geographic areas of the Council. The list will be made available to developers who do not have an acceptable suggestion available.

The availability of pre-approved street names will speed the processing of applications. In 2009 the Council held a consultation exercise for the public to suggest new street names for inclusion on the existing list which received a Best Practice Award from the National Address Custodian Exemplar Awards. The current list is shown at Appendix A. Names which have been used are scored though. It is expected that this process will replenish and restore the list.

Suggestions of new street names for non-specific developments will be checked for compliance with the Council's policy and eligible suggestions will be passed to the relevant Local Ward Councillor(s) for consultation.

A process will also be available to consider names of people deceased less than 25 years, which will increase the number of suggestions from newly settled communities. Such suggestions will not be accepted for specific developments, which require consideration within one month. This exception process will allow more time for consideration.

Where such suggestions are for names after people who have been deceased less than the required 25 years, the local Ward Member(s) will be consulted and asked to vouch for the suitability of the individual to be commemorated in this way. Consultation will require consideration of the reason for suggesting commemoration; the individual's good character; any outstanding achievements.

All suggestions for new street names for non-specific schemes which meet the Council's policy will be included in an annual report to the Cabinet Member for Transport.

The pre-approved list will be made available to developers with insufficient knowledge of the area of their development to make relevant suggestions.

#### 4.4. Recording of Street Name Decisions

Street naming is an executive function of the Council and all reports and background papers must be available for inspection at the Authority offices and on the Authority website with the exception of private reports. Decisions will be available for public inspection on the Council's website.

As soon as practicable after a SNN decision is taken by an Officer with delegated authority from the executive, the Officer must produce a written record of the decision containing the date, the decision taken, reasons, details of any alternatives considered and rejected and whether any elected member has declared a conflict of interest.

Written records of decisions and reports that must be available for public inspection must be retained in perpetuity.

### 5. Property numbering

#### 5.1. Property Numbering Policy

**Birmingham City Council uses the Data Entry Convention (DEC) to BS 7666-2:2006 for Addressing in discharging its powers and duties to number properties. The contents of the National Best Practice for Street Naming and Numbering will also be incorporated in Birmingham's practices as it is released.**

**All new properties, regardless of use, must be numbered by the Council. This includes new build properties and conversions of existing property; residential, commercial and industrial.**

**All properties will be numbered into the street last used to gain access to the main entrance. Numbers will be allocated incrementally according to the location of the new property on that street. Infill development will be allocated numbers in sequence with the existing properties surrounding them. Where necessary suffixes will be used.**

**Buildings in a single use will be given a number (the Primary Address) and a street name.**

**Buildings which are split internally for separate uses or separate occupiers will be subject to numbering of the self-contained units within the building (the Secondary Address), with reference to the (Primary Address) number of the building into the street.**

### 5.1.1. Numbering Sequences

Generally properties along a street will be allocated odd numbers on the right, even numbers on the left unless numbering in the immediate vicinity differs from this rule. Numbering will commence at the start of the street. The start of the street is considered to be:

- at its junction with a street;
- or if the street runs between two existing streets, at the more major of those streets;
- or if both streets are of equal importance then at the end of the street closest to the nearest town centre

Numbers will only be dropped to allow for future potential development.

Properties on a cul-de-sac may be numbered consecutively if there are fewer than 10 properties and no scope for future development from the cul-de-sac.

Where the existing retained numbering is consecutive, this pattern will be reflected in new numbering on the same street.

## 5.2. Property Numbering Procedure

### 5.2.1. Applications

Applications may be made on an electronic form or a paper form and submitted electronically or by post.

Applications will be checked for completeness, compliance with policy and acknowledged. An expected date of supply of addresses will be given.

Numbering of properties onto a new or existing street, and numbering of sub-divisions of a building, is delegated to the Address Custodian and Team.

### 5.2.2. New-build developments

Numbering will be odds on the right, evens on the left.

Numbers may be dropped for future infill development.

Infill developments will be numbered in sequence with the surrounding properties. If there are insufficient numbers for the properties being built, suffixes will be used.

Certain letters will not be used for suffixes, i.e. I, J, L, O, Q, Z. Depending on the font used, these letters can be confused with numbers: 1, 0 and 2

Where the use of suffixes is deemed excessive or confusing alternative identification of properties will be considered.

### 5.2.3. Flats and Apartments

Where a new block of flats is constructed, the building will be allocated a number to the street and the internal flats will be numbered in a logical manner according to the layout of the building. Numbering on the ground floor will commence at the main entrance. On upper floors numbering will commence at the main stair core. Where certain floors are accessible by a secondary stair core only, numbering will commence from this stair core.

Where the building contains a single continuous corridor flats will be numbered to the right and left in order of approach.

Where there are multiple internal corridors numbering will begin from the main entrance or the main stair core and proceed clockwise around the corridors.

Where a block of flats has multiple entrances, each entrance having separate corridors then each entrance will be numbered separately, and the flats accessed therefrom will be addressed into this door number.

Where a building has multiple entrances but continuous corridors then the main entrance will be numbered, and all flats addressed into this door number.

Flats may be addressed with the prefix of Flat or Apartment and be consistent within the building and/or development. Studio and Penthouse are to be avoided.

#### 5.2.4. Commercial buildings.

Commercial buildings must be subject to numbering.

Numbering sequences will be as per residential premises. Where commercial premises have an entrance directly to a street, they will be allocated a number into that street. If there are insufficient numbers within the existing sequence suffixes will be used.

Where premises are subdivided internally a logical numbering sequence will be applied according to the internal layout of the building and the order in which units are approached

#### 5.2.5. Industrial buildings

Industrial buildings must be allocated a number onto a street.

It is not acceptable for industrial buildings to be addressed by the occupier's name alone.

#### 5.2.6. Public Buildings

Where possible new public buildings will be allocated a number to the street. Where no appropriate number is available or use of a number would cause confusion, the building will be named. This will include schools, places of worship, leisure facilities and other public buildings.

#### 5.2.7. High-Rise buildings

Buildings containing more than 10 self-contained units on one floor and are more than five storeys high may be numbered hotel style: e.g. on the ground floor would be flats G1 to G12; on the first floor, flats 101 to 112 ; on the second floor, flats 201 to 212 etc.

#### 5.2.8. Building Conversions

Building conversions will be numbered internally in a logical manner according to circulation within the building and the order in which the individual units are approached. In buildings containing a single internal corridor, units will be numbered to the right and left in the order they are reached. Where there are multiple internal corridors units may be numbered circulating clockwise in the order units are reached.

Units may be addressed with the prefix of Flat, Apartment, Unit, Studio (commercial use), or Suite (commercial use) and be consistent within the building and/or development.



### 5.2.9. Naming of Buildings

In rare circumstances buildings may be allocated a name but must always include the number in addressing. Where a name is required this must be submitted with the application. For example, the official address of The Rotunda is

The Rotunda, 150 New Street, Birmingham.

Where all existing properties on a street have names and no numbers, then a name only may be considered. However, numbers will always be offered and are recommended for use. In rare instances there is little documentation of early addressing and the original numbering pattern maybe obscured by later unofficial additions. In rare cases it may be necessary to issue a name only, but every attempt will be made to issue a number.

Names of buildings should have a link which has an historical, geographical, or cultural to link to the area. Buildings should not be named after living people.

Building names must not include punctuation or promote commercial purposes.

## 5.3. Recording of Numbering Decisions

Numbering is an executive function of the Council and all reports and background papers must be available for inspection at the Authority offices and on the Authority website with the exception of private reports. Decisions will be available for public inspection on the Council's website.

As soon as practicable after a SNN decision is taken by an Officer with delegated authority from the executive, the Officer must produce a written record of the decision containing the date, the decision taken, reasons, details of any alternatives considered and rejected and whether any elected member has declared a conflict of interest.

Written records of decisions and reports that must be available for public inspection must be retained in perpetuity.

## 6. Fees

Fees will be charged for applications and reviewed annually. Our existing fees can be found [here](#).



## Appendix C- Draft Street Naming & Numbering Policy

### Results of Consultation with Councillors

All Local Ward Councillors were approached regarding the draft policy for Street Naming and Numbering on 13<sup>th</sup> June 2022 and responses to the consultation document were requested by 26<sup>th</sup> June 2022. The following points were drawn to Councillors' attention

### CHANGES TO POLICY

Proposed Policy change	Reasons for change
1. Where a street is to be named after a person no longer living this cannot be introduced within 25 years of that person's death.	<p>Current BCC policy does not apply a time limit, however due to rare but notable occurrences of reputational damage National Policy now recommends a delay of 50 years following a person's death.</p> <p>This limits consideration of names of influential members of Birmingham's more recently settled communities. To promote good relations between people with certain protected characteristics and other groups, it is proposed to introduce a procedure under which names of people can be considered much sooner.</p> <p>For specific development sites it is proposed that someone should have been deceased 25 years or more before considering use of their name as a street name.</p> <p>Names may be considered at an earlier date for inclusion in a list of names for non-specific schemes. This allows additional time for the local Ward Councillor to consider the application and vouch for the person.</p> <p>Applicants will be required to submit full identification details and research to back their application</p>
2. Street name suffixes will be applied according to the Oxford English Dictionary definition unless the name is in a foreign language or there is a cultural reason for the naming of the street in which case the relevant translation will be considered	<p>BCC is the largest Council in the country and there is often difficulty in finding a unique name for a street.</p> <p>A developer may have limited knowledge of the site location and use obvious features such as trees on the site for the street names. Birmingham already has 26 streets which include "OAK" in the name and such suggestions are discouraged.</p> <p>Suffixes such as Road, Lane and Close are common and need little interpretation but there can be a difference in opinion about the applicability of such terms as Boulevard, Court, Rise etc.</p>

	<p>The National Code of Practice proposes a list of acceptable suffixes and where each can be used.</p> <p>Use of the Oxford English Dictionary or relevant source allows BCC to reflect current trends, new communities and expand the range of suffixes in use for street names, whilst reflecting the nature of a throughfare.</p>
3. Applications for naming a street after a person no longer living will be delegated to the Assistant Director Transport & Connectivity	This is in line with applications for renaming of an existing street, brings overall policy into alignment and allows efficient processing of applications within the statutory time limit of 1 month.
4. Numbers will only be dropped to allow for future potential development.	<p>Current policy allows for the number 13 to be dropped in numbering sequences due to cultural practice. Other cultures have similar suspicions about a variety of numbers which are not currently represented in the policy.</p> <p>More numbers could be dropped from numbering sequences, but it would be difficult to maintain full reflection of our changing communities and this would lead to incomplete and changing numbering sequences over time.</p> <p>To avoid this possibility, it is proposed to revert to the use of all numbers in sequence (generally odds on the right and evens on the left) to ensure that properties can be located quickly and easily by the emergency services, visitors and delivery personnel. Whilst this removes a small element of cultural reflection, it is equal in its application to all Birmingham's groups.</p>

Comments are invited on the proposed policy revisions 1 to 4 above, particularly in relation to inclusivity.

continued

The following responses were received:

Response from	Comment	Date	Response	Date
Cllr Ian Ward	Happy with proposed changes	15/06/2022		
Cllr Mary Locke	May I share with residents' forum?	15/06/2022	Cllr Locke may forward the consultation to the Residents' Forum but no comments were received	15/06/2022
Suwinder Hundall obo Peter Bishop	Does this relate to new or existing street names?	24/06/2022	The policy refers to new street names, not existing streets  Documents shared	24/06/2022 04/07/2022
Cllr NarinderKaur Kooner	Can I suggest 'Khalsa Avenue' as a road name in Handsworth Wood as we have a high population of Sikhs in the Handsworth Wood ward?	22/06/2022	Details of information required to submit a persons' name for consideration for inclusion in the approved list of street names were supplied	18/07/2022
Cllr Waseem Zaffar via Phil Edwards	Question: naming a road after someone who has passed away at least 25years ago makes it difficult to name roads more reflective of significant BAME figures in the city? If this was the case, we would not have been able to name the 'Bert Carless' road in PB?	15/06/2022	A process to consider proposed names after people recently passed away for inclusion on the approved list of street names has been included in the new proposed policy	16/06/2022

The report was placed before Corporate Leadership Team on 25<sup>th</sup> July. Further consideration was requested in the light of the "Everyone's Battle, Everyone's Business" initiative; and improved guidance on identifying names which were unsuitable as street names. Guidance is being developed to incorporate these elements in the procedural areas of the Policy and will be circulated to appropriate Council Management and Leaders.



Title of proposed EIA *	<div>Street Naming and Numbering policy</div> <div>Please provide the title of your policy or service area.</div>
Reference No	<div>EQUA896</div> <div>Please do not amend. A reference number will automatically be applied once the form is saved.</div>
EA is in support of *	<div>Amended Policy</div>
Review Frequency *	<div>Two Years</div> <div>Please select how regularly you plan to review the assessment.</div>
Date of first review *	<div>01/06/2024</div> <div>Based on the review frequency, please enter the date when your first review will take place.</div>
Directorate *	<div>Inclusive Growth</div>
Division	<div>Transport &amp; Connectivity</div>
Service Area	<div>Property &amp; Technical Development</div> <div>Please add if applicable</div>
Responsible Officer(s) *	<div>Julie Kavanagh x</div> <div>This is the person responsible for completing, submitting and reviewing the assessment. If you get the message 'The user does not exist or is not unique'. Please enter the full email address.</div>
Quality Control Officer(s) *	<div>Jaswinder Gandham x</div> <div>This is the person responsible for checking the quality of the assessment. If you get the message 'The user does not exist or is not unique'. Please enter their full email address.</div>
Accountable Officer(s) *	<div>Philip Edwards x</div> <div>This is the person responsible for making the final decision on the EIA and the policy, plan, procedure etc. If you get the message 'The user does not exist or is not unique'. Please enter their full email address.</div>
Purpose of proposal *	<div>To review the process of naming new streets and addressing proper</div>
Data sources	<div><div><div><input type="checkbox"/> Survey(s)</div><div><input checked="" type="checkbox"/> Consultation Results</div><div><input type="checkbox"/> Interviews</div><div><input checked="" type="checkbox"/> relevant reports/strategies</div><div><input type="checkbox"/> Statistical Database (please specify)</div><div><input type="checkbox"/> relevant research</div><div><input type="checkbox"/> Other (please specify)</div></div><div>What sources of data have been used to produce the screening of this policy/proposal? (Please tick all that apply)</div></div>
Please include any other sources of data	<div>National Code of Practice for Street Naming &amp; Numbering</div>
ASSESS THE IMPACT AGAINST THE PROTECTED CHARACTERISTICS	<div></div> <div>Include how any potential negative impact be removed or mitigated.</div>
Protected characteristic: Age *	<div><div><div><input type="checkbox"/> Service Users / Stakeholders</div><div><input type="checkbox"/> Employees</div><div><input type="checkbox"/> Wider Community</div><div><input checked="" type="checkbox"/> Not Applicable</div></div><div>Please select those directly impacted or affected.</div></div>
Age details:	<div>No impact</div>



For the selected characteristics, please add further details. Describe the potential positive and negative impact of the policy or service and how any negative impacts will be mitigated. Describe who is affected, how they are affected and any additional comments.

Protected characteristic: Disability \*

- ☐ Service Users / Stakeholders
- ☐ Employees
- ☒ Wider Community
- ☐ Not Applicable

Please select those directly impacted or affected.

Disability details:

Potential to improve relations between people with a disability and those with no disability due to the naming of street after a person no longer living who belonged to this group.

For the selected characteristics, please add further details. Describe the potential positive and negative impact of the policy or service and how any negative impacts will be mitigated. Describe who is affected, how they are affected and any additional comments.

Protected characteristic: Sex \*

- ☐ Service Users / Stakeholders
- ☐ Employees
- ☐ Wider Community
- ☒ Not Applicable

Please select those directly impacted or affected.

Gender details:

No impact envisaged

For the selected characteristics, please add further details. Describe the potential positive and negative impact of the policy or service and how any negative impacts will be mitigated. Describe who is affected, how they are affected and any additional comments.

Protected characteristics: Gender Reassignment \*

- ☐ Service Users / Stakeholders
- ☐ Employees
- ☐ Wider Community
- ☒ Not Applicable

Please select those directly impacted or affected.

Gender reassignment details:

No impact envisaged

For the selected characteristics, please add further details. Describe the potential positive and negative impact of the policy or service and how any negative impacts will be mitigated. Describe who is affected, how they are affected and any additional comments.

Protected characteristics: Marriage and Civil Partnership \*

- ☐ Service Users/ Stakeholders
- ☐ Employees
- ☐ Wider Community
- ☒ Not Applicable

Please select those directly impacted or affected.

Marriage and civil partnership details:

No impact envisaged

For the selected characteristics, please add further details. Describe the potential positive and negative impact of the policy or service and how any negative impacts will be mitigated.

Protected characteristics: Pregnancy and Maternity \*

- ☐ Service Users / Stakeholders
- ☐ Employees
- ☐ Wider Community
- ☒ Not Applicable

Please select those directly impacted or affected.

Pregnancy and maternity details:

No impact envisaged

For the selected characteristics, please add further details. Describe the potential positive and negative impact of the policy or service and how any negative impacts will be mitigated. Describe who is affected, how they are affected and any additional comments.

Protected characteristics: Race \*

- ☐ Service Users / Stakeholders
- ☐ Employees
- ☒ Wider Community
- ☐ Not Applicable

Please select those directly impacted or affected.

Race details:

Potential to improve relations between people of a given race and those of other races due to the naming of street after a person no longer living of that race.

For the selected characteristics, please add further details. Describe the potential positive and negative impact of the policy or service and how any negative impacts will be mitigated. Describe who is affected, how they are affected and any additional comments.

Protected characteristics: Religion or Beliefs \*

- ☐ Service Users / Stakeholders
- ☐ Employees
- ☒ Wider Community
- ☐ Not Applicable

Please select those directly impacted or affected.

Religion or beliefs details:

Potential to improve relations between people of a religion or belief and those not of that religion or belief due to the naming of street after a person no longer living who belonged to this group.

For the selected characteristics, please add further details. Describe the potential positive and negative impact of the policy or service and how any negative impacts will be mitigated. Describe who is affected, how they are affected and any additional comments.

Protected characteristics: Sexual Orientation \*

- ☐ Service Users / Stakeholders
- ☐ Employees
- ☐ Wider Community
- ☒ Not Applicable

Please select those directly impacted or affected.

Sexual orientation details:

No impact envisaged

For the selected characteristics, please add further details. Describe the potential positive and negative impact of the policy or service and how any negative impacts will be mitigated. Describe who is affected, how they are affected and any additional comments.

Socio-economic impacts

The clear and unambiguous addressing of properties enables emergency services to locate properties quickly which has been proven in certain circumstances to save lives.

Residents and property owners can verify their address on-line to access public and private sector services efficiently and often at lower cost.

Unique addressing makes it more difficult to use an incorrect address for fraudulent purposes

Please indicate any actions arising from completing this screening exercise.

When naming new, and renaming existing streets, the relevance of that name to people with protected characteristics will be considered to ensure that negative effects are avoided

Please indicate whether a full impact assessment is recommended

NO ▼

If yes, please continue to complete the remaining questions. If no, please go to the quality control section below.

What data has been collected to facilitate the assessment of this policy/proposal?

There is no data available on the negative effects of naming of streets

What are the main findings from the analysis of the data?

Consultation analysis

Councillors are being consulted on the draft policy and amendments will be made in accordance with relevant comments.

Who was consulted, what are the results of the consultation exercise?

Adverse impact on any people with protected characteristics.

No adverse impact is anticipated

Based on the analysis of the data does the policy/proposal have any adverse impact?

Could the policy/proposal be modified to reduce or eliminate any adverse impact?

None anticipated

Can the policy/proposal be modified to reduce or eliminate any adverse impact? on any particular group(s)?

How will the effect(s) of this policy/proposal on equality be monitored?

Annual report to the Cabinet Member for Roads and Transport to consider additional suggestions for new street names

What data is required in the future?

Suggested names for new streets, whether accepted or rejected

03/10/2022, 09:36	Assessments - Street Naming and Numbering policy
	<div></div> <div>Please describe the data needed to ensure effective monitoring of this policy/proposal?</div> <div><input type="checkbox"/></div> <div>No</div>
Are there any adverse impacts on any particular group(s) If yes, please explain your reasons for going ahead.	
Initial equality impact assessment of your proposal	<div>The revised policy includes a process for the early consideration of use of the name of people no longer living as a new street name, in deviation from the national Code of Practice. The purpose of this is to enable members of Birmingham's more recently settled communities to commemorate celebrated members and promote good relations between that community with others which do not share the protected characteristics.</div>
	<div>Please give details on any initial assessment carried out. For a full assessment please complete the rest of the form. AS OF 29/11/2018 YOU ARE NO LONGER REQUIRED TO COMPLETE THIS BOX.</div>
Consulted People or Groups	<div>Councillors</div>
	<div>AS OF 29/11/2018 YOU ARE NO LONGER REQUIRED TO COMPLETE THIS BOX</div>
Informed People or Groups	<div></div>
	<div>AS OF 29/11/2018 YOU ARE NO LONGER REQUIRED TO COMPLETE THIS BOX</div>
Summary and evidence of findings from your EIA *	<div>The revised policy includes a process for the early consideration of use of the name of people no longer living as a new street name, in deviation from the national Code of Practice. The purpose of this is to enable members of Birmingham's more recently settled communities to commemorate celebrated members and promote good relations between that community with others which do not share the protected characteristics.</div>

Please add any documents including any consultation or engagement findings. Attach any source data using the attachment button above. Please include how you will mitigate against any negative impacts.

☐

Please tick this box and 'Save' the document once you have finished. Your nominated Quality Control Officer will be notified to review the assessment and decide whether it can proceed for approval or reject it.

Please untick 'Submit to quality control officer box' before saving.

Proceed for final approval ▼

IMPORTANT: Quality Control Officer - Please untick the above box 'Submit to the Quality Control Officer for reviewing?' before providing your decision.

☒

Quality Control Officers only - Please tick the box when you are happy for the assessment to be submitted for approval.

Approve ▼

IMPORTANT: Accountable Officer - Please untick the above box 'Submit draft to Accountable Officer' before providing your final decision.

30/09/2022 

☒

QUALITY CONTORL SECTION

Submit to the Quality Control Officer for reviewing?

Quality Control Officer comments

Decision by Quality Control Officer

Submit draft to Accountable Officer?

Decision by Accountable Officer

Date approved / rejected by the Accountable Officer

Reasons for approval or rejection

Please print and save a PDF copy for your records

Version: 63.0

Created at 14/04/2022 04:53 PM by ☐ Julie Kavanagh

Last modified at 03/10/2022 08:53 AM by Workflow on behalf of ☐ Janet L Hinks

Save

Cancel



# Street name with properties

2

Application forms

Information required

Application channels

Receive and validate application

Application rules

Validate and recommend new street name

Street name validation rules

Approval process

Governance rules

Approve

Governance rules

Allocate property numbering sequence or property name

Property number name validation rules

Issue approved document

Governance rules

Output channels

Governance rules



geoplace.co.uk

## Application forms

- Comply with the SNN Code of Practice and should include the following required information: contact name, contact address, contact e-mail address, telephone number, type of application, type of development, location of development, location/layout plan, planning reference number and the suggested street names.
- Should be available and accessible on authorities website

## Application channels

- Completed application forms can be submitted by various means including online forms, direct e-mail, telephone, post and social media.

## Receive and validate application

- Validate applications in line with your authority's timescales policies. Applications should be validated against all required information, appropriate planning approvals and building regulations.
- Reject application if information is missing

## Validate suggested street name or recommend new street name

- Validate suggested street name against SNN Code of Practice (includes duplication, living people, awkward spelling or pronunciation problems, rude names, construed as marketing/advertising etc) including appropriate street name suffixes.
- Validate suggested street name against authority's policies and governance process.
- Identify required location of street name plate in accordance with SNN Code of Practice.
- Advise applicant if street name rejected and negotiate/suggest appropriate alternative.
- If no street name is suggested recommend to the applicant appropriate street name that complies with SNN Code of Practice and authority's policies.

## Approval process

- Seek approval for validated/recommended street name. Approval should include any consultation processes contained in the Code of Practice and/or adopted under your authority's governance process.
- Any objections should only be made in accordance with SNN Code of Practice and authority's street naming policies.
- Any alternative suggested street name should comply with the SNN Code of Practice and authority's policies.
- Advise applicant if validated/recommended street name is rejected. Negotiate alternative suggested street name.

## Approve

- Document formal approval decision in accordance with your authority's governance process.
- Approval documents can include delegated decisions or Cabinet/Committee reports and should comply with the SNN Code of Practice. They should include document title, matter, type and location, development name, approved street name, reason for street names, plan of new street names or renaming of existing street, decision, date decision taken, file/document reference number, place of inspection and signature, name and date of approving officer.

## Allocate property numbering sequence or property name

- Allocate property numbering sequence in accordance with the SNN Code of Practice. This should include numbering on the street that provides the main pedestrian entrance, odds on the left and evens on the right, consecutive numbering in a clockwise direction for small cul-de-sacs etc.
- When it is not possible to allocate a property numbering sequence, validate any suggested property names against SNN Code of Practice (includes duplication, duplication with street names, awkward spelling or pronunciation problems, rude or misleading names, construed as marketing/advertising etc).
- Advise applicant if property name rejected and negotiate/suggest appropriate alternative.
- If no property name is suggested recommend to the applicant appropriate property name that complies with SNN Code of Practice and authority's policies.

## Approved allocation document

- Produce street name approved allocation document in accordance with the SNN Code of Practice. Document should include document title and date, applicant, development name (if applicable), approved street name, plan of new street name or renaming of existing street (includes location of required street name plates), specification of street name plates and File/document reference number.
- Produce property numbering sequence and/or property naming allocation document in accordance with the SNN Code of Practice. Document should include document title and date, applicant, development name (if applicable), plot to property number/name table or list, plan of plot to property number/name (including internal plans for properties), and File/document reference number.

## Output channels

- Issue approved allocation document by various means including direct e-mail, telephone, post, social media and online portal.

**Recommended street names (text is verbatim from proposer)**  
**(Names are struck through when taken into use)**

<b>Submission Date</b>	<b>Suggested name</b>	<b>Area</b>	<b>Historical connection</b>	<b>Cultural connection</b>	<b>Geographical connection</b>
22/05/2006	Denso Street	Acocks Green	Named the street after the building that was there for years.	It employed all sorts of people.	You could find your way using Denso as a landmark.
26/05/2009	Thomas George Turrall	Aston	Thomas Turrall was born in Aston	The last Birmingham born man to have won the Victoria Cross.	A son of this great city went to war and won the highest award for bravery.
10/06/2009	Doyle Drive	Aston	Sir Arthur Conan Doyle lived on Aston Road at one time and based certain characters on other Aston & Birmingham residents.	He was the founding father of the branch of English literature known as Detective Fiction.	Any new development near to his home could include a close in his honour as he will have wondered the area planning his narratives.
11/06/2009	Sandycliff Lane	Balsall Heath			A majority of the roads near where I live are named after costal towns and seaside areas such as Brighton Road, Newport Road etc. I haven't been able to find out exactly why this style was used but I like to think that when the road names were decided, these towns were thought of as distant and appealing in terms of 'going away', 'fresh air' and so on. I chose Sandycliff Lane just because of the seaside connection and the fact that it evokes peace and calm.

**Recommended street names (text is verbatim from proposer)**  
**(Names are struck through when taken into use)**

<b>Submission Date</b>	<b>Suggested name</b>	<b>Area</b>	<b>Historical connection</b>	<b>Cultural connection</b>	<b>Geographical connection</b>
28/05/2009	Carlton Road	Balsall Heath/ Sparkbrook	Carlton Cinema was bombed in WWII. Some people were killed. UB40 and other local bands played there before it was demolished.	It has local community significance. The Peace Memorial' is important to remember past and present situations of war for all our cultures.	It is relevant to the particular site nearby local streets.
12/06/2009	<del>Berchelai Grove</del>	<del>Bartley Green</del>	<del>Bartley Green was first noted in the Domesday Book of 1086 as Berchelai, this means either the birch tree wood or the clearing in the birch trees. Bartley woods still exists today.</del>		
29/05/2009	<del>Cocoa Corner</del>	<del>Bournville</del>	<del>Cocoa beans, used in the production of both chocolate and coffee.</del>	<del>We all love chocolate.</del>	<del>Cadbury World is in the vicinity</del> NB Cocoa Way allocated to new road but renamed as Oakville Drive for marketing purposes
09/06/2009	James Brindley Drive	Canals in Ladywood	James Brindley was famous for his canal building and the construction of the first major English canal.		

**Recommended street names (text is verbatim from proposer)**  
**(Names are struck through when taken into use)**

<b>Submission Date</b>	<b>Suggested name</b>	<b>Area</b>	<b>Historical connection</b>	<b>Cultural connection</b>	<b>Geographical connection</b>
23/05/2009	Tolkien Road <i>NB. Contact has been made with the Tolkien Society/Tolkien Estate regarding permission to use the name. Before this can be allocated to a new road they will want to be consulted to ensure that this name is used on an appropriate development.</i>	Cotteridge, Birmingham			
10/07/2009	William Slim	Edgbaston	William Slim, 1st Viscount Slim, was one of the most successful generals of WWII and lived opposite 146 Poplar Avenue.		

**Recommended street names (text is verbatim from proposer)**  
**(Names are struck through when taken into use)**

<b>Submission Date</b>	<b>Suggested name</b>	<b>Area</b>	<b>Historical connection</b>	<b>Cultural connection</b>	<b>Geographical connection</b>
29/05/2009	<del>Sir Arthur Steel-Maitland Street</del>	Erdington	<del>Sir Arthur Steel-Maitland was the first member for the Erdington division and held the seat until 1929. He was elected member of Parliament for Birmingham East and a Minister in Lloyd-George's government.</del>		NB: Arthur Way and Steel Maitland Avenue allocated to new roads
10/06/2009	<del>Mothers Street</del>	Erdington	<del>Named after the great music venue in Erdington (1968-1971). My dad says it was one of the best clubs in the country in its time.</del>		NB Mothers Grove allocated to new road

**Recommended street names (text is verbatim from proposer)**  
**(Names are struck through when taken into use)**

<b>Submission Date</b>	<b>Suggested name</b>	<b>Area</b>	<b>Historical connection</b>	<b>Cultural connection</b>	<b>Geographical connection</b>
09/06/2009	Tolkien Way <i>NB. Contact has been made with the Tolkien Society/Tolkien Estate regarding permission to use the name. Before this can be allocated to a new road they will want to be consulted to ensure that this name is used on an appropriate development.</i>	Hall Green	It's historically relevant because Tolkein grew up in the area.		



**Recommended street names (text is verbatim from proposer)**  
**(Names are struck through when taken into use)**

<b>Submission Date</b>	<b>Suggested name</b>	<b>Area</b>	<b>Historical connection</b>	<b>Cultural connection</b>	<b>Geographical connection</b>
26/05/2009	Tolkien Road <i>NB. Contact has been made with the Tolkien Society/Tolkien Estate regarding permission to use the name. Before this can be allocated to a new road they will want to be consulted to ensure that this name is used on an appropriate development.</i>	Hall Green	J R R Tolkein spent much of his boy hood in Birmingham	Tolkein's books are famous around the world but as far as I know, there is no street named after him in Birmingham	He spent most of his time in Hall Green, close to Sarehole Mill, which featured as 'Sandymans Mill' in 'The Hobbit' and he was educated in Edgbaston.
17/07/2009	Sarehole  <i>Sarehole Croft has been used off Thirlmere Drive, B13</i>	Hall Green/Moseley	Its unique to Birmingham and it has links to our industrial heritage. It still has tangible connections within the city.		
09/06/2006	Invention Avenue	Handsworth	<del>Highlights the role of the area as the cradle of the manufacturing revolution.</del>		<i>NB Allocated to new road</i>
09/06/2009	<del>Willow Avenue</del>	<del>Handsworth Wood</del>	<del>This used to be a wood.</del>		<i>Already In use since 2007 in Harborne Ward</i>

**Recommended street names (text is verbatim from proposer)**  
**(Names are struck through when taken into use)**

<b>Submission Date</b>	<b>Suggested name</b>	<b>Area</b>	<b>Historical connection</b>	<b>Cultural connection</b>	<b>Geographical connection</b>
22/05/2009	<p>Olaudah Equiano</p> <p>Equiano Place has been used.</p> <p>Olaudah is still available.</p>	Handsworth/Perry Barr	Equiano along with the great industrialists, Boulton and Watt, Played a role in the abolition of the slave trade. Bolton and Watt both lived in Handsworth and provided employment for local people and inventions that received world renown.	Boulton and Watt worked with Equiano for the abolition of the slave trade and the coming years saw Handsworth inhabited by the descendants of emancipated persons. Emancipation is a human right and freedom is achieved through education. This is especially relevant how Africans and Caribbean's came to live in Handsworth and contribute to the countries economy.	Matthew Boulton's abode exists on Soho Avenue within the ward of Soho and James Watt was his neighbour living in Heathfield Park. Equiano, a former slave, has a resonance with descendants of Africans and Caribbeans and his name should be made in indelible and be remembered for all his achievements. NB Allocated to new road
10/06/2009	<del>Kendrick Grove</del>	Harborne/Grove Park	<del>Grove Park was owned by the Kendrick Family and I believe they bequeathed it to the city.</del>	<del>Its named after the family. I do not believe there is another street named after them in the area.</del>	<del>It's in Harbourne, which encompasses Grove Park.</del> NB Allocated to new road
28/05/2009	Vegan Way	Jewellery Quarter, Ladywood	The Vegan Society has recently moved to Birmingham and has celebrated it's 60th anniversary in recent years. Also the first vegetarian hotel was located in the UK over one hundred years ago.	Birmingham and the West Midlands have recently hosted the UK's first Veggie Pride as well as regional fairs. Famous local vegans include Benjamin Zephaniah and Macca B.	The Vegan Society is located in the Jewellery Quarter.

**Recommended street names (text is verbatim from proposer)**  
**(Names are struck through when taken into use)**

<b>Submission Date</b>	<b>Suggested name</b>	<b>Area</b>	<b>Historical connection</b>	<b>Cultural connection</b>	<b>Geographical connection</b>
11/06/2009	Birds Road	Ladywood	Alfred Bird registered as a pharmacist in Birmingham in 1842.		
17/07/2009	Newark View	Ladywood or near to the airport			The name relates to Birmingham's status as an international city and links with Newark, New York. The name will complement any new streets created through the Big City Plan. NB Allocated to new road
10/06/2009	Wizard's Walk			The wizard refers to J.R. Tolkien's books and Tolkien was a resident of Moseley.	NB Allocated to new road
22/05/2009	Chocolate Road	Northfield			
22/05/2009	Graham Warren Way	Perry Barr	A true sporting legend well worthy of being remembered	Speedway has been one of the cornerstone sports of Perry Barr since 1928 and is engrained into the culture of the area.	Speedway has its roots at what was the 'old' Greyhound Stadium back in 1928. NB Allocated to new road
26/05/2009	Molyneux Road	Perry Barr	Named after John Molyneux who owned Perry Hall Mansion in 1473.		
26/05/2009	Deutch Way	Perry Barr	Named after Oscar Deutch who opened the first ever Odeon Cinema in Perry Barr.		

**Recommended street names (text is verbatim from proposer)**  
**(Names are struck through when taken into use)**

<b>Submission Date</b>	<b>Suggested name</b>	<b>Area</b>	<b>Historical connection</b>	<b>Cultural connection</b>	<b>Geographical connection</b>
27/05/2009	East/West Works Way or Rover Road <i>Note: West First Street/Road, West Second Street and West Third Street/ Road are currently reserved for developments in Longbridge</i>	Rubery/ Northfield			Ideally near the proposed Rover Museum.
17/06/2009	Castellum Way	Selly Oak	Castellum is the Latin word for 'Fort' and this has historical significance to the area because of the archaeological remains of the Roman Fort that now lies under the hospital and university.		
15/06/2009	Battery Drive	Selly Oak	Name honours the existence of the battery factory in Selly Oak and the Battery Works Building that was recently demolished.		

**Recommended street names (text is verbatim from proposer)**  
**(Names are struck through when taken into use)**

<b>Submission Date</b>	<b>Suggested name</b>	<b>Area</b>	<b>Historical connection</b>	<b>Cultural connection</b>	<b>Geographical connection</b>
22/05/2009	Lapal Lane	Selly Oak			The plan for the reopening of a small part of the Selly Oak to Lapal and Halesowen Canal is where I have taken the name from. NB Allocated to new road
09/06/2009	Macneice Street	Selly Park/Selly Oak	Irish poet Louis Macneice lived and worked in Birmingham for six years in the 1930's.	Macneice is a significant poet and some of his poetry directly draws on his experiences in pre war Birmingham.	Macneice lived in Selly Park whilst working at the university.
09/06/2009	The Timber Road/Way	Shard End/Hodge Hill	Its woodland area. The area already has streets named Pear Tree Road and Alderpits Road.		NB Allocated to new road
26/05/2009	Natures Way	Sheldon			The name represents the Sheldon Country Park and all the greenery, nature and animals there. NB Allocated to new road
01/06/2009	Merrick Road	Small Heath	In honour to the well know Blues keeper.		
31/05/2009	Attwood	Sparkbrook/Hall Green	Thomas Attwood (6th oct 1783 - 9th Mar 1859), was a British economist and his statue was erected in Larches Park, between Larches Street and Turner Street in Sparkbrook.	Attwood' is the surname of Thomas.	Sparkbrook is the area where Thomas Attwood's statue was erected.

**Recommended street names (text is verbatim from proposer)**  
**(Names are struck through when taken into use)**

<b>Submission Date</b>	<b>Suggested name</b>	<b>Area</b>	<b>Historical connection</b>	<b>Cultural connection</b>	<b>Geographical connection</b>
29/05/2009	Amani	Sparkhill		Amani means 'together' or 'united' in Swahili. The Sparkhill ward is a good example of how people are coexisting together, despite their very different cultural origins.	
26/05/2009	Leyland Road	Washwood Heath	Car manufacturers have been based here for over 90 years, originating from Wolseley and now bearing the name Leyland DAF and has been a thriving working place for thousands of Birmingham residents. I think to have a road named after it would be a great achievement for the many of people who have passed through its doors over the years and have been proud to work there.		
22/05/2009	De Somery Street	Weoley Castle/ Northfield	Weoley Castle which was a fortified manor house that was altered by Roger De Somery and his son after 1264.		The remains of Weoley Castle are present in the area.

**Recommended street names (text is verbatim from proposer)**  
**(Names are struck through when taken into use)**

<b>Submission Date</b>	<b>Suggested name</b>	<b>Area</b>	<b>Historical connection</b>	<b>Cultural connection</b>	<b>Geographical connection</b>
22/05/2009	Norman Lane	Weoley Castle/ Northfield	Weoley Castle which was a fortified manor house that was altered by Roger De Somery and his son after 1264.		The Normans where present all over the Midlands and particularly in this area. With the Norman Church and the name Frankley itself. NB Allocated to new road
27/05/2009	Fifty Seven Street	Witton	The last team from this city won the FA Cup.		
<del>09/06/2009</del>	<del>Lyon Road</del>				
29/05/2009	Peel Road	Lawley Street/Ladywood	Robert Peels family, moved from Peelfold to fazeley then to Lawley Street, Birmingham. His statue is outside the police station on Pershore Road.	The police force.	
	<del>Aston Webb Boulevard</del>	<del>Selly Oak New Road</del>			<del>Road will open up views of University Great hall – designed by Aston Webb</del> NB Allocated to new road
	Hadrians Boulevard	Selly Oak New Road	With the Roman fort on the hospital site (i.e. Hadrians Wall)		
	Bournbrook Freeway	<del>Selly Oak New Road</del>			To reflect the geographical setting of the road and its relationship to the historic name of the valley in which it exists



**Recommended street names (text is verbatim from proposer)**  
**(Names are struck through when taken into use)**

<b>Submission Date</b>	<b>Suggested name</b>	<b>Area</b>	<b>Historical connection</b>	<b>Cultural connection</b>	<b>Geographical connection</b>
	Sir Richard Knowles Way		Sir Richard Knowles was council leader for many years. So I suggest his name should be used. You may abbreviate it to something like Knowles Way		
	<del>New Fosse Way</del>	<del>Hospital Link Road</del>	<del>Vincent Drive being the old roman road leading to the fort in the hospital grounds</del>		NB Allocated to new road
	Queen Elizabeth Way	Hospital Link Road	To Maintain the connection with the original naming of Birmingham's premier hospital by the present queen's mother		
	William Withering Way	Hospital Link Road	Local Medical and historical connection. Internationally known therapeutic discovery.		
	Hospital Highway	Hospital Link Road			
	<del>Heroes Way</del>	<del>Selly Oak/QE Hospital Area</del>	<del>Commemorate the armed forces casualties treated at Selly Oak Hospital</del>		



# Birmingham City Council

## Report to Cabinet

11<sup>th</sup> October 2022



**Subject:** **SEXUAL HEALTH SERVICE EXTENSION**

**Report of:** **Dr Justin Varney**  
**Director for Public Health**

**Relevant Cabinet Member:** **Cllr Mariam Khan - Health and Social**  
**Cllr Yvonne Mosquito - Finance and Resources**  
**Cllr Karen McCarthy - Children, Young People and Families**

**Relevant O & S Chair(s):** **Cllr Mick Brown - Health and Social Care**  
**Cllr Akhlaq Ahmed - Resources**  
**Cllr Kerry Jenkins - Education and Children's Social Care**

**Report author:** **Juliet Grainger/Sarah Feeley**  
**Email:** [Juliet.Grainger@birmingham.gov.uk](mailto:Juliet.Grainger@birmingham.gov.uk)  
[Sarah.Feeley@birmingham.gov.uk](mailto:Sarah.Feeley@birmingham.gov.uk)

Are specific wards affected?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No – All wards affected
If yes, name(s) of ward(s):		
Is this a key decision?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If relevant, add Forward Plan Reference: No. 010454/2022		
Is the decision eligible for call-in?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Does the report contain confidential or exempt information?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
If relevant, state which appendix is exempt, and provide exempt information paragraph number or reason if confidential:		

### 1 Executive Summary

- 1.1 The report is seeking approval to extend the current Sexual Health Service contract with University Hospitals Birmingham NHS Foundation Trust for a maximum period of 12 months to March 2024.

- 1.2 There are no further provisions to extend the contract, however several extenuating circumstances have impacted on BCCs ability to re procure the service by April 2023:
- 1.2.1 Covid recovery plans have continued to divert commissioning and NHS service capacity away from business-as-usual activity during 2022. The impact of this has delayed the completion of our joint needs assessment, strategy development and public and clinical consultation process with Solihull MBC. This was only completed at the end of July 2022.
- 1.2.2 Birmingham and Solihull Councils have historically, jointly commissioned the service. This partnership approach was also recently confirmed as part of local integrated care system arrangements. Solihull MBC subsequently received political approval to extend the contract to March 2024 to enable the system approach to recommissioning to continue.
- 1.2.3 Nationally and locally, there is also a significant amount of new policy direction and local strategic planning that will need to be translated confidently to develop sexual health services that can meet current and future priorities.
- The Birmingham and Solihull Sexual Health Needs Assessment 2021
  - The draft Sexual Health Strategy 2023 -2030 (Birmingham and Solihull)
  - Towards Zero: the HIV Action Plan for England - 2022 to 2025
  - Women's Health Strategy for England published July 2022
  - *\*<sup>1</sup>Proposed national Sexual and Reproductive Health Strategy/action plan to be published in 2022*
- 1.3 The report includes the findings from the consultation during May 2022 – July 2022 on the draft Birmingham and Solihull Sexual and Reproductive Health Strategy 2023 - 2030 that will inform our future commissioning
- 1.4 The report outlines the proposed sexual health commissioning timeline for assurance of continued service delivery and the aligned, proposed commissioning timetable.

## **2 Recommendations**

- 2.1 That Cabinet; -
- 2.1.1 Approves an extension to the Sexual Health contract with University Hospitals Birmingham NHS Foundation Trust for a maximum period of 12 months (1<sup>st</sup> April 2023 to 31<sup>st</sup> March 2024).
- 2.1.2 Delegates the approval of the Commissioning and Procurement Strategy for the future service provision to the Cabinet Members for Health and Social Care and Finance and Resources in conjunction with the Director of Public Health,

---

<sup>1</sup> \*To be announced

Assistant Director – Procurement, the Director of Council Management (or their delegate) and the Interim City Solicitor & Monitoring Officer (or their delegate).

- 2.1.3 Authorises the Interim City Solicitor (or their delegate) to conclude and enter all legal documents to give effect to the above.
- 2.1.4 Endorse the consultation findings and the application of these within the design and co-production of the future service model

### **3 Background**

- 3.1 The responsibility for commissioning Sexual Health Services transferred to the Local Authority on the 1 April 2013. The provision of Sexual Health Services is a condition of the Public Health Grant that is received into the Council.
- 3.2 Currently the Sexual Health Service is delivered by University Hospitals Birmingham NHS Foundation Trust (UHB) under a contract which commenced on 1<sup>st</sup> March 2015 and expires on the 31 March 2023.
- 3.3 Current annual value is £14,541,854 million which is made up of the scheduled contract payments, annual value £14,038,587 and additional payments for mandated HIV Pre-Exposure Prophylaxis (PrEP) related activity at £503,267 per annum.
- 3.5 A consultation on the draft sexual health strategy (**Appendix 3**) has just been completed and there are important areas of feedback from the community and professionals that we now need to take account of in the design of the future service. A full report was taken to Health and Wellbeing Board on 27 September. The extension period will provide the time required to ensure that services meet the needs of the local population as well as responding to the national policy and strategy drivers above.
- 3.6 Feedback on the vision and aims of the draft strategy highlighted that there were some potential gaps in terms of:
  - Mental health in relation to sexual health in the strategy
  - Equity of service provision across Birmingham and Solihull
  - Cultural awareness and access to services for new communities
  - Cross border issues in relation to commissioning and patient access
  - Being aware of older citizens and those in deprived areas being excluded through use of technology
  - Sex worker sexual health needs and access to services
  - Male sexual health issues; education, awareness raising and engagement
  - Inclusion of Cervical and Blood Borne Virus screening and Human papillomavirus (HPV) vaccination

- Locality delivery improvements, utilising and supporting primary care
- How the strategy is going to be funded, implemented, and monitored

3.7 Taking account of feedback on the draft strategy, and the national policy and strategies indicated in 1.2.3, further time is required for translation and implementation to ensure that services meet the future requirements.

3.8 In order to ensure that services continue to be delivered during the development of the new service model and that changes in local and national policy are understood, an extension of this current contract would enable the Council to be in a better position to go to market in 2023.

#### **4 Options considered and Recommended Proposal**

4.1 Do Nothing – do not extend the current services or procure, this would lead to a failure to provide services which are a condition of the Public Health Grant. This is not recommended.

4.2 Commission the market to deliver the outcomes within this financial year – with the national developments and outcomes expected, this could lead to the Council having procured a service that does not align with the national standards and outcomes. Alternatively, it would be a short contract term which is not financially viable for the Council or provider creating further instability in service provision.

4.3 Extend the current services and procure in 2023 for the contract to start in April 2024. Extending the current service contract will enable new policy direction and local strategic planning to be translated confidently to develop sexual health services that can meet current and future priorities. Important areas of feedback were also gained from the community and professionals as part of the sexual health strategy consultation between May – July 2022 that we now also need to take account of. Extension would also allow stability with consideration being given for a longer-term contract. This is the recommended proposal.

#### **5 Consultation**

5.1 The recommendation to extend the contract to allow for a revised commissioning strategy to be developed is supported by the Public Health Senior Management Team, and in the meeting on 29 June 2022 the proposed commissioning timeline was endorsed by the team.

#### **6 Risk Management**

6.1 The commissioning proposal has been developed through a robust project management programme that includes the management and identification of risks that are tracked as part of the project delivery.

6.2 To minimise the risk of possible challenge from the market a Voluntary Ante Ex-Transparency Notice (VEAT) would be issued to the market to inform them of the decision and proposed timeline for the future commissioning/procurement.

## **7 Compliance Issues:**

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

7.1.1 Birmingham is an aspirational city to grow up in

7.1.2 Birmingham is a fulfilling city to age well in

### **7.2 Legal Implications**

7.2.1 The Health and Social Care Act 2012 and associated regulations transferred the responsibility for public health from the NHS to local authorities from April 2013. Several key indicators in the Public Health Outcome Framework relate to these areas and it is likely that they will be assessed in terms of performance.

### **7.3 Financial Implications**

7.3.1 The cost of the proposed extension to the Sexual Health Contract will be funded through the Public Health Grant that is received by the Council. There is no additional funding required from the Council to support the extension of this contract.

7.3.2 The overall total value of the proposed 12-month extension would therefore be £14,541,854, which is the same as the current financial year. Breakdown as 3.3. The contract has no inflation.

7.3.3 The additional NHSE grant that commenced in 2020 - 2021 for HIV Pre-Exposure Prophylaxis (PrEP) was received within the main public health grant for 2022/2023. The intention is to extend both the main service and PrEP activity to March 2024 at the total value of £14,541,854

### **7.4 Procurement Implications**

7.4.1 There is no further delegated provision to extend the current contract, as the original extensions have already been utilised. The Sexual Health Contract commenced on 10 August 2015 with University Hospitals Birmingham and expired on the 31 August 2020. Subsequent extensions approved by Cabinet on 1 November 2019 and 27 July 2021 have brought the contract end date to 31 March 2023.

7.4.2 Regulation 72. (1) of the Public Contract Regulations provides that "Contracts and framework agreements may be modified without a new procurement procedure...in any of the following cases...(b) for additional works, services or supplies by the original contractor that have become necessary and were not included in the initial procurement, where a change of contractor... (ii) would cause significant inconvenience or substantial duplication of costs for the contracting authority, provided that any increase in price does not exceed 50% of the value of the original contract."

- 7.4.3 This circumstance complies with Regulation 72(1)(b)(ii) as set out in 7.4.2, the costs of the extension do not exceed the 50% tolerance. As set out in paras 3.4 – 3.9 above, there is a significant amount of uncertainty surrounding strategic direction for a sexual health service and to go to market in advance of this being resolved would present the Council with a real potential that services would be procured that do not align with the national standards and outcomes.
- 7.4.4 In accordance with the Council's new Procurement and Contract Governance Rules, the Waiver Procedure guidelines have been followed. This has enabled the recommendation for the extension of this contract to be brought to Cabinet. The Waiver Form is included at Appendix 4.
- 7.4.5 In addition, a Voluntary Ante Ex-Transparency Notice (VEAT) would be issued to the market to inform them of the decision and proposed timeline for the future commissioning/procurement.
- 7.4.6 In parallel with the proposal to extend current contract arrangements for a further 12 months to the 31 March 2024, consideration has been given to ensuring continuity of delivery of current services.
- 7.4.7 The indicative implementation plan for the commissioning and procurement is detailed below to demonstrate that this can be completed in the proposed extension period:

Activity	Proposed Dates
National Sexual and Reproductive Health Strategy Published	End 2022
Co-production with citizens and partners	January 2023 onwards
Market engagement to develop specification	March 2023
Commissioning and Procurement Strategy approved	April 2023
ITT and specification signed off	May 2023
Tender published to the market	July 2023
Evaluation Period	September 2023
Contract Award approved/awarded	October 2023
Mobilisation period	November 2023
Contract Start	1 <sup>st</sup> April 2024

- 7.4.8 The proposal for the procurement is via the open tender route to market. The proposed split for price, quality and social value is based on ensuring that the quality and provision provided would be able to meet the needs of our most vulnerable citizens whilst still maintaining value for money, therefore the split of 50% Quality, 30% Price and 20% Social Value.
- 7.4.9 It is proposed that Cabinet delegates the approval of the Commissioning and Procurement Strategy for the future service provision to the Cabinet Members for Health and Social Care and Finance and Resources in



conjunction with the Director of Public health, Assistant Director – Procurement, the Director of Council Management (or their delegate) and the Interim City Solicitor & Monitoring Officer (or their delegate) to enable the procurement of a new integrated model to be achieved within the advised timeline above.

7.4.10 Any formal guidance issued by the Department of Health and Social Care in connection with the new Provider Selection Regime will be considered when evaluating options for the future Procurement Strategy.

7.4.11 The contracts will continue to be managed by the Public Health Commissioning Team within the Adult Social Care Directorate. As part of the ongoing contract management the provider will be required to update their Social Value Action Plan to include new targets for their plan for a further year of service delivery.

## **7.5 Human Resources Implications**

7.5.1 None

## **7.6 Public Sector Equality Duty**

7.6.1 See **Appendix 1** Equality Impact Assessment

7.6.2 The requirements of Standing Order No. 9 in respect of the Council's Equal Opportunities Policy are incorporated in the contract for those services proposed to be extended.

7.6.3 The requirements of the Equality Act 2010 are specifically included in the contract to ensure compliance with the Act.

## **7.7 Environmental and Sustainability Implications**

7.7.1 Attached as **Appendix 2**.

## **8. Appendices**

8.1 **Appendix 1** - Equality Impact Assessment

8.2 **Appendix 2** – Environment and Sustainability Assessment

8.3 **Appendix 3** - Consultation findings - Draft Birmingham and Solihull Sexual and Reproductive Health Strategy 2023 – 2030

8.4 **Appendix 4** – Waiver Form

## **9. Background Documents**

9.1 [Cabinet Member Decision 1 November 2019 - Contract Extension for the Provision of Sexual Health Treatment and Prevention Services](#)

9.2 [Cabinet Report 27 July 2021 – Sexual Health Contract Extension](#)



Title of EIA	Sexual and Reproductive Health Services in Birmingham
Reference No	EQUA961
EA is in support of	Amended Service
Review Frequency	Annually
Date of first review	11/08/2023
Directorate	Strategy Equality and Partnerships
Division	Public Health
Service Area	Sexual Health
Responsible Officer(s)	<a href="#">Lottie Drury</a>
Quality Control Officer(s)	<a href="#">Juliet Grainger</a>
Accountable Officer(s)	<a href="#">Dyna Arhin-Tenkorang</a>
Purpose of proposal	To inform the sexual and reproductive health commissioning and procurement arrangements in Birmingham
Data sources	Survey(s); Consultation Results
Please include any other sources of data	Sexual Health Needs Assessment 2021/ Draft Birmingham and Solihull Sexual and Reproductive Health Strategy 2023 - 2030
ASSESS THE IMPACT AGAINST THE PROTECTED CHARACTERISTICS	
Protected characteristic: Age	Service Users / Stakeholders; Wider Community
Age details:	The integrated sexual health service will be universally accessible to all ages within the legal framework for sexual consent and will therefore have a positive impact on this protected characteristic. Some of the specific services provided within the service model are targeted at vulnerable and most at-risk populations, including those under 25 years of age. The system will also maintain a focus on the needs of Young People and will further develop the service response to groups of Young People with greatest needs e.g. Looked after Children and Care Leavers. Guidance recommends that specific services are made available to Young People as evidence indicates this age group is more at risk of poor sexual health. Improved access to contraceptive services and larger volumes of young women using the most effective contraception will be achieved through redesigning the local approach. The National Chlamydia Screening Programme (NCSP) has changed focus by promoting screening for young women on change of partner or annually. The National Human Papillomavirus (HPV) vaccination programme is also benefiting girls and boys in terms of a reduction in genital warts.
Protected characteristic: Disability	Service Users / Stakeholders; Wider Community

Disability details:	This service will have a neutral impact on disabilities. The service will be contracted to meet all requirements around the Equality Act 2010 to ensure their services are accessible to disabled people. The service specification will outline in detail the requirements for the service to comply with the Equality Act 2010 and the Public Sector Equality Duty and ensure that all staff are trained and competent in equality and diversity issues.
Protected characteristic: Sex	Service Users / Stakeholders; Wider Community
Gender details:	The integrated sexual health service will have a positive impact on this protected characteristic. The service will need to demonstrate that it is contributing to the delivery of local priorities, including those that focus on meeting the needs of women, men and those who identify as non-binary. The service will identify those being, or at risk of being, sexually exploited and aim to reduce health inequalities for people who experience poor sexual health, including MSM (men who have sex with men), lesbians, bi-sexual women, and transgender people. An objective is to ensure that robust safeguarding arrangements are in place, which includes issues such as sexual exploitation and FGM (female genital mutilation) which disproportionately affects women and girls. Dedicated staffing that is configured in response to domestic violence and sexual violence will be available and explicit care pathways of support will be made available. Men who have sex with men are targeted through outreach to ensure sexual health needs are addressed.
Protected characteristics: Gender Reassignment	Service Users / Stakeholders; Wider Community
Gender reassignment details:	The service is likely to have a neutral impact on this protected characteristic. The service will provide an open access service that will be made available to the population of Birmingham including this protected group and those who suffer from gender dysphoria. The service will be expected to meet all service user needs by taking account of equality, discrimination and good relations between protected groups in the way that it delivers services, buys goods and services and employs people.
Protected characteristics: Marriage and Civil Partnership	Service Users/ Stakeholders; Wider Community
Marriage and civil partnership details:	The service is likely to have a neutral impact on this protected characteristic. The service will provide an open access service that will be made available to the population of Birmingham including this protected group.
Protected characteristics: Pregnancy and Maternity	Service Users / Stakeholders; Wider Community
Pregnancy and maternity details:	The service will have a positive impact on this protected characteristic. The integrated sexual health service will contribute to reducing unintended conceptions in all ages and repeat terminations through a range of measures including increased availability, uptake and continuing use of long-acting reversible contraception methods (LARC), have a clear referral pathway to abortion providers (not

commissioned by the LA) by liaising with those providers to ensure prompt contraception provision following termination.

Protected characteristics: Service Users / Stakeholders; Wider Community  
Race

Race details: The sexual health service will have a positive impact on this protected characteristic. It will provide a service that is contributing to the delivery of local sexual health priorities, including those that focus on particular groups within ethnically diverse communities. The service will also work to increase uptake of HIV testing, and to reduce late HIV diagnoses and new infections amongst groups who are most affected, including black African people.

Protected characteristics: Service Users / Stakeholders; Wider Community  
Religion or Beliefs

Religion or beliefs details: The integrated sexual health service will have a neutral impact on this protected characteristic. The service will provide an open access service that will be made available to the population of Birmingham including those who follow different religions or beliefs, or those with no religion or belief. The service will be contracted to meet all requirements of the Equality Act 2010 to ensure services are accessible. The specification outlines in detail the requirements to the service which is expected to comply with the Equality Act 2010 and the Public Sector Equality Duty and ensure that their staff is trained and competent in equality and diversity issues.

Protected characteristics: Service Users / Stakeholders; Wider Community  
Sexual Orientation

Sexual orientation details: The sexual health service will have a positive impact on this protected characteristic. The service will be expected to provide an open access service to the population of Birmingham, including people who are gay, lesbian, bisexual or heterosexual and to support their sexual health needs.

Socio-economic impacts As an open access and integrated sexual health service, it must be accessible to all patients eligible for free NHS treatment, irrespective of their place of residence and socio-economic status.

- a) A particular focus on prevention and sexual health promotion among young people – for example, improving relationships and sex education (RSE) and ensuring provision of free contraception and condoms.
- b) A specific objective in the contract to meet the needs of people from high risk groups, including young people, people from black ethnic groups, people who identify as LGBT and people with disabilities.
- c) Strengthening community-based services and consideration of alternative methods of service delivery, such as online services and self-testing – with the aim of reducing stigma and encouraging greater use of services, particularly by men and young people.

Please indicate any actions arising from completing this screening exercise. 1. This assessment will inform the development of the service specification

2. If procurement through tendering is utilised as part of identifying and agreeing a provider, the evaluation panel of submitted bids will need to be satisfied that proposals address the equality characteristics identified in this EIA.

3. To monitor the performance/ delivery of the contract from an equality perspective to minimise the chance of unintended negative outcomes for individuals/groups with protected characteristics.

Please indicate whether a full impact assessment is recommended

NO

What data has been collected to facilitate the assessment of this policy/proposal?

Sexual Health Needs assessment 2021 and subsequent consultation on the (Draft) Birmingham and Solihull Sexual and Reproductive Health Strategy 2023 – 2030 during May - July 2022

Consultation analysis

Public Consultation Report Summary:

The consultation was undertaken to provide assurance that the sexual health strategy adequately reflected the findings of the needs assessment and incorporated public and stakeholder feedback

Agreement for the strategy's vision and aims was unanimous, with only a few areas being identified as possible gaps -male sexual health education, mental health aspects of sexual health, older people and primary care as a vehicle to deliver improvements in localities.

In response to the themes in the strategy, the key feedback was on priority groups including integrating sexually transmitted infection and contraceptive advice as an important aspect of prioritizing women who may be vulnerable due to termination of pregnancy, sexual violence, domestic abuse, or cultural and language issues. In addition, building on practitioners' knowledge of the motivation of different client groups e.g. Gay men, Trans community and those with Gender dysmorphia for attending clinic could be used to increase opportunistic sexual health screening and uptake of PrEP.

In terms of younger people, a need for services and pathways tailored to the needs of vulnerable groups (i.e. under 13s, young Sexual Assault victims, Children in Care or foster homes) was highlighted. This will need to incorporate a wider system response to ensure legal, safeguarding and appropriate medical interventions are provided to children under the age of legal consent. Gillick competency and Fraser guidelines are the national standards that sexual health and children and young peoples services work to in order to balance the needs and wishes of the child and the responsibility to keep them safe.

The model that will be developed and used to deliver health services for Birmingham and Solihull in the future will be informed by the feedback received from the consultation

Adverse impact on any people with protected characteristics.	No
How will the effect(s) of this policy/proposal on equality be monitored?	Via the public contracting process. Any procurement exercise approved will include evidence of equalities compliance. Contract monitoring will also include equalities monitoring and service user feedback
What data is required in the future?	Service activity and demographic data as well as patient feedback
Are there any adverse impacts on any particular group(s)	No
Initial equality impact assessment of your proposal	The sexual health needs assessment, strategy and consultation findings have highlighted areas that we will seek to improve via our commissioning processes. These will include gender specific priorities around increased access to contraception for women, awareness raising around sexual health, relationships and behaviours in the male population and improved pathways for LGBTQ communities and older and young people
Consulted People or Groups	<p>As part of the needs assessment during 2021, consultation and engagement was undertaken across Birmingham and Solihull with the community, as well as 130 professionals, and practitioners. The aim of this was to find out what was working well as part of the delivery of sexual and reproductive health services and Genito-urinary Medicine (GUM) clinics and where there were areas for development. The public were also asked about their sexual health behaviours and experiences of services, and we received 106 responses.</p> <p>We also consulted on the subsequent sexual health strategy between May – July 2022. There were 77 responses to the online survey. In addition, one focus group was held with 35 community representatives, and a second with a total of 8 community members and professionals from across Birmingham and Solihull. A workshop was then held with 45 members of staff from the sexual health service.</p>
Informed People or Groups	A presentation on the strategy was provided to primary care via the general practice peer support team chaired by the Local Medical Committee. This was attended by 75 primary care leads.
Summary and evidence of findings from your EIA	N/A - initial assessment provided above.
Decision by Accountable Officer	Approve
Date approved by the Accountable Officer	18/08/2022
Reasons for approval	The assessment meets the requirement to systematically evaluate the likely effects of the sexual health service on people who have a protected characteristic in accordance with the Equality Act 2010. It provides information on the positive impacts that the service will have on clients who have specific protected characteristics.





### Environment and Sustainability Assessment

Birmingham City Council is required to assess any positive or negative impacts that any policy/strategy/decision/development proposal is likely to have on the environment. To complete the assessment, you should consider whether that policy/development/proposal will have a positive or a negative impact on each of the key themes by selecting whether the impact of the proposal is positive, negative or has no specific impact on the themes. Please only tick one of these, by deciding what the overall impact is. The assessment must be completed for all Cabinet reports. It is the responsibility of the Service Director signing off the report to ensure that the assessment is complete.

<b>Project Title: Sexual Health Service extension</b>				
<b>Department: Public Health</b>	<b>Team: Adults</b>			<b>Person Responsible for assessment: Juliet Grainger</b>
<b>Date of assessment: 15/08/22</b>		<b>Is it a new or existing proposal?: Existing</b>		
<b>Brief description of the proposal:</b> Request for cabinet approval to extend the Sexual Health contract with University Hospital Birmingham NHS Foundation Trust for a maximum period of 12 months (1 <sup>st</sup> April 2023 to 31 <sup>st</sup> March 2024)				
<b>Potential impacts of the policy/development decision/procedure/ on:</b>	<b>Positive Impact</b>	<b>Negative Impact</b>	<b>No Specific Impact</b>	<b>What will the impact be? If the impact is negative, how can it be mitigated, what action will be taken?</b>
Natural Resources- Impact on natural resources including water, soil, air			x	
Energy use and CO <sub>2</sub> emissions	x			The current service includes access to locality-based GP and Pharmacy sexual and reproductive health services e.g contraception which reduces the need for people to travel
Impact on local green and open spaces and biodiversity			x	
Use of sustainable products and equipment		x		Sexual health services by their nature generate clinical waste, e.g., syringes, testing equipment. There is also packaging that keeps equipment sterile and the use of PPE.

				<p>Many of these products are plastic based and therefore not currently sustainably manufactured. Products and packaging must also be disposed of frequently. These products will also need to be transported to the clinical sites and require regular delivery.</p> <p>As this is an existing service, we do not anticipate an increased impact. NHS waste management services are already in place. Products and equipment are sourced via the NHS supply chain and the appropriate governance arrangements.</p>
Minimising waste		x		<p>Clinical waste, packaging and PPE disposal required. As this is an existing service, we do not anticipate an increased impact. NHS clinical waste management services are already in place.</p>
Council plan priority: a city that takes a leading role in tackling climate change	x			<p>Locality based services reduce the need for residents to travel across the City</p>
Overall conclusion on the environmental and sustainability impacts of the proposal	<p>The sexual health service includes the main University Hospital Birmingham genito urinary medicine and contraceptive clinics run by the Umbrella service and sexual and reproductive health services offered in the community via GP practices and pharmacy. Whilst clinical services will require the use of sterile and disposable equipment and generate clinical waste, this will not be exacerbated by the contract extension.</p> <p>The governance and monitoring sits within our existing service contract and is part of the NHS infrastructure e.g the NHS supply chain has a sustainability strategy and targets to <b><i>“become the world’s first carbon net zero national health system by 2045, and 2040 for the emissions we control directly.”</i></b></p>			

If you require assistance in completing this assessment, then please contact: [ESAGuidance@birmingham.gov.uk](mailto:ESAGuidance@birmingham.gov.uk)

# **Birmingham and Solihull (Draft) Sexual Health Strategy 2023 – 2030 Public Consultation Report**

## **Contents**

- 1. Summary of Findings**
- 2. Background**
- 3. Rationale for Consultation**
- 4. Pre-Engagement: Sexual Health Needs Assessment**
- 5. Consultation Process: Birmingham & Solihull Sexual Health Draft Strategy 2023 – 2030**
- 6. Consultation Engagement**
- 7. Responses to Vision and Themes**
- 8. Conclusions**
- 9. Next Steps**

## **Appendices**

**Appendix 1 – Copy of Consultation Survey**

**Appendix 2 – Free Text Survey Responses**

**Appendix 3 – Draft Sexual Health Strategy Birmingham and Solihull 2023 - 2030**

**Appendix 4 – Needs Assessment Summary**

## 1. Summary of Findings

The consultation on the draft Sexual and Reproductive Health Strategy 2023-2030 was undertaken across Birmingham and Solihull during May – July 2022 to provide assurance that the strategy adequately reflected the findings of the needs assessment and to incorporate public and stakeholder feedback.

Agreement on the strategy's vision and aims was unanimous, with only a few areas being identified as possible gaps - male sexual health education, mental health aspects of sexual health, older people, and the enhancement of primary care as vehicle to deliver improvements in localities.

In response to the themes in the strategy, the key feedback was on:

- **Priority groups** – challenges in providing the service to the homeless should be addressed by reviewing outreach and multi-disciplinary working. In addition, better integration of sexually transmitted infection (STI) and contraceptive advice as an important aspect of prioritising women who may be at risk due to termination of pregnancy, sexual violence, domestic abuse, or cultural and language barriers.
- **Reducing rates of STI** - accessible, walk-in 7-day clinics are a requisite, and building on practitioners' knowledge of the motivation of different client groups (e.g. gay men, trans people and those with gender dysphoria) for attending clinic could be used to increase opportunistic sexual health screening and uptake of HIV medication, Pre-Exposure Prophylaxis (PrEP).
- **Reducing unplanned pregnancies** – requires removing barriers to accessing pregnancy tests, increasing access to long-acting reversible contraception (LARC) and emergency contraception with guaranteed confidentiality.
- **Building resilience** - Relationships and Sex Education (RSE) is essential and could also combat the unwanted? norms of abuse in relationships. Also important is specialist support for schools and colleges and the use of appropriate and novel media, such as social media sites and billboard on buses/bus shelters.
- **Children and young people** - services and pathways tailored to the needs of vulnerable groups (i.e., under 13s, young sexual assault victims, children in care, or foster homes). Clinics in Schools, such as lunchtime drop-in clinics achieved through collaboration with schools, school nurses and pastoral teams is a potential solution for young people unable to attend standard clinics and could provide safe spaces for identifying safeguarding issues.

The model that will be developed and used to deliver health services for Birmingham and Solihull in the future, will be informed by the feedback received from the consultation.

## 2. Background

The draft Sexual and Reproductive Health Strategy 2023-2030 sets out Birmingham City Council's (BCC) and Solihull Metropolitan Borough Council's (SMBC) themes, priorities, and approaches to meeting the sexual health needs of the populations of Birmingham and Solihull.

The content covers a joint response to increasing sexually transmitted infections (STIs), HIV rates and reproductive sexual health which can have long lasting impacts on sexual health and wellbeing. Sexual health can impact an individual's emotional, physical, and mental

health, economic means, and social relationships. The consequences of poor sexual and reproductive health are far reaching and for those affected, the impacts are compounded by social stigma and fear.

Key drivers for the strategy are the findings from the Sexual Health Needs Assessment (SHNA) for Birmingham and Solihull, which have been translated into the draft strategy to inform appropriate action and enhance existing pathways to meet the needs of citizens.

The objectives of the strategy are to:

1. Ensure that every resident has access to sexual health services that meet their individual needs.
2. Enable services that are local, relevant, approachable, confidential, non-judgemental, to provide services to anyone in need, while respecting all human protected characteristics.
3. Enable citizens to have control of their own sexual health with services providing support where needed.

The strategy will play a key role in realising the joint vision for sexual health services for the future and will facilitate:

- A fully integrated, free, and confidential sexual health service for all citizens across the life course.
- A reduction in the high rates of teenage and unwanted pregnancies, abortion and STIs, which can have far reaching consequences for individuals and society.
- Open and equitable access to sexual health services.

### **3. Rationale for Consultation**

The consultation on the draft strategy was undertaken between 23 May – 29 July 2022 to hear and take account of the voices and experiences of citizens and stakeholders. The consultation was set out to seek information to help understand whether the right priorities have been identified in the draft Sexual and Reproductive Health Strategy 2023-2030. The draft strategy was developed using findings from the SHNA and engagement undertaken in 2021 and highlights the following themes:

**Theme One:** Priority groups

**Theme Two:** Reducing the rates of sexually transmitted infections

**Theme Three:** Reducing the number of unwanted pregnancies

**Theme Four:** Building resilience

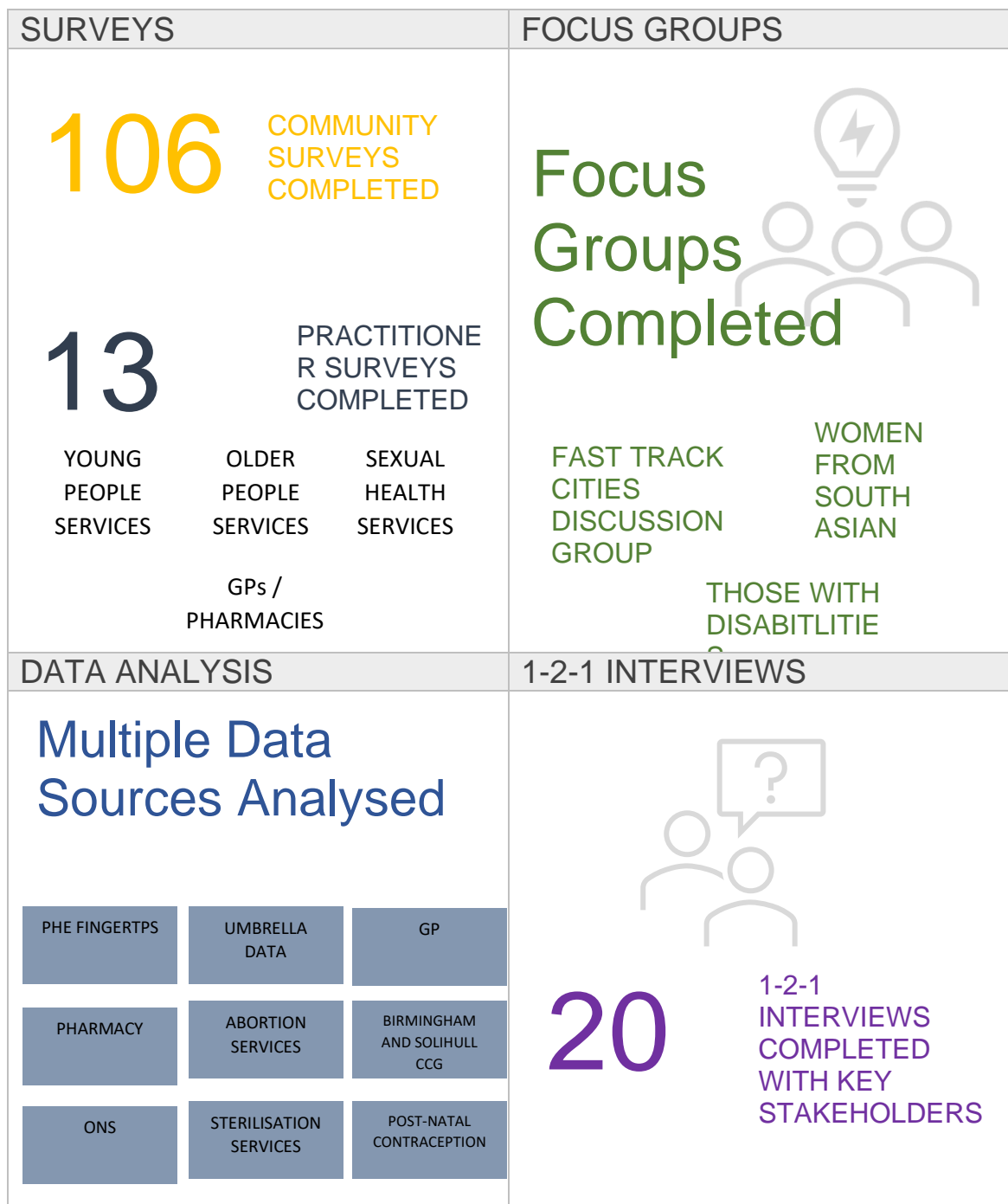
**Theme Five:** Children and young people

### **4. Pre-Engagement: Sexual Health Needs Assessment**

As part of the SHNA during 2021, engagement was undertaken across Birmingham and Solihull with the community, as well as with 130 professionals and practitioners (Figure 1: Engagement activity). The aim of this was to find out what was working well as part of the delivery of integrated sexual and reproductive health services, and where there were areas for development. The public were also asked about their sexual health behaviours and experiences of services which received 106 responses:

- Of the 106 responses from the public, 86 were from Birmingham, 12 were from Solihull and 7 were from outside both areas.
- 64 respondents were female and 36 were male. There were 2 non-binary respondents.
- In terms of ethnicity, most respondents were white English/ Welsh/ Scottish/ Northern Irish or British.
- 51% had unprotected sex in the last 12 months (this could include sex within a committed relationship).
- 23% had never had a sexual health check up

Figure 1: Engagement activity



## **4.1. Engagement Findings - Service Experience and Delivery**

### **Contraception Services**

#### Working Well

- Access to free condoms

#### Areas for development

- Vasectomies and sterilisation. A high proportion of survey respondents are unsure if services are meeting need
- Practitioners were generally happy with LARC services, although some highlighted delays in appointments as an issue
- Complex contraception services
- Emergency coil fittings
- Pathways for complex contraceptives

### **Advice and Information**

#### Working Well

- Contraceptive advice
- General sexual health information
- HIV advice
- Identifying those who have suffered abuse

#### Areas for development

- Information for gender dysphoria
- Information for Pre-Exposure Prophylaxis (PrEP)
- Information for Post Exposure Prophylaxis (PEP)

### **Response to Underserved Groups**

#### Working Well

- Support for victims/ survivors of rape and sexual violence
- Support for patients who identify as LGBTQ

#### Areas for development

- Support for sexual health needs of homeless
- Support for sexual health needs of refugees, asylum seekers and newly arrived migrants
- Feedback from some third sector practitioners working with older people and those with disabilities was that sexual health needs are not raised routinely

### **Barriers to Services**

#### Important practical considerations

- Easy to reach by public transport
- Open outside of 'normal' working hours
- Languages other than English

#### Important service/staffing considerations

- Availability of a range of treatments at a location
- Sexually Transmitted Infections AND Blood Borne Virus interventions

#### Working Well

- Access to chlamydia screening/treatment

#### Areas for development

- Rapid testing for STIs
- Community-based testing

### **5. Consultation Process: Birmingham & Solihull Sexual Health Strategy 2023-2030**

The findings from the SHNA were used to inform the Draft Birmingham and Solihull Sexual Health Strategy 2023 – 2030. To re-engage with the public and practitioners, consultation on the strategy was undertaken as part of a collaborative and inclusive approach. This was to help us understand whether we had taken the right approach, incorporated the feedback people gave us in the needs assessment process and to help us to shape the future of sexual health services.

The consultation obtained views across Birmingham and Solihull using an online survey through Be Heard, focus group discussions, and was publicised via a media and communications cascade, including with the following organisations and channels to access key groups:

- Age Concern (older people age 50+)
- Age UK Birmingham and the Black Country (older people age 50+)
- Birmingham City Council networks
- Birmingham LGBT
- Birmingham BVSC (voluntary/third sector)
- Birmingham Education Partnership
- Healthy Brum social media channels, including Facebook, Twitter and Instagram
- ICS (Integrated Care Systems) Communications Leads
- Solihull Metropolitan Borough Council networks
- Umbrella Sexual Health
- YMCA Heart of England (young people aged 0-18 and 18-35 years)

### **6. Consultation Engagement**

Direct engagement with community groups and representatives on the consultation was provided:

- One focus group was held with 35 community representatives and one with eight community members and professionals from across Birmingham and Solihull.
- A presentation to primary care via the General Practice Peer Support Team chaired by the Local Medical Committee and attended by 75 primary care leads.
- Presentation to the current commissioned sexual health service, Umbrella, attended by 35 practitioners.



The consultation had some competition with other engagement programmes that were running at the same time:

- Big Creative Birmingham Conversation
- Food Strategy Consultation
- Joint Birmingham and Solihull Draft Dementia Strategy
- Public Needs Assessment – Birmingham and Solihull Councils

In accordance with consultation requirements, the main Council routes of communication were used for all consultations during this timeframe. It is likely that visibility of the sexual health consultation was negatively impacted. The survey was extended for 2 weeks to take account of this.

## **7. Responses to Vision and Themes**

The Vision and Aims in the draft strategy cover:

- Ensuring that every resident has access to sexual health services that meet their individual needs.
- Enabling services that are local, relevant, approachable, confidential and non-judgemental, to provide services to anyone in need while respecting all human protected characteristics.
- Enabling citizens to have control of their own sexual health with services providing support where needed.

The strategy will play a key role in realising the joint vision for sexual health services for the future and will facilitate:

- A fully integrated, free, and confidential sexual health service for all citizens across the life course
- A reduction in the high rates of teenage and unwanted pregnancies, abortion and STIs, which can have far reaching consequences for individuals and society
- Open and equitable access to sexual health services

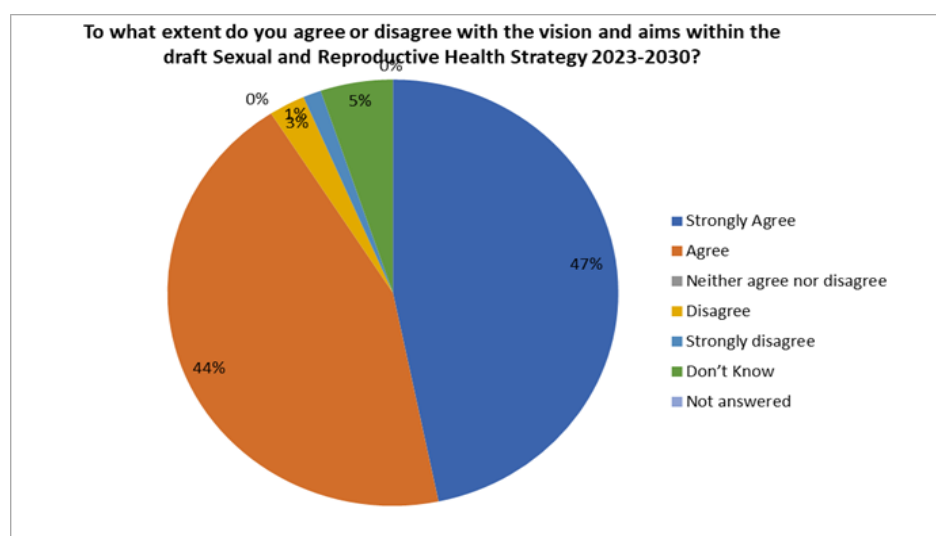
### **7.1. Demographics of Online Respondents**

Most survey respondents were between 30 – 60 years of age (67%). Over half (57%) were female, 6% of respondents declined to answer. In terms of ethnicity, 74% were White British/White European, 10% of respondents declined to answer. On sexual orientation, 62% of respondents identified as heterosexual, 12% bisexual and 8% homosexual, gay or lesbian, 13% declined to answer. Percentages may not have added up to 100% as respondents could choose more than one option.

### **7.2. Response to Vision – Results from the online survey**

Ninety one percent (91%) of online respondents strongly agreed or agreed with the vision and aims of the draft strategy. Those who disagreed formed only 3% of the respondents, as shown in Figure 2.

Figure 2: Vision and Aims



Feedback from the online survey free text and the targeted events highlighted that there were some potential gaps in terms of:

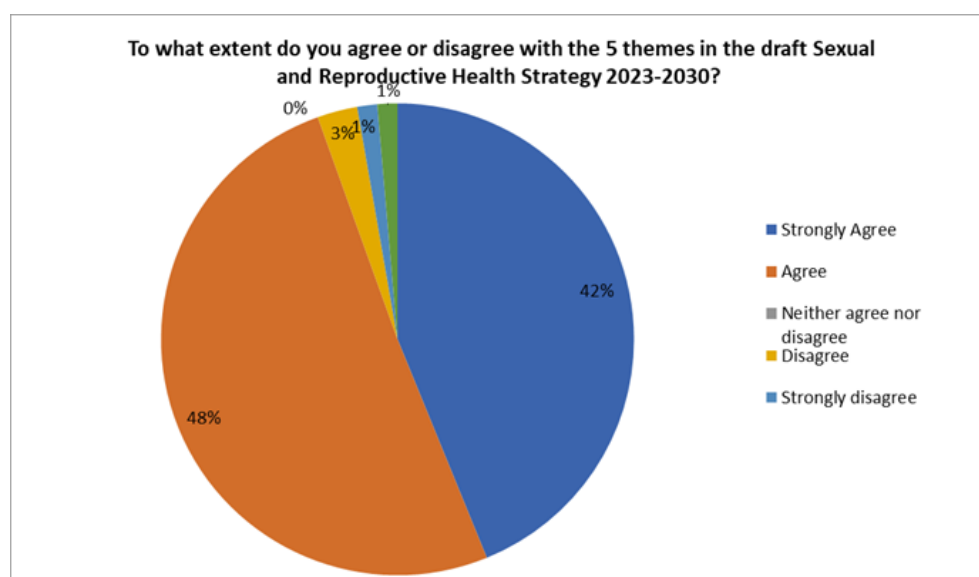
- Clear recognition of mental health in relation to sexual health in the strategy
- Equity of service provision across Birmingham and Solihull
- Cultural awareness and access to services for new communities, including women with female genital mutilation (FGM) who have no recourse to public funds
- Cross border issues in relation to commissioning and patient access routes to sexual health services out of area
- Being aware of older citizens and those in deprived areas being excluded through use of technology
- Recognition of sex workers and their support and treatment needs
- Male sexual health issues, education, awareness raising and engagement
- Inclusion of cervical and blood borne virus screening and human papillomavirus (HPV) vaccination
- Locality delivery improvements, utilising and supporting primary care
- How the strategy is going to be funded, implemented and monitored

### 7.3. Response to Themes – Results from Online Survey

Ninety percent (90%) of online respondents strongly agreed or agreed with the five themes in the draft strategy (Figure 3: Themes). Feedback on Theme 5, Children and Young People, highlighted concerns around the development of an under 13s service. This related to the view that sexual health services are for the population that are legally able to consent to sexual activity. It was felt that support to underage children should clinically fall to Paediatric services. It was also fed back that this would trigger safeguarding alerts that need to be reported to the correct safeguarding agencies.

The rollout of the Bystander programme in higher education settings was also queried. As the programme was not explained in the consultation document, people felt they did not have enough information.

Figure 3: Themes



#### 7.4. Results from Consultation Events

##### Theme One: Priority groups

Feedback was received from professionals around challenges in delivering outreach/inreach in a multi-disciplinary way and examples were given of historically provided clinics with the homeless population where limited take up was experienced. The importance of formal evaluation and review of interventions was raised as part of this. The need for better engagement with primary care was stressed, which included training and skills improvement.

In terms of community concerns, there was feedback that women relate and respond better to information provided to them by female professionals. The need for gender specific training to support this was advised. It was also raised that service delivery should include integrated STI and contraceptive advice. This was particularly highlighted for women who may be vulnerable due to termination of pregnancy, sexual violence, domestic abuse, or cultural and language issues for example. An absence of the recognition of issues arising from the menopause was also raised.

##### Theme Two: Reducing the rates of sexually transmitted infections

The keys to success in this area were described as the need to provide accessible, walk-in clinics, 7-day services and opportunistic screening in other services, particularly termination of pregnancy pathways, as well as understanding what motivates people to attend for a sexual health screen. From patient surveys and presentations at clinics, the following observations on motivation were communicated:

- *Women* – access the service more often because they see the need for contraception. The opportunity can be used to provide e.g. chlamydia testing at the same time, amongst other things.
- *Gay men* – as opposed to men who have sex with men (MSM), may not necessarily see themselves at risk. If a gay man attends because of concerns about the current monkey pox outbreak, however, they can be prescribed PrEP at the same time.

- *Trans community* – a recent Umbrella trans needs assessment (relatively small cohort) highlighted reasons why many of them would attend clinic, not for PrEP or vaccinations, but because they want other things e.g. to have their hormones measured.
- *Gender dysphoria* – someone who is trans or non-binary can be dispensed PrEP but not until it is established why they are attending. They may not attend clinic if what they want is not being offered. They may also require counselling.
- *Autism* – higher rates of autism can be seen in the trans population (A stigmatised condition that may require advocacy or support to engage. Some will have difficulties negotiating what they need because of the autism).

Community feedback focused on the need to have services available at a place level.

### **Theme Three: Reducing the number of unwanted pregnancies**

Community feedback highlighted the need for free, accessible pregnancy tests, locally accessible LARC and emergency contraception with guaranteed confidentiality, delivered by professionals with domestic violence and abuse awareness. Specialised training and advisors for pharmacy and clinic teams was recommended. A small number of comments were received on the need to prioritise the unborn child rather than offer abortion services.

Professionals shared concerns about low LARC uptake. It was felt that this may be influenced by the fact that most GPs only work with their own patients and only a small number with unregistered patients. These practices become extremely busy and there is a need to expand the number of practices that see unregistered patients. Other suggestions were around incentivising LARC activity and utilising pharmacies. Training needs would have to be met.

### **Theme Four: Building resilience**

This theme received the least feedback. Issues raised were in relation to how awareness raising, education and communication is undertaken and areas of good practice. A summary is provided below:

- *Abuse* - tackling abuse within young people's relationships is key. There are significant gaps in clarity relating to consent.
- *Education* – around sexual health and healthy relationships needs to address the patriarchal norms of society. Men and boys need to be given more comprehensive education around contraception and the risks of not using it.
- *Age* - there is currently stronger focus on the younger population than other groups with social media promotion and messaging. Need to utilise other forms of media for all age campaigns.
- *Brand awareness* – viewed as a good way of accessing services and finding information.
- *Pop up shops* – in local communities e.g. the Bull Ring, Perry Barr One-Stop shopping centre, and in underserved communities with local shopping areas.
- *Radio interviews* – more opportunities to engage with e.g. faith groups. Radio stations need to be convinced too that they need to broadcast sexual health messages to their listeners to normalise conversations about sexual health and dispel taboos.

- *Advertising* – positive patient feedback received on advertisements they have seen on buses etc. and how they have made talking about sexual health acceptable by using humour.
- *Promotion* – working with partners, attendance to freshers' fairs, promotion on buses/bus shelters, use of geolocate, social media sites and offering free branded merchandise.

## Theme Five: Children and young people

Community feedback focused on the importance of education; it was felt that this is already included in the government mandated education curriculum, but to ensure non-mainstream schools are involved, as well as the importance of specialists supporting schools and colleges around educating children and young people on positive sexual health. Healthy relationships programmes should provide an understanding of the role that gender plays and include a violence against women and girls context. The need to support foster carers with conversations about sexual health with young people who may have missed sexual health education, was also raised.

In terms of sexual health service delivery, some feedback highlighted current good practice. for example, it was observed that Umbrella's Education Team has created a comprehensive RSE programme for partner schools across the city, providing teaching support packages for those delivering RSE. The feedback relating to improving delivery is summarised below.

- *Under 13s* – Under 13s, by definition, cannot legally consent to sex and including pathways in an adult service is inappropriate. More thought is needed about where pathways and interventions should sit and who has the skills set and training to provide the service.
- *Sexual assault victims* – The current service is an all-age service, and there is a need to ensure the right support services, including Sexual Assault Referral Centres, are part of tight pathways.
- *Children in care* – Working with local authority care services to provide a high level of training to the nursing team to incorporate sexual health assessments within their assessments of the young people.
- *Foster carers* – Discussions with foster carers and Children's' teams regarding training people looking after young people in care to have conversations and facilitate the care they need is relevant and a good way of accessing and engaging with young people.
- *Clinics in schools* – Some young people are unable to attend actual clinics. Safe environments could be provided within schools e.g. lunchtime drop-in clinics, offering contraception and STI testing. Working in collaboration with schools, school nurses and pastoral teams. Would be beneficial for young people who are expected to go home straight after school and not allowed to travel outside their own environment.
- *Safeguarding* – Identify safe spaces for children and young people to talk to trusted adults about any issues.

## 8. Conclusions

8.1 The consultation findings indicate that there is strong support from the community and professionals for the content of the draft strategy and that the strategy adequately reflects the results of the needs assessment that was completed in 2021. Additionally, the consultation provides valuable feedback on how the strategy may be implemented.

8.2 Some stakeholder groups provided feedback that were focused on specific areas of the vision and aims and advocated for increased focus during implementation to interventions in these areas.

## **9 Next Steps**


9.1 In view of these conclusions, it is proposed that the content of the draft strategy is maintained without changes and therefore ratification of the strategy is requested from the Health and Wellbeing Board.


## APPENDIX 4 – WAIVER FORM

<b>PROJECT / CONTRACT TITLE</b>	SEXUAL HEALTH SERVICE EXTENSION
<b>PROJECT / CONTRACT REFERENCE NUMBER</b>	C0147
<b>DESCRIPTION OF CONTRACT (GOODS / SERVICES PROVIDED)</b>	Sexual Health Advisory Services
<b>SUPPLIER (where relevant)</b>	University Hospitals Birmingham NHS Foundation Trust
<b>CONTRACT PERIOD</b>	12 month extension period from March 2023 to March 2024
<b>VALUE (£/p)</b>	£14,038,587
<b>FUNDING SOURCE</b>	Public Health Grant
<b>DIRECTORATE</b>	Partnerships Insight and Prevention
<b>SERVICE AREA</b>	Adults
<b>SERVICE LEAD</b>	Juliet Grainger
<b>DIRECTOR/ ASSISTANT DIRECTOR</b>	Justin Varney
<b>HEAD OF SERVICE</b>	Dyna Arhin-Tenkorang
<b>Please indicate the justification for a Waiver to the Procurement and Contract Rules</b>	
i. <b>Efficiency / expediency in relation to process:</b> Following the Rules in whole or part would not add value to the intended outcomes and would significantly impact the delivery of the Council Plan and priority outcomes. A Waiver would not compromise transparency and accountability.	X
ii. <b>Increased cost / loss of income:</b> Following the Rules in whole or part would likely result in increased costs or loss of opportunity.	
iii. <b>Time constraints beyond the control of the Council:</b> Following the Rules in whole or part would create unreasonable time pressures to deliver outcomes required. In such cases this must not be through poor planning or lack of action by the Council to have created the time constraint.	
iv. <b>Avoidance of reputational damage:</b> Failure to act promptly would have a serious, damaging and long-term impact on the reputation of the Council, that from a time perspective the Council cannot afford to be mitigated through a formal tendering process.	
v. <b>Request for noting for transparency as a formal Breach of the Rules:</b> Noting outcome of formal Breach investigation and seeking to note in line	

with Waiver Approval procedure.	
<b>Please provide details on reasons for applying for a Waiver</b>	
<p>There are no further provisions to extend the contract beyond March 2023, however several extenuating circumstances have impacted on BCCs ability to re procure the replacement service by April 2023 as follows:</p> <p>Covid recovery plans have continued to divert commissioning and NHS service capacity away from business-as-usual activity during 2022. The impact of this has delayed the completion of our joint needs assessment, strategy development and public and clinical consultation process with Solihull MBC. This was only completed at the end of July 2022.</p> <p>Birmingham and Solihull Councils have historically, jointly commissioned the service. This partnership approach was also recently confirmed as part of local integrated care system arrangements. Solihull MBC subsequently received political approval to extend the contract to March 2024 to enable the system approach to recommissioning to continue.</p> <p>Nationally and locally, there is also a significant amount of new policy direction and local strategic planning that will need to be translated confidently to develop sexual health services that can meet current and future priorities.</p> <ul style="list-style-type: none"> <li>• The Birmingham and Solihull Sexual Health Needs Assessment 2021</li> <li>• The draft Sexual Health Strategy 2023 -2030 (Birmingham and Solihull)</li> <li>• Towards Zero: the HIV Action Plan for England - 2022 to 2025</li> <li>• Women's Health Strategy for England published July 2022</li> <li>• * Proposed national Sexual and Reproductive Health Strategy/action plan to be published in 2022</li> </ul> <p>A consultation on the draft sexual health strategy (Appendix 3) has just been completed and there are important areas of feedback from the community and professionals that we now need to take account of in the design of the future service. The extension period will provide the time required to ensure that services meet the needs of the local population as well as responding to the national policy and strategy drivers above.</p> <p>Feedback on the vision and aims of the draft strategy highlighted that there were some potential gaps in terms of:</p> <ul style="list-style-type: none"> <li>• Mental health in relation to sexual health in the strategy</li> <li>• Equity of service provision across Birmingham and Solihull</li> <li>• Cultural awareness and access to services for new communities</li> <li>• Cross border issues in relation to commissioning and patient access</li> <li>• Being aware of older citizens and those in deprived areas being excluded through use of technology</li> <li>• Sex worker sexual health needs and access to services</li> <li>• Male sexual health issues; education, awareness raising and engagement</li> <li>• Inclusion of Cervical and Blood Borne Virus screening and Human papillomavirus</li> </ul>	



(HPV) vaccination <ul style="list-style-type: none"> <li>• Locality delivery improvements, utilising and supporting primary care</li> <li>• How the strategy is going to be funded, implemented, and monitored</li> </ul> <p>Taking account of feedback on the draft strategy, and the national policy and strategies indicated in 3.5, further time is required for translation and implementation to ensure that services meet the future requirements.</p> <p>In order to ensure that services continue to be delivered during the development of the new service model and that changes in local and national policy are understood, an extension of this current contract would enable the Council to be in a better position to go to market in 2023</p>			
<b>Which part(s) of the Procurement and Contract Governance Rules are being sought to be waived?</b>			
Contract Extensions and Modifications clause 4.36			
<b>What implications, risk(s) or consequences would apply if a Waiver is not approved?</b>			
With the national developments and outcomes expected, this could lead to the Council having procured a service that does not align with the national standards and outcomes. Alternatively, it would be a short contract term which is not financially viable for the Council or provider creating further instability in service provision.			
<b>What longer terms plans are in place to ensure compliant contractual arrangements will be established prior to the end of the contract awarded under Waiver?</b>			
Extending the current service contract will enable new policy direction and local strategic planning to be translated confidently to develop sexual health services that can meet current and future priorities. Important areas of feedback were also gained from the community and professionals as part of the sexual health strategy consultation between May – July 2022 that we now also need to take account of. The outcome of these considerations will inform the Procurement Strategy for engaging with the market in 2023.			
<b>Other Comments</b>			
<b>DECLARATIONS</b> <b>I (the undersigned) declare that I have no conflicts of interest which would otherwise prevent my signature to this Waiver.</b>			
Directorate Service Lead		Date	12/09/22
<b>Corporate Procurement Comments</b>			
Waiver form appended to Cabinet report for Cabinet approval			

<b>Name / Title</b> <b>Mike Smith</b> <b>Head of People</b> <b>Category</b>		<b>Date</b>  	23/09/22
--	---	---------------------	----------

<b>AUTHORISATIONS</b>			
	DIRECTORATE SIGN OFF	CORPORATE SIGN OFF	Date
<b>Over £5,000 up to £100,000</b>	Assistant Director or Head of Service (in line with the Scheme of Delegations)	Relevant Head of Category (Corporate Procurement Service)	
Comment (if required)		Waiver form appended to Cabinet report for Cabinet approval	
Name / Title			
<b>Over £100,000 to £200,000</b>	Assistant Director	Assistant Director (Procurement)	
Comment (if required)			
Name / Title			
<b>Over £200,000 to £500k (revenue) or to £1million (capital)**</b>	Director	Section 151 Officer in conjunction with Cabinet Member (Finance)	
Comment (if required)			
Name / Title			

\*\* Above these levels and/ or Key Decision and/ or where deemed required by the

Cabinet Member formal sign off is required at Cabinet.



# Birmingham City Council

## Report to Cabinet

11<sup>th</sup> October 2022



**Subject:** THE BIRMINGHAM LOCAL PLAN-CONSULTATION ON 'ISSUES AND OPTIONS' DOCUMENT

**Report of:** STRATEGIC DIRECTOR – PLACE, PROSPERITY AND SUSTAINABILITY

**Relevant Cabinet Member:** Councillor Ian Ward, Leader of the Council

**Relevant O & S Chair:** Councillor Saima Suleman, Economy and Skills  
Councillor Chaman Lal, Sustainability and Transport  
Councillor Mohammed Idrees, Housing and Neighbourhoods

**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?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No – All wards affected
If yes, name(s) of ward(s):		
Is this a key decision?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If relevant, add Forward Plan Reference: 009892/2022		
Is the decision eligible for call-in?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Does the report contain confidential or exempt information?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
If relevant, provide exempt information paragraph number or reason if confidential:		

### 1 Executive Summary

- 1.1 To seek authority to undertake public consultation on the Birmingham Local Plan 'Issues and Options' Document for a period of six weeks 24 October to 5 December 2022.

- 1.2 In line with legislative requirements, a review of the Local Plan, including the Birmingham Development Plan (BDP) was undertaken and a decision to update the plan was agreed by Cabinet in June 2021. The Birmingham Local Plan, as it is now to be known, will be the statutory planning framework for the whole City and will guide planning decisions on all development and regeneration activity up to 2042. It will set out how, where and how many new homes, jobs, services and infrastructure will be delivered and the type of places and environment that will be created.
- 1.3 In order to reach a point where the new Birmingham Local Plan can be adopted, several statutory stages will need to be carried out, each with an opportunity for citizens, businesses and other stakeholders to make comments and representations to the Council to shape the Plan going forward. This is the first stage in that process with consultation taking place on the issues facing the growth and development of Birmingham over the coming years and the planning options we have to try and deal with those issues.
- 1.4 When the update to the BDP was agreed by Cabinet in June 2021 it was accompanied by a timetable which was set out in the Local Development Scheme (LDS) which is a rolling three-year project plan setting out the Development Plan Documents (DPDs) that will be produced by the Council. Since that time, the timetable for the Birmingham Local Plan has been amended and so approval is also sought for a revised version of the LDS (Appendix 3) to be adopted with the updated timetable.

## **2 Recommendations**

- 2.1 Approves the Birmingham Local Plan 'Issues and Options' Document, including the accompanying Sustainability Appraisal and Consultation Strategy (attached as Appendices 1, 2 and 4) for public consultation for a period of 6 weeks commencing 24 October 2022.
- 2.2 Approves the updated Local Development Scheme (LDS), as set out in Appendix 3.

## **3 Background**

- 3.1 The Birmingham Local Plan, once adopted, will be the statutory planning framework for the whole City and will guide planning decisions on all development and regeneration activity up to 2042. It will set out how, where and how many new homes, jobs, services and infrastructure will be delivered and the type of places and environment that will be created.
- 3.2 A review of BDP concluded that the plan required updating due to substantial changes to national planning policy and local priorities since it was adopted. Following Cabinet approval in June 2021, work commenced on a full update of the documents concerned.

- 3.3 The key Plan to be updated is the Birmingham Development Plan (BDP) which was adopted on 10 January 2017. Local planning authorities are required by legislation to review Local Plan documents at least every five years from the date of adoption in order to ascertain if their policies need updating. As the BDP is now over 5 years old and circumstances have changed sufficiently during that time, work has commenced to gather evidence and prepare an update to be known as the Birmingham Plan.

Local Development Scheme and the Birmingham Local Plan timetable

- 3.4 The timetable for the Birmingham Local Plan was set out in the Local Development Scheme which was approved by Cabinet in June 2021. Local planning authorities are required through the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011) to produce a Local Development Scheme (LDS). This is a rolling three-year project plan setting out the Development Plan Documents (DPDs) that will be produced by the Council and the timetable for their preparation.
- 3.5 However, since the LDS was adopted, the timetable for the Birmingham Local Plan has been amended and so approval is also sought within this report for a revised version of the LDS (set out in Appendix 3) to be adopted with this updated timetable.
- 3.6 The Birmingham Local Plan is divided into several key stages in its production. Within those key stages, there are opportunities to formally consult with local communities, businesses and key stakeholders. These stages are the 'Issues and Options' Consultation, the 'Preferred Option / Draft Plan' consultation and the 'Publication / Pre-submission' consultation. These three consultation periods are set out as a statutory requirement of Regulations 18 and 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 3.7 The table below sets out the timetable for the key stages of the Birmingham Plan along with the minimum consultation period for each stage.

Key Stages	Scheduled Date	Minimum Consultation Period
Issues and Options consultation (Regulation 18)	October 2022	6 weeks
Preferred Options / Draft Plan consultation (Regulation 18)	October 2023	6 weeks
Publication/Pre-submission consultation (Regulation 19)	October 2024	6 weeks
Submission to Secretary of State (Regulation 22)	June 2025	N/A

Examination by Planning Inspectorate (Regulation 24 and Regulation 25)	Autumn 2025	N/A
Adoption (Regulation 26)	Summer 2026	N/A

### Issues and Options Consultation document

- 3.8 As the evidence gathered so far has emerged, officers have been able to assess the issues needing to be considered within the new Birmingham Local Plan. These issues have been set out in the Issues and Options document which is to be subject to consultation for 6 weeks in June 2022 following approval and attached as Appendix 1. This consultation is therefore an opportunity for citizens, businesses and other stakeholders to make comments and representations to the Council to shape the Plan going forward. In turn, this will help determine which are the preferred options to inform the preparation of the next stage of consultation (the Preferred Options / Draft Plan).
- 3.9 The Issues and Options document has been divided into thematic chapters to cover all of the issues needing to be addressed in the final Birmingham Local Plan as well as setting out a vision and objectives for the City which the Plan will aim to deliver. A key theme running throughout the Plan will be to ensure that future growth and development will be delivered whilst achieving the City Council's aim to achieve net-zero carbon status by 2030 following its declaration of a Climate Emergency in 2019. The thematic areas covered by the document are:
- Meeting housing growth with suggested options for delivery
  - Meeting economic growth with suggested options for delivery
  - Spatial strategy for growth with options as to where future growth could be directed and concentrated in the City
  - Environment and sustainability including options on how development and growth will be accommodated whilst responding to climate change mitigation and adaptation as well as issues such as flood risk, nature conservation, historic conservation and access to open space / sports facilities.
  - Homes and neighbourhoods including options on the provision of affordable housing and wider housing needs including student accommodation and gypsies and travellers.
  - Economy and the network of centres including options on industrial land, commercial premises and offices as well as looking at the City's network of centres and the diversity of uses within them.



- Connectivity including approaches on the future of sustainable transport, public transport, walking and cycling, freight, strategic highways and digital connectivity

3.10 The Issues and Options consultation document is accompanied by a Sustainability Appraisal (SA) (Appendix 2) which assesses the policies and content of the Birmingham Plan thus far gathered, to ensure they have a positive impact on social, economic and environmental factors.

#### 4 Options considered and Recommended Proposal

- 4.1 **Option 1- Do Nothing:** Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) requires local planning authorities to review their local plans at least once every 5 years from their adoption date to ensure that policies remain relevant, up-to-date and effectively address the needs of the local community. If not, the Local Plan must be updated. By doing nothing, the Council will not be keeping its Local Plan up-to-date and thereby not comply with this legislative requirement. This is therefore not deemed an acceptable option.
- 4.2 **Option 2: To carry out a partial update of the Local Plan.** It was clear from the review of the previous BDP adopted in 2017 as well as national policy, that the BDP required fully updating due to a range of significant changes in national planning policy and local circumstances including changes to national planning policy and guidance relating to affordable housing, climate change mitigation and increased housing requirements as well the declaration of a climate emergency by the City Council in 2019. The production of the 'Our Future City Plan – Central Area Framework' by the Council will also require the spatial strategy for Central Birmingham to be re-evaluated. All of these factors mean that a partial update of the Local Plan will be inadequate in addressing all these issues and is therefore not a viable option.
- 4.3 **Option 3: To carry out a full update of the Local Plan including the production of the Birmingham Local Plan to replace the BDP.** To fully update the Local Plan and proceed with the production of the Birmingham Local Plan is the recommended option. This consultation will be the first main stage in the production of the Birmingham Local Plan.

#### 5 Consultation

- 5.1 A cross-party Local Plan Member's Working Group has been established to help guide the process of producing the Plan. It is chaired by the Leader of the Council and considers reports relating to the Local Plan review process.
- 5.2 Internal officer groups and meetings have also been set up to ensure that officers from different departments are engaged with and contributing towards the production of the Plan. This includes officers from Birmingham

Property Services, Highways, Transportation, Housing, Environmental Health, Public Health and Leisure.

- 5.3 Under the 2011 Localism Act and the National Planning Policy Framework (NPPF), local planning authorities have a legal Duty to Cooperate with other local planning authorities and organisations to seek to address strategic planning matters that are driven by larger than local issues that are likely to have an impact beyond their immediate Local Plan area. Neighbouring local authorities and other Duty to co-operate bodies are being consulted as part of the Issues and Options consultation and views are being sought on any strategic cross boundary issues arising.
- 5.4 The launch of the public consultation on the Birmingham Local Plan Issues and Options document will be the first consultation stage for the Plan. Public consultation will take place following Cabinet approval and will be 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.
- 5.5 The consultation document and relevant material will be published online and all those on the Planning Policy Consultation Database will be notified. All feedback and comments received will be taken into consideration in formulating the next stage of the consultation prior to the eventual adoption of the document. A Consultation Strategy has been produced (Appendix 4) which details how the consultation will take place for this stage and for subsequent stage in the development of the Birmingham Local Plan. This Strategy will be reviewed and updated at each consultation stage for the production of the Birmingham Local Plan.
- 5.6 Officers from Legal and Democratic Services and City Finance have been involved in the preparation of this report.

## **6 Risk Management**

- 6.1 Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) requires local planning authorities to review their local plans at least once every 5 years from their adoption date to ensure that policies remain relevant, up-to-date and effectively address the needs of the local community. Where relevant Local Plan policies are out of date, the presumption in favour of sustainable development will apply on all development proposals and the Council's ability to deliver on its strategic objectives would be harmed. It would mean the Council may be susceptible to decisions being challenged by planning appeals and reduce the ability to provide certainty for residents, developers and investors. The Birmingham Development Plan (2017) is now considered to be out of date and due to increased housing need, the City Council does not have a 5-year Housing Land Supply. The only way the city

can secure a 5-year housing land supply, based on the current national standard methodology for housing need, is to adopt a Local Plan which sets out a deliverable housing number for the city.

- 6.2 Government are currently undertaking a programme of planning reform. The Planning White Paper was published in August 2020 and the Levelling Up and Regeneration Bill is currently progressing through the parliamentary process. The Bill proposes some significant changes to plan-making, however, the timescales are unclear and many of the changes would require secondary legislation. The Government are clear that authorities should continue with plan-making. There is a risk that legislation could change and this could impact on the work undertaken to progress the Plan and mean that revision to the timetable or the process are necessary to align with a new system.
- 6.3 The timetable for completion and adoption of the Birmingham Local Plan allows flexibility to account for any potential issues. This allows time for discussion with stakeholders and for issues to be addressed, as well as the processing of any comments made. However, the timetable will be under review after each stage and any risks on the timely delivery of the Plan will be mitigated.
- 6.4 Other risks are addressed elsewhere in this report, including the option analysis in Section 4 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 recommended decisions are consistent with 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 for the future planning and development of the city.
- 7.1.2 As outlined in paragraph 3.9 above, the new Plan will also play an important role in supporting the Council's declaration of a Climate Emergency in July 2019 and is significant in helping to deliver the Climate Change Action Plan.

### **7.2 Legal Implications**

- 7.2.1 Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) requires local planning authorities to review their local plans at least once every 5 years from adoption to ensure that policies remain relevant, up-to-date and effectively address the needs of the local community.

- 7.2.2 The preparation of the Birmingham Local Plan, including this consultation, is being carried out in accordance with the Planning and Compulsory Purchase Act 2004 and is prescribed under Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012.

### **7.3 Financial Implications**

- 7.3.1 The process of evidence gathering and producing a new Local Plan requires officer time and resources as well as external resources to provide expert advice and evidence. The Birmingham Local Plan and its Sustainability Appraisal have been prepared using existing Place, Prosperity and Sustainability Directorate (Planning and Development) staff resources and specialist external consultants funded from existing approved revenue budgets.

### **7.4 Procurement Implications (if required)**

- 7.4.1 The procurement of technical evidence base studies will be the subject of separate delegated reports.

### **7.5 Human Resources Implications (if required)**

- 7.5.1 No implications.

### **7.6 Public Sector Equality Duty**

- 7.6.1 The Birmingham Local Plan is being 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 Birmingham Local Plan includes the carrying out of an integrated Sustainability Appraisal (Appendix 2) at each formal stage which ensures positive social, economic and environmental impacts as well as a separate Equalities Analysis (Appendix 5).

## **8 Appendices**

Appendix 1 – Birmingham Local Plan – Issues and Options document

Appendix 2 – Birmingham Local Plan – Sustainability Appraisal for the Issues and Options Document

Appendix 3 – Revised Local Development Scheme (October 2022)

Appendix 4 – Consultation Strategy for the Birmingham Local Plan Issues and Options

Appendix 5 – Equalities Assessment

## Appendix 6 – Risk Assessment

### **9 Background Documents**

- 9.1 Cabinet Report on Birmingham Development Plan review and revised Local Development Scheme 29th June 2021





# OurFuture *Birmingham* CityPlan

## Birmingham Local Plan Issues and Options

BE BOLD BE BIRMINGHAM

Page 529 of 674





# Birmingham Local Plan

Issues and Options

October 2022





# Contents

<div>1</div> <div>Introduction</div> <div>What is the Birmingham Local Plan?</div> <div>Why we need a new plan?</div> <div>The climate emergency</div> <div>Have your say</div> <div>What happens next?</div> <div>Forthcoming changes to the planning system</div> <div>Evidence to inform the Birmingham Local Plan</div> <div>Relationship with other plans</div> <div>Our future city plan: Central Birmingham Framework</div> <div>Working with our neighbours</div> <div>National requirements for local plans</div>	<div>p4</div>	<div>3</div> <div>Vision and Objectives</div> <div>Vision</div> <div>Objectives</div>	<div>p18</div>	<div>6</div> <div>The Built and Natural Environment</div> <div>Introduction</div> <div>Green infrastructure</div> <div>Biodiversity net gain</div> <div>Urban greening</div> <div>Open space and playing pitches</div> <div>Minimising environmental pollution</div> <div>Historic environment</div> <div>Placemaking and design quality</div> <div>Tall buildings</div>	<div>p44</div>	<div>8</div> <div>Connectivity</div> <div>A sustainable transport network</div> <div>Reducing car use and dominance</div> <div>Safe and healthy environment/active travel/15-20 minute neighbourhoods</div> <div>Public transport</div> <div>Freight</div> <div>Digital connectivity</div>	<div>p58</div>
<div>2</div> <div>Challenges and Opportunities</div> <div>Birmingham today</div> <div>Challenges</div> <div>Opportunities</div> <div>What does sustainable development mean for the Birmingham Local Plan</div>	<div>p10</div>	<div>4</div> <div>Homes and Neighbourhoods</div> <div>Why do we need new homes?</div> <div>What are the benefits of new homes?</div> <div>How many homes do we need?</div> <div>Existing sources of housing supply</div> <div>Maximising the use of brownfield land</div> <div>Current assessment of available land</div> <div>Options for housing growth</div> <div>What types of homes do we need</div> <div>Healthy neighbourhoods (15-20 minute neighbourhoods)</div>	<div>p22</div>	<div>7</div> <div>Economy and Centres</div> <div>Introduction</div> <div>Employment land need</div> <div>Current assessment of available land</div> <div>Options for employment growth</div> <div>Portfolio of employment land</div> <div>Regional Investment Sites</div> <div>Core Employment Areas</div> <div>Protection of employment land</div> <div>Offices</div> <div>Other employment policies</div> <div>The city centre/central Birmingham</div> <div>Urban centres</div> <div>Tourism, culture and the nigh time economy</div>	<div>p48</div>	<div>9</div> <div>Locations for Growth</div> <div>Background</div> <div>Key growth areas - opportunity areas</div> <div>Potential opportunity areas</div>	<div>p64</div>
		<div>5</div> <div>Climate Change</div> <div>Introduction</div> <div>Energy efficiency and zero carbon development</div> <div>Sustainable design and construction</div> <div>Low and zero carbon energy infrastructure</div> <div>Flood risk and water management</div> <div>Sustainable waste management</div>	<div>p38</div>			<div>Appendices</div> <div>Appendix 1 - Call for sites</div> <div>Appendix 2 - What happens to the existing Local Plan documents?</div> <div>Appendix 3 - Neighbourhood plans</div> <div>Appendix 4 - List of consultation questions</div>	<div>p68</div>

# 1

## Introduction

**1.1** As the UK's second largest city and the economic heart of the region, Birmingham is a dynamic and exciting place to live, work and play. Our city is attracting record levels of investment and we are building the homes and creating the jobs and opportunities that we need. Hosting the 2022 Commonwealth Games has put Birmingham in the global spotlight. 2022 represents the start of a Golden Decade of Opportunity for Birmingham. Significant regeneration has been delivered as a result of hosting the Commonwealth Games, and HS2, Smithfield, Paradise and the regeneration of Digbeth are all well underway. Local areas across Birmingham are receiving huge, transformative investment, with the Perry Barr masterplan, the Longbridge redevelopment, the East Birmingham Inclusive Growth Strategy, and the Local Centres Strategy, ensuring that opportunity is shared across our city. Our great challenge over the coming decade is ensuring that this opportunity is made available to every community in our city, lifting our children out of poverty, and giving everyone a stake in Birmingham's growth and success.

**1.2** Birmingham City Council has already made a strong case for Birmingham to be at the very heart of the Government's Levelling Up agenda. We have set out our ambitions to challenge deeply ingrained structural inequalities, addressing poor health, poor educational attainment, low skills and incomes, congestion and air pollution, while bringing forward new homes, employment sites and community facilities.

**1.3** However, like all big cities Birmingham is constantly changing and will need to adapt to many challenges over the next 20 years including the climate emergency, massive housing pressures and a changing economy. Our Future City Plan (OFCP) will set a vision for major change in central Birmingham. Using the climate emergency as impetus, we are setting a new direction, one where we aim for a net zero carbon and climate resilient future. In addition to this, we will build inclusive growth principles into the very foundation of all plans to ensure that every citizen in Birmingham benefits from development.

**1.4** The urgent need for action to tackle climate change has been set out through the City Council's ambitious commitment to eliminate carbon emissions through the 'Route to Zero' initiative. Birmingham aims to become a global leader in tackling climate change, meeting the challenges head-on and grasping the opportunities of being at the forefront of a green revolution. As digital technology changes our life and work styles, together with the economic and social uncertainty and change accelerated by the Covid-19 pandemic, the future of our city centre has been brought into question: what needs to be done to stay relevant and thrive; how does it become greener and cleaner; how does it evolve and grow as a destination for living, learning, working, shopping, enterprise, culture and leisure, and how does it remain attractive to inward investment? Whilst

these urgent challenges make the headlines, we know that the growth and investment we have seen in the city doesn't always meet the needs of all of our residents, and endemic deprivation and inequality remains at unacceptable levels in parts of our city, often in those communities closest to areas of intense development. Building new homes is a priority for our communities and there is demand for a range of homes to suit many different needs and aspirations. In a dense urban area, innovative ways need to be found to deliver new, quality homes and neighbourhoods, ensure affordability for all and create healthy, happy and attractive places to live. These challenges require us to take a major shift in direction. We encourage your input to ensure we develop a plan for Birmingham that will create a successful, inclusive, connected and green city.







What is the Birmingham Local Plan?

1.5 The Birmingham Local Plan will shape how the city will develop over the next 20 years. It will set out a vision, spatial strategy and planning framework that will be used to guide decisions on development proposals and planning applications.

1.6 It will ensure we deliver the right number and type of homes and jobs in the right places with the right services and infrastructure. It will also be an important tool to help us become a net zero carbon city and create resilient and adaptive environments.

1.7 This ‘Issues and Options’ document summarises the key planning issues and invites your views on how these issues should be addressed in the Birmingham Local Plan. Further rounds of consultation will take place as the plan gets into more detail on specific policies and where development will take place.

Why we need a new Plan

1.8 All local authorities are required to have an up-to-date Local Plan. Without an up-to-date Plan the city is vulnerable to speculative planning applications and poor or piecemeal development. In the absence of a Plan there is no certainty where development will take place which means we cannot properly plan for the impacts of development.

1.9 The existing Birmingham Development Plan (2017), Aston, Newtown, Lozells Area Action Plan (2012) and Longbridge Area Action Plan (2009) were all adopted before recent changes were introduced to national planning policy. We need an up-to-date Plan that will guide us through the next 20 years and respond to the new challenges and opportunities the city faces. The new plan will cover the period 2020-2042.

The Climate Emergency

1.10 Birmingham City Council declared a climate emergency in June 2019 with an ambition to work towards zero carbon by 2030. The Council is committed to taking a leading role, playing its part, and working with individuals, communities, businesses, partners, and others across the city and region to act now on the causes and impacts of the climate emergency.

1.11 The Birmingham Development Plan (BDP) contains existing policies aimed at addressing climate change such as policies on carbon reduction, sustainable construction, low and zero carbon energy generation, flood risk, green infrastructure, biodiversity, sustainable transport, as well as through its spatial strategy which focuses growth in sustainable locations. However, the BDP was prepared before the declaration of the Climate Emergency and with the aspiration to achieve net zero carbon emissions by 2030, big changes and a rapid response is required.

Have your say

1.12 We would like you to be involved in creating the Birmingham Local Plan and making choices about how land is used, where future development takes places and how places and buildings are designed. Your views and local knowledge are important. The quickest and easiest way to comment is online at [www.birmingham.gov.uk/birminghamplan](http://www.birmingham.gov.uk/birminghamplan). You can also go to your local library to look at this consultation and get help to respond online.

1.13 For more information about online and in person events where you can come and talk to us, please see our webpage above. You can also browse our document library here.

1.14 If you would prefer to submit your response in writing please identify the question or paragraph to which your comments refer. Send these to:

Email

[planningstrategy@birmingham.gov.uk](mailto:planningstrategy@birmingham.gov.uk)

Address

Planning Policy Team,  
Planning and Development,  
Birmingham City Council,  
B1 1TU.

What happens next?

1.15 The development of a new Plan involves several key stages. We are currently at Issues and Options, which is the first stage in the process. The Council will review all the comments received at this stage and publish a summary report. Your comments, along with technical evidence, will help to inform the next stage of the Plan. The timetable

shown below may change due to a range of factors such as forthcoming changes to planning legislation and national planning policy.

Forthcoming changes to the planning system

1.16 The Levelling Up and Regeneration Bill which was introduced in May 2022, and continues its passage through Parliament, sets out a wide range of changes to the planning system. The Government will consult on the detail of these changes over the coming months. It is anticipated that the changes will be implemented from 2024 following the introduction of associated regulations and updated national policy. Therefore, at this point in time, we are working within the current plan making system. The Government are clear that local authorities should not delay or halt plan making. As such, we consider it is best to proceed with preparing the Birmingham Local Plan and respond to any changes in circumstances or interim arrangements going forward.

Stage	Date
Issues and options consultation (this stage).	October 2022
Preferred options consultation.	October 2023
Publication document consultation.	October 2024
Submission of the plan for examination.	June 2025
Examination.	Autumn 2025
Adoption.	Summer 2026



### Evidence to inform the Birmingham Local Plan

**1.17** Local Plans need to be supported by a robust evidence base. In this report we refer to existing studies, work that is currently being undertaken, as well as future work we may need to undertake to inform the Plan. We will publish all of our evidence base studies on our website as they are completed.

**1.18** One of the assessments looks at the economic, social and environmental effects of the Plan and possible alternative options. This is called the Sustainability Appraisal (SA) and helps us identify the most appropriate options that will deliver the best outcomes for our area. A SA has been undertaken on this Issues and Options Document and is published alongside this document for consultation.

**1.19** We are also required to consider the impacts of the Plan on significant natural habitats. This process is called the Habitat Regulation Assessment (HRA). Both the SA and HRA derive from European legislation and may be subject to changes in the near future as a result of planning reforms.

### Relationship with other plans

**1.20** The Local Plan must conform with policies set out by national Government in the National Planning Policy Framework (NPPF) unless we have sufficient evidence to demonstrate a different approach is needed. The Birmingham Local Plan will also be influenced by various Council strategies and plans shown below.



### Our Future City: Central Birmingham Framework

**1.21** Our Future City: Central Birmingham Framework is a non-statutory planning document which will set a vision for the future of Birmingham city centre and inner-city suburbs beyond the ring road. The feedback provided on the first stage Our Future City: Central Birmingham 2040

(January 2021) has been used to feed into the key issues and objectives of this Issues and Options Document. An evidence base is being prepared to inform Stage 2 of the Central Birmingham Framework and could be used in turn to inform the Birmingham Local Plan. Consultation on the next stage of the Central Birmingham Framework is due to take place in Spring 2023.

### Working with our neighbours

**1.22** The Council is required to work with other local authorities and bodies in the wider area to deal with issues that run across local authority boundaries. This joint working is critical for Birmingham as we are unlikely to be able to meet all of our development needs within our boundary. At the same time, we have to consider any unmet development needs from our neighbours. Birmingham will need to continue to work effectively with neighbours to achieve a planned response to the issues, particularly in relation to housing shortfalls.

### National requirements for Local Plans

**1.23** National policy requires that plans promote a sustainable pattern of development that seeks to meet the development needs of their area; align growth and infrastructure; improve the

environment; mitigate climate change and adapt to its effects and increase resilience. Plans must include strategic policies which address the priorities for the area. Strategic policies should set an overall strategy for the pattern, scale and quality of development and make sufficient provision for:

- Housing (including affordable housing), employment, retail, leisure and other commercial development;
- Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- Community facilities (such as health, education and cultural infrastructure) and
- Conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

**1.24** The NPPF also sets out that Local Plans should be prepared in line with procedural and legal requirements and will be assessed on whether they are considered 'sound'. Plans are considered sound if they are: positively prepared, justified, effective, and consistent with national policy.





# 2

## Challenges and Opportunities

### Birmingham today

**2.1** Known in the Victorian era as ‘the city of a thousand trades’ and the birthplace of the Industrial Revolution, today Birmingham continues to be a dynamic force as the UK’s second largest city and the financial, commercial and cultural hub of the region. Its rich history and culture is reflected in its varied neighbourhoods and environments which is home to over 1.1 million people and growing.

**2.2** After a long period of population decline between the 1960s-80s following the collapse of many of its staple industries during that period, the City Council’s commitment to urban renaissance has meant that over the last 30 years, the city has seen a return to growth as new homes, jobs and infrastructure have been delivered. Boosted

by transformational development plans, major infrastructure investment, successful industry sectors and strong innovation assets, Birmingham has gone from strength to strength in recent years. As host of the Commonwealth Games 2022, the city’s international standing and global status is also set to rise.

**2.3** Birmingham’s connectedness is unparalleled and High Speed 2 will cement the city’s excellent transport connections and unlock major development opportunities within and beyond the city. Along with the extension of Metro, re-opening of the Camp Hill Chords, and new cycle lanes, improvement of public transport and active travel is a key priority for Birmingham’s Transport Plan and is essential to delivering a sustainable well-connected city. Connectedness goes beyond physical locations, it recognises the need for Cities

to have the right digital infrastructure that enables businesses to work seamlessly with their supply chains and acts to attract new businesses, linking them to world markets from their location in a culturally diverse Birmingham.

**2.4** Over the last 15 years, Birmingham has attracted record levels of investment due to its welcoming and enterprising nature. Our population has grown and with this growth has come new homes, jobs, businesses and opportunities. Our city centre is bigger and better than ever and is set to continue to evolve as several key developments and new plans come forward. Other key major developments in the city will bring holistic regeneration spreading benefits into the surrounding communities.







**Paradise Circus** has already transformed Chamberlain Square and made the city centre better connected. With phase two under construction adding a new hotel and a fourth office building plus plans for a landmark residential tower, this new part of Birmingham, will be a premier destination and one we can take great pride in.

**Langley Sustainable Urban Extension** is the largest development site in the city and will provide around 6,000 homes making a significant contribution to meeting the city's housing needs. With a focus on family housing and other housing types provided, the site will support a mixed community and be sustained by a comprehensive range of social infrastructure including new schools, shops, healthcare, recreation and leisure facilities.

**Icknield Port Loop** is a mixed use development involving the redevelopment and remediation of 43 acres of land which will deliver 1,150 new homes plus employment and leisure facilities is circled by a kilometre of historic canal and located only 1km from Central Birmingham.



**Smithfield**, formerly the site of Birmingham's Wholesale Markets, the 14 hectare site which lies in the heart of the city centre, will provide a new home for the city's historic Bull Ring markets, outstanding new leisure and cultural spaces, including a festival square and landscaped park, integrated public transport, and 3,000 new homes alongside community facilities.

**Perry Barr** is currently benefitting from £700+ million of public sector investment focusing on enhancing infrastructure, providing 2,000 new homes and creating new community spaces. The wider regeneration programme has other long-term opportunities, including further housing to be built over the next 20 years and ongoing infrastructure improvements, which have been captured in the 'Perry Barr: A Vision for Legacy' master plan.

**Curzon Enterprise Zone** is centred on construction of the HS2 railway, the planned Curzon Station will bring a step-change in connectivity for the city and the region, unlocking major cultural, development and investment opportunities.

**Ladywood Estate** is a predominantly 1960s residential neighbourhood spanning 153 acres in Birmingham's city centre. The ambition is to transform the estate into a high-quality residential neighbourhood of exemplar sustainable development and radically improve connectivity into the surrounding area.

**Bordesley Park** and its environs offers a major opportunity for transformational change and the creation of 1,500 jobs for East Birmingham, one of the most deprived areas in Birmingham.

**2.5** While Birmingham has many great strengths, it also faces many serious challenges. Birmingham suffers from high levels of deprivation, with 43% of the population living in the 10% most deprived in England making it rank the 7th most deprived local authority in England. While there are pockets of deprivation in all parts of the city, deprivation is most heavily clustered in the area surrounding the city centre. Around 21.2% of households in Birmingham are in fuel poverty, compared to 13.4% across England.

**2.6** Birmingham has a comparatively high claimant unemployment rate. At 14.7%, Birmingham's claimant unemployment rate is the highest of the core cities, significantly above the core city average of 11.1%<sup>1</sup>. In terms of education attainment, the gap is closing. In 2019, 62.1% of pupils in Birmingham reached at least the expected standard in reading, writing and maths compared to the national average of 64.9%.

**2.7** Life expectancy for men and women in Birmingham is lower than the national average at 77.2 years for men (England 79.5) and 81.9 years for women (England 83.1). Child obesity is prevalent with more than one in ten 4-5 year olds being obese (11.5%) and a quarter of all 10-11 year olds (25.5%).

**2.8** Air pollution is second only to tobacco smoke in causing premature death (deaths before the age of 75). In the UK it is estimated that each year there are 40,000-50,000 deaths attributable to air pollution; in Birmingham based on current mortality, this equates to almost 900 deaths a year.

<sup>1</sup> Birmingham City Council, Labour Market Update Q2.





### Challenges

**2.9** Birmingham will need to adapt to respond to many challenges and opportunities over the next 20 years to ensure that we can build a inclusive, resilient and connected city.

**Climate change** - is the biggest existential threat that affects us all. In response to the climate crisis, the City Council declared a Climate Emergency in June 2019 and is striving to achieve net zero carbon and build the city's resilience to a changing climate. The Birmingham Local Plan will play a key part in helping us achieve this challenge, but this will affect how we address other priorities that are important to the area. It will influence where we plan for development, how it is designed and how we live.

**Infrastructure** - we need to ensure the city has the natural and built infrastructure it needs to deliver upon its aspirations and that this infrastructure is resilient to the changing climate and changing demands placed upon it. The city's net zero ambition will result in a significant growth in electricity demand for building heat decarbonisation and transport decarbonisation. The Birmingham Transport Plan aspires to achieve significant shifts in private vehicle use within and across the city to support this net zero ambition. Proposed new legislation for heat network zones to support heat decarbonisation may necessitate priority locations for heat generation and distribution and we need to ensure the opportunities for a growth in renewable energy generation can be supported within the infrastructure investment planned by energy utilities.

**Delivering quality homes and places** - our population is growing and changing. By 2042 we expect there to be around 133,600 more people

living in Birmingham (HEDNA). This means more homes will be required including affordable housing and different types and sizes of homes. It will be a significant challenge to accommodate all of our local housing need within our boundary. The way development is planned, designed, developed and maintained has a huge impact on quality of life, appearance and the desirability of places. It will be essential to ensure that the right quality as well as quantity of development is delivered.

**Creating an inclusive economy** - inclusive growth is about ensuring that the benefits of growth are translated into greater opportunity and prosperity for all while planning for the growth and jobs we need to reflect the changing economy. Covid-19 has accelerated the long-term trends in retail, and we need to support our local centres as well as help them adapt to future trends. We must also ensure that we deliver cleaner and more sustainable growth by transitioning to a low carbon economy.

**Growing the digital economy** - the growth of digital and creative businesses and those that are reliant on ultrafast and low latency digital communications continues at pace, stifled only by 20th century connectivity infrastructure. Regeneration and redevelopment presents great opportunities to ensure that the underpinning of digital infrastructure provides foundations for businesses to thrive.

**Protecting and conserving** - Birmingham's unique heritage assets and treasured natural environments are what make it an attractive place to live. The challenge we face is to ensure we protect these valuable resources for future generations but also to incorporate them into new developments and ensure we all have fair access to open green spaces.

### Opportunities

**2.10** With major shifts in society, economy and the environment also come opportunities to fundamentally transition the way we operate and to build people-centred places.

**Global leader in a Green Future** - as an enterprising and innovative city we have always been at the forefront of significant shifts in the economy, society and environment. The green economy offers exciting opportunities to transition to a cleaner and greener place that can deliver jobs, homes and places in a sustainable way. Growth in renewable energy heat and power generation and storage will enhance the city's resilience to global energy markets.

**Proud of Brum** - we have a captivating history, a city that continuously adds to our layers of character, diversity, and culture, and a young population full of promise and creativity. In positioning and promoting our city on the world stage we need to shout louder about our heritage, world class arts, dance, music, food and cultural offer, and grasp the chance to build sporting excellence and long-term health benefits beyond the Commonwealth Games and beyond.

**Connected and smart** - located at the centre of the country's rail and motorway networks, and with Birmingham Airport's international connections, we have an opportunity to use our advantageous location to attract inward investment and to build new innovative, smart and digitally connected clusters to support job growth in emerging industries, as well as enabling existing industries to transform.

**Place quality and thriving neighbourhoods** - new development will bring site specific interventions and payments of community infrastructure levy to fund facilities and infrastructure in the city. It will provide an opportunity to regenerate and re-create places that are healthier, greener, cleaner, safer and more connected.

**Build a stronger economy** - with our youthful population, diverse economic base, sectoral strengths in a range of areas and five universities, we have the opportunity to maximise the productive potential of our people, businesses and places, creating new jobs and thereby raising living standards and quality of life.

**Creating a sustainable future** - sustainable development is defined at many levels. At the international level the UN Sustainable Development Goals set out the overall principles. For planning, sustainable development is a combination of environmental, economic and social objectives. We need to follow these in drawing up the Birmingham Local Plan and making decisions on planning applications. The NPPF requires us to consider what the international Sustainable Development would look like for Birmingham and use this to shape the plan.







### What does sustainable development mean for the Birmingham Local Plan?

- Utilising brownfield land and re-using existing buildings and sites. We already prioritise brownfield land and will continue to ensure that as much development as possible is provided on brownfield land.
- Locating development in places where schools, jobs, and services are accessible by foot and cycle or creating new neighbourhoods where walkability is central to its design.
- Ensuring good access to open space.
- In built resilience to climate change.
- Supporting the creation of effective public transport systems.

- Ensuring easy access to a range of job opportunities by walking, cycling or public transport.
- Developing near public transport hubs where higher densities use less land and support public transport use.
- Contributing to the delivery of essential transport, digital and social infrastructure.
- Providing affordable homes where it meets people's needs and ensuring a range of housing types.
- Focussing development on land not at risk of flooding.
- Designing places where people can lead safe and healthy lives as part of a community.

- Avoiding the loss of best agricultural land.
- Ensuring we have a well-connected, well managed and resilient Nature Recovery Network.
- Avoiding development in areas of landscape quality.

**HAVE YOUR SAY**

**Challenges and opportunities**

1. Do you agree with the challenges and opportunities identified?
2. Are there any others which are important?

## SUSTAINABLE DEVELOPMENT GOALS





# 3

## Visions and Objectives

### Vision

**3.1** In response to the challenges and opportunities facing the city, we have developed a draft vision and series of objectives for the Birmingham Local Plan to achieve. We would like you to help us shape the vision and objectives as these will guide the direction of the Plan.

**3.2** At the heart of this vision is for Birmingham to be a world class net zero city built on a vibrant inclusive economy and a resilient, green and beautiful environment where people and business can thrive and reach their full potential.



By 2042, Birmingham will be:

- **A net zero carbon city** that has delivered sustainable development and showcases the best environmental quality, resource efficiency and adaptability.
- **A resilient city** that has prepared for the local impact that climate change will present and has maximised the local capacity for energy generation and storage.
- **A city of growth for all** based on diversity and equality, where everyone can reach their full potential and where new housing, jobs and infrastructure meets the needs of our people, raising quality of life and increased prosperity.
- **A city of thriving neighbourhoods** with an integrated collection of vibrant, distinct and successful neighbourhoods offering a wide choice of high quality and affordable housing supported by services and facilities which enable residents to meet their daily needs by walking and cycling and public transport.
- **A city of nature** with more wildlife, trees and a rich multifunctional, connected green infrastructure network that can be enjoyed by everyone.
- **A healthy city** with cleaner air and water and wide range of open spaces and recreation facilities to support active healthy lifestyles.
- **A city of layers** rich in history, the arts, industry, culture, technology, and sports which make Birmingham like no other place, and a city that we can be proud of, own and celebrate. A city known for its people-centred design, enduring places and high quality environment.
- **A connected city** with a sustainable, green, inclusive, go-anywhere transport system where walking, cycling and public transport are the first and natural choice of travel.
- **A city of knowledge and innovation** world class for its jobs, education and research, where residents are highly skilled, businesses are successful, and we maximise the potential of technology and data to create a smart and sustainable city underpinned by future proofed digital and data connectivity.
- **An inclusive city** characterised by diversity and equality and where everyone can reach their full potential regardless of where they live.





**Objectives**

**3.3** We have drafted a set of objectives for the Birmingham Local Plan which will help us achieve this vision. The objectives will form the framework for the Plan, and our policies and sites should all contribute to achieving them.

**Objective 1: A net zero carbon city**

- To ensure all new development achieves net-zero carbon emissions and is as energy efficient as possible.
- To have a positive and bold strategy to renewable energy.
- To make the most efficient use of our natural resources and minimise energy use.
- To minimise waste and promote a circular economy.

**Objective 2: A resilient city**

- To ensure development is designed to create resilient, adaptive and liveable environments that supports nature and human health and well-being.
- To manage flood risk and encourage the use of sustainable drainage systems.
- To reduce the impacts of urban overheating.
- To make building and places greener.

**Objective 3: A city of growth for all**

- To develop and grow the city in fair and inclusive way, meeting the needs of all of Birmingham's citizens.
- To support business growth, job creation, and inward investment by providing a range of employment and economic growth opportunities.

- To meet the housing needs of the city while protecting the things that are important to existing communities.
- To provide essential infrastructure to support development in a co-ordinated and timely manner.

**Objective 4: A city of knowledge and innovation**

- To build on Birmingham's competitive economic advantages and retain and attract the best talent.
- To capture the potential of our innovation assets such as our universities and strengths in next generation transport, sustainable construction and medical sciences to drive economic growth.
- To promote low carbon industries and a green economy.
- To improve the education and skills of Birmingham's residents, increasing life prospects and prosperity.

**Objective 5: A city of thriving neighbourhoods**

- To provide for a significant increase in high-quality new homes and affordable housing in a range of, sizes, types and tenures to meet the city's housing needs.
- To create safe, attractive and sustainable neighbourhoods where there is good access to services and facilities within walking and cycling distance.
- To support our network of urban centres as they adapt to changing trends and demands, encouraging investment and a wider range of activities to increase footfall and spend.
- To continue to enhance the City Centre to make it greener, more attractive and resilient as well as spreading the success of the City Centre to surrounding areas beyond the ring road through the emerging Central Area Framework.

**Objective 6: A city of layers**

- To raise the standard of design and place quality across the city creating enduring places popular with those who live here and visit.
- To create safe, accessible and distinctive places which enhance local identity and pride of place.
- To protect and enhance the city's rich heritage and its cultural offer, integrating new development with respect.
- To make the city an international destination for tourists.

**Objective 7: A healthy city**

- To ensure development contributes to reducing health inequalities and maximising health and well-being.
- To improve access to health and social care facilities, high quality open spaces and sports and recreation facilities to support healthy lifestyles.
- To radically improve our air and water quality.

**Objective 8: A city of nature**

- To protect and enhance our varied natural environments and promote a connected green and blue infrastructure network.
- To deliver net gains in biodiversity and improve access to nature.
- To expand the Birmingham Urban Forest and green the city.

**Objective 9: A connected city**

- To facilitate a step change in how people travel with the delivery of an integrated and sustainable transport network which prioritises walking, cycling and public transport.
- To maximise on Birmingham's position as one of the best-connected places in the UK - locally, nationally and internationally - using the catalyst of High Speed Rail (HS2) to drive growth and investment.
- To create a framework for a smart and digitally connected city.
- To establish a digital ecosystem that brings together data, future proof connectivity and emerging technologies to the forefront.

**Objective 10: An inclusive city**

- To ensure physical, social and digital infrastructure meets the needs of all existing and future citizens.
- To provide local economic opportunities through skill development and job creation.
- To facilitate social interaction and the creation of inclusive and safe environments.

“

HAVE YOUR SAY

Vision and objectives

3. Do you agree with the proposed vision?

4. Are these right objectives for the Birmingham Local Plan to achieve?

5. What is most important to you?  
e.g. 1 - Net zero carbon city.  
2 - A connected city etc.

6. Is there anything missing from the vision and objectives?

”



# 4

## Homes and *Neighbourhoods*

### Why do we need new homes?

**4.1** Birmingham is a growing city and based on the Government's standard methodology, we need to build 7,136 new homes every year. The Birmingham Development Plan (2017) was unable to identify enough land to meet all of Birmingham's housing need, whilst the city has delivered more homes than the plan set out, there has still been a need to work with neighbouring authorities within the Housing Market Area (HMA) to deliver the shortfall. This Plan will also be capacity led, despite creative approaches used to identify sites which may be suitable for development, and proposed changes to policy approaches, including increased density, particularly within the city centre, we will continue to be reliant on working with other local authorities within the Housing Market Area to deliver our required housing growth.

**4.2** Over the next 20 years Birmingham's population is expected to grow by around 133,600 people resulting in increased pressures on services, jobs and infrastructure. To meet the needs of our growing population, we need to significantly increase the delivery of new housing, especially affordable housing for which there is a pressing need. This means not only ensuring a strong housing land supply but also ensuring the right type, size and tenure of housing is provided. Birmingham has a good track record of delivering housing growth, but the housing challenge remains the biggest the Birmingham Local Plan will need to address going forward.

**4.3** The pressure on the existing housing stock is reflected in high levels of homelessness and overcrowding in the city as households are unable

to access suitable housing. Birmingham has a young population which means affordability presents a particular challenge for a large proportion of our residents. At the same time, we have an ageing population which presents issues around the type of housing required and high levels of under-occupancy in parts of the city. As affordability has worsened and house prices have outstripped growth in wages more people will require housing support. It is clear that we need to deliver a major step change in the provision of new high-quality affordable housing.

**4.4** The private rented sector makes up 18% of the tenure market in Birmingham. The evidence tells us that most of the privately rented accommodation in Birmingham is occupied by people in their 20-30s, often economically active and with young children. It is likely that these

households are not able to afford to purchase property and therefore remain stuck in the rental market without the means to access the capital needed for home ownership. Only 55% of households in Birmingham are owner occupiers, significantly lower than the national average at 63% (Census 2011). The growth of HMO accommodation and Exempt Accommodation means the city has seen a significant loss in privately rented family homes.

**4.5** Access to good quality housing is one of the most important factors affecting quality of life and we want to ensure that every citizen is able to find, access and sustain housing that meets their needs. The new homes we build will need to be resilient to a changing climate, including hotter temperatures and increased surface water flooding.







### What are the benefits of new homes?

#### 4.6 New housing development can:

- Create more choice in the housing market and can help first time buyers onto the property ladder or older people wishing to downsize.
- Improve the environment and neighbourhood, especially where sites have been vacant for a long time.
- Deliver new facilities e.g. open space, transport improvements, schools.
- Add to the supply of affordable housing.
- Support struggling services e.g. shops, community facilities.
- Create construction jobs.
- Provide opportunities to enhance biodiversity.
- Bring about the wider social and economic regeneration of an area.

### How many homes do we need?

**4.7** National government has set a standard method for calculating how many homes are needed in a local authority area. This currently gives Birmingham a local housing need of 7,136 dwellings per annum (dpa) (as at March 2022). This

includes an additional 35% for the top 20 largest cities in the UK which includes Birmingham. The government expects the standard method to be used as the starting point for Local Plans and only in exceptional circumstances can a different approach be taken.

**4.8** As a sensitivity the Housing and Economic Needs Assessment (HEDNA) has explored housing need if the more recent 2018-based household projections were relied upon. This scenario resulted in an annual requirement of 6,140 new homes to be delivered in the city. (See Footnote 1). However, the assumptions that underpin this scenario would diverge from the Planning Practice Guidance and would also result in higher needs for other local authorities within the Greater Birmingham and Black Country Housing Market Area. For this reason, the City Council did not pursue this scenario and are continuing to follow the government's standard method.

**4.9** Applying the standard method to the plan period (2020-2042) gives a total housing figure of 149,286 dwellings for the plan period (prior to taking completions into account). This takes into account the housing requirement of 6,566 dwellings between April 2020 and March 2022

*Footnote 1: At a very late stage in the production of the HEDNA, ONS published affordability ratios for 2021. This would increase the 6,140 figure to 6,459 dpa.*

based on the adopted BDP and LHN and 7,136 dpa from April 2022 to March 2042 based on the standard method. When completions between 2020/21- 2021/22 of 6,624 dwellings are taken into account, the figure is 142,662 dwellings.

**4.10** Delivering these many homes will be a huge challenge given that our current annual rate of housebuilding is 3,347 homes (average over the last 5 years). We will need to explore the scale of housing growth that can be realistically achieved and consider where and how we can accommodate new homes. While the housing need figure is 7,136 dpa, the eventual housing requirement will be determined through the Birmingham Local Plan.

**4.11** The formula for the standard method means that this number will also vary annually in line with population changes and affordability ratios. The Office of Budgetary Responsibility (OBR) published its annual Economic and Fiscal Outlook in March 2022. The analysis shows that the housing affordability ratio is inflated due to pandemic factors, which saw a higher than normal increase in house prices and a reduction in average workplace incomes. This has worsened affordability leading to an increase in the housing

need. The OBR report suggests that affordability ratios may return to their 2017/2018 levels in future thereby returning to pre-pandemic levels. (<https://obr.uk/efo/economic-and-fiscal-outlook-march-2022/>). Furthermore, there may also be updates to the standard method itself during the preparation of this Plan. If this is the case, the local housing need will be reviewed accordingly.

### Existing sources of housing supply

**4.12** Based on the government's standard method, we need to deliver 149,286 new dwellings over the plan period. There will be existing sources of new housing which we can take into account and will be common to all proposed approaches.

**4.13** These include housing sites under construction, existing planning permissions yet to be started, and site allocations not completed ('committed sites') and other opportunity sites (including suitable Call for Sites submissions). The majority of these will be on previously developed ('brownfield') land. The Langley Sustainable Urban Extension, allocated within the existing Birmingham Development Plan, will deliver around 6,000 new homes.

### Maximising the use of brownfield land

**4.14** The use of brownfield land is a priority for the government and has been a key part of Birmingham's development strategy for many years. Whilst many large brownfield sites have been redeveloped through the continued regeneration of the city, further opportunities have been identified through work undertaken to search for sites which have not come forward through the traditional Call for Sites process, this includes land in public and private ownership, as well as areas where multiple land parcels will need to be assembled to bring forward deliverable sites. Many of the sites require a change to the existing land use. We have written to all the landowners of the land parcels identified as suitable through our digital land search and where landowners have confirmed availability of their land for development, these have been included in the HELAA as 'other opportunity sites'. Work will continue to identify further sites appropriate for inclusion in the HELAA. Therefore, the supply figure could increase by the time we consult on Preferred Options, reducing any housing shortfall. It should be noted that should even if all of the sites come forward there would still be a significant housing shortfall.



Current assessment of available land

4.15 Based on the latest HELAA, we estimate the potential capacity from the sources mentioned to amount to a total of 70,871 dwellings (identified sites and windfalls) taking into account completions between 2020/21 and 2021/22. This leaves a shortfall of around 78,415 dwellings to be found through the preparation of this Plan. It should be noted that this figure will be refined as the plan progresses.

4.16 The HELAA is not a policy document, it is simply a database of available land from which we select the most suitable and deliverable sites to meet future development needs. The HELAA will continue to be updated throughout the plan-making process and is available to view on the Evidence Base page at: [www.birmingham.gov.uk/downloads/download/5184/evidence\\_base\\_for\\_the\\_new\\_birmingham\\_plan](http://www.birmingham.gov.uk/downloads/download/5184/evidence_base_for_the_new_birmingham_plan)

Category	Dwellings
Under construction.	15,737
Detailed Planning Permission (not started).	12,132
Outline Planning Permission.	5,602
Permitted Development (office, retail, agricultural to residential).	433
Permission in principle.	18
Allocation in Adopted Plan.	9,604
Other opportunity (including call for sites submissions).	11,044
Sub total - identified sites.	54,570
Lapse rate 12% (applied to outline consents and other opportunities).	-1,998
Sub total - identified sites - lapse rate.	52,572
Windfall allowance (unidentified sites x19 years - no windfalls in year 1).	11,675
Completions 2020/21-2021/22.	6,624
Total capacity.	70,871

Summary of housing need/supply	Number of dwellings
Housing need 2020-2042.	149,286
Housing supply.	70,871
Shortfall.	78,415

Options for housing growth

4.17 Maximising the use of brownfield land will continue to be a key part of Birmingham’s strategy for growth so it is not listed below as an option because it will be common to all approaches taken. Brownfield land alone however will not deliver the number of homes we need. The broad options identified by the Council below could help to increase the supply of land for housing. At this stage of the process, it is about the overall strategy, not specific sites, therefore housing numbers are not identified against the different options. The options are not mutually exclusive; meaning it’s not a case of choosing one or another but deciding which combination of options would best help deliver the number of homes we need. It should also be noted that even if all the all of the options were adopted there would still be a significant housing shortfall. The options are:

- Option 1  
Increase housing densities.
- Option 2  
More active public sector land assembly.
- Option 3  
Further comprehensive housing regeneration.
- Option 4  
Utilise poor quality under-used open space for housing.
- Option 5  
Utilise some employment land for housing.
- Option 6  
Release Green Belt for housing.





Option 1  
Increase housing densities

**4.18** This option would seek to maximise densities on housing sites within the city and make better use of the land. A simple definition of density is the number of residential units per hectare. The more units within a given space, the higher the density. Our current policy (TP30) in the BDP requires new housing to be provided at a minimum of:

- 100 dwellings per hectare in the City Centre.
- 50 dwellings per hectare in areas well served by public transport.
- 40 dwellings per hectare elsewhere.

**4.19** The policy acknowledges that there may be occasions where lower densities would be appropriate, for instance in conservation areas, mature suburbs or to enable the provision of larger housing.

**4.20** We have analysed the density of sites that have been granted planning permission and sites that have been built in the last 3 years. The assessment revealed that the density for dwellings in suburban locations is broadly in line with Policy TP30 at 40 dwellings per hectare. We do not think there is much potential to vary this figure due to the prevailing character of suburban areas and the need for larger homes.

**4.21** The average density achieved in and around urban centres is 70 dwellings per hectare, which is higher than the policy target of 50 dwellings per hectare for ‘areas well served by public transport’ in Policy TP30. We therefore consider it reasonable to increase the density target to 70 dwellings per hectare in and around centres. ‘Around’ is defined as a 400 metre buffer from the boundary of an identified local centre.

**4.22** Densities being granted consent and delivered in the city centre average at 400 dwelling per hectare which is considerably higher than the current 100 dwellings per hectare target. There will be variation across the city centre but acknowledging the density optimising approach set out in national policy which seeks to maximise the use of land, it is suggested that this is an appropriate average density to achieve within and around the city centre (a 400 metre buffer has also been applied to the city centre).

**4.23** The new density assumptions and net developable area calculations have been used to inform the HELAA and have been applied to ‘Other Opportunity’ sites which do not have anything else to inform their capacity (e.g. expired consent, pre-

apps). The new density assumptions have yielded an additional estimated 1,300 dwellings compared to the lower BDP density assumptions.

**4.24** Examples of different densities are shown in a topic paper available to view on the Local Plan evidence page.

Area	Average net density (dwelling per hectare)
In and around City Centre.	400
In and around Urban Centres.	70
Suburban.	40

Option 1 Increase housing densities	
Opportunities	Challenges
More people would live within easy reach of employment and leisure opportunities.	The range of housing provided may be more limited. Less scope to meet demand for family housing.
Potentially lower carbon emissions and air pollution due to shorter travelling distances from new homes to jobs and facilities.	Residents might have less access to open space and private outdoor space than people living in less dense areas; this could be detrimental to physical and mental health, unless adequate provision is made.
Could result in lower car dependency if supported by investment cycling, walking and public transport infrastructure.	Potential issues related to urban heat island effect.
Likely to meet the housing needs of younger people moving to the city to study or work.	Possible adverse impact on heritage assets but this will depend on design.
Maximises opportunities for development to utilise district heat networks.	Possible adverse impacts on biodiversity or nature conservation sites but this will depend on site specifics.
Would support shops, restaurants, community facilities, other services and public transport.	
Would maximise the capacity of sites and boost housing supply.	

Option 2  
More active public sector land assembly

**4.25** To meet the city’s housing needs will require a proactive approach to land assembly. Larger sites deliver more housing and provide wider regeneration benefits but there are few of these within the city. Large schemes often span across land ownership boundaries, and one of the first steps in making them happen is to acquire the

property interests from the various owners. This could also be applied to smaller schemes which would typically result in higher densities.

**4.26** Assembling land does not necessarily mean the use of compulsory purchase powers but national policy encourages local authorities to use CPO power where necessary and the proposed changes to the planning system attempts to make the process faster.

Option 2 More active public sector land assembly	
Opportunities	Challenges
Where the Council is a major landowner, we could take a proactive role using our land and general land assembly powers to shape new development.	Will require effective partnerships between the public and private sector and stakeholder buy in.
Would boost housing supply.	Can be a complex, lengthy and expensive process.
Would allow under-utilised land to be repurposed such as underperforming shopping centres.	The co-ordination of infrastructure is challenging on large complex sites often involving collaboration and equalisation agreements to ensure that infrastructure costs are shared.
Would help to remove or relocate non-conforming industrial sites from residential areas.	Limited resources to assemble land
Would help to secure more comprehensive development and better development outcomes.	





Option 3  
Further comprehensive housing regeneration

4.27 The city has a long tradition of supporting regeneration and the renewal of existing housing estates to deliver better homes, enhanced neighbourhoods and improve quality of life. Recent examples include the Lyndhurst Estate, Newtown, the Meadway and Kings Norton which have been

regenerated to provide new housing and enhanced community facilities and open space. However, there are still some large residential estates which do not provide the quality of accommodation or environment that ensure a high quality of life for residents. This option would look to identify further housing regeneration areas where the Council would take a proactive approach to work with delivery partners and local residents to deliver comprehensive change and improvement.

Option 3 Further comprehensive housing regeneration	
Opportunities	Challenges
Regeneration would result in better homes and improvements to the local environment and amenities.	Will require effective partnerships between the public and private sector and local resident buy in.
Would have a positive local economic impact.	Can be a complex, lengthy, contentious, disruptive and expensive process.
Would improve other area outcomes such as crime, health and well-being.	The cost of demolition, compensation and construction could result in a reduced number of homes for social rent and increased rental and service charges for tenants.
Would raise property values.	Carbon emissions released from demolition and disposal.
Diversification of the housing mix.	

Option 4  
Utilise poor under-used open space for housing

4.28 As the city's population grows the demand for open space will also increase and there will be both a need to provide more open space in some areas and improve what already exists. Open space is an important asset and is vital to environmental quality, biodiversity and health and well-being. In many parts of the city there is

already a shortage of good quality open space, so opportunities to utilise open space for housing are limited. The Council also aspires to increase the amount of open space in the city as set out in the City of Nature Plan.

4.29 This option would explore the potential to develop or partially develop open space where it is of limited value, underused or no longer serves its purpose. This could also provide the opportunity for improvements to the quality of open space.

Option 4 Utilise poor under-used open space for housing	
Opportunities	Challenges
Sites would be in accessible locations.	There is already an under-provision of open space.
Would increase the supply of housing land.	Could increase impacts of climate change.
Would reduce the housing shortfall and number of dwellings to be provided by neighbouring authorities.	Some open space may be valuable for biodiversity.
Provision of enhanced open space integrated into housing developments.	Could impact on the amenity and health and wellbeing of residents.



Option 5  
Utilise some employment land for housing

**4.30** A significant amount of the city’s employment land lies within established employment locations which have been designated as Core Employment Areas. These are protected for industrial uses to ensure that the city has a sufficient supply of land to support jobs and the needs of businesses. There is also a significant amount of employment land that falls outside of the Core Employment Areas.

**4.31** Whilst the employment land supply section of this document has identified that most of these Core Employment Areas will need to be retained, there may be opportunities to repurpose poorer quality and underused employment land outside for housing development.

Option 6  
Release green belt for housing

**4.32** Birmingham’s Green Belt covers about 15% of the city’s land area. The majority of this is in the north of the city; there are smaller areas where the city boundary meets Sandwell to the west and Bromsgrove to the south. There are also a number of ‘green wedges’ along river valleys, such as the Cole Valley and Woodgate Valley.

**4.33** The Green Belt was reviewed around 5 years ago through the Birmingham Development Plan and through that process 274 hectares was released for the development of 6,000 homes at Langley, Sutton Coldfield along with a 71 hectare employment site at Peddimore. An outline planning application has been submitted for the Langley SUE in December 2021.

**4.34** We do not want to see further release of Green Belt but the city’s housing need is now much greater and the ability of neighbouring authorities to accommodate any Birmingham housing shortfall will be challenged by the need to deal with any of their own housing shortfall.

**4.35** All reasonable alternatives must be explored before considering altering the Green Belt. The government says that changes to the Green Belt should only be done in exceptional circumstances and through Local Plans. The starting point is looking at whether we can maintain the current Green Belt and still build the homes needed. Much of Birmingham’s Green Belt is constrained by nature designations and flood risk. The only

significant areas of Green Belt remaining are in the north east of Birmingham in Sutton Coldfield. The BDP 2017 confirmed that the Green Belt (Areas A and B) in the Sutton Coldfield area were of higher landscape value and more sensitive to development with regard to landscape and visual effects. The Council also considers that there are limits to the number of new homes that can be built and sold in a similar location, particularly given that Langley SUE has not yet started on site. If all alternative options are exhausted (including asking our neighbouring authorities for help) and there is still a shortfall in the number of homes we need to deliver, we will need to undertake a Green Belt review.

Option 6 Release green belt for housing	
Opportunities	Challenges
Would boost the supply of housing and maximise provision of affordable housing.	Potentially higher carbon emissions and air pollution due to more new homes having increased travelling distances to jobs and facilities.
Would facilitate a wider range of new homes and deliver more suburban family housing.	Additional infrastructure investment will be required in some locations such as schools.
Lower risk of people wanting larger family homes moving out of Birmingham.	Likely to concentrate delivery later in the plan period due to infrastructure provision and phasing.
Would provide a wider range of sites and could ensure more consistent delivery in the face of changes in the housing market.	Loss of green belt land.
Would have greater opportunity to promote rail travel for inter urban trips.	Impacts on the wider transport network may need to be mitigated in some locations.
May help to protect more urban green spaces.	

HAVE YOUR SAY

Options for housing growth

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

8. What is your preferred option or combination of options?

9. Do you think the proposed densities are appropriate? Should we build to even higher densities?

10. Are there any additional sites you think are suitable and available for housing development? If so, please submit a Call for Sites Form at:  
bcc-call-for-sites.nw.r.appspot.com



### What type of homes do we need?

**4.36** In bringing forward new housing schemes the type, size and tenure of homes will be just as important as the overall numbers that are built. The NPPF requires local planning authorities to assess the size, type and tenure of housing needed for different groups in the community and reflect these in planning policies. A Housing and Economic Development Needs Assessment (HEDNA) has been undertaken which provides updated evidence on the overall need for housing, and type and mix of housing needed.

### Affordable housing

**4.37** There is a significant need for affordable housing estimated at 2,997 dwellings per annum (excluding households already in accommodation). This includes social and affordable rented housing (See Footnote 2).

**4.38** In deciding what types of affordable housing to provide, including the split between rented and home ownership products, the Council will need to look at the levels of need and whether it would be viable to meet the need. While the evidence suggests that affordable housing delivery should be maximised, the amount of affordable housing provided will be limited by financial viability and other priorities such as the provision of open space, transport improvements, and education contributions.

**4.39** The Council's current affordable housing policy (TP31 in the BDP) seeks 35% affordable homes as a developer contribution on residential developments of 15 dwellings or more.

*Footnote 2: Under-delivery of affordable housing should not be seen as cumulative. See para 7.86 of the HEDNA.*

### Proposed policy changes

- Given the significant need for affordable housing in the city, it is proposed that the Council tests the 35% figure to see if a higher contribution is viable, particularly as viability may be improved with inclusion of First Homes.
- There will be a need for both social and affordable rented housing but a rigid policy for the split between the two is not considered appropriate. The specific tenures to be provided would be determined on a site by site basis. This gives flexibility but less certainty over the types of affordable homes that will be provided.
- The Council will need to consider the NPPF requirement for 10% of housing to be affordable home ownership and the role that First Homes will play in the overall affordable mix.
- The HEDNA suggests changes should be made to our existing housing size and tenure mix requirements. The Council will be led by this evidence and propose to update the policies on the type, size and tenure of new housing.

### Family housing

**4.40** The loss of family housing is frequent concern raised by residents through planning applications involving the conversion of family houses to Houses in Multiple Occupation (HMO) or specialist housing. This can be problematic as the city has a relatively high level of families and this is expected to grow.

### Proposed policy changes

- While the Council has introduced a city-wide HMO Article 4 Direction and more stringent policy on HMO development, a policy to prevent the loss of family housing (Use Class C3) would help to retain economically active families in the city and ensure the housing needs of families can be met, sustaining mixed and balanced communities.

### Housing for older people

**4.41** The older person population (65+) is projected to increase by 32% in the future and an ageing population means that the number of people with disabilities is likely to increase substantially. This would suggest there is a clear need to increase the supply of accessible and adaptable dwellings and wheelchair user dwellings as well as providing specific provision of older persons housing (e.g. sheltered housing, extra-care).

**4.42** Currently there is no policy which sets a specific percentage or threshold requirement for residential development to provide specialist housing for older people within the BDP. Policy DM10 in the Development Management in Birmingham requires housing development of 15 or more dwellings to provide 30% as accessible and adaptable dwellings in accordance with Building Regulation Part M4(2) but there is currently no provision for housing to support wheelchair users.

### Proposed policy changes

- The Council will consider whether to have a policy which requires new residential development to provide a specific percentage of homes for older people. This would provide more certainty of provision but would need to be viability tested.
- The Council could also explore allocating sites or parcels within larger sites for specialist housing. This would provide greater certainty of meeting specialist housing needs.
- To help meet the housing needs of wheelchair users, we could consider having a policy which requires residential development of a certain threshold to provide a percentage (e.g. 10-15%) of wheelchair accessible homes.

### Purpose built student accommodation

**4.43** Birmingham is home to five main universities, which bring many positive benefits to the city through research and innovation, the production of skilled workers and supporting jobs. The supply of good quality accommodation in the right location is important to not only students but also the neighbourhoods within which they are located.

**4.44** The existing policy (TP33) for purpose built student accommodation in the BDP supports on campus provision and sets out criteria for off campus provision. This includes demonstrating a need for the development and being very well located to the university it seeks to serve.

**4.45** The majority of purpose built student accommodation is currently located in the city centre and the Selly Oak and Edgbaston area. Local residents in Selly Oak have expressed concerns about the impact of high densities of students on their local area and have asked the Council to explore a policy which would spread student accommodation more evenly across the area surrounding each university.

### Proposed policy changes

- Review existing BDP policy TP33 and consider alternative policy approaches.
- Another policy option that has been suggested by local residents is setting a limit on the density of students permitted to live in an area. This would be difficult to implement as students live in a variety of accommodation, have the freedom to move and change accommodation and there is no complete data on where all students live.







#### Built to rent

**4.46** ‘Build to rent’ is a growing sector in the housing market, comprising large purpose-built developments for private rent. This type of housing is associated with long term institutional funding/ investment and is expanding particularly in major urban areas.

**4.47** The government is promoting build to rent as a means of improving the supply, choice and quality of private rented accommodation. The Council accepts that build to rent can add to the choice of good quality rented accommodation and secure longer-term tenancies.

#### *Proposed policy change*

- Currently the Council has no policy for build to rent. It could be beneficial to have a policy which defines the city’s expectations for such housing to ensure the delivery of high quality schemes.

#### Large scale shared accommodation

**4.48** Large scale shared accommodation, commonly known as co-living, is a relatively new form of accommodation where residents rent a room within a purpose-built (or converted) development which has shared amenities and facilities. This type of accommodation can provide an alternative to traditional flat or house shares and includes additional services and facilities, such as room cleaning, on site gyms, communal workspaces and a concierge service. Co-living is currently undefined in the Use Classes Order which means that they would typically be a “Sui Generis” Use as they are non-self-contained housing. There is currently no specific national or local planning policy for co-living. However, the Council has produced a Supplementary Planning Document to provide guidance to developers.

#### *Proposed policy change*

- A new policy would help to define the city’s expectations for co-living and ensure schemes are located in the right place and deliver high quality accommodation.

#### Gypsies, travellers and travelling show people

**4.49** A study into the requirements of gypsies and travellers was produced in 2014 and updated in 2019. The HEDNA has taken the 2019 study and extrapolated the need. 30 pitches will be required to 2042.

**4.50** Two sites were allocated at Hubert Street/ Aston Brook Street East and Rupert Street/Proctor Street in the BDP to provide a sufficient 5 year supply of permanent and transit sites. However, given the pressing need for the Council to provide transit sites to assist with an increasing prevalence of unauthorised encampments across the city, the two allocated sites have been identified as transit sites.

**4.51** Transit provision in the city is currently under review but it is likely that the City Council will also need to identify and allocate a further site or sites for permanent provision for gypsies and travellers which will need to be delivered during the new Birmingham Local Plan period to meet any shortfalls.

**4.52** It is also likely that an additional site will need to be identified and allocated for travelling show people. This will be for accommodation and storage of fairground equipment particularly during the winter months.

#### *Proposed policy change*

- If there is a need, the Council are required to allocate sites to provide at least 5 years supply of sites against the need assessed by the latest gypsy and travellers assessment.

#### Healthy neighbourhoods

**4.53** National policy says that local plans should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles. The health and wellbeing of residents a key priority for the City Council and is embedded in the Council Plan, Health and Wellbeing Strategy, the BDP, BTP and other documents.

**4.54** Poor health is linked to a number of environmental, social, and cultural factors and high levels of deprivation. Although planning is not the only solution, it plays a vital role in promoting health and wellbeing, such as encouraging active travel, promoting sustainable transport, creating access to high quality open space and the design of safe places.

**4.55** The 15 or 20 minute neighbourhood concept can enable residents to access all of their needs within a 15 or 20 minute walk or bike ride from their home. It can reduce car use and encourage active travel helping to address the climate emergency, imbalances in access to services and facilities and improve the health and well-being of all residents.

**4.56** Meeting Birmingham’s future housing needs will generate additional demand and increase pressure on existing facilities. Healthcare infrastructure planning is necessarily an on-going process and Birmingham will continue to work closely with healthcare partners and the development industry to assess and meet existing and new healthcare infrastructure needs.

**4.57** A Health Impact Assessment (HIA) can be a useful tool in assessing development proposals where there are expected to be significant impacts on health and wellbeing. They can be used to identify measures to help reduce adverse impacts and maximise the positive impacts of a development proposal. Detailed guidance would need to be prepared on HIA to assist with the implementation of any HIA policy requirement.

#### *Proposed policy change*

- The Council will consider introducing a requirement for development proposals of a certain threshold to be subject to Health Impact Assessment (HIA). HIA can help to enhance the benefits and minimise the risks to health of a development. We would need to determine the appropriate type and scale of development that HIA requirement would be applied to.

HAVE YOUR SAY

Homes and neighbourhoods

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

12. How do you think we can increase the supply of affordable housing?

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

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

15. Should we have a policy which requires a percentage of older persons housing on residential developments?

16. Should we allocate sites specifically for older persons housing? Where should they be?

17. What should the policy be on purpose built student accommodation?

18. Where should new gypsy and traveller sites be located?

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



# 5

## Climate Change

### Introduction

**5.1** Today we are facing a crisis that requires urgent action. The City Council declared a Climate Emergency in June 2019 and aspires to be net zero carbon by 2030. The latest Action Plan was endorsed by Full Council in January 2021, setting out priority actions and a dedicated team to facilitate this net zero ambition was established in January 2022. The net zero ambition exists to limit global warming to 1.5°C above pre-industrial levels. In May 2021, the UK's Met Office announced, "There is more than a 40% chance that the annual average global temperature in at least one of the next five years will temporarily reach 1.5°C above pre-industrial levels.<sup>2</sup>" We are already vulnerable

<sup>2</sup> [www.metoffice.gov.uk/about-us/press-office/news/weather-and-climate/2021/chance-of-temporarily-reaching-1.5-c-in-next-five-years-is-increasing](https://www.metoffice.gov.uk/about-us/press-office/news/weather-and-climate/2021/chance-of-temporarily-reaching-1.5-c-in-next-five-years-is-increasing)

to climate impacts and this will increase. This declaration underlines the critical need to adapt the way the way we plan, live, work, and move around in order to reduce carbon emissions and build our resilience to a changing climate.

**5.2** Climate change is the long-term shift in average weather patterns across the world, which human activity has contributed to through the release of carbon dioxide and other greenhouse gases into the air, leading to global warming. The impacts of global warming include an increase in extreme weather events such as flooding, heatwaves, droughts, and rising ocean levels - posing risks to people, nature, infrastructure and our economy.

**5.3** There are various planning measures which can help to support net zero and build climate resilience including reducing the need to travel through place making, supporting new and well-connected sustainable transport systems, integrating and enhancing natural capital and biodiversity through implementation of nature-based solutions, minimising demand for energy through design integrating renewable energy generation and supporting infrastructure and connection to decarbonised heat networks.

**5.4** Similarly, it will be necessary to ensure developments are designed and futureproofed

against the impact of climate change. Climate resilience measures include mitigating surface water flood risk, through Sustainable Drainage Systems and increased natural infrastructure, mitigating risk of overheating through building design and material selection, minimising the urban heat island effect through green infrastructure and increased planting and water efficiency through rainwater collection and reuse, and planning for water infrastructure. Planning therefore has a significant role to play in ensuring sustainable patterns of development and sustainable design.



## Energy efficiency and zero carbon development

**5.5** A large proportion of carbon emissions generated in the city come from buildings, and particularly the use of fossil fuels for heating. Improving the energy efficiency of buildings and minimising energy demand is the first priority. The remaining energy demand should be supplied from renewable energy sources or low carbon energy sources that will support a transition to renewable or net zero in the future. The significant gap between designed energy demand and operational (actual) energy demand also needs to be reduced.

**5.6** The rising cost of energy emphasises the importance of moving towards net zero and the strong case for increasing non-fossil fuel energy generation and energy cost resilience across the city. The planning system can support this by requiring local generation of heat and electricity and supporting opportunities for excess heat or electricity generation to be shared with others. Central government is currently piloting the introduction of mandated heat network zones in areas where heat networks present the most cost-effective decarbonisation solution. There are emerging opportunities for carbon reduction via aggregation of over-generation of renewable electricity (known as sleeving) which may present additional opportunity for carbon and energy cost reduction.

**5.7** 100% self-sufficiency from renewable sources of heat and electricity or heat networks may not be available in every circumstance and therefore a role remains for alternative options to reduce residual carbon emissions, including aggregation of excess renewable electricity generation in other locations (sleeving) and local carbon offsetting.

**5.8** Nationally, the government will introduce the ‘Future Homes Standard’ which will change the Building Regulations so that by 2025 new homes will be expected to reduce carbon emissions by 75-80%, compared with current levels. This would be achieved through very high fabric standards and low carbon heating systems such as ground or air source heat pumps in place of heating from gas. The Government suggested that the move towards a de-carbonised electricity grid would mean that homes built to the Future Homes Standard would become net zero carbon over time, with no need for further retrofit. However, this does not account for building local resilience to imported energy (through onsite renewable energy investment), local opportunities for decarbonised heat supply through heat networks, or the potential for developments with capacity to over-generate renewable energy to share with other sites. The city is keen to maximise these opportunities to maintain long term affordable, cost-effective energy supply.

**5.9** The Government’s commitment to strengthening Building Regulations will be a big step on the pathway to net zero carbon. However, they will not be ambitious enough to meet Birmingham’s ambition to be net zero by 2030; new development will need to go further than the requirements set out in the current and future Building Regulations.

### *Proposed policy changes*

- If we are to achieve net zero carbon by 2030, all new development will have to be zero carbon. This means setting high energy efficiency standards to reduce the demand for energy and incorporating renewable energy to provide cost-effective and resilient energy supply, and/or connection to a heat network where required.

- Where residual carbon emissions remain, alternative options for achieving net zero carbon will be explored. The priority will be to ensure residual carbon emissions are realised within the city boundary or projects that directly contribute to City net zero.
- Policies will need to deal with all of the carbon associated with new buildings including the energy needed to power them (operational energy) and that needed to construct and decommission them (embodied energy). This is known as whole life carbon. Only operational carbon is covered in Building Regulations.
- New development would be expected to get as close as possible to zero-carbon onsite, before relying on alternative options to make up any residual emissions reductions. Such alternatives may have the potential to support carbon reduction in existing buildings through demand reduction measures and by installing renewable technologies. Alternative options must be for projects which go over and above those that would happen anyway.
- Evidence around alternative options will be developed to progress any policy requirements. This includes assessing the impact on the viability of development posed by the additional cost of higher local standards alongside other priorities for contributions and requirements from new development.

## Sustainable design and construction

**5.10** At the same time as reducing carbon emissions, we must recognise that our climate is already changing as a result of past emissions. Extreme weather events including flooding and heat waves are becoming more frequent, and as such we need to ensure that all new developments are adaptable to this changing climate, in ways which do not energy use and associated carbon emissions.

**5.11** Overheating, particularly in new residential buildings is becoming an increasing problem with potentially serious consequences to health and life. The urban heat island effect is caused by extensive built-up areas absorbing and retaining heat during the day and night, leading to those areas being several degrees warmer than their surroundings. With higher temperatures across the country, the likelihood of heat being trapped in this way is very likely to increase. The use of green roofs and/or walls plus increased provision of natural infrastructure as part of developments can provide some mitigation by shading roof surfaces and through the mechanism of evapotranspiration. Building in resilience to future impacts will also be important.

**5.12** The Severn Trent Water has been identified as an area of ‘serious water stress’. It is therefore essential that water resources are managed efficiently within the region. Current Building Regulations require that water consumption in new homes does not exceed 125 litres per person per day. Currently the Council does not have a specific policy on water consumption for new homes.

### *Proposed policy changes*

- The Council will develop policy to require development to minimise internal heat gain and the impacts of urban heat islands. This would help to reduce health risks associated with retained heat in indoor air quality which could have serious effects on the very young or the elderly, or those with respiratory diseases.
- Requiring new development to meet higher water efficiency standards than specified in the Building Regulations would help to conserve water and lower water consumption helping to address issues of water stress in the city. Such a policy would need to be justified including financial viability evidence.

- With surface water flooding risk set to increase as a result of climate change, a strengthening of natural environment measures to reduce flooding risk is needed.
- The Council’s current policy (TP3) requires new non-residential development of certain threshold to aim to meet BREEAM standard Excellent unless it can be demonstrated that the cost of achieving this would make the proposed development unviable. It is proposed that this policy is retained but options explored to include requiring minor non-residential development to meet a BREEAM standard. This would mean applying the standard to a larger number of developments and could improve the environmental credentials of smaller development. This would also need to be assessed to see if it would be financially viable.

## Low and zero carbon energy infrastructure

**5.13** All new developments should aim to generate, at building or development level, all operational heat and power demands. There may also be opportunities for over generation and shared energy benefit within communities or developments. There may also be certain locations within the city that offer greater potential for the installation of low and zero carbon technologies (LZCs) such as solar panels coupled with electricity storage, and heat networks. The Council will undertake studies to identify such opportunities, which could lead to the identification of ‘Energy Zones’ including proposed Heat Network Zones being considered by central government.

**5.14** Heat networks are key to providing a decarbonised source of heating and cooling to existing buildings and new development. Connection of new development to heat networks supports the expansion of the network and connection of a wider number of existing buildings. There are 3 heat networks in the city centre at Broad Street, Aston University Campus and Birmingham Children’s Hospital. Their development in combination with energy efficiency could help to deliver affordable, secure and zero carbon heat across the city.

**5.15** The main heat decarbonisation policies in the government’s Net Zero Strategy are the switch to heat pumps and hydrogen. With a growing demand for electricity to support the switch to heat pumps coupled with electrification of the transport sector, it is increasingly important that spatial planning is aligned with energy infrastructure planning and investment. The Council will seek to proactively engage local utility infrastructure providers in the development of the Plan and investment infrastructure to support the city’s net zero ambitions.

### *Proposed policy changes*

- The Council has been working with BEIS on Heat Network Zoning. This could result in the identification of ‘Energy Zones’ where greater carbon reductions are expected to be achieved.
- The Council could seek to ensure that new housing and employment schemes are provided with the infrastructure to link into decarbonised heat networks where they do not currently exist or are still in the process of being delivered. This would help to future-proof development and prevent the need to retrofit in the future.





### Flood risk and water management

**5.16** Parts of Birmingham are at risk of flooding from rivers, watercourses, surface water, sewer flooding and groundwater as well as potential for canal and reservoir breach and overtopping. The risk of flooding is likely to increase with climate change. Measures to minimise the risk of flooding and mitigate its effects are therefore required.

**5.17** The risk of flooding can be avoided by directing development away from the highest risk areas and where development is necessary in such areas, they should be made safe for its lifetime and not increase flood risk elsewhere. The Council is in the process of updating its Strategic Flood Risk Assessment to provide a detailed assessment of the extent and nature of flood risk across the plan area. We will take account of this assessment and update policy where necessary in consultation with the Environment Agency.

**5.18** Current BDP policy (TP6) seeks to ensure that developments are planned to avoid vulnerability to flooding and manage risks with suitable adaptation measures. New developments are required to incorporate Sustainable Drainage Systems where feasible. It is proposed that policy is updated to provide clearer expectations to developers when developing sites vulnerable to flooding and in terms of sustainable drainage.

### Sustainable waste management

**5.19** There is a need to reduce the waste the city produces from its homes and businesses and carefully and sustainably manage what is left. How the city deals with waste will be important to planning for sustainable growth and tackling climate change

**5.20** The ‘waste hierarchy’ (3Rs) - Reduce, Reuse, Recycle summarises the overall national approach to waste management. This gives priority to preventing waste in the first place, then re-using it, then recycling it. Last of all, is disposal (e.g. landfill). Local plans are required to set policies on waste management and promote a circular economy where materials are retained in use at their highest value for as long as possible and are then reused or recycled, leaving a minimum of residual waste.

**5.21** With the need to accommodate further growth, it is important that adequate waste and recycling facilities which adopt the 3Rs principles are provided. The Council has commissioned a Total Waste Study which will explore a range of issues including predicted waste arisings from all sources and future capacity requirements. The results of the study will be used to update the waste policies.

### Proposed policy changes

- The Council will explore how we can strengthen policy to ensure that the principles on waste management and resource efficiency are addressed by new development, including construction waste.
- This could include applying the circular economy principles to the design of buildings for adaptation, reconstruction and deconstruction, extending the useful life of buildings and allowing for the salvage of building components and materials for reuse or recycling. Taking such an approach reduces the need to extract raw materials and the manufacture of new building components, reducing carbon emissions and assisting with the achievement of net zero carbon.
- Policies which require major development to provide infrastructure for facilitating recycling and composting on site and a strategy for sustainable disposal of waste can also help to reduce the amount of landfill.

“

HAVE YOUR SAY

Climate change

”

20.

Do you feel we have missed any policy opportunities to help the City achieve net zero?

21.

How should we encourage all developers to deliver net zero carbon development?

22.

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

23.

Should we introduce higher water efficiency standards?

24.

Do you agree with introducing a policy to prevent overheating of new buildings?

25.

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

26.

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



# 6

## The Built and Natural Environment

### Introduction

**6.1** Birmingham City Council is on a journey to improve the environment our citizens live in. The City of Nature Plan is a 25-year delivery plan which was approved by the City Council in February 2022. The Plan sets out the Council's ambition to create a greener, healthier, fairer and more involved city. It highlights the issue of 'environmental justice' - inequalities across the city in accessing green space and seeks to address this through framework which resets how we should look at green spaces. It also includes an action plan for tackling the top 5 wards most affected by 'environmental injustice' in the city.

**6.2** As well as its natural environment, Birmingham has a varied and unique built environment. The has rich historic environs which contributes to its local distinctiveness and gives it a unique sense of place. The existing BDP seeks to ensure that development responds sympathetically to its surroundings, protecting what is treasured and valued, whilst enhancing the environmental quality of the area through good design.

**6.3** Good design makes places enjoyable, safe and sustainable. It can create a sense of belonging, reduce opportunities for crime, improve accessibility and enhance biodiversity.

### Green infrastructure

**6.4** Green infrastructure is a network of multi-functional green and blue spaces and other green and blue features. This can include open spaces, playing fields, parks, woodlands, street trees, allotments, green roofs and blue spaces such as rivers, streams, lakes, pools and canals. Green infrastructure has a critically important role to play in mitigating the impacts of extreme weather events, particularly heat waves and reducing flood risk. In addition, green infrastructure helps support biodiversity, enhances the quality of the city's environment and improves health and well-being.

**6.5** An Urban Forest Masterplan has been produced by the City Council which outlines how Birmingham's Urban Forest (which comprises all

trees and associated vegetation along streets, in parks and woodland, in private gardens, and elsewhere) will be developed and proactively manage and grow the city's tree canopy.

### Proposed policy change

- Current policy (TP8) promotes the protection and enhancement of the existing green infrastructure network. A more proactive approach to expanding the green infrastructure network including Birmingham's Urban forest could be taken using the Local Nature Recovery Strategy and Urban Forest Master Plan to help increase the number of trees and canopy cover and identify locations for the improvement or restoration of existing wildlife habitats or the creation of new habitats.



Biodiversity Net Gain

**6.6** The varied natural environments in the city support a diverse range of biodiversity. Biodiversity means the variety of all living species, including plants and animals. In recent years biodiversity has been much affected by climate change. Increases in average temperatures and changing weather patterns have impacted on all living things. The city’s green infrastructure has a critical role to play in helping species survive.

**6.7** The Environment Act 2021 introduces a mandatory requirement for most new development to achieve a 10% net gain in biodiversity on or near the development site. This means that habitats for wildlife must be left in a measurably better state than before the development took place. The mandatory requirement for Biodiversity Net Gain is expected to be introduced in Winter 2023.

**6.8** Birmingham is highly urbanised, and the majority of development occurs on brownfield sites with very limited existing biodiversity. As such there is a case for seeking to achieve a higher net gain percentage.

**6.9** Local Nature Recovery Strategies (LNRS) introduced by government through the Environment Act 2021 will map the most valuable existing habitat for wildlife and opportunities for creating or improving habitat. They will also set out priorities for nature recovery. The Council will be able to use the LNRS to guide the delivery of Biodiversity Net Gain where it cannot be achieved on a development site. In such cases, developers have the option to contribute to off-site nature recovery projects instead, either at a local or regional scale. These could include, for example, woodland creation and flood plain restoration.

Proposed policy change

- Given that the majority of development sites will be on brownfield land with limited biodiversity value, the Council will explore a higher percentage of Biodiversity Net Gain e.g. 20%. A key challenge in securing higher net gains through development will be the effect on viability.

Urban greening

**6.10** Urban greening is about making streets, buildings and other public spaces green. This can include roofs and walls covered in plants, street trees and small pocket parks. Urban greening can help to improve air and noise pollution, soak up rainwater that may cause flooding, reduce urban heating effects, create habitats for local wildlife, offset carbon emissions in the local area, improve physical and mental health and make places look more attractive. As the city grows and the population increases, having a greener environment will help the city stay healthy and liveable, as well as less grey; showing the changing of seasons.

**6.11** Current BDP policy (TP8) encourages development to integrate green infrastructure as part of the design process to encourage urban greening.

Proposed policy change

- The Council proposes to strengthen the policy on urban greening to ensure major development proposals include urban greening as part of their design. We will also consider whether to develop an Urban Greening Factor to identify the appropriate amount of urban greening required in new developments. A number of cities such as London have successfully adopted a ‘green space factor’ to encourage more and better urban greening.

Open space and playing pitches

**6.12** Open space encompasses a wide range of spaces, not just traditional parks and gardens, but allotments, playgrounds and natural and semi-natural green spaces. All are important in providing recreational, health and other benefits for Birmingham residents and those who work in or visit the city.

**6.13** An Open Space Assessment has been prepared which assesses the quality, quantity and accessibility of publicly accessible open spaces in Birmingham and identifies surpluses and deficiencies. The Open Space Assessment is published as evidence alongside the issues and options consultation. The Open Space Assessment proposes new standards for provision of public open space in the city.

**6.14** A Playing Pitch Assessment and Strategy is currently being prepared. This focuses on outdoor sport and will analyse the current and future demand for outdoor sports facilities looking at quantity, quality and availability in relation to supply and demand. The Council intends to produce a Physical Activity Strategy and Built Indoor Sport Facilities Strategy in the future. These reports will be used to inform policies in the Birmingham Local Plan on provision of playing pitches.

Proposed policy change

- The new open space standard would see an increase in the requirement for open space from 2 hectares per 1,000 persons under current BDP Policy TP9 to 2.35 hectares per 1,000 persons. The new standard would be split into separate standards for allotments, parks and recreation grounds, play space, and accessible nature/informal green space. This contrasts with the current approach which sets an undifferentiated

standard for all open space without identifying particular types of open space. More details of the proposed standard is set out in the Open Space Assessment.

Minimising environmental pollution

**6.15** Air quality and the impacts of noise and light pollution are key considerations which can arise as a result of new development proposals. Policies relating to air, noise and light pollution have been recently adopted through the Development Management in Birmingham DPD. This provides up to date policies on ground conditions and pollution which are consistent with national policy so the Birmingham Local Plan will not cover these policy areas.

Historic environment

**6.16** Birmingham’s character is shaped by its historic development, which is represented by a rich and varied environment consisting of archaeological remains, canals, historic buildings, townscapes and landscapes. High levels of development will be expected in the future and this could place increased pressure on heritage assets and their wider settings. However, it also presents potential opportunities to reinforce and reveal the historic environment through incorporating it rather than isolating or losing it.

**6.17** Current policy (TP12) seeks to value, protect, and enhance the historic environment and manage new development in ways which will make a positive contribution to its character.

Placemaking and design quality

**6.18** Good design makes places enjoyable, safe and sustainable. It can create a sense of belonging, excitement, beauty, and reduce opportunities for crime, improve accessibility and enhance biodiversity. Essentially, good design can improve quality of life.

**6.19** The existing BDP policy (PG3) requires all new development to achieve high quality design. To facilitate the delivery of this policy, the Council has produced the Birmingham Design Guide SPD which was adopted in September 2022.

**6.20** We are aware of potential forthcoming requirements for all Local Authorities to produce a Design Code for their whole area. Should this requirement be introduced, we intend to prepare a Design Code to sit alongside the Local Plan, as a separate document and we will publish a timetable for doing so.

Tall buildings

**6.21** In the right locations tall buildings can make important contributions toward delivering new homes, economic growth and regeneration. Tall buildings will be particularly important to the delivery of a growth strategy which seeks to optimise the use of land. At the same time, it is also important to ensure that new development respects the existing historic character of the city and key landmarks and views that help to make Birmingham distinctive.

Proposed policy change

- The Council are considering whether to introduce a tall buildings policy which will indicate the most appropriate locations for them and ensure that they are well designed including greening of tall buildings.

HAVE YOUR SAY

The built and natural environment

27. How should the city’s green infrastructure network be improved and expanded?

28. Should we explore a higher than 10% biodiversity net gain for all major developments?

29. Should the new Local Plan seek to identify/allocate sites to provide off-site Biodiversity Net Gain?

30. Should the Council introduce an Urban Greening Factor policy?

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

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

33. How can the Birmingham Local Plan achieve high quality design in all developments?

34. Are there any specific issues that the Birmingham Local Plan needs to address regarding the environment?



# 7

## Economy and Centres

### Introduction

**7.1** A strong inclusive economy that is environmentally responsible and benefits local residents is a key part of achieving sustainable development. The Birmingham Local Plan will have an important role to play in providing opportunities for economic development and job creating activity.

**7.2** The current local plan supports local economic development, seeks to protect existing employment land and maintain the vitality of our urban centres. While these policies are still relevant, the Covid-19 pandemic has re-emphasised the continuing need to strengthen and diversify Birmingham's economy. The current local plan also needs updating in the light of recent legislation introduced by the Government to allow more changes of use without the need for planning permission.

### Employment land need

**7.3** The Birmingham Local Plan will need to set out the amount of employment space that is required over the period to 2042. To help us understand what is needed a Housing and Economic Development Needs Assessment (HEDNA) has been undertaken which assesses the future requirements for both economic development and housing.

**7.4** The HEDNA identifies a need for 295.6 hectares of employment land over the plan period. Ensuring that an adequate supply of employment land is maintained throughout the plan period will be essential in enabling long-term balanced growth to be sustained and is therefore a key challenge.

**7.5** The HEDNA also highlights a number of key growth sectors, such as construction, transport and storage, food and accommodation, information and communication, financial, professional and business services, education, health and residential and social services which are vital to the future of Birmingham's economy.

### Current assessment of available land

**7.6** Based on the latest HELAA, we estimate the potential capacity from the sources listed in the adjacent table to amount to a total of 221.96 hectares. This leaves a shortfall of 73.64 hectares to be found through the preparation of this Plan. It should be noted that this figure will be refined as the plan progresses.

**7.7** The HELAA is not a policy document, it is simply a database of available land from which we select the most suitable and deliverable sites to meet future development needs. The HELAA will continue to be updated throughout the plan-making process and is available to view at: [www.birmingham.gov.uk/downloads/download/5184/evidence\\_base\\_for\\_the\\_new\\_birmingham\\_plan](http://www.birmingham.gov.uk/downloads/download/5184/evidence_base_for_the_new_birmingham_plan)



Category	Hectares
Under construction.	17.5
Detailed Planning Permission (not started).	24.20
Outline Planning Permission.	73.33
Allocation in adopted Plan.	29.54
Other opportunity (including call for sites submissions).	34.49
Land at Washwood Heath (to be released following HS2 construction.	24
Sub total - identified sites.	204.98
Completions 2020/21 - 2021/22.	18.9
<b>Total Capacity.</b>	<b>221.96</b>

Employment land need/supply	Hectares
Employment land need 2020-2042.	295.6
Employment land supply.	221.96
Shortfall.	73.64



Approaches to increasing employment land supply

7.8 The City Council will continue to investigate and identify further sources of land supply to address this shortfall. For example, a review of the existing Core Employment Areas has been undertaken as part of the HEDNA and this has identified some potential opportunities for future industrial development. The City Council has also identified further development opportunities through the urban capacity work that as yet has had no confirmation from landowners about the potential for development. Discussions will also continue with authorities in the wider Housing Market Area to determine whether any employment land proposed in their forthcoming plans can meet any of the need arising from Birmingham. In particular, evidence prepared for the Black Country Plan has identified 53 hectares of potential development land at the West Midlands Strategic Rail Freight Interchange in South Staffordshire that can cater for a share of Birmingham’s B8 warehousing needs<sup>3</sup>.

Portfolio of employment land

7.9 Ensuring that an adequate supply of employment land is maintained throughout the plan period will be essential in enabling long-term balanced growth to be sustained.

7.10 The current portfolio of employment land in the city is set by policy TP17 of the BDP. This requires the maintenance of an ongoing reservoir of employment land within different categories that is readily available for development over a 5 year rolling period.

7.11 The HEDNA has found that there is a significant unmet need for small to medium sized sites to meet the needs of SMEs operating or wishing to set up within the city. It has also found that with the allocation and outline approval of Peddimore, the allocation of the Former Wheels site and the future release of the large 24 hectare site at Washwood Heath following the construction of HS2, there should be sufficient land to meet the need for larger scale, strategic sites over the next plan period.

7.12 The new portfolio of employment land recommended by the HEDNA is therefore to continue to require an ongoing 5 year reservoir of readily available employment land, but that this should be refocused on supporting the delivery of small to medium sized sites to cater for locally generated needs. The resulting recommended portfolio of employment land for the new plan is as follows.

7.13 The portfolio reflects the government’s reclassification of B1 uses to the new E use class, so it will now only cater for B2 (general industrial) and B8 (storage and distribution) uses.

Site size	Minimum supply over 5 years
10+ hectares.	22.4 hectares.
2.4 to 10 hectares.	22.4 hectares.
1 to 2.4 hectares.	11.2 hectares.
Less than 1 hectare.	11.2 hectares.
Total reservoir.	67 hectares.

7.14 The HEDNA also recommends moving away from the categorisation of employment land as ‘Best Quality’, ‘Good Quality’ and ‘Other Quality’ and instead relying simply on the site size categories listed above.

Proposed policy changes

- The Council proposes to revise the employment land portfolio so that it continues to have a requirement for an ongoing 5-year reservoir of readily available employment land but is reduced from the current BDP target of 96 hectares to 67 hectares. This new reservoir reflects the up to date needs identified in the HEDNA and the narrower definition of employment uses in the Use Classes Order which now only comprises of B2 and B8 uses. The new portfolio will have a greater focus on supporting the delivery of small-medium sized sites compared with the existing portfolio if policy TP17 of the BDP.
- The Council also propose to re-categorise the definition of ‘readily available’ employment land that is counted in the 5 year deliverable supply to those that are allocated or have planning permission for employment development, as this more closely reflects the PPG<sup>4</sup>.

<sup>3</sup> West Midlands Strategic Rail Freight Interchange, Employment Issues Response Paper - Whose need will the SFRI serve? (Stantec; prepared on behalf of the Black Country Local Planning Authorities, February 2021).

<sup>4</sup> Planning Practice Guidance, Paragraph: 014 Reference ID: 3-014-20190722

Regional Investment Sites

7.15 There are two Regional Investment Sites in the city at Aston and Longbridge. These are locations that meet strategic development needs and are limited to the former B1 uses and extant B2 uses. B8 warehousing is discouraged unless it is ancillary to the main B1/B2 use. Over the BDP plan period since 2011, the successful delivery of development in both of these areas has seen the remaining supply of land in this category progressively reduce from 45 hectares when originally allocated, to 27 hectares in 2021. The Regional Investment Site designation originates from the West Midlands Regional Spatial Strategy which was revoked by the government in 2010.

7.16 Given the changes to the Use Classes Order, the reducing supply of land in the Regional Investment Sites and because the designation of these areas originated from the West Midlands Regional Spatial Strategy which was revoked in 2010, it may now be an appropriate time to reconsider the Regional Investment Sites designation and simply rely on their designation as Core Employment Areas over the next plan period.

7.17 If the Regional Investment Sites designation continues, then it may be appropriate for the new plan to restrict the proposed uses to B2 class only, with some complementary uses continuing to be allowed. The other criteria of policy TP18 relating to transport, IT, location and education and training are considered to remain appropriate.

Proposed policy change

- The Council proposes to remove the designation of Regional Investment Sites but maintain their designation as Core Employment Areas. If it is deemed appropriate within the Growth Options to continue with the Regional Investment Sites designation, then developments in these locations will need to be restricted to B2 uses only due to the government’s changes to the Use Classes Order. All other policy criteria will remain but may require amendment, for example to reflect the reduced land supply in these locations. This will ensure that the Aston and Longbridge sites will continue to be focused on delivering high quality advanced manufacturing developments and will not become diluted by the introduction of other uses. The benefits to the local population of education and training opportunities will also continue to be maximised.







### Core Employment Areas

**7.18** Much of the city's employment land supply lies within the established employment locations which have been identified as Core Employment Areas in the BDP. These areas are the focus of the city's main industrial activity. The BDP currently requires Core Employment Areas to be retained in B1b (Research and Development), B1c (Light Industrial), B2 (General Industrial) and B8 (Warehousing and Distribution) uses.

**7.19** The HEDNA has reviewed the Core Employment Areas and found that most are continuing to function as intended under policy TP19 of the BDP, i.e. that they are predominantly in a B class use and have good levels of occupancy and economic activity. There is a big variation in the quality of the Core Employment Areas, with some areas containing modern premises in a high quality and attractive local environment, whilst other areas contain older buildings which are in poor condition or near derelict, and often set within degraded and uncared for local environments. Despite the very poor quality of some of the Core Employment Areas most generally remain in high occupancy, which reflects the unmet localised demand for modern employment premises that is a key finding of the HEDNA.

**7.20** It is clear therefore that there is an overall need to retain the Core Employment Areas designation but amend and refocus them so that they are more able to deliver better and more modern premises or, where appropriate, contributing to meeting housing need. There is also a continuing need to improve the quality, attractiveness and accessibility of many of the Core Employment Areas.

**7.21** The government's changes to the use classes order have seen B1b and B1c uses become part of to the new E use class. As E class encompasses a wide range of other uses that are more appropriate for centres, such as retail, offices and restaurants, it is not considered that E class uses will be appropriate for Core Employment Areas in the future. The City Council is therefore proposing that the future policy for Core Employment Areas will focus on retaining them for B2 (General Industrial) and B8 (Warehousing and Distribution) uses only, but that there will continue be scope for other uses that are appropriate for industrial areas, such as waste management and builders' merchants. In reflection of these changes the City Council is considering whether it may be more appropriate to rename the Core Employment Areas as Core Industrial Areas in the new plan.

**7.22** Some Core Employment Areas which contain high concentrations of Use Class E may therefore no longer be appropriate for designation. This is because the City Council has little control over many changes of use within or from class E. For example, Core Employment Areas that contain large numbers of office, light industry or research and development uses can now change to retail, leisure or food and drink uses without the need for a planning application. There is also a national permitted development right to allow class E uses to change to residential use. As a result, the Core Employment Area designation will have little effect in such cases.

**7.23** Taking these changes in to account, the HEDNA has reviewed the 63 existing Core Employment Areas in the city and found that the majority should be retained as they are, some should be retained but with amended boundaries to reflect the current distribution of uses and where further development opportunities exist, and that some should be de-designated due to them no longer being predominantly in an employment use.

### Proposed policy changes

- The Council proposes to refocus the Core Employment Areas for B2 (General Industrial) and B8 (Warehousing and Distribution) uses only but retain some scope for other Sui Generis uses of an industrial nature. Given the new focus, we propose renaming the designation to 'Core Industrial Areas'. This will provide greater clarity of the types of uses that would be considered as acceptable within these locations.

- It is proposed that the Core Employment (or Industrial) Areas policy in the new Birmingham Local Plan will include more specific criteria to establish what will constitute an exceptional justification non-employment uses in a Core Employment Area. This will be supported by a new Loss of Industrial Land to Alternative Uses SPD that will be prepared in parallel to the new plan.

### Protection of employment land

**7.24** There are also existing employment land and premises that fall outside of the Core Employment Areas. Policy TP20 of the BDP currently provides protection for such land and says that development for other uses is only considered appropriate where it is a non-conforming use (which the Loss of Industrial Land to Alternative Uses SPD defines as less than 1 acre/0.4 hectares and in a predominantly residential area) or has been unsuccessfully marketed for a new employment use for at least two years.

**7.25** The high housing needs that city faces has seen increasing pressure on existing employment sites outside the Core Employment Areas to be redeveloped for housing. Given the city's very high housing needs, there may be room for greater flexibility in the criteria for the loss of employment uses outside the Core Employment Areas in the future but this will need to be considered further in the context of the shortfall of employment land identified earlier on in this section.

### Proposed policy changes

- The Council is considering making the non-conforming employment use requirement more flexible. This could mean amending or removing the size requirement so that larger industrial sites, or any size of industrial site could be considered as non-conforming if it is in a predominantly residential area.
- Another option could be broadening the definition of the surrounding uses, so that non-conforming sites are not restricted to predominantly residential areas. For example, this could also include sites in predominantly commercial areas. Another broader approach could be to consider any isolated industrial site that does not adjoin another industrial use as being non-conforming.
- The requirement to demonstrate active marketing ensures that sites which are capable of providing a valued contribution to the city's economy and to local employment are not lost. The City Council therefore considers that this requirement should continue in some form, but there may be potential to increase the flexibility for the evidence required. For example, the required marketing period could be reduced to one year instead of two years.
- The criterion also makes provision for viability evidence to be submitted where it is argued that redevelopment for employment purposes would be commercially unviable. A further option to consider is that the requirement for a viability assessment could entirely replace the requirement for active marketing to be submitted. This would also continue to provide a safeguard to ensure that valued employment sites are not lost to other forms of development.



Offices

**7.26** The Coronavirus pandemic has seen an increase in homeworking for workers who are normally office based, and it is unlikely that full time office-based work will see a return for many companies and employees, with hybrid working (i.e. partly in the office and partly at home or another remote location) likely becoming the normal working pattern. In reflection of this, the HEDNA has determined that a 30% discount on the projected future office development needs is appropriate. The resulting need for office floorspace over the plan period up to 2042 is 469,000 square metres.

**7.27** The government’s changes to the Use Classes Order means that offices fall within the same use class as other commercial uses such as retail and food and drink. Changes within class E do not require a planning application and permitted development rights mean that such uses can be converted to residential use. As a result, the City Council now has little control over how office floorspace can be used.

Proposed policy change

- Given the above, the City Council does not propose to include a detailed policy to guide future decisions on office developments in the new plan. It may instead be appropriate to have a broader policy setting out the criteria and geographic locations for development under Use Class E.

Other employment policies

**7.28** The NPPF states that planning policies should also allow for new and flexible working practices, for example live-work accommodation. The BDP doesn’t currently have a policy relating to newer ways of working. The City Council would therefore welcome your comments and suggestions as to whether the new Birmingham Local Plan should contain such a policy and what the scope of any new policy should be.

**7.29** Recent development proposals such as 193 Camp Hill (2021/10845/PA) and land at Key Hill in the Jewellery Quarter (2021/06272/PA) have also seen increased discussions about the provision of affordable workspace, particularly within the city centre. This is employment floorspace that is provided within development schemes at a reduced rate for eligible occupiers and is funded through developer contributions via Section 106 agreements. The City Council welcomes your views on whether the new plan should contain a policy relating to the provision of affordable workspace within relevant development schemes.

The city centre/Central Birmingham

**7.30** Over the last 30 years, the city centre has undergone major transformation, attracting unprecedented levels of investment and development into the city, providing jobs, homes, enhanced public transport infrastructure and environmental improvements. Exciting future developments such as Smithfield, HS2 and the completion of Paradise will ensure we continue to be one of the largest growing city economies in the UK.

**7.31** For the last 30 years, the regeneration and growth of the city centre has been focussed within the area defined by the Middle Ring Road. The central civic, cultural and economic core of the city has expanded with many exemplar developments, with surrounding quarters evolving and developing their own identities leading to great opportunity.

**7.32** In defining the city centre by the ring road, this has however often resulted in physical and perceived barriers between areas, with the city centre considered separate from the surrounding inner city.

**7.33** ‘Our Future City Plan - Central Birmingham Framework 2040’ will provide a new vision for the central area of the city. This will incorporate the entire Central Birmingham area, from the city core to the inner city suburbs beyond the ring road to promote and link opportunities and investment into surrounding communities.

Urban centres

**7.34** Birmingham contains a large and diverse network of centres which meet day-to-day shopping needs but also act as focal points for local communities and provide important sources of local employment. In addition to the centres identified in the existing hierarchy of centres, there are also many smaller shopping parades.

**7.35** Changes that were already occurring in the retail sector have been accelerated by the Covid-19 pandemic; changing shopping habits, use of space and consumer demand. While some centres have met this challenge by finding a new focus and flourishing, others will need to evolve to remain attractive, viable and vibrant places.

**7.36** Recent changes to the Use Classes Order means that there is more flexibility for businesses to change from one use to another. This means that a shop can become a restaurant or a gym for example without needing planning permission. On the one hand this provides flexibility to allow vacant retail units to be occupied but on the other hand, it removes the Council’s ability to maintain the retail function of centres.

**7.37** As the city looks to the future, we will need to reimagine the role of our urban centres as places which offer more than just somewhere to shop. New working patterns with more people working at home for most of the week could drive new footfall into local centres as demand grows for smaller scale affordable workspace, leisure, social experience and personalised services.

**7.38** The digital infrastructure of local centres will become more important with more businesses offering customers seamless online and physical services, building on the trend of click and collect. This type of retail service delivery means that bricks and mortar shops are becoming multi-use spaces, and there is generally less need for retail space and more demand for urban warehousing and delivery lockers.

**7.39** The City Council will prepare a Retail and Leisure Needs Assessment which will assess future retail and leisure needs in terms of floorspace, type and location. A health check and boundary review of the centres will also be undertaken. The evidence gathered will be used to update the centre hierarchy and boundaries and inform the focus or locations for future retail and leisure growth.

**7.40** Recent evidence places Birmingham in the top 20% of local authorities with the highest prevalence of obesity in adults, and just outside the top 20% for children (Birmingham Health Profile 2019). Evidence shows links between greater exposure to takeaway food outlets and the likelihood of being overweight and obese. The Council considers there is continuing need to ensure our local centres promote healthy living and to restrict the concentration of hot food takeaways. However, we would like to know if there should be more flexibility to allow for the changing needs of our centres but still ensure healthy environments.

**7.41** Empty space above shop units represents a significant waste of floorspace and an untapped resource. Non-retail uses such as offices and homes on the upper floors of buildings within existing centres could be given more policy support provided that they do not have a negative impact upon the operation of the existing ground floor business or the amenities of potential future occupants.





*Proposed policy changes*

- The Council will review the centre hierarchy and centre boundaries, looking at potential for new local centre designations and amending centre boundaries where appropriate.
- Given the flexibilities allowed by the new Use Class E, we can no longer have a policy requirement for 50%/55% of uses in centres to be retained in retail use (former Class A1). We will need to refocus our centres as places to work, rest, and socialise. This could include promoting local enterprise (providing affordable workspace), enhancements to the public realm and digital connectivity, enabling street markets and pop up events. We also need to manage the impacts of the growth in online shopping on local centres (increased deliveries and click and collect).
- The Retail and Leisure Needs Assessment will be used to inform new policies in relation to the quantitative and qualitative requirements for local centres.
- The Council will consider how more policy support can be given promoting the use of empty space above shops.

**Tourism, culture and the night-time economy**

**7.42** Birmingham is a top visitor destination in the UK attracting millions of people a year to experience the wide range of cultural, leisure and recreational activities it has to offer. The Creatively Birmingham statement of intent sets out our shared ambition, as partners, invested in the creative future of our city, to grow and develop Birmingham’s diverse creative, cultural and arts sector over the next decade. The Creatively Birmingham Strategy will be developed over the next six months and will deliver an inclusive, accessible, sustainable and economically vibrant arts, culture and creative sector that is alive in every community across Birmingham.

**7.43** Tourism has an important economic role and Birmingham’s continued success as a destination for tourists will depend upon the city having a diverse mix of facilities that are attractive to a range of audiences. Protecting and enhancing the diverse leisure, recreation, arts and cultural facilities in the city where they meet local and wider needs will be important to Birmingham’s economy.

**7.44** A vibrant and mixed evening and night time economy can introduce new activity and help valued cultural, recreational and social assets like pubs and music venues to be retained, but it can also have negative impacts on local residents and the local environment needs to be carefully managed.

*Proposed policy changes*

- We would like to take a proactive approach to enabling and managing the evening and night-time economy. This could include considering whether to have a policy that seeks to protect public houses, theatres, live music venues and night clubs from change of use.
- We are also considering whether to have a policy which identifies where the clustering of night-time economy uses would be encouraged and not encouraged to help promote intensification and diversification of leisure and cultural uses while protecting local amenity and character. Clustering of night-time economy uses would support provision of public transport, in particular evening services and timetables.

HAVE YOUR SAY

Economy and centres

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

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

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

38. Are there any additional sites you think are suitable and available for employment development? If so, please submit a Call for Sites Form at:  
**bcc-call-for-sites.nw.r.appspot.com**

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

40. What are your views on the proposed approach to offices? Should we instead have a broader policy approach to cover commercial developments under use class E?

41. Do you think there should be a policy to support the delivery of affordable workspace and other new ways of working? If so, what should this policy be?

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

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

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

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

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

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



# 8

## Connectivity

### A sustainable transport network

**8.1** The City Council is committed to delivering an efficient, fair, green, sustainable and healthy transport system. The Birmingham Transport Plan (BTP) outlines how the city's transport system needs to be transformed to meet the challenges of the future focusing on the key areas of intervention: reallocating road space, transforming the city centre, prioritising active travel in local neighbourhoods and managing demand through parking measures. The key objectives of the BTP, which we propose will be embedded in the Birmingham Local Plan are:

- A sustainable, green, inclusive, go-anywhere network.
- Safe and healthy environments - walking and cycling will be 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.
- A smart, innovative, carbon neutral and low emission network will support sustainable and inclusive economic growth, tackle climate change and promote the health and well-being of Birmingham's citizens.

### Reducing car use and dominance

**8.2** Reducing car use will reduce congestion delays, carbon emissions and improve air quality. The average Birmingham driver spent 80 hours sat in traffic in 2019, costing £624 per driver, and £325 million for the city as whole (INRIX, 2020).

**8.3** By focusing development on locations which are sustainable or can be made sustainable, the need to travel can be reduced and/ or the use of sustainable modes of transport can be increased. This can help to reduce congestion and emissions and improve air quality and public health. We would expect development to be located and designed to be accessible by the whole community and reduce reliance on the private

car. Increasing density of development close to public transport links such as rail and bus routes can also help people to move around the city in a sustainable way.

**8.4** With competition for road space so high, reallocating road space away from private cars in favour of public transport and active travel networks, such as cycle and bus priority lanes, may be necessary.

**8.5** Managing demand through parking measures will also be used as a way to reduce car travel through availability, pricing and restrictions. Where development potential exists, land currently occupied by car parking will be put to more productive use.





### Safe and healthy environments

**8.6** The BTP puts pedestrians first with the commitment to create safer and healthy environments to make walking, cycling and active travel the natural choice for short journeys.

**8.7** As a way of prioritising active travel in local neighbourhoods, Birmingham is looking to introduce a 20mph standard for all residential streets and local centres in Birmingham, while retaining a 30mph speed limit on strategic and distributor roads. Walking infrastructure and street pedestrianisations will also be introduced, as well as wayfinding to ensure connectivity with public transport hubs. This includes Places for People and School Streets schemes which are being developed to reduce the amount of traffic in residential neighbourhoods and improve the quality of the pedestrian environment, making it safer for people to walk and cycle, and children to play.

**8.8** Cycle schemes and canal towpath improvements will be introduced including new cycle routes along main commuter corridors and cycle hire schemes incorporating electric vehicles. A Kerbside Management Strategy will be compiled to ensure that kerbside space in our city is managed for the benefit of all our residents and our environment. The Birmingham Local Plan will ensure that we deliver homes and jobs in the right places close to services and infrastructure. This will reduce journey lengths and enhance the convenience and attractiveness of walking and cycling.

**8.9** 15-20 minute neighbourhoods/Healthy Living Zones will be key in reducing travel times and increasing access for residents to day-to-day services and facilities. But provision of safe walking and cycling infrastructure and access to frequent, reliable, affordable public transport is fundamental to making the 15-minute model work. Active travel corridors can also provide opportunities for delivering green infrastructure.

**8.10** New development will continue to be expected to incorporate high quality pedestrian routes including to and from bus stops, train stations and Metro stops, providing pedestrian crossing facilities where appropriate and ensuring footway surfaces are well maintained.

**8.11** Development will also expect to continue to support the city-wide programme of cycling infrastructure improvements and opportunities such as improving cycle security, increasing access to bicycle hire opportunities, support for travel behaviour initiatives and ensuring that new development incorporates appropriately designed facilities which will promote cycling as an attractive, convenient and safe travel method.

### Public transport

**8.12** There is a continuing need to improve public transport so that there is an attractive and realistic alternative to the car. Active travel and public transport need to be complemented by road space reallocation that supports a fundamental change in

the way that people and goods move around the city and leads to the reduction of car kilometres travelled. Road space will be reallocated to make active travel and public transport more attractive than private car use, whilst not restricting those who still need to use a car or a taxi, such as people with a Blue Badge. Buses are the most accessible mode of travel in the city and can adapt quickly to changing demands, facilitating immediate shift from private cars to public transport and delivering rapid decarbonisation without major infrastructure changes. There is good bus coverage in Birmingham, but journey times can be unpredictable and provision unequal across the city and different times of the day. Several important bus investment programmes are taking shape including the introduction of Sprint rapid transit buses and the development of cross-city bus routes. These will reduce the need to change buses in Birmingham city centre, increasing connectivity across the different neighbourhoods of the city and connectivity with areas beyond the city's administrative boundaries. This work is also complemented by prioritising buses at junctions across the region and the introduction of zero and low emissions buses.

**8.13** In terms of rail, the city's network is limited in size and in need of enhancement, particularly as levels of commuting are rising and journey lengths increasing. HS2 provides opportunities to enhance the local and regional rail services by releasing network capacity. This will be used by new local services and stations, which will be

enabled by delivery of the Midlands Rail Hub which will also improve regional connectivity between Birmingham, Worcestershire and Herefordshire and between Birmingham, Leicester, Nottingham and the East Midlands. More imminently, work is underway to re-introduce passenger services on the Camp Hill rail line and open new stations in Moseley Village, Kings Heath and Pineapple Road.

**8.14** Light Rail provides a fast and reliable travel mode which can encourage more sustainable travel patterns, improve access to key employment locations and complement the city's existing bus and heavy rail public transport networks. As such, it is a key component of the City Council's Birmingham Transport Plan. The Midland Metro network is planned to triple in size over the coming years, connecting more people to employment, leisure and education opportunities this includes a new tram route running from the city centre through East Birmingham to Solihull and the Airport, providing a new direct and reliable connection to both HS2 stations and to Birmingham City Centre. Sprint buses will deliver high frequency services on main commuter routes with predictable journey times. The first phase of Sprint has recently been delivered on the A34 Walsall Road and A45 Coventry Road corridors. Once complete, the Sprint rapid bus transit route created along the A45 Coventry Road will have a dedicated lane, providing a fast and reliable service through East Birmingham with connections to Solihull and Birmingham Airport.







### Freight

**8.15** Efficient freight movement is essential to ensuring business and individuals receive the goods they need at the time and location they need them. Improvements for freight could include the introduction of consolidation and micro-consolidation centres that will serve specific areas of the city, and replacement of delivery journeys with electric vehicles, including electric cargo bikes that can serve the last part of delivery journeys. The Council will continue to work with businesses and the logistics industry to explore sustainable freight solutions for Birmingham. The introduction of the city centre segments, which 'divides' the city centre into seven segments, will encourage sustainable freight movements. Each segment can only be accessed from the A4540 Ring Road, while movement between segments is only possible for public transport, pedestrians, and cyclists. All other vehicles cannot cross the segment boundaries due to physical measures such as bus gates and road closures, and so would need to go back to the A4540 Ring Road to move between segments. Whilst access is restricted to private cars, servicing and loading will be maintained for local businesses.



### Digital connectivity

**8.16** High quality digital connectivity and mobile networks will become increasingly important to our working, learning, leisure and community activity. It can also contribute towards reducing the need to travel. Improving digital connectivity is a national and a local priority. The Government has set a target of achieving 5G coverage for the majority of the population by 2027 and full fibre connectivity across the whole country by 2033.

**8.17** Access to high-speed broadband across Birmingham remains inconsistent. Currently full fibre coverage in Birmingham is 48% compared to 11.5% across England. Many urban cities and regions are developing plans to accelerate full fibre deployments in order to increase their competitive advantage. Given the importance of internet access to residents and businesses, the Council are considering whether to require all new developments to make provision for ultrafast broadband and full fibre connectivity. For non-residential development, viability will need to be considered. Adopting this approach will prevent the need for fibre retrofitting programmes in the future, which have significant cost implications and cause considerable disruption through road works.

**8.18** Birmingham aspires to be one of the most connected digital cities in the world, an instrumented city enabled through the deployment of sensors and actuators to capture real time data. The infrastructure for the provision of Internet of Things sensors should be considered by developers in order for city operations to gain valuable insights into environmental and climate conditions, better planning, greater utilisation of the use of space and places as well as early warning monitoring systems for other inclement conditions.

**8.19** The adaptive use of properties/buildings continues to evolve with homes becoming offices. There is a need to ensure that all new developments are supplemented by a digital specification to accompany the physical building plans to ensure that the development is futureproofed and capable of supporting intergenerational living. The digital specification should facilitate emerging technologies such as the Internet of Things, the establishment of local smart energy grids, electrical charging points as well as enhanced digital connectivity infrastructure.

**8.20** The use of virtual 3D modelling technologies is becoming more and more prevalent. The Council aims to develop digital twins, virtual representations of the city which can be used for modelling new concepts and ideas, and testing, trialling and validating technologies. The adaptable virtual models will enable planners and developers to design optimal developments in the right locations to meet city and commercial needs. Birmingham proposes that all development plans are accompanied by virtual models in a format and data standards that enable federated network of digital twins. Together these platforms can be developed into a comprehensive digital twin for Birmingham. This hugely ambitious aspiration would not only see Birmingham leading the way in terms of city data sharing nationally, delivering benefits for its citizens and city organisations, while also providing a platform to attract high profile businesses requiring data to drive their innovation agendas.

### HAVE YOUR SAY Connectivity

48. What else can be done to encourage people to walk and cycle more and use their car less?
49. How can public transport be improved so that more people will use it?
50. Should new development be required make provision for future proof digital infrastructure?
51. Should all developments be required to meet an accredited standard for digital connectivity?



# 9

## Locations for *Growth*

### Background

**9.1** Historically, Birmingham has seen new development accommodated through the regeneration, redevelopment and renewal of its urban area with periodic expansion. The city is extensively built up and tightly constrained Green Belt. Other constraints, such as open space and ecological designations will also affect where new development can go.

**9.2** National policy encourages local plans to make the best use of land in meeting the need for homes and other uses, while safeguarding and improving the environment. The development of previously developed or 'brownfield' land and under-utilised land and buildings is encouraged. However, large scale regeneration will often involve 'land assembly' (combining land under different ownerships to create a larger more comprehensive redevelopment) and land decontamination (many brownfield sites have previously been used for industrial purposes).

**9.3** This chapter reviews the current spatial strategy (how much development is built and where it is located) and set out in the BDP and proposes principles to underpin the strategy of the new Birmingham Local Plan. This chapter also suggests potential broad locations for growth. At this stage specific sites are not identified.



Key growth areas - opportunity areas

9.4 The current BDP strategy for growth focuses on ten key growth areas within the city but also distributes growth in the network of centres, transport corridors, housing regeneration areas, Core Employment Areas, and other opportunity sites.

9.5 Some of these key growth areas will continue to be important locations for growth over the new plan period, such as Langley Sustainable Urban Extension and Peddimore employment site. Some will have mostly achieved their objectives and need to be refocussed such as Longbridge and Selly Oak. There will also be new opportunities identified through the local plan process and the Council’s existing and emerging area frameworks such as ‘Our Future City Central Birmingham Framework’ which will need to be taken into account.

9.6 The opportunity areas will be informed by the evidence base including sustainability appraisal, site availability assessments, and the area frameworks. However, it is also important to establish the key principles to guide their selection. We would like to hear your views on whether the following key principles are appropriate. The opportunity areas will be:

- 1. Focussed on existing urban areas.
- 2. Locations which are (or will be) well served by public transport, cycling and walking infrastructure and other services and amenities.
- 3. Where clusters of development opportunities exist.
- 4. Built on emerging or recently adopted masterplanning/area frameworks.

Proposed policy changes

- The Council considers that the growth areas need be more focussed both in size and purpose.
- We propose they contain clusters of development opportunity sites and or/ infrastructure improvements, the delivery of which would bring about wider change in the area.
- Each growth area would have a policy which would set out the key requirements e.g. land use, scale of growth (floorspace for commercial/ leisure/industrial/mixed uses, the number homes), housing density and other area specific other requirements.
- Each growth area would be supported by a masterplan SPD to facilitate a co-ordinated and comprehensive approach to the regeneration of the area.
- We propose that key growth areas are renamed to ‘Strategic Regeneration Areas’ or ‘Opportunity Areas’.

Potential opportunity areas

9.7 The Council propose to carry forward some growth areas from the current BDP into the new plan because they have not been completed. Other growth areas in the BDP need to be refocussed as they have been largely achieved but remain as important locations for further growth. Finally, new opportunity areas have been Identified through the Council’s work on emerging or existing area frameworks:

- Langley Sustainable Urban Extension.
- Peddimore.
- Sutton Coldfield Town Centre.
- Bordesley.
- Longbridge.
- Selly Oak.
- City Centre.
- Knowledge Quarter and Nechells.
- Hockley, St. George’s, Gun Quarter.
- Highgate and Balsall Heath.
- Edgbaston.
- Digbeth and Bordesley.
- Ladywood.
- Perry Barr.
- Smethwick - Birmingham Corridor.
- Tyseley Energy Enterprise Park (Centre of Excellence for Decarbonisation of Heat.

HAVE YOUR SAY

Locations for growth

52. Do you agree with the principles for identifying opportunity areas? Is there anything missing?

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

54. Have we identified the correct opportunity areas? Is there anything missing?

# Appendices

## Appendix 1

### Call for sites

The Council issued a Call for sites in Summer 2021, providing the opportunity for landowners, developers and communities to let us know about potential sites or broad locations for development that they wish the Council to consider through the Housing Land and Availability Assessment (HELAA). All Call for sites submissions have been assessed in accordance with the HELAA methodology.

The HELAA assesses a site’s suitability, availability and viability for development. The HELAA is not a policy document and does not allocate sites for

development, it is simply a database of available land from which we select the most suitable and deliverable sites to meet future development needs. Not all the sites that have been suggested will be suitable for development. A HELAA report documenting all the sites assessed and the results of the assessment has been published alongside this consultation document. This can be viewed at: [www.birmingham.gov.uk/birminghamplan](http://www.birmingham.gov.uk/birminghamplan)

While the initial Call for sites has taken place, we would welcome any additional site suggestions during this consultation period. To submit a site to us for consideration please use the link here: [bcc-call-for-sites.nw.r.appspot.com](http://bcc-call-for-sites.nw.r.appspot.com)

## Appendix 2

### What happens to the existing Local Plan documents?

The current local plan for Birmingham comprises:

- The Birmingham Development Plan (adopted January 2017) sets out the strategic planning policies, housing and employment targets and allocations of land for development in the city.
- The Development Management in Birmingham Development Plan Document (adopted December 2021) provides detailed development management policies on a range of topics used to inform decisions on planning applications.
- The Bordesley Area Action Plan (adopted January 2020) sets a vision and development strategy for the regeneration of the area.
- The Longbridge Area Action Plan (adopted April 2009) was prepared to secure the comprehensive redevelopment of the area following the closure of the MG Rover plant in 2005.

- The Aston, Newtown and Lozells Area Action Plan (adopted in July 2012) includes a development strategy and policies for the area to inform planning decisions.

The new the Birmingham Local Plan, once adopted, will supersede the existing BDP and Longbridge Area Action Plan (2009) and Aston, Newtown and Lozells Area Action Plan (2012). The existing BDP includes a number of sites which are allocated but have not yet been developed; these allocations will be reviewed and rolled forward in the new plan where appropriate.

The recently adopted Bordesley Area Action Plan (2020) and Development Management in Birmingham Plan (2021) will not form part of the new Birmingham Local Plan but will be reviewed five years or earlier from their adoption date.

## Appendix 3

### Neighbourhood plans

Neighbourhood plans are local area plans that have been or are being produced by Birmingham communities. They contain local area initiatives and policies and are used alongside the local plan. A neighbourhood plan should support the delivery of strategic policies set out in the local plan.

The made and emerging neighbourhood plans in Birmingham are:

- Balsall Heath Neighbourhood Development Plan (made October 2015).
- The Beeches, Booths and Barr (3Bs) Neighbourhood Plan (made October 2021).
- Jewellery Quarter Neighbourhood Development Plan (in development).

There is no requirement to review or update a neighbourhood plan. However, policies in a neighbourhood plan may become out of date, for example if they conflict with policies in a local plan.

Appendix 4  
List of consultation questions

Challenges and opportunities

- 1. Do you agree with the challenges and opportunities identified?
- 2. Are there any others which are important?

Vision and objectives

- 3. Do you agree with the proposed vision?
- 4. Are these right objectives for the Birmingham Local Plan to achieve?
- 5. What is most important to you e.g.
  - 1 - Net zero carbon city.
  - 2 - A connected city etc.
- 6. Is there anything missing from the vision and objectives?

Options for housing growth

- 7. Are there any additional housing growth options that we should consider?
- 8. What is your preferred option or combination of options?
- 9. Do you think the proposed densities are appropriate? Should we build to even higher densities?
- 10. Are there any additional sites you think are suitable and available for housing development? If so, please submit a Call for Sites Form at:  
**bcc-call-for-sites.nw.r.appspot.com**

Homes and neighbourhoods

- 11. What type, size and tenure of homes do you think will be needed in the future?
- 12. How do you think we can increase the supply of affordable housing?
- 13. Should we have a policy with a simple split of affordable rent and affordable home ownership or a policy with a more detailed tenure split?
- 14. How do you think we can prevent the loss of family housing to other forms of housing?
- 15. Should we have a policy which requires a percentage of older persons housing on residential developments?
- 16. Should we allocate sites specifically for older persons housing? Where should they be?
- 17. What should the policy be on purpose built student accommodation?
- 18. Where should new gypsy and traveller sites be located?
- 19. What type and scale of development should Health Impact Assessments apply to?

Climate change

- 20. Do you feel we have missed any policy opportunities to help the City achieve net zero?
- 21. How should we encourage all developers to deliver net zero carbon development?
- 22. How can we ensure that the principles on waste management and resource efficiency are addressed by new development?
- 23. Should we introduce higher water efficiency standards?

- 24. Do you agree with introducing a policy to prevent overheating of new buildings?
- 25. Should the Plan include policy to ensure that rivers within the city provide multi-functional benefits in relation to flood risk, ecology biodiversity and support health and wellbeing?
- 26. Should the Plan include policy to ensure a catchment-based approach to flood risk management from all sources and deliver climate resilience?

The built and natural environment

- 27. How should the city’s green infrastructure network be improved and expanded?
- 28. Should we explore a higher than 10% biodiversity net gain for all major developments?
- 29. Should the new Local Plan seek to identify/ allocate sites to provide off-site Biodiversity Net Gain?
- 30. Should the Council introduce an Urban Greening Factor policy?
- 31. Do you agree with the proposed new standards for open space?
- 32. How can we ensure that residents have good access to quality open space?
- 33. How can the Birmingham Local Plan achieve high quality design in all developments?
- 34. Are there any specific issues that the Birmingham Local Plan needs to address regarding the environment?

Economy and centres

- 35. Do you agree with the proposed removal of the Regional Investment Sites designation?
- 36. Do you agree that the Core Employment Areas should be refocused on B2 and B8 uses only, including renaming them as Core Industrial Areas?
- 37. How do you think the shortfall in the supply of employment land should be addressed?
- 38. Are there any additional sites you think are suitable and available for employment development? If so, please submit a Call for Sites Form at:  
**bcc-call-for-sites.nw.r.appspot.com**
- 39. Do you think we should allow more flexibility for employment land outside of the Core Employment Areas to change to other uses?
- 40. What are your views on the proposed approach to offices? Should we instead have a broader policy approach to cover commercial developments under use class E?
- 41. Do you think there should be a policy to support the delivery of affordable workspace and other new ways of working? If so, what should this policy be?
- 42. Do you have any other suggestions or comments about the economy and employment land?
- 43. What would you like to see more of in your local high street/centre?
- 44. Do you think we should have a policy which seeks to protect public houses, theatres, live music venues and night clubs from change of use?

- 45. Do you think we should have a policy which says where night-time uses should be located and where they should not be?
- 46. What type of leisure and cultural activities would you like to see more of in the night-time economy?
- 47. How can the night-time economy be better managed (e.g. noise, transport, safety etc)?

Connectivity

- 48. What else can be done to encourage people to walk and cycle more and use their car less?
- 49. How can public transport be improved so that more people will use it?
- 50. Should new development be required make provision for future proof digital infrastructure?
- 51. Should all developments be required to meet an accredited standard for digital connectivity?

Locations for growth

- 52. Do you agree with the principles for identifying opportunity areas? Is there anything missing?
- 53. What are your views on the proposed approach to the opportunity areas?
- 54. Have we identified the correct opportunity areas? Is there anything missing?



# Contact

**Birmingham City Council**

**Web:**  
[www.birmingham.gov.uk](http://www.birmingham.gov.uk)

**E-mail:**  
[planningstrategy@birmingham.gov.uk](mailto:planningstrategy@birmingham.gov.uk)

**Post:**  
Birmingham City Council  
PO Box 28  
Birmingham  
B1 1TU

A selection of images within this document created by:  
Tim Cornbill ([www.timcornbillphotography.com](http://www.timcornbillphotography.com))  
Glenn Howells Architects  
Graeme Massie Architects  
John Killock  
Thomas Morris

If you require this document in an alternative format please contact us. Requests for the document in alternative formats will be considered on a case by case basis including large print, another language and typetalk.

© Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings. Birmingham City Council. Licence number 100021326, 2022.





OurFuture *Birmingham* CityPlan

**Birmingham Local Plan Issues and Options**

**BE BOLD BE BIRMINGHAM**

October 2022







# Birmingham Local Plan Issues & Options

Sustainability Appraisal  
Interim Report

Birmingham City Council

October 2022

## Quality information

Prepared by	Checked by	Verified by	Approved by
Omar Ezzet	Ian McCluskey	Ian McCluskey	Alastair Peattie
Consultant	Associate Director	Associate Director	Associate Director

## Prepared for:

Birmingham City Council

## Prepared by:

AECOM Limited  
1 New York Street  
Manchester M1 4HD  
United Kingdom

T: +44 161 601 1700  
aecom.com

© 2022 AECOM Limited. All Rights Reserved.

This document has been prepared by AECOM Limited ("AECOM") for sole use of our client (the "Client") in accordance with generally accepted consultancy principles, the budget for fees and the terms of reference agreed between AECOM and the Client. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. No third party may rely upon this document without the prior and express written agreement of AECOM.

## Contents

<b>1.</b>	<b>INTRODUCTION .....</b>	<b>1</b>
<b>2.</b>	<b>OPTIONS FOR APPRAISAL .....</b>	<b>2</b>
	INTRODUCTION .....	2
	HOUSING GROWTH OPTIONS .....	2
	EMPLOYMENT OPTIONS.....	3
<b>3.</b>	<b>APPRAISAL METHODS.....</b>	<b>5</b>
	METHODS .....	5
<b>4.</b>	<b>HOUSING OPTIONS: SUMMARY OF FINDINGS .....</b>	<b>8</b>
<b>5.</b>	<b>APPRAISAL FINDINGS: EMPLOYMENT OPTIONS .....</b>	<b>11</b>
	SUMMARY OF FINDINGS .....	11
<b>6.</b>	<b>APPRAISAL OF PROPOSED POLICY CHANGES.....</b>	<b>13</b>
	INTRODUCTION .....	13
	SUMMARY .....	21
<b>7.</b>	<b>NEXT STEPS .....</b>	<b>23</b>
	DEVELOPING REASONABLE ALTERNATIVES .....	23
	RECOMMENDATIONS.....	24
	<b>APPENDIX A – THE SA FRAMEWORK .....</b>	<b>25</b>
	<b>APPENDIX B – APPRAISAL OF HOUSING OPTIONS .....</b>	<b>35</b>
	<b>APPENDIX C – APPRAISAL OF EMPLOYMENT OPTIONS.....</b>	<b>53</b>

# 1. Introduction

- 1.1 The emerging Birmingham Local Plan (BLP) will shape how the city will develop over the next 20 years. It will set out the spatial strategy and planning framework to be used to guide development in the city. Once adopted (c. 2026) the BLP will replace the existing Birmingham Development Plan (2017), Aston, Newtown, Lozells Area Action Plan (2012) and Longbridge Area Action Plan (2009).
- 1.2 The Plan development process is currently at the Issues and Options stage which summarises key planning issues such as the level and distribution of housing and employment growth over the Plan period. The Issues and Options document also sets out proposed / potential changes to policy approaches in the existing Birmingham Development Plan.
- 1.3 A sustainability appraisal (SA) is being undertaken alongside the Local Plan review, which is a legal requirement. The aim of SA is to assess the effects of a Plan (and reasonable alternatives) with a view to identifying significant effects and identifying ways to minimise negative effects and maximise the positives.
- 1.4 This report is an interim step in the Sustainability Appraisal process, setting out an appraisal of the 'Issues and Options' document. This is a voluntary stage intended to support engagement and the decision making process. Further appraisals will be undertaken as the Plan progresses.
- 1.5 The structure of the Interim SA report is as follows:
  - Housing growth options
  - Employment Options
  - Other Plan Options
  - Proposed policy changes

## 2. Options for appraisal

### Introduction

- 2.1 The 'Issues and Options' document sets out the vision and objectives for Birmingham and sets the level of housing and employment growth and identifies initial / high level options for the distribution of growth. It also considers potential policy approaches including changes to currently adopted BDP policies. These are summarised below.

### Housing growth options

- 2.2 Five options are considered for the distribution of housing growth which can be summarised as follows:
- 2.3 **Option 1 Increase housing densities:** this option seeks to maximise housing densities (dwellings per hectare of land) on sites allocated for residential development within the City Centre. The adopted BDP (policy TP30) specifies densities ranging from 40 to 100 dwellings per hectare (dph) depending on locations with the highest density (100 dph) proposed for City Centre sites, 50 dph in areas well served by public transport and 40 dph elsewhere. Having analysed the densities of sites recently granted planning permission, the Council found that it is reasonable to revise densities as follows:
- 40 dph in suburban locations
  - 70 dph in and around urban centres<sup>1</sup>
  - 400 dph within and around the city centre<sup>2</sup>.
- 2.4 **Option 2 More active public sector land assembly:** this involves acquiring parcels of land from multiple landowners (including through compulsory purchase) and assembling them to produce larger sites which deliver more housing and provide wider regeneration benefits. There are few of these opportunities within the city, but the approach could also be applied to smaller schemes which would typically result in higher densities.
- 2.5 **Option 3: Further comprehensive housing regeneration:** there have been several regeneration schemes of existing estates to deliver better homes, and improving the attractiveness of neighbourhoods and providing enhanced community facilities and open space. This option involves identifying further housing regeneration areas to deliver similar improvements.
- 2.6 **Option 4: Utilise poor quality under-used open space for housing:** this involves developing open space that is currently of limited value or underutilised to provide new housing. In many parts of the city there is already a shortage of good quality open space, so opportunities to utilise open space for housing are limited. The Council also aspires to increase the amount of and quality of open space in the city.
- 2.7 **Option 5: Utilise some employment land for housing:** involves repurposing poorer quality / underused employment land for housing development.

<sup>1</sup> 'Around' centres is defined as within a 400 buffer from the boundary of an identified local centre.

<sup>2</sup> 'Around' City centre is defined as within a 400 buffer from the boundary of the City centre.



- 2.8 **Option 6: Release Green Belt land for housing:** involves releasing Green Belt land for housing development. The Green Belt currently covers around 15% of the city's area. The majority is in the north of the city with smaller areas where the city boundary meets Sandwell to the west and Bromsgrove to the south. There are also a number of 'green wedges' along river valleys, such as the Cole Valley and Woodgate Valley. The only significant areas of Green Belt remaining are in the north east of Birmingham in Sutton Coldfield.
- 2.9 It is important to recognise that these options above are not 'mutually exclusive' and would not in themselves represent a spatial strategy for the Plan. Some of the options overlap with one another in terms of the locations that could be involved, and to meet identified housing needs, it is likely that a range of sources would need to be secured, rather than just one of these options.
- 2.10 The purpose of exploring and appraising a range of options at this stage is not to compare them to one another (or say which is better or worse), but to identify what potential issues and opportunities each approach would generate, and then this can be fed into the development of a more detailed strategy (and reasonable alternatives), which is likely to contain elements of several of these initial options.

## Employment options

- 2.11 The BLP will set out the amount of employment land required up to 2042. This will be informed by the findings of the recent Housing and Employment Development Needs Assessment (HEDNA 2022)<sup>3</sup> which identifies a need for 295.6 ha of employment land over the BLP period. However, the most recent assessment of available employment land supply (Housing Employment Land Availability Assessment 2022) (HELAA)<sup>4</sup> estimates employment land supply capacity to be around 221.96 ha, leaving a shortfall of 73.64 ha which needs to be found through the BLP process. Therefore, the Issues and Options document considers the following broad options/ approaches to increase employment land supply:
- 2.11.1 **Option 1: To continue investigating and identifying further sources of land supply to address the shortfall:** the Council cites opportunities for future industrial development, identified (through the HEDNA), within the Core Employment Areas (CEAs). Further potential opportunities have been identified but these are yet to be confirmed by the landowners concerned.
- 2.11.2 **Option 2: To accommodate the shortfall within other authorities in the wider Housing Market Area (HMA):** this is to be discussed by the concerned authorities to determine whether any employment land proposed in their forthcoming plans can meet some of Birmingham's need. For example, evidence for the Black Country Plan has identified 53 hectares of potential development land at the West Midlands Strategic Rail Freight Interchange in South Staffordshire that can cater for a share of Birmingham's B8 warehousing needs.
- 2.12 Similar to the housing options, the employment options are high level in nature, and not site specific. Therefore, the appraisals are undertaken in this context

---

<sup>3</sup> HEDNA 2022

<sup>4</sup> HELAA 2022

and are designed to inform the identification of a more detailed approach to employment (including detailed alternatives if they are reasonable).

### 3. Appraisal methods

#### Methods

- 3.1 The appraisal has been undertaken by assessing each option / proposed policy changes against a framework of sustainability topics, objectives and guiding appraisal questions.
- 3.2 The framework for the SA was established at the Scoping Stage of the SA process and finalised following consultation with a range of stakeholders (including the statutory consultation bodies).
- 3.3 Table 3-1 below lists the headline topics and objectives (Appendix A replicates the full SA Framework as established in the scoping report).

**Table 3-1 The SA Objectives**

SA Topic	SA Objectives
<b>1. Housing</b>	1a) To meet housing needs of the current and future resident and by providing decent affordable homes of right quality and type.
<b>2. Equality, diversity and community development</b>	2a) To promote safer communities and reduce the fear of crime and antisocial behaviour.
	2b) To reduce Index of Multiple Deprivation (IMD) to address poverty and help improve access to facilities and services for disadvantaged individuals and communities
	2c) Ensure easy and equitable access to services, facilities and opportunities.
	2d) Support, empower and connect communities to create a healthier and just society.
<b>3. Health and wellbeing</b>	3a) To improve the health of the population and reduce health inequalities.
	3b) To improve access and availability of sports and recreation facilities.
	3c). To improve access and availability to open spaces.
<b>4. Waste and resource use</b>	4a) Encourage and enable waste minimisation, reuse, recycling and recovery.
	4b) To ensure efficient use of natural resources such as water and minerals.
<b>5. Economy and employment</b>	5a). Achieve a strong, stable and sustainable economy and prosperity for the benefit of all of Birmingham's inhabitants.
	5b) To achieve sustainable levels of prosperity and growth throughout the city.
	5c) To improve educational skills of the overall population
	5d) To maintain and enhance the vitality and viability of town and retail centres

SA Topic	SA Objectives
<b>7. Air quality</b>	7a). Minimise air pollution levels and create good quality air.
	7b) Increase use of public transport, cycling and walking as a proportion of total travel and ensure development is primarily focused in the major urban areas, making efficient use of existing physical transport infrastructure
<b>8. Water quality</b>	8a) Minimise water pollution levels and create good quality water.
<b>9. Land and soil</b>	9a) Minimise soil pollution levels and create good quality soil.
	9b) Encourage land use and development that creates and sustain well-designed, high quality distinctive and sustainable places.
	9c) Encourage the efficient use of previously developed land and buildings and encourage efficient use of land.
<b>10. Achieving zero carbon living</b>	10a) Minimise Birmingham's contribution to the cause of climate change by reducing emissions of greenhouse gases from transport, domestic commercial and industrial sources.
	10b) Promote and ensure high standards of sustainable resource efficient design, construction and maintenance of buildings
	10c) Urgently and drastically reduce carbon emissions from transport to contribute to the Council's decarbonisation commitment.
<b>11. Flooding</b>	11a) To reduce vulnerability to climatic events and flooding.
<b>12. Historic environment</b>	12a) Value, conserve, enhance and restore Birmingham's built and historic and archaeological environment and landscape.
<b>13. Natural landscape</b>	13a) Value, protect, enhance and restore Birmingham's natural landscape.
<b>14. Biodiversity and geodiversity</b>	14a) To conserve and enhance biodiversity and geodiversity.
<b>15. Accessibility and transport</b>	15a) Increase use of public transport, cycling and walking as a proportion of total travel and ensure development is primarily focused in the major urban areas, making efficient use of existing physical transport infrastructure.
	15b) Ensure development reduces the need to travel and reduce the negative impacts of transport on the environment
	15c). Urgently and drastically reduce carbon emissions from transport to contribute to the Council's decarbonisation commitment.

- 3.4 The aim of appraisals at this stage is to identify what the effects would be as a result of the plan proposals / options and how this compares to what might otherwise be expected to happen (the projected baseline).
- 3.5 At this stage the options / proposed policy changes are necessarily outlined in broad terms and will be refined and become more defined as the LP process progresses. Therefore, this interim appraisal considers the effects in broad terms to determine the potential effects (rather than providing a detailed assessment of significance). When identifying potential effects, account is taken of a range of factors including: the magnitude of change, sensitivity of receptors, the likelihood of effects occurring, the length and permanence of effects and cumulative effects. The potential effects are classified as shown in Table 3.2.

**Table 3-2 Scale used to record potential effects**

Potential to be significantly positive	
Likely to be positive	
Neutral	
Likely to be negative	
Potential to be significantly negative	
Uncertainty	?

## 4. Housing options: Summary of findings

- 4.1 Table 4.1 presents a visual summary of the options appraisal findings. Below is a summary of the effects for each of the Options. A more complete appraisal is presented in **Appendix B**.
- 4.2 It is important to point out that the options appraised are not mutually exclusive it is likely that a combination of several or all options would be required in order to fulfil the housing growth required. As such this appraisal does not rate the option against each other but rather highlights the potential effects associated with each option.
- 4.3 **Option 1** (Increased housing densities) scores particularly well with likely significant positives for housing, economy and employment, and accessibility and transport as the approach would increase housing provision with less land take and increase growth in more sustainable, well-connected locations; improving accessibility services, employment and transport. Conversely, the option could potentially have significant negative effects on the historic environment due to the concentration of heritage assets in the City Centre and urban centres; making it harder to avoid impacts on the character of such locations.
- 4.4 **Option 2** (More active public sector land assembly) scores relatively well with respect to six of the SA topics as it would help improve housing land supply and address the housing shortfall including for affordable housing. No likely significant effects (either positive or negative) are predicted for this option but as with other options, there are some potentially negative effects on air quality, water quality, the historic environment and biodiversity due to the scale of growth urban areas. It is important to point out that effects are ultimately dependent on the locations, sizes and site-specific policies pertaining to the assembled sites and therefore there is a degree of uncertainty at this stage.
- 4.5 **Option 3** (Further comprehensive housing regeneration) has some mixed effects with respect to housing and equality, diversity and community development as the option is unlikely to result in a substantial net increase in dwellings and may have negative effects in the short term during the demolition and construction phases (which will reduce the housing stock including affordable housing and social rents in the interim). However, the regeneration approach is also likely to produce positive effects due to improved quality of housing, environment, open space and amenities. Due to the overall scale of development required, negative effects are predicted for the air quality, water quality, achieving net zero living and the historic environment topics, but these are unlikely to be significant. The option is neutral with respect to the remaining topics. There is a large degree of uncertainty at this stage which would be resolved once the extent and locations of proposed regeneration sites are identified.
- 4.6 **Option 4** (Utilising poor quality under-used open space for housing) is positive with respect to housing as it would likely improve housing land supply with knock on positive effects on equality, economy and employment, land and soils (as growth is likely to reduce land take outside urban areas) and accessibility/transport (as sites are likely to be in more accessible locations). However, mixed effects are likely on health and wellbeing; positive ones due to the enhanced housing provision (including affordable housing) and potentially negative



implications due to the reduction of open space which is already underprovided in the City. Mixed effects are also predicted with respect to the natural landscape; negative effects due to the loss of amenity and change to the existing landscape/ townscape character with potential positive effects due to reduced encroachment on areas of high landscape sensitivity and the potential for improved provision of higher quality open/ green space.

- 4.7 **Option 5** (Utilise some Core Employment Area land for housing) is likely to have positive effects on housing as it will improve housing land supply with knock on positive effects on health and wellbeing due to the increased choice of housing, including affordable housing. The option could also result in negative effects on health and wellbeing due to the location of new housing within employment areas. These may not be well suited to residential use due pollution or noise associated with some industrial / commercial premises and the lack of comprehensive walking/ cycling infrastructure within the Core Employments Areas (CEAs). The option also has mixed effects with respect to employment and the economy with additional housing helping support economic growth (positive effects) but potential negative effects due to the loss of employment land. Positive effects are likely with respect to the landscape, and land and soil topics as the option would reduce development pressures on areas of higher landscape sensitivity and non-urban areas containing good quality agricultural land.
- 4.8 **Option 6** (Release Green Belt for housing) could potentially generate significant positive effects on housing due to the improved land supply and potential for larger scale developments such as SUEs with associated beneficial effects on health, wellbeing and the economy. However, this option is likely to have negative effects on land and soil and the natural landscape as it will lead to the loss of some high-quality agricultural land and change the character of areas of landscape sensitivity in the Green Belt areas. Some locations in the Green Belt are also not ideally located in terms of accessibility.

**Table 4-1 Summary of findings: Housing Growth Options**

SA Topic	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6
Housing						
Equality, diversity and community development						
Health and wellbeing						
Waste and resource use						
Economy and employment				?	?	
Air quality						
Water quality						
Land and soil		?				
Achieving zero carbon living						
Flooding						
Historic environment				?		
Natural landscape		?				
Biodiversity and geodiversity						
Accessibility and transport		?				

## 5. Appraisal findings: Employment options

### Summary of findings

- 5.1 Table 5.1 presents a visual summary of the options appraisal findings. Below is a summary of the effects for each of the two high level employment options identified at this stage. A more complete appraisal is presented in **Appendix C**.
- 5.2 There is considerable uncertainty involved in predicting the effects of the options at this level of detail. This is because effects could vary widely depending on the actual sites and locations that are involved. The appraisals at this stage should therefore be taken in this context, and as broad indications of the potential merits and drawbacks of each approach.
- 5.3 Option 1 brings potential for the widest range of effects, which is to be expected given that it would involve additional land being identified for employment in Birmingham itself. However, the effects are mixed for many SA topics, as location will be important in determining whether effects are positive or negative. The most beneficial aspect of Option 1 is in terms of economy and employment, as it will deliver needs where they are arising, which is a potential significant positive effect. Provided that jobs are accessible to communities and well located, this ought to bring benefits in terms of health, equality and community development. Effects on environmental factors such as heritage, landscape, biodiversity are uncertain, but could be negative depending on the sites involved. Conversely, they could help reduce pressure on greenfield development. A balance will need to be carefully explored though, as there is also pressure to maximise the use of land for housing in the urban areas.
- 5.4 Addressing the shortfall in employment locally may also lead to increases in employment related traffic, which could affect air quality, and could also mean more growth in areas at risk of flooding.
- 5.5 Meeting the shortfall in land outside of Birmingham has some clear environmental benefits for Birmingham itself, but it is unclear what the knock on effects would be in the wider HMA. However, given that there is limited land supply in the City, and the area is already highly urbanised, a reduced pressure to address all employment needs locally could help to free land for housing and / or reduce the need to utilise sub-optimal sites. This could have subsequent knock-on benefits with regards to heritage, landscape, biodiversity, land and soil (which may otherwise be difficult to avoid). In terms of social factors though, Option 2 would be less beneficial with regards to Birmingham's economy (though would still have some positives) and could make it more difficult for less mobile members of the community to access the full range of employment on offer. These are negative effects, but are only considered to be minor given that the majority of needs would still be met in the City.

**Table 5-1 Summary of findings: Employment Growth Options**

SA Topic	Option 1		Option 2	
Housing	?			
Equality, diversity and community development	?	?	?	
Health and wellbeing	?	?		
Waste and resource use	?		?	
Economy and employment				
Air quality	?			
Water quality				
Land and soil	?		?	
Achieving zero carbon living	?		?	
Flooding	?			
Historic environment	?	?		
Natural landscape	?	?	?	
Biodiversity and geodiversity	?	?	?	
Accessibility and transport	?	?	?	?

## 6. Appraisal of proposed policy changes

### Introduction

- 6.1 A crucial element of the plan making processes is to establish a suitable strategy for development growth and distribution. The Issues and Options document puts forward a range of policy approaches (including changes to adopted policy approaches) to help guide development. This section presents an appraisal of the preliminary high level policy approaches outlined in the Issues and Options stage of the BLP against the SA Framework. The high level effects have been identified taking into account magnitude, duration, frequency, and likelihood. Combined, these factors have helped to identify the likely significance of effects, whether these are positive or negative. The policies are individually considered and appraised at this stage, but will be considered in their totality in combination with the spatial strategy at the next stages of the plan and SA processes. Where policies are not mentioned under a particular SA Topic, then the assumption should be that they are of little relevance and would not give rise to effects.

### Methods

- 6.2 The potential significance of effects is recorded according to the following scoring convention;

**Potential significant positive effects**

**Likely positive effects**

**Neutral effects**

**Likely negative effects**

**Potential significant negative effects**

**? Indicates uncertainty**

### Appraisal findings

- 6.3 The below discussion takes each SA topic in turn and appraises the policies / policy changes proposed in the Issues and Options document, outlining the potential effects and their likely significance. The discussion below considers each policy proposal / policy change in turn and considers effects on the SA topics of relevance; i.e. those likely to be affected by the policy being appraised.
- 6.4 **Affordable housing:** The proposed policy changes seek to maximise affordable housing (AH) provision in Birmingham. The adopted policy (BDP policy TP31) seeks 35% AH provision on sites of 15 dwellings and over. The recent HEDNA estimates a need for 5,396 AH per year and 1,031 dpa affordable ownership tenures. When 'existing households falling into need' i.e. those already in accommodation, is excluded from the above figure a net 'current need' of 3,049 AH per annum results. This represents 45% of the total housing need calculated in the HEDNA (using the standard method); a very substantial portion of the total growth required. The HEDNA concludes *the analysis identifies a notable need for affordable housing, and it is clear that provision of new affordable housing is an important and pressing issue in the area* adding that *'affordable housing delivery should be maximised'*.

- 6.5 Therefore, the proposed policy change could be beneficial in helping achieve more AH provision. However, this will ultimately depend on viability considerations which will vary from site to site. Too rigid a requirement for greater AH contribution may make development unviable. However, this is recognized in the proposed policy change which states that the Council will *test the 35% to see if a higher contribution is viable*. Overall, the policy change is **potentially positive** with regards to housing and health and wellbeing as it is likely to maximise AH delivery without jeopardising viability. The effects on other SA topics are considered likely to be limited given that viability will need to be taken into consideration.
- 6.6 **Family Housing:** Seeks to safeguard family housing (use class C3) from potential loss, through conversion of larger family homes into smaller multiple units or Houses in Multiple Occupation (HMO). The Council already has a city-wide Article 4 direction relating to HMOs and HMO SPD in place. The latter identifies a higher demand in the city for 2 and 3 bed dwellings and that the proportion of households with dependent children is higher in Birmingham than regional and national averages, adding that there is a particular shortage of family accommodation. The SPD requires applicants to demonstrate that there is an established lack of demand for the single family use of the property to be converted. Whilst the guidance is helpful in reinforcing the Council's intention to safeguard family housing it may have adverse effects on AH provision as smaller dwellings in HMOs are likely to be more affordable to those most in need, particularly younger residents. Having said that the proposed policy change is not expected to significantly affect the baseline position given the existence of the above-mentioned Article 4 direction and the SPD. Therefore, **neutral effects** are envisaged at this stage for all SA topics. Site specific policies may be more effective in helping achieve an appropriate housing mix on a specific site, appropriate to its location.
- 6.7 **Housing for older people:** The Council is considering whether to introduce a policy that requires the provision of a specific percentage of homes for older people and explore allocating sites/ parcels within larger sites for specialist housing. Additionally, the Council may consider a policy requiring development above a certain threshold to provide a percentage (10-15%) wheelchair accessible homes. Typically, people downsize to more manageable properties as they age and there is often a significant degree of under occupation in older households. This may be out of personal choice but can often be due to lack of suitable smaller, more adaptable/ accessible homes that older residents can move into. Therefore, the proposed additions are likely to have **positive effects** on housing as they would help release larger properties back into the market and may also have positive effects on affordable housing as smaller dwellings/ older people development schemes are generally more affordable than larger homes. There are also likely to be **positive effects** on equality, diversity and community development as the schemes could engender a sense of social inclusion and reduce isolation. **Positive effects** on health and wellbeing are also envisaged as the provision of adaptable/ accessible homes would allow older and/ or less abled residents to live in accessible (including wheelchair accessible) more suited to their needs helping them live more independently.



- 6.8 **Purpose built student accommodation:** The change being considered pertains to setting limits on the extent of student accommodation so as to avoid large concentrations in particular areas (e.g. in the City Centre, Selly Oak and Edgbaston).
- 6.9 The HEDNA identified this issue as impacting the provision of a more balanced housing mix. Selly Oak is identified as an area where a need for a higher proportion of larger homes is maybe required and where the conversion of larger homes to shared student housing may be a limiting factor. Clearly students make up a substantial proportion of the City's residents as there are five universities in Birmingham. They bring multiple benefits to the city economically and in the form of research, education and innovation. If the proposed policy additions result in limiting the provision of student accommodation this may have adverse effects as it may make the City less attractive to students. Site or area specific policies may be more effective in ensuring that new development meets local housing need, providing a mix that is appropriate to the location. Also, the aforementioned Article 4 direction and the SPD (paragraph 4.2) can also safeguard larger homes from being converted to student accommodation. Ultimately the effects will depend on the requirements of the policy to be included but at this stage, **uncertain negative effects** on housing, as policy can reduce availability of student accommodation. Similar effects are also likely pertaining to economy and employment as the universities are major contributors to the economy and employment in Birmingham and the policy could make the City less attractive to students. From a **positive perspective**, limiting student accommodation could be positive with regards to housing choice in the city, whilst also helping to maintain vibrancy in the city outside of term times.
- 6.10 **Built to rent:** The NPPF defines built-to-rent housing as '*purpose built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses but should be on the same site and/or contiguous with the main development*'. Such schemes are likely to help meet some of the demand for private rents thus helping increase housing supply and improving choice in the market. The HEDNA identifies several recently implemented built-to-rent schemes in Birmingham and highlights the important contributions such schemes make to housing supply and choice. Therefore, the inclusion of a policy seeking the provision of built-to-rent developments maybe helpful, but such schemes are already being implemented in the City even though there is not a currently adopted policy promoting built-to-rent. Therefore, only **minor positive effects** are likely with regards to housing.
- 6.11 **Large-scale shared accommodation:** This considers including a policy on co-living schemes. In this form of accommodation, residents rent a room within a purpose-built (or converted) development which has shared amenities and facilities. Other services and facilities are often provided including cleaning, gyms, communal workspaces and a concierge. This type of accommodation is likely to be beneficial in reducing land supply required (as it is often higher density than traditional dwellings) can provide an alternative to traditional flat or house shares which may help address some of the housing shortfall in the City. This form of living may also be more affordable than flats and may help reduce isolation with positive effects on health and wellbeing and is likely to be more sustainable particularly if located in areas with good access to services and transport. It may also be amenable and suited to regeneration/ conversion of under used office/ commercial buildings.

- 6.12 The HEDNA recommends that this type of accommodation be supported through a policy on co-living housing, noting a demonstrable market for such developments, particularly in student concentrations with the City Centre, southern Edgbaston and Selly Oak.
- 6.13 The proposed policy addition is therefore likely to produce **positive effects** on housing through increased provision and reduced land requirements due to the higher densities such schemes produce. Potentially **positive effects** are also envisaged on health and wellbeing and equality, diversity and community as the communal living aspect (through shared facilities) may help reduce isolation and engender a sense of community and belonging and may help provide better quality affordable accommodation.
- 6.14 **Gypsies, travellers and travelling show people:** This considers the option of including a policy allocating at least 5 years supply of sites required as demonstrated by the latest assessed needs. The Council has a pressing need to provide transit sites to cope with the increasing occurrence of unauthorised encampments. This has led to the 2 BDP allocated sites being utilised as transit sites. The HEDNA estimates a need for 30 pitches up to 2042. Therefore, the proposed policy addition could help ensure adequate provision for the Gypsy/ Traveller community's needs in future. This is predicted to have **likely significant positive effects** on health and wellbeing as currently the community has significantly shorter life expectancies, 10-15 years, shorter than the general population (HEDNA). The provision of healthy, safe sites can help improve the community's health and wellbeing it is also likely to improve the health and wellbeing of other residents who may be negatively impacted by the ad-hoc encampments. There could also be positive effects with regards to equality and diversity. The choice of sites will determine other possible effects such as accessibility, environmental impacts and so on. At this stage though, uncertain effects are recorded.
- 6.15 **Healthy neighbourhoods:** Considers adding a requirement in policy that all developments above a certain threshold be subject to a Health Impact Assessment (HIA). This is likely to be **positive** on health and wellbeing as it will help identify early on in the planning process the proposal's potential positives and negatives on health and wellbeing thus offering the opportunity to maximise positives and reduce or eliminate negatives. This requirement is unlikely to lead to any significant negative effects with regards to development.
- 6.16 **Climate change:** The proposed policy changes consider setting higher energy efficiency standards for new development and incorporating renewable energy and/ or connection to a heat network. The proposed changes require policies to consider the whole life carbon associated with proposals seeking to '*get as close to zero-carbon onsite*'. These more rigorous requirements in the form of policy are likely to have **significant positive effects** on the achieving zero carbon living SA topic as it is likely to result in more energy efficient developments and facilitate renewable energy and low carbon district heating schemes. However, the requirement may be too onerous for developers with negative implications on viability due to the initial costs involved which will also impact AH provision. Therefore, mixed effects are predicted at this stage: likely significant positives effects on achieving zero carbon living and potentially **negative effects** on housing due to the potential viability issues raised.

- 6.17 Sustainable design and construction:** Considers the development of policy to improve the resilience of new development to the effects of climate change including minimising internal heat gain to reduce the impact of the urban heat island effect and addressing water shortage by specifying higher water efficiency standards than currently specified in the building regulations.
- 6.18** The proposed changes include reducing the threshold above which non-residential developments aim for achieving BREEAM standard Excellent. Again, mixed effects are possible: **Positive effects** on health and wellbeing, as there would be a requirement to reduce the impact of urban heat island effects which can have serious health implications particularly for the youngest and oldest residents and those with chronic health conditions. **Positive effects** are also likely on the waste and resource use topic as the higher water efficiency requirements will help conserve water resources into the future. The proposed changes also highlight the need to address surface water flood risk which is also beneficial, as it may help reduce flood risk in the future (**positive effects** on flooding). Conversely, there may be some **negative effects** on the economy and employment topic as these changes may make some employment / commercial developments less viable due to the costs involved.
- 6.19 Low and zero carbon infrastructure:** The proposed changes relate to utilising heat networks (3 have been identified in the City) to provide a decarbonised source of heating and cooling to existing buildings and new development. The policy envisages Heat Network Zoning that would identify 'Energy Zones' where greater carbon reductions can be achieved. Furthermore, through policy the Council could seek to ensure that new residential/ employment schemes are provided with the infrastructure to link them into the heat networks. As above mixed effects are potentially likely; **positive effects** on the achieving zero carbon living SA objective as the policy will likely result in an overall carbon reduction but there may also be **negative effects** on viability of affected developments due to the cost implications of linking to the networks and adapting development to utilise the networks. There could also be some short term disruptions with regards to infrastructure works (e.g. congestion, noise etc), which could be **negative** for health and wellbeing.
- 6.20 Flood risk and water management:** Considers including a policy seeking to reduce flood risk from all sources. This is to be achieved by directing development away from areas at highest risk of flooding such that they are safe for their lifetime without increasing flood risk elsewhere. New policy could also emphasise the need to attenuate and use storm water for irrigation for example. The policies are likely to have **positive effects** on health and wellbeing as they will reduce the impacts of future flood events on residents with **positive effects** on flooding as the policy will help reduce the impact of flood events by directing development to areas at lower risk of flooding.
- 6.21 Sustainable waste management:** Considers strengthening policy to ensure that the reduce/ reuse/ recycle approach to solid waste and resource management is implemented as a part of new development. This would include applying circular economy principles to new buildings and extending the useful life of buildings including salvaging building materials for reuse. This is likely to have **positive effects** on carbon emissions (achieving zero carbon living) and the waste and resource use SA objectives as it will help recycle embedded carbon in buildings and construction materials.

- 6.22 Further beneficial effects are possible due the inclusions of a requirement that major developments provide onsite recycling such as composting and suitable waste disposal to reduce landfill.
- 6.23 **Green infrastructure:** Considers including policy that seeks a more proactive approach to GI provision by protecting and enhancing the green infrastructure network using Local Nature Recovery Strategy and Birmingham's Urban Forest Master Plan. This likely to have **positive effects** on biodiversity as the planned scale of growth will inevitably lead to some loss of habitats and the biodiversity associated with them. This policy approach could help mitigate / partially offset some of resulting loss and fragmentation reducing the overall magnitude of negative effects.
- 6.24 **Biodiversity net gain:** Proposes to explore going above the mandatory 10% biodiversity net gain e.g. 20%. Again, this is likely to have **positive effects** on biodiversity, potentially mitigate/ partially offset any resulting loss and fragmentation predicted as a result of new development. Conversely, this may place an added burden on new development in terms of space required and costs which may **negatively** impact viability and consequently housing delivery.
- 6.25 **Urban greening:** Proposes to include policy changes to strengthen the urban greening approach ensuring that major development include urban greening as part of their design. This may also include an Urban Greening Factor to identify the amount of urban greening required in new developments. Again, this is likely to have beneficial (**positive**) effects on biodiversity, potentially helping mitigate some of the loss due to the scale of new development. There could also be knock on benefits with regards to health and wellbeing and climate change resilience. As discussed above this may also have negative implications on viability of new development with potentially **negative effects** on the provision of housing.
- 6.26 **Open space and playing fields:** Considers introducing a policy requiring new open space standards to be applied. This will increase the requirement from 2ha per 1000 persons to 2.35 ha/ 1000 persons. Introducing the new standard would imply a 17.5% increase of provision of open / recreational space in new development. Open space is currently underprovided in the City and therefore this policy approach is likely to have **positive effects** on health and wellbeing due to the additional open and recreational space. The additional provision can also have beneficial effects on biodiversity potentially reducing fragmentation and providing spaces that serve as stepping stones for species. **Positive effects** are also likely on the equality, diversity and community development topic due to the enhanced provision and improved access to open space and recreational space. Conversely, some potential **negative effects** are possible on the housing topic as the increased open space provision may impact housing land supply.
- 6.27 **Minimising environmental pollution:** No policy changes are proposed therefore it is not possible to predict effects at this stage.
- 6.28 **Tall buildings:** Considers whether to introduce a tall buildings policy that indicates appropriate locations and design. Effects would depend on the wording of the policy which are yet to be formulated.

- 6.29 **Portfolio of employment land:** This proposes a policy change to revise the employment land portfolio in order to continue providing an ongoing 5-year supply of readily available employment land with a reduced target of 67 ha as evidenced by the recent HEDNA. The new portfolio will focus on delivering small-medium sized sites. This is likely to have **positive effects** on the economy and employment topic as it will help ensure the council meets future demand for sites.
- 6.30 The HEDNA identified an unmet demand for small/ medium sites and this policy would help address this need. Effects upon other factors would be dependent on the choice of sites.
- 6.31 **Regional Investment Sites:** proposes removing the designation of Regional Investment Sites (term inherited from the revoked West Midlands Regional Spatial Strategy) and maintaining their designation as Core Employment Areas. If deemed appropriate within the Growth Options to continue with the Regional Investment Sites designation, then developments in these locations will need to be restricted to B2 uses only due to the government's changes to the Use Classes Order. This change in designation is unlikely to produce significant effects on employment as it unlikely to produce a substantial increase or reduction in employment land.
- 6.32 **Core Employment Areas:** Considers introducing a policy that redefines the Core Employment Areas boundaries according to the findings of the HEDNA. The majority of areas making up the CEAs will remain as they are, but some will be retained with amended boundaries to reflect current distribution of uses and where further development potential exists, and some will be de-designated as they no longer contain predominantly employment uses. Furthermore, the policy will require exceptional justification for non-employment uses in CEAs. Whilst this is likely to have **positive effects** on economy and employment as it safeguards existing employment land in these well connected locations but it may adversely impact growth options seeking to introduce some residential/ mixed uses into CEAs thereby **negatively** impacting housing land supply and housing delivery.
- 6.33 **Protection of employment land:** Seeks to introduce greater flexibility in re-purposing non-conforming employment sites (ones in predominantly residential areas) outside the CEAs for residential use. This would include measures to ensure that sites which are capable of providing a valued contribution to employment and economy are not lost, including viability assessments. The proposed policy approach is likely to be **positive** with respect to housing as it would help improve housing land supply and housing provision. Potential negative effects on employment land are unlikely given the proposed policy requirements that valuable employment land is not lost. Overall, positive effects are predicted on the housing topic with knock on **positive effects** on health and wellbeing (due to improved housing provision, choice and potentially affordability).
- 6.34 **Offices:** Proposes not to include a detailed policy to guide future office development, opting for a broader policy setting out locations for development under Use Class E. The post Covid-19 pandemic increase in homeworking and hybrid working will mean there could be less need for office floorspace supply. The HEDNA also reduced the projected office floorspace needs by 30% up to 2042.



- 6.35 This is unlikely to have significant effects (**neutral**) as the changes in Use Classes Order mean offices are in the same class as other commercial uses (retail and food and drink) and the introduction of new Permitted development rights would enable the conversion of class E buildings to residential dwellings without requiring a planning application.
- 6.36 **Urban centres:** This states the council intention to review the centre hierarchy and boundaries seeking to designate new centres and possibly amend some existing centre boundaries.
- 6.37 The policy would also remove the requirement for 50%/55% of uses in centres to be retained for retail use. The approach taken will be informed by the Retail and Leisure Needs Assessment. The proposed policies are potentially **positive** on economy and employment as they will help reduce empty shops in town centres and repurpose empty spaces above shops to various uses including as affordable workspaces promoting local enterprises, offices and homes. This is likely to improve the vitality of centres and attract more footfall producing positive effects on the local economy and employment. There may also be **positive** effects on housing through the conversion of empty premises or above ground floor spaces into residential accommodation. There are potential positive and negative impacts upon the character of the built environment and heritage, but these are uncertainties at this stage.
- 6.38 **Tourism, culture and the night-time economy:** Considers the inclusion of a policy seeking to enable evening and night-time economic activity. This may include protecting public houses, theatres, live music venues and night clubs from change of use. Other measures considered include supporting the night-time economy by better provision of evening/ night-time public transport services. The potential policy measures are likely to have **positive effects** on the local economy and employment as they are likely to improve the vitality of leisure, cultural and social venues, helping to increase visitors through the improved public transport provision. There are potential **minor negative effects** with regards to housing provision, as it prevents changes in use that may otherwise occur.
- 6.39 **Key growth areas - opportunity areas:** Outlines the Council's intention to identify new areas to focus growth. These new opportunity areas will be within existing urban areas, in locations that benefit from good public transport, services and cycling and walking infrastructure. They will be in areas where clusters of development opportunities exist and will be developed through a masterplanning/ area framework approaches. The proposed policy changes include more focussed growth (in size and purpose) in locations where clusters of opportunity sites / infrastructure improvement would bring about wider change in the area. Each growth area is to have a policy setting out key requirements including land, scale, density and site specific requirements. Growth areas identified would be supported by a masterplan SPD. The Council proposes to name such growth areas as 'Strategic Regeneration Areas' or 'Opportunity Areas'. The effects will depend on the eventual policies drafted but generally beneficial effects are likely as the focused regeneration approach is likely to engender multiple benefits including improved design, better housing, employment and infrastructure provision through the proposed masterplanning approach with **positive effects** predicted on housing and economy and employment in particular.



## Summary

- 6.40 The appraisal of the proposed policy approaches and changes (to adopted policy) identified mostly positive effects with respect to the housing, health and wellbeing, economy and employment, equality, diversity and community, waste and resource use, flooding and biodiversity SA topics. **Likely significant positives** were identified with respect to the health and wellbeing, and achieving net zero carbon living, SA topics. The former is due to the addition of a policy seeking to ensure adequate provision for the Gypsy/ Traveller community's needs in future.
- 6.41 This community has significantly shorter life expectancies, 10-15 years shorter than the general population, therefore, the provision of healthy and safe sites can help improve the community's health and wellbeing.
- 6.42 Proposed policy changes considering the setting of higher energy efficiency standards, incorporating renewable energy and/ or connections to heat networks, the requirement for proposals to consider whole life carbon and seeking to 'get as close to zero-carbon onsite' are anticipated to produce **likely significant positive effects** with respect to the achieving net zero carbon living SA topic. These more rigorous requirements in the form of policy are likely to produce concrete contributions to lowering the carbon footprint associated with new development.
- 6.43 Some **negative effects** were predicted for the Housing and Economy and Employment SA topics due to the risk that some policies may reduce housing / employment development due to viability issues through the requirement for more rigorous energy efficiency standards, and restrictions on certain types of dwellings (HMOs, student housing). No likely significant negative effects were identified.
- 6.44 Table 6-1 summarises the potential effects of the proposed policy changes visually. For each policy, where effects have been identified for at least one of the SA topics, a colour is provided for specific SA topics to represent whether effects are broadly likely to be positive or negative.
- 6.45 For some policies, neutral effects have been identified against all the SA topics, so these are not shown in the table.

Table 6-1 Summary of findings: Proposed policy changes

Proposed policy changes	Potential effects			
Affordable housing	Housing	Health & wellbieng	Housing	
Housing for older people	Health & wellbieng	Equality, diversity & community		
Purpose built student accommodation	Housing	Housing		
Built-to-rent	Housing			
Large scale shared accommodation	Housing	Health & wellbieng	Equality, diversity & community	
Gypsies, travellers and travelling show people	Health & wellbeing			
Healthy neighbourhoods	Health & wellbeing	Equality, diversity & community		
Climate change	Achieving net zero carbon living	Housing		
Sustainable design and construction	Health & wellbeing	Waste & resource use	Flooding	Economy & employment
Low and zero carbon infrastructure	Achieving net zero carbon living	Health and wellbeing		
Flood risk and water management:	Health & wellbeing	Flooding	Water quality	
Sustainable waste management:	Achieving net zero carbon living	Waste & resource use		
Green infrastructure	Biodiversity	Health and wellbeing	Water quality	
Biodiversity net gain	Housing	Biodiversity		
Urban greening	Housing	Biodiversity	Health and wellbeing	
Open space and playing fields	Housing	Equality, diversity & community	Health and wellbeing	Biodiversity
Portfolio of employment land:	Economy & employment			
Core Employment Areas	Housing	Economy & employment		
Protection of employment land	Health & Wellbeing	Housing		
Urban centres:	Housing	Economy & Employment	Historic Environment?	Historic Environment?
Tourism, culture and the night-time economy	Economy & employment	Housing		
Key growth areas - opportunity areas	Housing	Economy & employment	?	

Light green is a potential positive effect

Dark green is a potentially significant positive effect

Amber is a potential negative effect

## 7. Next Steps

### Consultation

- 7.1 The Council has prepared an Issues and Options document, with the prime purpose of consulting with stakeholders to invite feedback and suggestions with regards to how the Local Plan Review should progress.
- 7.2 Following the consultation stage, the Council will work on developing the Plan further, and this will draw upon a wide range of evidence, stakeholder feedback and technical studies.
- 7.3 The SA process will continue alongside Plan making activities, with a particular focus on the appraisal of site options and more detailed reasonable alternatives.

### Developing reasonable alternatives

- 7.4 The focus in the interim SA Report has been on the appraisal of high-level options and policy approaches. Whilst options appraisals are helpful to help refine plan-making and stimulate debate, they should not be confused with 'reasonable alternatives' in the context of the SEA Regulations. The Regulations state that alternatives to the 'Draft Plan' should be considered (rather than every element of the plan individually), and this will be the focus of SA work at the next stages of Plan making.
- 7.5 The appraisal of options (including individual site options) should therefore be viewed as steps towards identifying reasonable alternatives.
- 7.6 Following consultation on the Issues and Options Document (and this interim SA Report), the Council will work towards developing a spatial strategy, and exploring changes to plan approaches / policies in further detail. At some point it should be possible to identify a draft plan approach and any reasonable alternatives with regards to key issues such as housing and employment growth.
- 7.7 Ideally, this will take the form of a series of 'alternative key diagrams', illustrating different combinations of growth locations / sites that could be explored to meet the plan objectives. The reasonable alternatives will explore distribution of growth as well as the overall quantum (with the two intrinsically linked).
- 7.8 Consultation on this interim SA Report alongside the Issues and Options document provides an opportunity for stakeholders to provide input in relation to several key elements of the SA process:
  - The appraisal findings in relation to the high-level options and proposed policy approaches.
  - Are there other high level options that ought to be considered?
  - What detailed reasonable alternatives might look like and which locations should be focused upon?

## Recommendations

7.9 When developing the options / policies, the following high level recommendations can be drawn from this interim SA exercise.

- It is unlikely that any of the housing options will be capable of meeting the shortfall in housing on their own (at least not without generating significant negative effects on particular SA topics). It is therefore recommended that a mix of the options are utilised to develop a series of reasonable strategies for growth.
- Undertake sustainability appraisal of reasonable site options to help inform the development of reasonable strategies for growth.
- Support patterns of growth that will help to create 20 minute neighbourhoods.
- Ensure that new development in urban areas brings with it improvements to open space and urban greening.
- The accessibility of some Green Belt areas is poorer than the urban areas. Small scale incremental growth in such locations would likely result in increased car trips and / or poor access to services and should be avoided in such instances. Green Belt should only be released in exceptional circumstances where the locations are sustainable or can be made so, which is more likely to be achieved through a SUE.
- It will be important to ensure that increased densities, intensification and repurposing of land in the urban areas does not result in a significant increase in car travel as this could exacerbate air quality issues. The Plan should therefore seek to provide strong support for walking, cycling and public transport throughout the urban areas.
- Consider the use of poorer performing sites (in terms of sustainably located housing) for biodiversity / open space provision (linked to a Local Nature Recovery Strategy).

## APPENDIX A – The SA Framework

SA Topics	SA Objectives	Guide questions	Potential monitoring indicators	Topic in the SEA Directive
<b>1. Housing</b>	1a) To meet housing needs of the current and future resident and by providing decent affordable homes of right quality and type.	Will it reduce homelessness?  Will it provide a mix of good quality housing, including affordable homes?	Number of people recorded as homeless Net additional dwellings. Housing mix (types, size, tenure) Net additional pitches Number of extra care homes	Human Health  Material Assets  Population
<b>2. Equality, diversity and community development</b>	2a) To promote safer communities and reduce the fear of crime and antisocial behaviour.	Will it reduce the fear of crime in all age and cultural groups?  Will it reduce antisocial behaviour amongst the population?  Will it promote design that discourages crime?	Community safety crime rates in the city. Serious acquisitive crime rate. Reducing arson incidents. Serious violent crime rate. The number of gun crimes committed in Birmingham.	Population  Human Health
	2b) To reduce Index of Multiple Deprivation (IMD) to address poverty and help improve access to facilities and services for disadvantaged individuals and communities	Will it reduce deprivation and improve access to services and facilities?	Reduction in IMD score at ward and super output area level.	Population  Human Health
	2c) Ensure easy and equitable access to services, facilities and opportunities.	Will it improve access to services and facilities?  Will it maintain and improve access to key services and facilities for all sectors of the population?  Does it promote accessibility for disabled people?		Population  Material Assets
	2d) Support, empower and connect communities to create a healthier and just society.	Will it help to create a better healthier and just society?  Will it empower and connect communities?	Number of schemes with adequate infrastructure to improve social inclusion and connectivity Number of developments/schemes taking account of health as a material asset	Population  Human Health

SA Topics	SA Objectives	Guide questions	Potential monitoring indicators	Topic in the SEA Directive
<b>3. Health and wellbeing</b>	3a) To improve the health of the population and reduce health inequalities.	<p>Will it improve access to health facilities and social care facilities?</p> <p>Does it help provide equitable access to health services?</p> <p>Will it encourage healthy lifestyles?</p> <p>Will it support the diverse range of health needs within the community?</p> <p>Will it contribute to a healthy living environment? (noise, odour etc?)</p> <p>Will it avoid locating development in locations that could adversely affect people's health?</p> <p>Will it improve accessibility for people with disabilities?</p> <p>Will it provide sufficient areas of accessible green multifunctional spaces?</p> <p>Will it provide opportunities for contact with nature?</p>	<p>Condition of residents general health(ONS/Local datasets)</p> <p>Change in the amount of Accessible Natural Greenspace (Natural England)</p> <p>Decent homes – council housing and RSLs.</p> <p>Percentage of the city's population having access to a natural greenspace within 400 metres of their home</p> <p>Hectares of accessible open space per 1,000 population in each ward</p> <p>Tree canopy cover in each ward (the threshold is 25%)</p> <p>Gap between the areas with the worst health and deprivation indicators and the population as a whole.</p> <p>Number of planning applications meeting ANGSt</p> <p>Number of people using parks &amp; greenspaces after improvements</p>	<p>Population</p> <p>Human Health</p> <p>Climatic Factors</p> <p>Flora</p> <p>Fauna</p> <p>Biodiversity</p>
	3b) To improve access and availability of sports and recreation facilities.	Will it improve accessibility and availability of sports and recreation facilities?	Number of new sports pitches or other leisure facilities delivered annually through development.	<p>Population</p> <p>Human health</p>
	3c). To improve access and availability to open spaces.	<p>Will it improve access and availability of open spaces?</p> <p>Will it improve access and wayfinding to the local canals?</p>	<p>Percentage of the city's population having access to a natural greenspace within 400 metres of their home</p> <p>Length of greenways constructed.</p> <p>Hectares of accessible open space per 1,000 population</p>	<p>Population</p> <p>Human health</p>



SA Topics	SA Objectives	Guide questions	Potential monitoring indicators	Topic in the SEA Directive
<b>4. Waste and resource use</b>	4a) Encourage and enable waste minimisation, reuse, recycling and recovery.	<p>Will it reduce household waste generated/ head of population?</p> <p>Will it reduce commercial and industrial waste generated/ head of population?</p> <p>Will it increase rate/head of population of waste reuse and recycling?</p> <p>Does it divert resources away from the waste stream, including the use of recycled materials where possible?</p>	<p>Capacity of new waste management facilities by type (AMR).</p> <p>Percentage of household waste sent for reuse, recycling or composting.</p> <p>Municipal waste sent to landfill</p> <p>Residual waste per household.</p>	<p>Waste</p> <p>Climatic Factors</p>
	4b) To ensure efficient use of natural resources such as water and minerals.	<p>Will it improve use of natural resources like water and minerals?</p>	<p>Usage of water and minerals</p>	<p>Population</p> <p>Material Assets</p>
<b>5. Economy and employment</b>	5a). Achieve a strong, stable and sustainable economy and prosperity for the benefit of all of Birmingham's inhabitants.	<p>Does it encourage and support a culture of enterprise and innovation, including social enterprise?</p>	<p>Amount of land developed for employment by type (AMR).</p> <p>Employment land supply by type (AMR)</p> <p>Vacancy rates</p>	<p>Population</p> <p>Material assets</p> <p>Human health</p>
	5b) To achieve sustainable levels of prosperity and growth throughout the city.	<p>Will it improve business development and enhance competitiveness?</p> <p>Will it promote growth in key sectors?</p>	<p>Loss of employment land to other uses (AMR).</p> <p>Working age people claiming out of work benefits in the worst performing neighbourhoods.</p>	
	5c) To improve educational skills of the overall population	<p>Will it reduce unemployment, especially amongst disadvantaged groups?</p>	<p>Percentage of small businesses in an area showing employment growth</p> <p>Estimated new job creation</p>	
	5d) To maintain and enhance the vitality and viability of town and retail centres	<p>Will it improve the resilience of business and the economy?</p> <p>Will it improve economic performance in disadvantaged areas?</p> <p>Will it improve qualifications and skills of young people and adults?</p>	<p>Working age population qualified to at least Level 2 or higher.</p> <p>Working age population qualified to at least Level 4 or higher.</p> <p>Achievement of 5 or more 9-4 grades at GCSE or equivalent including English and Maths.</p> <p>Children in care achieving 5, 9-4 GCSEs (or equivalent) at Key Stage 4 (including English and Maths).</p>	

SA Topics	SA Objectives	Guide questions	Potential monitoring indicators	Topic in the SEA Directive
		<p>Does it ensure that Birmingham's workforce is equipped with the skills to access high quality employment opportunities suited to the changing needs of Birmingham's economy whilst recognising the value and contribution of unpaid work?</p> <p>Will it encourage indigenous business?</p> <p>Will it encourage inward investment?</p> <p>Will it make land available for business development?</p> <p>Will it increase the range of employment opportunities, shops and services available in town centres?</p> <p>Will it decrease the number of vacant units in town centres?</p>	<p>Number of business paying business rates</p> <p>Number of vacant units in town centres.</p> <p>Increased levels of investment.</p> <p>Increased levels of spend.</p> <p>Enhanced retail facilities.</p>	
<b>7. Air quality</b>	7a). Minimise air pollution levels and create good quality air.	<p>Will it improve air quality?</p> <p>Will it avoid exacerbating existing air quality issues in designated AQMAs?</p> <p>Will it reduce CO<sub>2</sub> emissions?</p> <p>Will it contribute to a healthy environment?</p>	<p>Estimated CO<sub>2</sub> emissions in the city</p> <p>Nitrogen dioxide levels.</p> <p>Number of publicly available long stay parking spaces in the City Centre.</p>	<p>Air</p> <p>Climatic factors</p> <p>Population</p>
	7b) Increase use of public transport, cycling and walking as a proportion of total travel and ensure development is primarily focused in the major urban areas, making efficient use of existing physical transport infrastructure	<p>Does it reduce road traffic congestion, pollution and accidents?</p> <p>Will it encourage walking and cycling?</p> <p>Does it help to reduce travel by private car?</p> <p>Will it improve access to or encourage the use of the canal network for sustainable travel?</p>	<p>Net additional dwellings in the City Centre (AMR).</p> <p>Percentage of new residential development within 30 mins public transport time of a GP, hospital, primary and secondary school, employment and a major shopping centre (AMR).</p> <p>Percentage of trips by public transport into Birmingham City Centre (AMR).</p>	<p>Material Assets</p> <p>Population</p> <p>Air quality</p>

SA Topics	SA Objectives	Guide questions	Potential monitoring indicators	Topic in the SEA Directive
			Percentage of completed retail, office and leisure development in town centres (AMR). Number of people killed or seriously injured in road accidents in Birmingham. Number of children killed or seriously injured in road accidents in Birmingham.	
<b>8. Water quality</b>	8a) Minimise water pollution levels and create good quality water.	Will it improve water quality?  Will it support the achievement of Water Framework Directive Targets?  Will it promote sustainable use of water?  Will it support the provision of sufficient water supply and treatment infrastructure in a timely manner to support new development?  Will it improve water quality on the canal network?	Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality (AMR).  Biological quality of rivers (Working with the Grain of Nature).  Percentage of water bodies classified as being of 'good ecological status'.  Creation and retrofitting of SUDs in the city	Water  Material assets  Fauna
<b>9. Land and soil</b>	9a) Minimise soil pollution levels and create good quality soil.	Will it maintain and enhance soil quality?  Will it encourage the efficient use of land?  Will it minimise the loss of soils to development?  Will it encourage the use of previously developed land and/or the reuse of existing buildings?  Will it prevent land contamination and facilitate remediation of contaminated sites?	Area of contaminated land.  Percentage of development recorded on greenfield / brownfield land	Soil

SA Topics	SA Objectives	Guide questions	Potential monitoring indicators	Topic in the SEA Directive
	<p>9b) Encourage land use and development that creates and sustain well-designed, high quality distinctive and sustainable places.</p> <p>9c) Encourage the efficient use of previously developed land and buildings and encourage efficient use of land.</p>	<p>Will it encourage development of well-designed and sustainable places?</p> <p>Will it improve sustainable use of previously developed land?</p> <p>Will it encourage the efficient use of land and minimise the loss of greenfield land?</p> <p>Will it value and protect the biodiversity/geodiversity (of previously developed land and buildings)?</p>	<p>Number of well-designed places</p> <p>% of permissions granted on previously developed land as a % of previously developed land available within the city.</p> <p>Percentage of employment land, by type which is on previously developed land (AMR).</p>	<p>Population</p> <p>Human Health</p> <p>Material Assets</p> <p>Biodiversity</p>
<b>10. Achieving zero carbon living</b>	<p>10a) Minimise Birmingham's contribution to the cause of climate change by reducing emissions of greenhouse gases from transport, domestic commercial and industrial sources.</p>	<p>Will it contribute to Council's decarbonisation agenda?</p> <p>Will it reduce emissions of greenhouse gases by reducing energy consumption?</p> <p>Will it increase the proportion of energy needs being met by renewable sources?</p>	<p>Carbon dioxide emissions and Greenhouse gas emissions.</p> <p>Number of buildings meeting Code for Sustainable homes/BREEAM Standards</p> <p>Reduction in the amount of emissions associated with transport.</p>	<p>Climatic factors</p> <p>Population</p> <p>Flora</p> <p>Fauna</p>
	<p>10b) Promote and ensure high standards of sustainable resource efficient design, construction and maintenance of buildings</p>	<p>Has the installation of water source heat pumps using water from the canal been considered?"</p> <p>Does it help reduce dependence on fossil fuels?</p> <p>Will it increase the number of buildings which meet recognised standards for sustainability?</p>		<p>Human Health</p> <p>Biodiversity</p> <p>Landscape</p>
	<p>10c) Urgently and drastically reduce carbon emissions from transport to contribute to the Council's decarbonisation commitment.</p>	<p>Will it reduce the emissions associated with transport?</p> <p>Will it reduce the need for unnecessary carbon costs maintenance? e.g., reduce mowing of amenity grassland via creation of pollinator areas flowering perennials &amp; scrub.</p> <p>Will it reduce reliance on carbon hungry materials e.g. bedding plants in parks?</p>		<p>Water</p> <p>Material assets</p> <p>Air Quality</p>

SA Topics	SA Objectives	Guide questions	Potential monitoring indicators	Topic in the SEA Directive
<b>11. Flooding</b>	11a) To reduce vulnerability to climatic events and flooding.	<p>Will it minimise the risk of flooding from rivers and watercourses to people and property?</p> <p>Will it reduce the risk of damage to property from storm events?</p> <p>Will it help reduce surface water flooding</p> <p>Will it safeguard land for future flood defences?</p> <p>Will development allow sufficient easement (8-20m) from the top of the bank of a watercourse / river?</p> <p>Will area flood more often or to a greater depth due to climate change ?</p>	<p>Estimated number of properties at risk from flooding</p> <p>Number of schemes incorporating nature based SUDs mechanisms</p> <p>Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality</p> <p>Land available for future flood defences</p>	<p>Water</p> <p>Biodiversity</p>
<b>12. Historic environment</b>	12a) Value, conserve, enhance and restore Birmingham's built and historic and archaeological environment and landscape.	<p>Will it conserve and enhance buildings, monuments, sites, places, areas and landscapes of heritage interest or cultural value (including their setting) meriting consideration in planning decisions?</p> <p>Will it conserve and enhance features of built and historic environment and landscape?</p> <p>Will it conserve and enhance sites, features and areas or archaeological value?</p> <p>Will it safeguard and enhance the character of the local landscape and local distinctiveness?</p> <p>Will it provide opportunities to enhance the historic environment?</p>	<p>Number of heritage assets recorded as 'at risk'</p> <p>Number of Conservation Areas with an up to date character appraisal and a published Management Plan.</p> <p>Number of Grade II Buildings considered to be buildings at risk.</p> <p>Number of buildings of historic or architectural interest brought back into active use.</p> <p>Number, or % or area of historic buildings, sites and areas and their settings (both designated and non-designated) damaged.</p> <p>Loss of historic landscape features, erosion of character and distinctiveness (HLC).</p>	<p>Cultural Heritage</p> <p>Landscape</p>

SA Topics	SA Objectives	Guide questions	Potential monitoring indicators	Topic in the SEA Directive
		Will it safeguard and enhance the character of the city's historic canal network?	Extent and use of detailed characterisation studies informing development proposals (HLC).  The proportion of housing completions on sites of 10 or more which have been supported, at the planning application stage by an appropriate and effective landscape character and visual assessments with appropriate landscape proposals.	
<b>13. Natural landscape</b>	13a) Value, protect, enhance and restore Birmingham's natural landscape.	Will it safeguard and enhance the character of the local landscape and local distinctiveness?  Will it improve the landscape quality and character of the countryside?  Will it reduce the amount of derelict, degraded and underused land?	Number of planning applications accompanied by a landscape appraisal  Development brought forward through regeneration projects.	Air Landscape Population Material Assets Climatic factors Biodiversity
<b>14. Biodiversity and geodiversity</b>	14a) To conserve and enhance biodiversity and geodiversity.	Will it conserve and enhance natural/semi natural habitats and conserve and enhance species diversity?  Will it maintain and enhance European designated nature conservation sites?  Will it maintain and enhance nationally designated nature conservation sites?  Will it maintain and enhance locally designated nature conservation sites?	Change in the number and area of designated ecological sites Impact on the Local Nature Recovery Network  Recorded condition/status of designated ecological sites  Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance  Percentage of major developments generating overall biodiversity enhancement	Biodiversity Flora Fauna Climatic factors Population Water Landscape



SA Topics	SA Objectives	Guide questions	Potential monitoring indicators	Topic in the SEA Directive
		<p>Will it help deliver the targets and actions in the Biodiversity Action Plan?</p> <p>Will it help to reverse the national decline in at risk species?</p> <p>Will it protect and enhance sites, features and areas of geological value in both urban and rural areas?</p> <p>Will it lead to the creation of new habitat?</p> <p>Does it ensure current ecological networks are not compromised, and future improvements are not prejudiced?</p> <p>Does it encourage and facilitate the creation of new ecological networks?</p> <p>Does it encourage multi-functional use of green blue corridors e.g. SUDs, sustainable transport?</p>	Hectares of biodiversity habitat delivered through strategic site allocations	
<b>15. Accessibility and transport</b>	15a) Increase use of public transport, cycling and walking as a proportion of total travel and ensure development is primarily focused in the major urban areas, making efficient use of existing physical transport infrastructure	<p>Does it reduce road traffic congestion, pollution and accidents?</p> <p>Will it encourage walking and cycling?</p> <p>Does it help to reduce travel by private car?</p> <p>Does it promote accessibility for disabled people?</p> <p>Will it improve access to or encourage the use of the canal network for a sustainable travel?</p>	<p>Net additional dwellings in the City Centre (AMR).</p> <p>Percentage of new residential development within 30 mins public transport time of a GP, hospital, primary and secondary school, employment and a major shopping centre (AMR).</p> <p>Percentage of trips by public transport into Birmingham City Centre (AMR).</p> <p>Percentage of completed retail, office and leisure development in town centres (AMR).</p> <p>Number of people killed or seriously injured in road accidents in Birmingham.</p> <p>Number of children killed or seriously injured in road accidents in Birmingham.</p>	<p>Material Assets</p> <p>Population</p> <p>Air quality</p> <p>Human health</p>

SA Topics	SA Objectives	Guide questions	Potential monitoring indicators	Topic in the SEA Directive
	15b) Ensure development reduces the need to travel and reduce the negative impacts of transport on the environment	Will it reduce traffic volumes? Will it reduce average journey length? Will it reduce the negative impact of transport?	Increase in road traffic. Workplace Travel Plans. Number of people working from home. Reduction in number of journeys	
	15c). Urgently and drastically reduce carbon emissions from transport to contribute to the Council's decarbonisation commitment.	Will it reduce the emissions associated with transport? Will it contribute to Council's decarbonisation agenda?	Reduction in the amount of emissions associated with transport.	

## APPENDIX B – Appraisal of Housing Options

### Option 1 Increased Housing Densities

- 1.1 This option seeks to maximise housing densities (dwellings per hectare of land) on sites allocated for residential development within the City Centre. The adopted BDP (policy TP30) specifies densities ranging from 40 to 100 dwellings per hectare (dph) depending on location with the highest density (100 dph) proposed for City Centre sites, 50 dph in areas well served by public transport and 40 dph elsewhere. Following analyses of recent planning permissions and sites completed within the last 3 years the Council concluded that average densities in and around urban centres is around 70 dph which is substantially higher than the density specified in TP30 for 'areas well served by public transport'. The analyses also showed that densities (for developments granted consent / completed) in the City Centre average 400 dph; four times the target specified in TP30. Birmingham contains a large network of centres ranging from the City Centre that holds a national position as a retail destination to local centres which meet immediate day-to-day needs. More than 70 other (local) centres are identified in the Birmingham Development Plan. These centres are varied in terms of size and play a vital role in providing for the every-day needs of residents, providing a varied retail offer, employment, banking and administrative needs, leisure and social opportunities. Some of these serve not only local residents but are often utilised by visitors from the wider region and further afield. Birmingham's centres are diverse and have a range of uses, particularly retail but also other focal points for the local communities which they serve, for example places of worship, community centres, universities and offices.
- 1.2 **Housing:** This option could contribute towards **significant positive effects** for housing as it would deliver a higher number of dwellings than otherwise would be the case, in locations that are likely to be more sustainable in terms of transport, services and employment provision. Furthermore, the increased density may help deliver a greater proportion of affordable housing due to the potential for improved viability obtained as a result of lower land acquisition costs per dwelling. The approach may also help in meeting the significant strategic challenge of meeting Birmingham's housing need, and reducing the shortfall arising from the Birmingham Plan.
- 1.3 **Equality, diversity and community development:** The increased growth within the City Centre and urban centres implemented through this approach can significantly help improve accessibility to jobs, education and employment. This is particularly helpful for residents living in deprived neighbourhoods around the City Centre and inner city areas, as it is likely to provide improved outcomes through improved access to health, education, employment and services.
- 1.4 The increased housing growth is also likely to improve affordability in these locations through increased affordable housing delivery and increased choice in term of type, tenure and size of dwellings. Therefore, potential **positive effects** are predicted.
- 1.5 Conversely, increasing densities fourfold could lead to more cramped urban living environments that do not achieve good standards of living for communities

living here, which is likely to affect those most disadvantaged groups. This is a potential **negative effect** that would need to be addressed. It is envisaged that plan policies would be applied to ensure minimum space standards and seek good design. However, higher densities still present potential issues in relation to living environments. Whilst negative effects are not a certainty, they are a possibility.

- 1.6 **Health and wellbeing:** As discussed above, the increased housing growth within some of the more deprived areas in the City Centre and urban centres is likely to produce beneficial outcomes due to improved access to services, jobs and facilities. The increased density is also likely to produce improvements in the existing infrastructure (e.g. transport, education and healthcare) and potentially attract investment for new infrastructure. The increased densification can potentially have positive effects on open/ green space provision as it is likely to limit encroachment on existing areas of open space and green space. This would be particularly effective if brownfield and previously developed land were to be fully utilised under this approach. Conversely there are potential negative effects as the increased density in already congested City Centre and urban centre locations is likely to exacerbate issues such as traffic, noise and pollution which would adversely impact residents' health and wellbeing. The approach can also exacerbate urban heat island effects rendering the city more vulnerable to heat waves. It may be possible to mitigate some of these effects through site specific policies for example through the implementation of a clean or low emission zones, car free neighbourhoods and park and ride schemes. Overall mixed effects are predicted with potential **positive effects** due to enhanced accessibility to services and jobs, the likely preservation of green and open space and the improved housing choice and affordability with some uncertain **negative effects** due to increased vulnerability to urban heat island effects and pollution associated with traffic congestion and other urban activities.
- 1.7 **Waste and resource use:** Recycling rates are significantly lower than the national average<sup>5</sup>. The proposed growth can potentially exacerbate the issue as more household waste would be generated. However, densification in the City Centre and urban centres may help make more efficient technologies such as district heating systems more viable due to the economies of scale and higher densities. Overall, whilst the proposed growth will lead to increased household waste, the location of growth is unlikely to significantly influence the waste recycling rates or collection regimes (though it will be important to ensure adequate solutions for waste management at very high densities). However, this approach may facilitate more efficient district / neighbourhood wide energy systems and may provide more scope for incorporating water recycling systems into new buildings, but this remains uncertain at this stage. Therefore, uncertain **positive effects** are envisaged at this stage. There is an opportunity for the BLP to promote the use of water recycling/ reuse systems such as grey water systems within new buildings. The Plan can also promote the more energy efficient buildings to minimise energy use etc.
- 1.8 **Economy and employment:** Further concentration of growth within the City Centre and urban centres is likely to provide improved accessibility to employment opportunities within these locations.

<sup>5</sup> DEFRA [Statistics on waste managed by local authorities in England 2020/21](#)

- 1.9 It is also likely to improve footfall with positive knock on effects on businesses located in centres. Development may further help to improve the attractiveness of City Centre areas through regeneration of neglected parts of the centre and brownfield sites thus making them more attractive to visitors.
- 1.10 Overall, this approach could help to contribute towards **significant positive effects** due to improved access to jobs, increased footfall and enhanced attractiveness of City centre and urban centres with the potential to improve the local economy and local employment opportunities.
- 1.11 **Air quality:** The whole of Birmingham has been designated an Air Quality Management Area (AQMA) declared for Nitrogen Dioxide (NO<sub>2</sub>) in 2010. The Council stated its commitment to reducing exposure levels in its Air Quality Action Plan (2021) and introduced a Clean Air Zone in June 2021. The latter operates in the central Birmingham area within the A4540 Middleway (excluding the ring road itself). The Clean Air Zone, which operates 24-hours a day, throughout the year has so far helped reduce NO<sub>2</sub> levels an average of 13% (compared to 2019 baseline)<sup>6</sup>. Whilst the Clean Air Zone and increased use of EV vehicles will help reduce vehicular emissions in the future, further growth in the City Centre and urban centres will inevitably lead to increased traffic and congestion and therefore likely to exacerbate the current air quality issues. It also places more new homes in areas at risk of experiencing poor air quality. Therefore, potential **negative effects** are envisaged at this stage. There is an opportunity through the BLP to promote further mitigation measures such as car free neighbourhoods, and more public transport provision (including low emissions public transport) to help reduce adverse effects.
- 1.12 **Water quality:** The additional growth proposed can potentially adversely impact the quality of water bodies in the City, none of which currently meet 'good' ecological status. Additional pollution is potentially likely from surface water runoff and treated wastewater effluent. This can potentially be mitigated through policy requiring the installation of SuDS and ensuring there is sufficient wastewater treatment capacity. Additionally, pollution from the additional development is generally less of problematic (provided adequate mitigation is in place) than that caused through agricultural (e.g. farm effluents, nutrients) and Industrial waste. The increased densification would potentially allow enhanced SuDS provision (e.g. blue infrastructure and permeable areas) by allowing more space for SuDS and improved permeability. Overall, with mitigation in place through BLP policies, significant negative effects can likely be avoided, leaving potential **negative effects** due to the additional pollution likely to be generated from surface run-off and combined sewer over-flow events.
- 1.13 **Land and soil:** The densification approach proposed under this option is likely to have positive effects on land and soil. Increasing densities within the City centre and urban centres will reduce development pressure on agricultural land elsewhere in Birmingham. Therefore, this option is envisaged to contribute **positive effects** on land and soil as it is likely to reduce the loss of agricultural land to development.
- 1.14 **Achieving zero carbon living:** The scale of growth involved is likely to create more vehicular traffic leading to increased congestion and emissions. On the other hand, the City Centre and urban centres are well connected by existing

---

<sup>6</sup> [Clean Air Zone six month report \(March 2022\)](#)

public transport infrastructure and contain the bulk of services, retail and employment.

- 1.15 Therefore, increasing densities in such locations is likely to be more sustainable as it would help reduce reliance on cars and encourage active travel (walking/ cycling) and public transport use. It also has the potential to facilitate enhanced and /or new transport infrastructure. Conversely increased housing densities in urban centres can exacerbate urban heat island effects which would lead to increased use of cooling/ air conditioning and increased emissions. The increased use of electric vehicles in future and the recently implemented clean air zone are also likely to lead to reductions in emissions in the City.
- 1.16 Therefore, the increased emissions associated with growth would be partly mitigated by sustainably located growth (with respect to transport and services) and improved transport infrastructure. The BLP has the potential to further reduce emissions through car-free zones, enhanced EV and active travel infrastructure. Plan policies can also promote the use of more sustainable building materials, more energy efficient building design and low carbon district heating / cooling systems and more projects such as the Tyseley Energy Park energy from waste plant. At this stage, this option is likely to contribute towards **positive effects** with regards to minimising per capita emissions.
- 1.17 **Flooding:** The higher urban densities approach can potentially reduce land area taken up by new development thus allowing more room for SuDS and enhanced permeability. The majority of the City Centre and urban centre areas are at low risk of flooding (flood zone 1). Therefore, **positive effects** are envisaged under this approach as the increased density within central locations may help to avoid the need to place developments within areas at greater risk of flooding. The BLP presents further opportunities to reduce flood risk through policies aimed at improving permeability, implementation SuDS and enhanced blue/ green infrastructure provision.
- 1.18 **Historic environment:** There are numerous heritage assets and 29 Conservation Areas within Birmingham. These are predominately concentrated within the City Centre and urban centres. Densification in such locations can potentially have negative effects on heritage as the higher densities may not be in keeping with the existing scale, massing and overall character of historic areas. Therefore, the potential for **significant negative effects** should be noted under this option at this high level of assessment. Having said this, there are locations that are less sensitive with regards to heritage across the City. Including within parts of the central areas where concentrations of heritage are highest. The effects that arise will be very dependent upon the location of sites and the nature of development. Furthermore, the Plan presents opportunities to conserve and bring back into use some of the heritage assets, including ones that are currently on the at risk register. If this is carried out through a masterplanning approach with appropriate design, sensitive to the surrounding townscape and historic character, positive effects may be possible, but this remains uncertain at this stage.
- 1.19 **Natural landscape:** The densification of development in City Centre and urban centres is potentially beneficial as it is likely to reduce development pressure on areas of high landscape sensitivity outside the centres and in the countryside.



Therefore, **positive effects** are envisaged under this option as it is likely to reduce encroachment on sensitive landscapes and the countryside (as well as possibly better protecting open space throughout the urban areas themselves).

- 1.20 **Biodiversity and geodiversity:** There are a number of areas within Birmingham that are protected for their nature conservation value including 2 Sites of Special Scientific Interest (SSSIs), National Nature Reserve (NNR) and 11 Local Nature Reserves (LNRs).
- 1.21 Additionally, there over 50 Sites of Importance for Nature Conservation (SINCs) comprising ancient woodlands, grasslands, lakes, streams, and other important wildlife habitats. These are generally located outside of the City Centre and urban centres. Therefore, the higher densities sought in centres under this option would potentially alleviate some of the development pressure on designated biodiversity sites elsewhere in Birmingham. However, there are Sites of Local Importance for Nature Conservation (SLINCs) within the City Centre along the canal network and the River Rea and development near these locations could potentially create additional disturbance and recreational pressures on biodiversity. Therefore, the positive effects associated with pursuing higher densities in centres could be offset by the potential for adverse effects on SLINCs within the City Centre resulting in **neutral effects** overall.
- 1.22 **Accessibility and transport:** This option is expected to have beneficial effects on accessibility as it focuses growth in central locations where the bulk of services, retail and employment opportunities exist. Furthermore, urban centres benefit from Birmingham's extensive transport links. The City is currently pursuing several initiatives aimed at enhanced/ expanded Metro, Bus and Sprint Rapid Transit links. HS2 will help reduce travel times between Birmingham and London which will further enhance accessibility to employment and education opportunities. In view of the above, potential **significant positive effects** are anticipated.

## Option 2 More active public sector land assembly

- 1.23 Under this option the Council proposes to pursue a proactive approach to land assembly. This could help address the issue of land supply for development. The public sector can play an important role in unlocking sites by assembling parcels of land for development. This approach also has the potential to give the local planning authority some degree of control over shaping development including placemaking and the provision of affordable housing. The Council also expects larger sites to produce wider regeneration benefits through this option; though acknowledges there are few within the City. This option would entail acquiring land parcels (often in multiple ownerships) and assembling them into larger sites. National planning policy makes this possible through compulsory purchase powers. The effects of this option would clearly depend on the nature, size and location of the actual sites created through this approach. As this is unknown at this stage, the appraisal below is necessarily very high level.
- 1.24 **Housing:** This option is likely to produce beneficial effects with respect to housing as it is likely to boost land supply in the city helping to deliver a higher number of dwellings. It may also enable the provision of more affordable housing, particularly on larger sites where this becomes more viable. This approach may also allow the reuse of currently underutilised land (e.g. unsuitably located

industrial facilities and vacant retail facilities) and facilitate the regeneration of neglected/ run-down locations within inner city areas, although the availability of larger sites may be limited within the city. Overall, whilst the acquisition process is likely to be complex and lengthy this option is predicted to produce some **positive effects** as it is likely to help meet some of Birmingham's housing shortfall.

- 1.25 **Equality, diversity and community development:** The land assembly approach would enable the Council to exercise greater influence in shaping developments in the City. However, effects would be largely dependent on the location of such developments and associated site specific policies. Having said that, the approach is likely to facilitate greater provision of affordable housing, particularly on larger sites which can be particularly helpful to more deprived households and those who are unable to afford suitable housing. In this respect the approach is **potentially positive** with respect to equality. The approach can also facilitate regeneration of more deprived neighbourhoods, particularly on larger inner city sites where some of the most deprived communities reside, though this is uncertain at this stage and would depend on the Council's ability to acquire and assemble the required sites in such locations.
- 1.26 **Health and wellbeing:** potentially **positive effects** are predicted for the reasons outlined in the preceding paragraph. The land assembly approach may facilitate regeneration of run down areas helping to improve their attractiveness and provide more affordable housing which would have positive impacts on the health and wellbeing of communities. The Council would also have more control over place making on such sites, including the provision of green space and community facilities which will have further positive effects. Again, this is largely dependent on the location of the resulting developments and site specific policies.
- 1.27 **Waste and resource use:** Under this approach the Council may be able to influence the design of developments including for example the recycling of existing buildings or reusing construction materials from existing structures in order to recycle embedded carbon and specifying more energy efficient design. Other options likely to have beneficial outcomes include the installation of water recycling systems (e.g. grey water systems), district heating and cooling systems and on site recycling facilities. This would largely depend on the site chosen and site specific policies, therefore uncertain **positive effects** are predicted at this stage.
- 1.28 **Economy and employment:** The greater potential for regeneration may have positive consequences on improving the attractiveness of previously run down areas. It may also help improve land values and attract more investment to the regenerated areas. These factors are likely to have positive effects on the economy. On the other hand, this approach may also lead to the loss of some employment land (e.g. commercial/ industrial premises in unsuitable locations). At this stage therefore, **neutral effects** are predicted as the benefits of potential regeneration may be negated by the loss of employment land.
- 1.29 **Air quality:** The approach has limited scope to impact air quality though the housing growth will inevitably lead to increased traffic and congestion and therefore likely to exacerbate the current air quality issues. The Council may be able to implement measures such as car free neighbourhoods but this uncertain at this stage and therefore, **negative effects** are envisaged at this stage.

- 1.30 **Water quality:** as with other options discussed the additional growth proposed can potentially adversely impact the quality of water bodies through surface water runoff and treated wastewater effluent. The land assembly approach may give the Council more opportunity for instigating the provision of SuDS but this remains uncertain at this stage.
- 1.31 Possible **negative effects** are predicted due to the additional pollution likely from surface run-off and combined sewer over-flow events.
- 1.32 **Land and soil:** The locations of parcels to be identified and assembled under this approach are more likely to be within existing urban areas where there is very little (if any) good quality agricultural land. The approach may therefore help relieve some of the development pressures on non-urban areas (e.g. in the countryside) which are more likely to contain valuable agricultural land. Therefore, the effects are predicted to be **positive** but there remains a degree of uncertainty until the sites are identified.
- 1.33 **Achieving zero carbon living:** As discussed under the other options the scale of growth proposed is likely to create more vehicular traffic leading to increased congestion and emissions. This approach may enable the Council to positively influence the development by promoting more energy efficient design, active travel /public transport infrastructure provision and sustainably located neighbourhoods (with respect to services and employment). Assembled sites can also provide opportunities for the provision of low carbon or more efficient district heating/ cooling systems. Therefore, the adverse effects associated with increased traffic are partly offset by the additional control this approach provides enabling the inclusion of more sustainable design, low carbon transport infrastructure and low carbon heating/ cooling systems but this would largely depend on the ability of the Council to acquire sufficient land parcels, in suitable locations and the implementation of site specific policies. Therefore, residual **negative effects** are predicted at this stage.
- 1.34 **Flooding:** Effects would largely depend on the location of sites but in general terms, the approach should provide more scope for the Council to implement SuDS and greater provision of green / blue infrastructure which would alleviate flood risk in the future. However, the number and location of sites likely to be assembled remain unknown at this stage and therefore **neutral effects** are predicted at this juncture.
- 1.35 **Historic environment:** Again, effects would be dictated by the location and size of sites assembled through this approach. If sites are located in less constrained areas (away from heritage assets / conservation areas) adverse effects would be less likely to occur. The approach may give the Council more control as to how developments in heritage constrained areas are shaped helping ensure that new development is appropriate in terms of design and scale to the character of its surroundings.
- 1.36 However, given the scale of growth proposed and numerous heritage assets and conservation areas within the City, it is unlikely that development in heritage constrained locations can be entirely avoided. Therefore, at this stage, uncertain effects are predicted on the historic environment (these could be positive and / or negative).

- 1.37 **Natural landscape:** effects would be largely dependent on the location of sites assembled. If these are focused on areas of low landscape sensitivity, then adverse effects would be less likely. The approach may give the Council more say on the design, layout and landscaping of new development on such sites. However, effects remain uncertain until the sites can be identified.
- 1.38 **Biodiversity and geodiversity:** Sites in environmentally constrained locations (within or in proximity to SSSIs, NNR, LNRs and SINCs) would be more likely to engender adverse effects. Effects specifically associated with this approach remain uncertain until the locations and sizes of sites to be assembled can be ascertained. However, given the overall scale of development expected, this approach could result in an overall reduction in open / green spaces in the City which would reduce biodiversity mobility and increase fragmentation leading to **negative effects** on biodiversity.
- 1.39 **Accessibility and transport:** As discussed above this option is likely to give the Council more control over how development is shaped on assembled sites. This could include the requirement to integrate new development with existing public transport and the provision of walkways and cycle routes for example. Accessibility would be largely dependent on the actual location of sites and therefore effects are uncertain at this stage. However, given the extensive public transport links (Bus, Metro, Sprint Rapid Transit and HS2) it is likely that development under this option would be well connected to the transport system therefore enabling better accessibility. In view of the above, **uncertain positive effects** are predicted at this stage.

### Option 3 Further comprehensive housing regeneration

- 1.40 This option involves identifying housing regeneration areas such as large residential estates which do not currently provide high quality of life for residents. Several such schemes have been completed over recent years in Birmingham to provide new housing with enhanced community facilities and open space.
- 1.41 **Housing:** This option is likely to produce beneficial effects with respect to quality and choice of housing, but it is likely to have limited benefit in terms of net delivery of new housing as it would involve demolishing existing dwellings and replacing them with new ones on the same sites. A net increase in dwellings would only be possible if a higher density approach is applied to such sites. Furthermore, this approach would initially lead to a reduction in available housing including affordable housing and social rents during the initial phases as existing housing is demolished and new housing constructed. This could take several years exacerbating the housing shortfall in the interim. On the plus side this approach could produce better quality housing with more community facilities and open space to provide a healthier environment to residents. Therefore, in the short term the effects are potentially **negative** (due to the initial reduction in housing stock) with **neutral or positive effects** on housing in the longer term.
- 1.42 **Equality, diversity and community development:** Following the initial period of demolition and construction this option can generate benefits on equality and community development as it is likely to improve the quality, choice, and potentially affordability, of housing for the community including those within the most deprived areas and households who rely on affordable / social rents. However, in the short term negative effects are possible as there would be a decrease in overall housing stock which would disproportionately impact those in the most need for social housing. Therefore, mixed effects are likely: short term

**negative** ones due to the initial decrease in housing with **positive effects** in the longer term due to the improved quality of housing, improved environment, community facilities and open space.

- 1.43 Health and wellbeing:** Localised beneficial effects on health and wellbeing are likely under this approach. The regeneration of rundown estates is likely to produce better quality housing, community facilities and more open space which would have beneficial effects on local residents in the long run. However, there are potential adverse impacts in the short/ medium term during the demolition and construction works as existing residents may lose their homes and need to be suitably re-homed in the interim. The extent of potential regeneration is unknown at this stage, but effects (positive or negative) are likely to be localised and small scale (compared to the overall scale of growth proposed) therefore **neutral effects** are predicted at this stage.
- 1.44 Waste and resource use:** Under this approach the Council would be able to influence the design of developments including for example the recycling of existing buildings or reusing construction materials from existing structures and specifying more energy efficient design. Other options likely to have beneficial outcomes include the installation of water recycling systems (e.g. grey water systems), district heating and cooling systems and on site recycling facilities. However, any such benefits are likely to be relatively small scale and localised, therefore **neutral effects** are predicted at this stage.
- 1.45 Economy and employment:** The greater potential for regeneration may have positive consequences on improving the attractiveness of previously run down areas which may improve land values and attract more investment to the regenerated areas. However, effects are likely to be localised and therefore, significant effects are considered unlikely (**neutral effects**).
- 1.46 Air quality:** The approach has limited scope to impact air quality and may result in localised deterioration in air quality during the demolition/ construction phases of regeneration. At this stage it is envisaged that any effects would be localised, and small scale compared to the overall scale of growth proposed which will inevitably lead to increased traffic. Therefore, **negative effects** are envisaged at this stage due.
- 1.47 Water quality:** The additional growth proposed in the BLP can potentially adversely impact the quality of water bodies through surface water runoff and treated wastewater effluent. The regeneration approach may provide beneficial mitigation measures such as the installation of SuDS and stricter specification aimed at limiting run off rates from new development. However, such measures are likely to be relatively small in scale compared to the overall growth and distribution of growth proposed in the BLP. As such, **neutral effects** are predicted overall.
- 1.48 Land and soil:** The option is unlikely to produce significant effects as the regeneration would take place on existing estates and not produce a significant impact on the net new dwellings delivered. Whilst, it is unlikely to significantly reduce the overall amount of housing required, it will help to improve stock, potentially increase density (and therefore reduce the shortfall), and would take place in urban areas, helping reduce pressure on greenfield sites. Therefore, minor **positive effects** are predicted at this stage.



- 1.49 **Achieving zero carbon living:** Under this approach the Council can positively influence the regenerated estates by promoting more energy efficient design and active travel /public transport infrastructure.
- 1.50 The option presents opportunities to incorporate low carbon or more efficient district heating/ cooling systems. However, any such effects are likely to be localised and small in scale and therefore unlikely to significantly impact the adverse effects associated with the overall scale of development proposed. Consequently, **neutral effects** are predicted at this stage.
- 1.51 **Flooding:** The approach may produce beneficial localised effects where SuDS are implemented, and green/ blue infrastructure are provided within development. However, the effects are not expected to be significant therefore **neutral effects** are predicted at this stage.
- 1.52 **Historic environment:** The effects would be dictated by the location and size of regenerated sites. Locations in less constrained areas are less likely to give rise to adverse effects. The approach presents opportunities to improve rundown areas providing designs that are more sympathetic in design and character to surrounding areas and potentially improving the attractiveness of estates located in proximity to heritage assets. However, such effects are likely to be relatively small and localised compared to the overall scale of growth proposed. The option is unlikely to lead to the complete avoidance of development in heritage constrained locations, but likewise, regeneration areas are unlikely to be affected in a negative way in terms of heritage. Therefore, **neutral / uncertain effects** are predicted.
- 1.53 **Natural landscape:** effects would be largely dependent on the location of regeneration sites. If these are focused on areas of low landscape sensitivity, then adverse effects would be less likely. The approach may also give the Council more say in the design, layout and landscaping of regenerated estates. However, effects are likely to be localised and small in scale producing **neutral effects** overall.
- 1.54 **Biodiversity and geodiversity:** The regeneration approach is unlikely to produce significant effects as these would be localised within existing estates. There may be opportunities to improve the amount and connectivity of GI. However, for the reasons discussed above, the approach is unlikely to result in the complete avoidance of growth in environmentally constrained locations; therefore **neutral effects** are predicted.
- 1.55 **Accessibility and transport:** As discussed above this option may present localised, small scale, opportunities to improve development within regenerated areas. For example the integration of regenerated sites with existing walkways/ cycle routes and bus routes would be beneficial.
- 1.56 However, accessibility would be largely dependent on the actual location of sites and therefore effects are uncertain at this stage. Potential positive effects are likely to be localised and small in scale producing **neutral effects** overall.

#### **Option 4 Utilise poor quality under-used open space for housing**

- 1.57 This option involves identifying underused, poor quality open space that is currently of limited value and utilising it for residential development. The Council envisages that such sites would be in accessible locations.



- 1.58 **Housing:** This option is likely to produce beneficial effects with respect to housing as it is likely to boost land supply and help meet the housing growth required in the BLP. It may also enable the provision of more affordable housing, particularly on larger sites. Furthermore, the locations are likely to be in centrally located areas with good access to transport, services and employment. Therefore, this option is predicted to produce some **positive effects** as it is likely to boost land supply thus helping meet some of Birmingham's housing shortfall.
- 1.59 **Equality, diversity and community development:** Some of the open spaces likely to be utilised for this option are within some of the more deprived areas of the City. The provision of more housing in such locations, particularly social affordable/ housing can be particularly helpful to more deprived households who are unable to afford suitable accommodation. In this respect the approach is **potentially positive** with respect to equality. The approach can improve accessibility to jobs, transport and service for the more deprived neighbourhoods. Having said that, there is a degree of uncertainty at this stage as the above would depend on the Council's ability to identify a sufficient number of open space sites to utilise.
- 1.60 Conversely, by changing open space sites to housing, it removes the amount of recreational in the urban area, and the potential for these to be enhanced for community use (despite these not being used proactively at this time). In this respect, potential **negative effects** are predicted.
- 1.61 **Health and wellbeing:** Mixed effects are likely; **positive ones** due to the enhanced housing provision (including affordable housing) and potentially **negative** implications due to the reduction of open space which is already underprovided in the City. The option may present opportunities to provide higher quality open/ green spaces within new developments, but this would largely depend on the sites chosen and associated site specific policies.
- 1.62 **Waste and resource use:** No direct significant effects are anticipated from this approach. Any effects (positive or negative) would largely depend on the sites chosen and site specific policies, therefore **neutral effects** are predicted at this stage.
- 1.63 **Economy and employment:** The replacement of poor quality / underutilised open space may improve the attractiveness of previously run down areas. It may also help improve land values and attract more investment particularly if new development were to include higher quality open/ green spaces. These factors are likely to have generally positive effects on the economy.
- 1.64 The location of such sites in areas in close proximity to employment (e.g. City Centre and inner city areas) would help increase footfall in existing employment / commercial areas which could further improve the local economy and employment. Again, this would be largely dependent on the location and number of sites identified under this approach therefore, **uncertain positive effects** are predicted at this stage.
- 1.65 **Air quality:** The approach has limited scope to impact air quality though the overall housing growth will inevitably lead to increased traffic and congestion and therefore likely to exacerbate the current air quality issues. The Council may be

able to implement measures such as car free neighbourhoods but this uncertain at this stage and therefore, **negative effects** are envisaged at this stage.

- 1.66 **Water quality:** As with other options discussed the additional growth proposed can potentially adversely impact the quality of water bodies through surface water runoff and treated wastewater effluent. There may be opportunities to implement SuDS as part of new development, but this remains uncertain at this stage with **negative effects** predicted due to the additional pollution likely from surface run-off and combined sewer over-flow events.
- 1.67 **Land and soil:** This approach has potentially **positive effects** on land and soil as it will likely enhance housing provision in existing urban/ built-up areas, improving land supply and reducing the need to utilise high quality agricultural land elsewhere.
- 1.68 **Achieving zero carbon living:** As discussed under the other options the scale of growth proposed is likely to create more vehicular traffic leading to increased congestion and emissions. The effects associated with this approach would be largely dependent on the location of sites identified and site specific policies. There may be scope for new development to implement more energy efficient design and provide more active travel /public transport links, but this is uncertain at this stage. The location of sites under this option are generally sustainably located (with respect to services and employment) in accessible locations which would reduce the need to travel. Therefore, some of the adverse effects associated with increased traffic are partly offset by the more sustainable/ better connected locations. Therefore, neutral effects are predicted at this stage.
- 1.69 **Flooding:** This approach will result in the loss of open space within the City which could have adverse effects on permeability and may exacerbate surface water flood risk. There may be opportunities to implement SuDS and provide replacement green space but this is uncertain at this stage. Therefore, **negative effects** are predicted at this stage due to the loss of open space and associated impacts on flood risk.
- 1.70 **Historic environment:** Effects would be dictated by the location and size of sites utilised through this approach. If sites are located in less constrained areas (away from heritage assets/ conservation areas) adverse effects would be less likely to occur. However, given the scale of growth proposed and numerous heritage assets and conservation areas within the City, it is possible that development in heritage constrained locations would occur under this approach. Therefore, there could be some **negative effects** on the historic environment, particularly where open space contributes to the setting of heritage assets.
- 1.71 There is uncertainty at this stage, as effects will depend on the specific sites involved and the amount of open space sites that were released. A precautionary approach is taken at this high level of appraisal.
- 1.72 **Natural landscape:** Effects would be largely dependent on the location of sites identified. If these are focused on areas of low landscape sensitivity, then significant effects would be less likely. That said, open space constitutes an important aspect of landscape and townscape therefore its loss can potentially substantially alter the character of the landscape. Additionally, the removal of open space may result in some loss of amenity to nearby residents/ receptors.

Conversely, the approach may present opportunities to improve current landscape through the provision of higher quality open/ green spaces.

- 1.73 Overall, uncertain mixed effects are predicted at this stage: potentially **negative effects** are predicted due to the loss of amenity and change to the existing landscape/ townscape character with potential **positive effects** as the approach may help reduce encroachment on areas of high landscape sensitivity (outside of the urban area) and may engender improvements by providing higher quality open/ green space.
- 1.74 **Biodiversity and geodiversity:** Effects would be dependent on the location of sites selected for development. The approach is likely to lead to some loss of urban greenspace, which potentially includes natural / semi-natural and artificial habitats that occur frequently in urban settings, such as parks and community gardens, wasteland (derelict/ unmanaged), amenity or recreational greenspaces etc. Such areas often have an important role to play in reducing habitat fragmentation and retaining some connectivity between habitats in developed areas. Therefore, this option may lead to **negative effects**, though there is scope for new development to offset some of the fragmentation by providing new kinds of habitats such as community woodland and by linking green spaces to facilitate the movement of species.
- 1.75 **Accessibility and transport:** This option is likely to engender positive effects on accessibility as the sites would be in accessible locations benefitting from the city's extensive public transport links (Bus, Metro, Sprint Rapid Transit and HS2). Therefore, **positive effects** are predicted at this stage.

### Option 5 Utilise some employment land for housing

- 1.76 This option involves converting some of the City's employment land for mixed use or residential use. Some of the city's employment land is poor quality and under occupied and so might present opportunities to be redeveloped for other uses.
- 1.77 **Housing:** This option is likely to produce beneficial effects with respect to housing as it is likely to boost housing land supply thus contributing towards the housing growth required in the BLP. It may also enable the provision of more affordable housing, particularly on larger sites. Furthermore, the land involved is well located with respect to transport and employment. Therefore, this option is predicted to produce some **positive effects**.
- 1.78 **Equality, diversity and community development:** The majority of the CEAs overlap some of the most deprived areas in the City. The provision of more housing in such locations, particularly social affordable/ housing can be particularly helpful to more deprived households who are unable to afford suitable accommodation. In this respect the approach is potentially positive with respect to equality. The approach can also improve accessibility to jobs as the sites would be located within employment areas and the locations are well connected to the roads and rail networks within Birmingham. However, some of the locations may not be well placed with respect of community services such healthcare and education which may adversely impact the ability of residents to access such services. Additionally, some of the locations may not lend themselves to active

travel modes such as walking and cycling. Therefore, whilst some positive effects are likely due to improved housing provision and access to jobs this is counterbalanced by the potential lack of services and active travel networks leaving **neutral effects** overall.

- 1.79 **Health and wellbeing:** Mixed effects are likely; **positive ones** due to the enhanced housing provision (including affordable housing) and potentially **negative** implications due to the location of new housing within employment areas which may not be suited to residential use for example there may be issues around pollution or noise associated with remaining industrial/ commercial premises. Furthermore, some employment sites may not lend themselves to active travel such as walking/ cycling which could impact residents' health and wellbeing.
- 1.80 **Waste and resource use:** No direct significant effects are anticipated from this approach. Any effects (positive or negative) would largely depend on the sites chosen and site specific policies, therefore **neutral effects** are predicted at this stage.
- 1.81 **Economy and employment:** The approach will lead to some loss of employment land which could adversely impact future employment land supply. The planned transport improvements along with HS2 are likely to attract more businesses to the City which is likely to increase future employment land demand. Conversely, the introduction of residential and mixed-use sites within existing employment areas may provide a boost to businesses through the increased footfall generated. Additionally, the option may help bring back into productive use sites which may have been vacant for a long time with poor prospects of future employment use. Also, at a time of personnel shortage, businesses may potentially benefit from having a potential workforce pool in their immediate vicinity. The recent Birmingham Housing and Economic Development Needs Assessment (HEDNA)<sup>7</sup> which assessed employment land supply and demand up to 2042, estimated that there will be a gross need for 319 ha of land to 2042 (split into 23.5 ha offices and 295.6 ha industrial). When the employment land supply is taken into account a potential oversupply of office employment land is predicted with a shortfall of 73.64 ha for industrial land, however the report adds that this can potentially be met from sites released from the HS2 works and / or the proposed West Midlands Interchange Site in South Staffordshire District.
- 1.82 Therefore, mixed effects are predicted at this stage with **positive effects** likely due to the increased footfall and proximity of potential workforce to employment locations and **uncertain negative effects** due to the potential loss in employment land. The latter may potentially be overcome by the release of HS2 (or other) land but this remains uncertain at this stage.
- 1.83 **Air quality:** The approach has limited scope to impact air quality though the overall housing growth will inevitably lead to increased traffic and congestion and therefore likely to exacerbate the current air quality issues. Whilst employment areas are well connected to the existing transport networks they may not be well connected or in close proximity to community services such as schools and

<sup>7</sup> [Iceni Projects report \(2022\): Birmingham Housing and Economic Development Needs Assessment \(HEDNA\)](#)

healthcare which makes walking/ cycling less likely thus increasing reliance on car journeys. Therefore, **negative effects** are envisaged at this stage.

- 1.84 **Water quality:** As with other options discussed the additional growth proposed can potentially adversely impact the quality of water bodies through surface water runoff and treated wastewater effluent. There may be opportunities to implement SuDS as part of new development, but this remains uncertain at this stage.
- 1.85 Given that much of the land involved is already likely to be previously developed, the potential for pollution and flooding issues are considered to be low, thus **neutral effects** are predicted.
- 1.86 **Land and soil:** This approach has potentially **positive effects** on land and soil as it will likely enhance housing provision in existing industrial/ commercial non-agricultural areas, improving land supply and reducing the need to utilise high quality agricultural land elsewhere.
- 1.87 **Achieving zero carbon living:** As discussed under the other options the scale of growth proposed is likely to create more vehicular traffic leading to increased congestion and emissions. Employment areas may not be within walking/ cycling distance from community services such as schools, shops and GP surgeries which may increase reliance on cars for such journeys. The effects would be largely dependent on the location of sites identified and site specific policies. There may be scope for new development to provide these community services locally, but this is uncertain at this stage. Conversely, the location of sites under this option are generally sustainably located with respect to roads/ railway transport and employment in accessible locations which would reduce the need to travel to work. However, the overall scale of growth proposed will inevitably lead to increased vehicular traffic and congestion with associated increases in emissions. Therefore, residual **negative effects** remain at this stage.
- 1.88 **Flooding:** This approach is not expected to produce significant effects therefore **neutral** effects are predicted. However, some employment uses are considered suitable in areas at risk of flooding, whilst residential development would not be. As such, a change of use in this respect could be negative.
- 1.89 **Historic environment:** effects would be dictated by the location and size of sites utilised through this approach. If sites are located in less constrained areas (away from heritage assets/ conservation areas) adverse effects would be less likely to occur. Employment land is less likely to contain heritage assets therefore the provision of housing here can potentially reduce pressure on other locations in more constrained locations (e.g. conservation areas).
- 1.90 However, given the scale of growth proposed and numerous heritage assets within the City, it is unlikely that development in heritage constrained locations can be entirely avoided. **Neutral effects** are predicted in relation to development within CEAs.
- 1.91 **Natural landscape:** Existing employment land is generally within less sensitive landscape areas therefore the introduction of residential development into such locations is unlikely to adversely impact the landscape. There may **be positive effects** as the approach can help reduce encroachment on areas of high landscape sensitivity.



- 1.92 **Biodiversity and geodiversity:** Employment land is generally less environmentally constrained, therefore this approach is unlikely to lead to adverse effects and would potentially help reduce development pressure on other more constrained areas. Therefore, this option could have some **positive effects** overall.
- 1.93 **Accessibility and transport:** This option is likely to engender some positive effects on accessibility as the sites would be in accessible locations benefitting from the city's extensive public transport links (Bus, Metro, Sprint Rapid Transit and HS2).
- 1.94 However, this is offset by the potential lack of walking/ cycling infrastructure within the employment locations and the lack of community services such as healthcare and education within employment areas. Therefore, **neutral effects** are predicted overall at this stage.

### Option 6 Release Green Belt for housing

- 1.95 This option proposes Green Belt release for new residential development. The majority of Green Belt land is concentrated within the north and north east of Birmingham but there are smaller Green Belt areas (green wedges) to the east, west and south west along the city's boundary. The Green Belt covers around 15% of the total area of Birmingham. The adopted BDP set a precedent for Green Belt release, proposing a 6,000 dwelling sustainable Urban Extension (SUE) in the green belt at Langley in Sutton Coldfield, north east of Birmingham.
- 1.96 **Housing:** This option is likely to produce beneficial effects with respect to housing as it is likely to boost housing land supply thus contributing towards the housing growth required in the BLP. It may also enable the provision of more affordable housing, particularly on larger sites and could provide a different type of housing than would be possible at higher densities in the City. Whilst the locations are relatively remote from the rest of the City, development in the form of SUE's would partly compensate for this by providing necessary infrastructure and community services (e.g. health, education and retail) and some of the locations are in close proximity to local centres (e.g. Sutton Coldfield). Importantly, this option may be critical to fulfilling the unmet housing need, as such, it is predicted to produce **likely significant positive effects** on housing.
- 1.97 **Equality, diversity and community development:** Whilst there are relatively small areas of deprived neighbourhoods in the north east, the majority of Green Belt areas are less deprived than more central locations in Birmingham. In this context development in the Green Belt is less likely to help those in the most deprived locations.
- 1.98 However, large schemes (e.g. Langley SUE) can provide more affordable housing, new employment opportunities and new community services which would be particularly beneficial to the deprived households in Birmingham. However, this would only apply to large scale SUE schemes, smaller scale development within the Green Belt may not be well placed with respect to employment and community services (e.g. healthcare and education) which may adversely impact the ability of residents to access such services. Therefore, whilst some positive effects are possible due to improved housing provision and access to jobs and services, this would depend on the location and size of development proposed which remains unknown at this stage. Therefore, **neutral effects** are predicted overall.



- 1.99 Health and wellbeing:** Large scale development within the Green Belt has the potential to produce attractive new neighbourhoods with better provision of open green space and active travel infrastructure, particularly if these are in the form of SUEs. Furthermore, the enhanced housing provision, including affordable housing would have beneficial impact on health and wellbeing. However, these positive effects are offset by the negative effects associated with the net loss of open/ green space, particularly in areas of high landscape value (e.g. in Sutton Coldfield). Therefore, mixed effects are likely; **positive ones** due to the enhanced housing provision (including affordable housing) and potentially **negative** implications due to loss of high quality green/ open space which is currently underprovided in Birmingham.
- 1.100 Waste and resource use:** No direct significant effects are anticipated to arise specifically due to this approach. Any effects would depend on the relevant BLP site specific policies, therefore **neutral effects** are predicted at this stage.
- 1.101 Economy and employment:** The approach may produce some new employment, retail and offices if a mixed use SUE development approach is implemented. The boost in housing would also help support future economic growth. Therefore, **positive effects** are envisaged.
- 1.102 Air quality:** The overall housing growth will inevitably lead to increased traffic and congestion and therefore likely to exacerbate the current air quality issues. Green Belt locations could potentially be less accessible to facilities and services by sustainable modes, and this could lead to increased car trips and associated air quality issues. These are potential minor **negative effects**.
- 1.103 Water quality:** As with other options discussed the additional growth proposed can potentially adversely impact the quality of water bodies through surface water runoff and treated wastewater effluent. There may be opportunities to implement SuDS as part of new development, but this remains uncertain at this stage with **negative effects** predicted due to the additional pollution likely from surface run-off and combined sewer over-flow events.
- 1.104 Land and soil:** Under this option there would some loss of non-urban land in the Green Belt areas some which is best and versatile agricultural land (BVM) including grades 2 and 3a area in the north east of the City. This is likely to be significant if the proposed sites are similar in scale to the Langley SUE scheme. Therefore, this approach has **likely significant negative effects** on land and soil due to the encroachment on non-urban land within the green belt in locations likely to contain high quality agricultural land.
- 1.105 Achieving zero carbon living:** As discussed under the other options the scale of growth proposed is likely to create more vehicular traffic leading to increased congestion and emissions. The Green Belt areas may not be within walking/ cycling distance from community services such as schools, shops and GP surgeries which may increase reliance on cars. The relative remoteness of the potential sites from existing employment and the larger centres may lead to greater reliance on cars. Conversely if development is to take the form of large scale SUEs then these would provide significant new community services and infrastructure which could reduce reliance on cars and may facilitate modal shift. That said, the overall scale of growth proposed will inevitably lead to increased vehicular traffic and congestion with associated increases in emissions. Therefore, residual **negative effects** are likely to remain.

- 1.106 Flooding:** Some Green Belt locations are in areas of low flood risk. Though there are areas that contain flood zone 2 and 3, it is presumed that these would be sequentially avoided. Therefore, this approach is predicted to have **neutral effects**.
- 1.107 Historic environment:** Green Belt areas within Birmingham present varied sensitivities with regards to heritage. Though the number of assets are reduced compared to urban areas, there are still sensitive assets such as scheduled monuments and listed buildings near or within potential development locations. It is considered unlikely that these assets would be directly affected, but there is certainly the potential for the setting of assets to be affected, as open countryside is important to several of these historic features. On the other hand, if less sensitive Green Belt locations are involved, it could help to take pressure from the urban areas where the prevalence of heritage is much higher. On balance, given the relative shortage of open space around the urban areas, it is considered that some residual **negative effects** on the historic environment would arise. It is unclear whether these would be significant, as the precise locations are unknown at this stage.
- 1.108 Natural landscape:** The Green Belt locations are varied in relation to landscape sensitivity. However, much of the remaining areas contain parcels assessed to be of high landscape sensitivity to development<sup>8</sup>. Further encroachment into Green Belt could therefore have negative effects. Development in Green Belt locations is more likely to be of a scale that supports new facilities (to ensure that they are sustainable), and therefore, the potential for **significant negative effects** is higher in this respect. Smaller piecemeal development could be more acceptable from a landscape perspective, but would be more likely to have poor accessibility (which is contrary to the NPPF). Again, the effects will depend on the exact location and extent and nature of growth.
- 1.109 Biodiversity and geodiversity:** The Green Belt locations include a number of habitats of moderate to high ecological values including (to varying extents) Local Nature Reserves, Sites of Special Scientific Interest (SSSI), Sites of Importance for Nature Conservation (SLINCs) and Tree Preservation Orders (TPOs). Therefore, this option is likely to lead to some development in environmentally constrained locations with potentially **negative effects** on biodiversity. That said, there may be scope for mitigation in the form of providing new, connected green spaces and seeking biodiversity net gain within new development schemes.
- 1.110 Accessibility and transport:** Generally speaking, growth in Green Belt locations would be in proximity to suburban areas with either poor or reasonable access to facilities and services. There are also locations where the existing road infrastructure is congested particularly at peak times. Also, the choice of travel modes may be limited which may lead to increased car journeys due to the relative remoteness from the main employment sites in Birmingham. Furthermore, walking/ cycling infrastructure is likely to be more limited. Therefore, some **negative effects** are envisaged. Larger scale developments such as SUEs may provide the scale of investment required to enhance existing infrastructure and provide new transport services, but this remains uncertain at this point.

---

<sup>8</sup> [Green belt assessment \(2013\)](#)

## APPENDIX C – Appraisal of Employment Options

### Employment Option 1 Continue investigating and identifying further sources of land supply to address the shortfall

- 1.1 This option would involve identifying further opportunities for employment development within the city, including in existing employment areas such as the CEAs, and other locations identified by the Council. Effects would ultimately depend on the locations of sites identified; if these are located in the existing core employment locations (CEAs) then positive synergies would be likely as these areas already benefits from good transport links and are located close to other businesses and services. Conversely, if the chosen locations are in remote or less well connected locations which may not be well located with respect to transport infrastructure and services, potentially negative effects would be likely due to the less sustainable locations. Furthermore, if the identified sites lie in non-employment use areas, e.g. residential neighbourhoods, there may be adverse effects on existing uses. Overall, uncertain mixed effects are likely at this stage; uncertain positive effects if identified sites are in existing employment areas such as the CEAs and uncertain negative effects if the selected sites are relatively remote from services and infrastructure or in non-employment related use.
- 1.2 **Housing:** Effects would depend on the location of sites identified, if these are located outside residential areas, within employment areas such as the CEAs then effects are neutral. However, if identified sites are within residential neighbourhoods there may be **negative effects** on housing as the new employment areas may lead to disturbance, loss of privacy, road congestion, parking issues and potentially pollution. Some areas identified for employment expansion might also be potential sites options for housing, so a balance would need to be struck.
- 1.3 **Equality, diversity and community development:** As discussed above, effects are dependent on locations chosen. If sites are located within the CEAs, which overlap some of the most deprived areas in the City, there may be **positive effects** pertaining to improved accessibility to new employment opportunities. Conversely if sites selected are distant from the more deprived areas, there are less likely to be any beneficial effects (neutral). Increased employment in the City could also potentially add to air quality issues, which could disproportionately affect deprived communities (**negative effects**).
- 1.4 **Health and wellbeing:** Effects depend on the location of the additional employment land. As discussed above, if sites are placed in residential locations there is potential for **negative effects** on the health and wellbeing of residents due to issues around parking, congestion, noise and pollution. If sites are within existing employment locations, no significant effects would be expected in this respect. **Positive effects** may also arise if communities are able to access new employment opportunities.
- 1.5 **Waste and resource use:** Locations within existing CEAs may offer more scope for waste reuse / circular economy production due to the concertation of different industrial/ commercial and business uses in the same location where by-products or waste from one industry may be useful as a resource for another neighbouring facility, but this is uncertain as it depends on the exact location chosen and type

of commercial/ industrial uses in the area chosen. Therefore, uncertain **positive effects** are envisaged at this stage for sites located in existing employment areas, otherwise effects are unlikely to be significant for sites located outside the CEAs (i.e. **neutral**).

- 1.6 **Economy and employment:** Accommodating the employment land shortfall within the City is likely to engender positive effects as it would create more job opportunities; directly benefitting Birmingham's economy, generating growth and revenue locally. Location will have an important bearing on the magnitude of such effects, sites within existing employment areas and CEAs are likely to be more positive due to the synergies with exiting uses, transport infrastructure and services. However there may be some locational specific factors for some industries that mean areas outside of the CEAs are more favourable. Potential **significant positive effects** are identified at this stage.
- 1.7 **Air quality:** Whilst effects depend on locations chosen and the type of employment use proposed, placing the employment land shortfall within the City is generally positive as it will benefit from existing transport infrastructure and services, particularly in the existing employment areas. It also means residents will travel shorter distances to access employment. Allocating employment land in more remote locations would be more likely to lead to longer journeys and increased reliance on car journeys. Having said that the scale of growth proposed will generate more industry associated emissions (e.g. from HGV traffic) and traffic leading to **negative effects** overall. These may be made worse if the shortfall is allocated in relatively remote, less well connected areas.
- 1.8 **Water quality:** No additional or significant effects are envisaged; neutral effects.
- 1.9 **Land and soil:** Mixed effects are predicted; locations within existing employment areas are not anticipated to produce significant effects as land would most likely be brownfield. However, negative effects would be more likely if sites were allocated in non-urban and rural/ semi-rural areas as this could lead to loss of BVM agricultural land. Potential / uncertain **negative effects** are predicted.
- 1.10 **Achieving zero carbon living:** Uncertain effects are envisaged at this stage; placing the employment land shortfall within the City is generally positive as it will benefit from existing transport infrastructure and services, particularly in the existing employment areas. This should help to reduce emissions arising from the construction of new infrastructure, and limit additional emissions due to transport and travel. However, allocating employment land in more remote locations would be more likely to lead to longer journeys and increased reliance on car journey. It is difficult to predict whether per capita emissions would increase or decrease without understanding where growth would be located.
- 1.11 **Flooding:** Effects would be dependent on the exact locations and therefore, effects are uncertain at this stage. Some parts of the existing CEAs fall within flood risk zones 2 and 3, as well as being at risk of surface water and groundwater flooding. Development here could therefore have negative effects.
- 1.12 However, given the need to apply a sequential approach with regards to flood risk, and the less sensitive nature of some employment land uses, it is anticipated that effects would not be significant.
- 1.13 **Historic environment:** Effects would be dictated by the location and nature of sites identified. If sites are located in less constrained areas (away from heritage

assets/ conservation areas) adverse effects would be less likely to occur. For example, employment areas are less likely to contain heritage assets, and therefore the provision of additional employment here can potentially reduce pressure on other more constrained locations; leading to **positive effects**. However, if employment land is allocated in more constrained locations such as, in the vicinity of heritage assets or conservation areas, **negative effects** would be more likely due to the potential adverse impacts on the character and settings of the historic environment resulting from incompatible employment type uses.

- 1.14 **Natural landscape:** Existing employment areas are generally in less sensitive landscape areas therefore locating more employment land in these locations is unlikely to adversely impact the landscape, and could potentially reduce pressure in more sensitive locations (i.e. **positive effects**) Location of employment land in more sensitive landscape areas would potentially lead to negative effects as the allocations are likely to be out of character with the existing landscape character.
- 1.15 **Biodiversity and geodiversity:** Effects would be dependent on the location of sites selected for development. Locations in existing employment areas are unlikely to lead to development in environmentally constrained areas, and could reduce pressure elsewhere, which is **potentially positive**. However, if employment land is located in more environmentally constrained areas, this option may lead to **negative effects**, due to potential loss of habitats and fragmentation as well as disturbance and pollution impacts.
- 1.16 **Accessibility and transport:** Locating more employment land within existing employment areas is likely to have **positive effects** as these already benefit from transport infrastructure and services. However, not all of these locations would necessarily support sustainable travel, and so significant positives cannot be presumed at this stage. Selecting more remote locations could be more likely to have **negative effects** as they would likely be less well connected to transport and services; leading to increased reliance on car journeys.



## Employment Option 2 Accommodate the shortfall within other authorities in the wider Housing Market Area (HMA):

- 1.17 This option would involve working with other authorities within the wider Housing Market Area (HMA) to address the shortfall. The Council would discuss this with other HMA authorities to determine whether any employment land proposed in their forthcoming plans can meet some of Birmingham's need. For example, evidence for the Black Country Plan has identified 53 hectares of potential development land at the West Midlands Strategic Rail Freight Interchange in South Staffordshire that can cater for a share of Birmingham's B8 warehousing needs.
- 1.18 **Housing:** There are unlikely to be significant effects on housing under this option. However, less requirement to deliver surplus employment could open opportunities to promote housing on land within the City, which is a potential **positive effect**.
- 1.19 **Equality, diversity and community development:** Effects would depend on the locations of employment sites. If these are in areas in proximity to more deprived areas in neighbouring authorities (in the HMA), there may be beneficial effects associated with improved accessibility to new employment opportunities (however, this would not necessarily have direct effects in Birmingham unless deprived communities can access these jobs). If employment sites are distant from the more deprived areas and are not accessible via commuting for Birmingham residents, then there are less likely to be any beneficial effects for the City itself. At this stage, potential **minor negative effects** are predicted, as opportunities to access jobs could be more difficult for certain communities in Birmingham that have less social mobility.
- 1.20 **Health and wellbeing:** Effects depend on the location of the additional employment land, however as these are expected to be met outside of Birmingham itself, it is considered unlikely that significant effects would arise for the health of residents in Birmingham itself. Therefore, neutral effects are predicted.
- 1.21 **Waste and resource use:** Employment will generate waste and use resources during construction and operation, regardless of location. However, in terms of how resources and waste are managed, if the shortfall in employment land is met outside of Birmingham, it would mean that lower amounts of waste are generated in the City itself and fewer resources utilised. This could be considered a **positive effect** for Birmingham, but the effects would be very minor, and depending upon waste disposal and recycling arrangements, waste could very well be brought back into the City to be processed (which would not be effective with regards to the movement of waste).
- 1.22 **Economy and employment:** Accommodating the employment land shortfall outside the City may have adverse effects on the local economy and employment (In Birmingham itself), but this would not be anticipated to be significant given the existing stock of employment land and pipeline development in the City. Furthermore, provision within the HMA is also likely to have direct / indirect economic benefits for Birmingham due to growth produced in the regional / HMA economy. Therefore, effects are predicted to be **minor positive**.



- 1.23 Such an approach may also offer better opportunities to identify high quality employment land if the scope of sites is widened beyond Birmingham City itself.
- 1.24 **Air quality:** Placing the employment land shortfall outside the City could lead to some degree of out commuting with adverse consequences on air quality. On the other hand, this may reduce further deterioration in the AQMA which covers the whole of Birmingham. As discussed above effects are likely to be insignificant when considered in proportion to the overall growth in employment land, the majority of which is to be provided within the City. On balance, **neutral effects** are predicted.
- 1.25 **Water quality:** No additional or significant effects envisaged; **neutral effects**.
- 1.26 **Land and soil:** The effects of growth in other HMA areas is difficult to predict without knowing the nature of the land involved. However, it is possible that this could involve some greenfield agricultural land, which are potential negative effects in those locations (but not from a Birmingham City only perspective). If growth is on land that has already been identified for employment growth, then the additional effects on land are neutral / **positive** as it would reduce pressure for further land use in Birmingham.
- 1.27 **Achieving zero carbon living:** Seeking to meet a shortfall in employment land outside of the City could have mixed effects. In one respect, it could lead to increased travel /commuting from residents out of Birmingham, which could increase emissions from transport. On the other, it would reduce emissions being generated within Birmingham at new employment locations. These emissions would still arise elsewhere though, so overall, **neutral effects** are predicted.
- 1.28 **Flooding:** Meeting employment land shortfalls outside of the City would mean that there are **neutral effects** in terms of flooding and flood risk in the City itself. The nature of effects in the wider HMA are difficult to predict without knowing the location of development (and is beyond the scope of this SA).
- 1.29 **Historic Environment:** Effects would be dictated by the location and nature of sites identified. If sites are located in less constrained areas (away from heritage assets/ conservation areas) adverse effects would be less likely to occur. Generally existing employment areas (in the City or wider HMA) are less likely to contain heritage assets therefore the provision of further employment land here can potentially reduce pressure on other more constrained locations leading to positive effects. However, land could be identified in greenfield locations in the wider HMAs. For the City itself, the reduced need to identify land for employment would most likely be beneficial for heritage, as it would reduce pressure to develop locations that are more sensitive (whether this be for employment or housing). Therefore, minor positive effects are predicted).
- 1.30 **Natural landscape:** The existing employment areas are generally in less sensitive landscape areas therefore locating more employment land in such locations is unlikely to adversely impact the landscape. If new land is involved, this could lead to negative effects, but this is an uncertainty, and the effects would be outside of Birmingham City itself (though potentially on the periphery) From a Birmingham perspective, this approach could reduce pressure to release Green Belt land (whether this be for housing or employment), and so is potentially **positive** with regards to landscape.

- 1.31 **Biodiversity and geodiversity:** Effects would be dependent on the location of sites selected for development in the wider HMA. From a Birmingham perspective, this approach would reduce pressure to release land in sensitive locations (whether this be for housing or employment, and so potentially is **positive** with regards to biodiversity).
- 1.32 **Accessibility and transport:** Locating more employment land within the wider HMA could lead to increased commuting (from Birmingham to the HMA) to access employment. This is negative, as it increases the length of trips and could lead to more car travel and poorer access to jobs for some communities. On the other hand, some HMA employment locations have good accessibility by sustainable modes of travel, and this could be preferable to poorly located sites in Birmingham itself. These are potential **positive effects**, but a degree of uncertainty exists.



## Appendix 3



# **Birmingham Local Development Scheme**

**2022 – 2025**

**October 2022**

## Contents

1. What is a Local Development Scheme? .....	2
2. The plan-making framework .....	2
3. The current development plan .....	4
4. Development Plan Documents .....	4
5. Neighbourhood Plans .....	6
6. Other supporting documents .....	7
7. Monitoring and review.....	9
8. Resources .....	9
9. Risk Assessment .....	9

## **1. What is a Local Development Scheme?**

- 1.1 Local planning authorities are required through the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011) to prepare, maintain and publish a Local Development Scheme (LDS). The LDS is a three-year project plan setting out the Development Plan Documents (DPDs)<sup>1</sup> that will be produced and, once adopted, form part of the development plan for Birmingham. The LDS details the main stages in the preparation of DPDs to inform members of the public, stakeholders and organisations about the timetable for their preparation.
- 1.2 This LDS covers the period June 2022- June 2025 and supersedes the Council's previous LDS which covered the period January 2021 – January 2024.
- 1.3 The LDS provides an updated schedule of DPDs and Neighbourhood Plans that make up the development plan for Birmingham. Details of newly proposed documents and those that have been adopted since the previous LDS was published are also included.
- 1.4 The LDS does not include a timetable for the preparation of individual Neighbourhood Plans as the timing and delivery of these are the responsibility of the 'qualifying bodies.' However, the LDS does provide a summary of those plans that have been made (adopted) and identifies those that have progressed to at least submission stage at the time writing. Upon being adopted, a Neighbourhood Plan will become a statutory plan and form part of the development plan.<sup>2</sup>
- 1.5 Supplementary Planning Documents (SPDs) are not part of the Development Plan as they supplement adopted policy. It is no longer a requirement to detail SPDs and their timetables for preparation within the LDS. Instead, information on their production can be found on the Council's website.
- 1.6 Other documents that are not part of the development plan, but support it, include the Statement of Community Involvement (SCI), the Authority Monitoring Report (AMR) and the Community Infrastructure Levy (CIL). Chapter 6 provides the context to their relationship with the Development Plan.

## **2. The plan-making framework**

- 2.1 The development plan is at the heart of the planning system with a requirement set in law that planning decisions must be taken in line with the development plan unless material considerations indicate otherwise.

---

<sup>1</sup> Development Plan Documents (DPDs) are statutory planning policy documents. They are also referred to as Local Plans.

<sup>2</sup> Adopted Neighbourhood Plans have statutory weight and are considered as part of the development plan but are not classed as a Development Plan Documents (DPDs).



- 2.2 Plans set out a vision and a framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for conserving and enhancing the natural and historic environment, mitigating and adapting to climate change, and achieving well designed places.
- 2.3 The Planning and Compulsory Purchase Act 2004 sets out that each local planning authority must identify their strategic priorities and have policies to address these in their development plan documents (taken as a whole).
- 2.4 The Act also sets out specific matters to which the local planning authority must have regard when preparing a local plan. Regulations 8 and 9 of the Town and Country Planning (Local Planning) (England) Regulations 2012 prescribe the general form and content of local plans and adopted policies maps, while regulation 10 states what additional matters local planning authorities must have regard to when drafting their local plans.
- 2.5 The National Planning Policy Framework (NPPF) and the associated National Planning Practice Guidance (NPPG) sets the national context for planning policy and must be taken into account in preparing plans. The NPPF confirms that the planning system continues to be ‘plan-led’ which means that planning applications have to be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF also confirms that the policies in emerging plans will gather more weight as they progress towards adoption.
- 2.6 Plans must be prepared with the objective of contributing to the achievement of sustainable development. They should be based on a proportionate evidence base which includes adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.
- 2.7 Legislation clarifies that the term local plan applies only to DPDs. A local plan can consist of either strategic or non-strategic policies, or a combination of the two.
- 2.8 Paragraph 33 of the NPPF states that policies in local plans and spatial development strategies should be revised to assess whether they need updating at least once every five years and should then be updated as necessary.<sup>3</sup> Reviews should be completed no later than five years from the adoption date of a plan and should take into account changing circumstances affecting the area and any relevant changes in national policy.

---

<sup>3</sup> Review at least every five years is a legal requirement for all local plans (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012).

### 3. The current development plan

3.1 The current development plan for Birmingham comprises a number of adopted DPDs prepared by Birmingham City Council as the local planning authority and made (adopted) Neighbourhood Plans prepared by parish/ town councils or established Neighbourhood Planning Forums. The documents listed below currently form the development plan for Birmingham:

- The [Birmingham Development Plan](#) (BDP) adopted in January 2017 sets out the vision, spatial strategy and strategic policies for the development of Birmingham. The BDP contains strategic policies and site allocations which are used to shape development and determine planning applications. This is the lead local plan for Birmingham.
- The [Development Management in Birmingham Development Plan Document](#) (DMB) adopted in December 2021 provides detailed development management policies supporting the BDP. The DMB document has been adopted since the publication of the previous LDS.

The [Bordesley Park Area Action Plan](#) adopted in January 2020 provides policies for the transformation and growth of parts of Washwood Heath, Bordesley Green, Bordesley Village and Small Heath to 2031.

- The [Longbridge Area Action Plan](#) adopted in April 2009 provides specific detailed policies for the regeneration and redevelopment of the Longbridge area.
- The [Aston, Newtown and Lozells Area Action Plan](#) adopted in July 2012 provides detailed specific policies for the Aston, Newtown and Lozells areas of the City. Policy ED1 was replaced by the adoption of the BDP in January 2017.
- The [Balsall Heath Neighbourhood Development Plan](#) adopted by the Council in November 2015 following a majority yes vote (89%) at a referendum. The plan was prepared by Balsall Heath Neighbourhood Planning Forum.

### 4. Development Plan Documents

4.1 The section outlines the DPDs that the Council intends to produce or is in the process of producing.

#### **The Birmingham Plan (BDP update)**

4.2 The Birmingham Development Plan (BDP), adopted on 10 January 2017, sets out the spatial vision and development strategy for the sustainable growth of the city for the period 2011-2031. The Plan contains strategic policies and site allocations, organised by growth areas and a suite of thematic policies to establish Birmingham as an enterprising, innovative and green City.

- 4.3 In line with legislative requirements, a review of the BDP was undertaken to assess if an update of the plan was required. The review indicated that the BDP requires updating due to a number of significant changes to national planning policy, guidance and legislation, as well as changes in local circumstances and priorities. The results of the review were report to Cabinet on 23 June 2020 at which the recommendation to undertake a full update of the plan was accepted.
- 4.4 The intention of this LDS update is to set out a revised timetable for the update of the BDP. This is shown in the table below overleaf. The timetable reflects the aim to submit the plan under the current planning system.
- 4.5 However, it should be noted that the Government intend to introduce future changes to the planning system, which could affect the preparation and timetable of the plan. It is difficult to predict when and what planning reforms will be enacted at this stage. The preparation of the new/ updated plan will therefore need to be flexible to respond to any potential future changes to the planning system including impact on the LDS timetable. The timetable will therefore be kept under close review and updated when necessary.
- 4.6 What is clear is the Government is commitment to the target of building 300,000 new homes a year, which is reflected in the standard method for calculating housing need. This places a 35% uplift on the housing number of the top 20 largest English cities, which includes Birmingham, increasing the city's housing need number considerably when compared to the current BDP housing requirement. The new plan will therefore need to respond to increased housing need, economic development needs, supporting infrastructure requirements, environmental considerations and meet the Council's key priorities including its commitment to zero carbon city.

Table 1: The Birmingham Local Plan (BDP Update) Timetable

Document Title	<b>The Birmingham Local Plan (BDP update)</b>		
Coverage	City wide	Status	DPD
Role and content	The plan will update the existing BDP, reviewing the development requirements, policies and site allocations and extending the plan period to 2042.		
Chain of Conformity	National Planning Policy Framework and Guidance, Planning Policy for Travellers Sites, case law and planning legislation. Influenced local strategies and priorities.		
<b>Key Milestones</b>		<b>Timescales</b>	
Evidence gathering / Sustainability Appraisal scoping		June 2021	
Issues and Options consultation (Regulation 18)		October / November 2022	

Preferred Options consultation (Regulation 18)	October/ November 2023
Publication/ Pre-submission consultation (Regulation 19)	October 2024
Submission (Regulation 22)	June 2025
Examination (Regulation 24)	Autumn 2025
Receipt of Inspector's Report (Regulation 25)	Spring 2026
Adoption (Regulation 26)	Summer 2026

## 5. Neighbourhood Plans

- 5.1 The Localism Act 2011 enables local communities to produce a neighbourhood plan to support the development of their area. Neighbourhood plans are led and prepared by the community, not the Council, although the Council has a statutory role to provide advice and support to those producing a plan and at prescribed stages in the plan making process.
- 5.2 When a neighbourhood plan is passed by an independent examiner and agreed at a local referendum, the Council must adopt the plan as part of its development plan. This means that the neighbourhood plan must be taken into consideration when decisions on planning applications are made, alongside other development plan documents and material considerations.
- 5.3 As neighbourhood plans are not prepared by the Council and their timetables are dependent on the progress made by the community, timetables for their production are not included in the LDS. However, the section below provides the status of plans at June 2022. Further details can be found on the Council's website, where the progress of these plans will be recorded and updated:
- 5.4 There is currently one neighbourhood plan being prepared by designated Neighbourhood Forums for the Jewellery Quarter. The Beeches, Booths and Barr (3Bs) Neighbourhood Plan was subject to a referendum in October 2021 and resulted in the Neighbourhood Plan being 'made' in December 2021.
- **Jewellery Quarter Neighbourhood Development Plan.** In May 2022 the Jewellery Quarter Neighbourhood Forum submitted the final plan and supporting documents to the City Council. Statutory consultation on the plan opened on 25<sup>th</sup> July 2022 and closes on 16<sup>th</sup> September 2022. (Regulation 16 Consultation). [https://www.birmingham.gov.uk/info/20054/planning\\_strategies\\_and\\_policies/76/jewellery\\_quarter\\_neighbourhood\\_development\\_plan](https://www.birmingham.gov.uk/info/20054/planning_strategies_and_policies/76/jewellery_quarter_neighbourhood_development_plan)
  - **Beeches, Barr and Booths (3Bs) Neighbourhood Development Plan** covering residential area, with proposals focused around environmental and ecological

improvements. The Plan was formally 'made' in December 2021 following a referendum in October 2021.

[https://www.birmingham.gov.uk/info/20054/planning\\_strategies\\_and\\_policies/1032/beeches\\_booths\\_and\\_barr\\_3bs\\_neighbourhood\\_plan](https://www.birmingham.gov.uk/info/20054/planning_strategies_and_policies/1032/beeches_booths_and_barr_3bs_neighbourhood_plan)

## **6. Other supporting documents**

6.1 While not forming part of the development, the Council have produced other supporting document to aid in the preparation and implementation of the development plan policies:

- A detailed evidence base
- Statement of Community Involvement
- Sustainability Appraisal and Strategic Environment Assessment
- Policies Map
- Authority Monitoring Report
- Supplementary Planning Documents and Guidance
- Community Infrastructure Levy

### **Evidence base**

6.2 In preparing documents included in the LDS, the Council will develop and maintain a sound evidence base. Necessary research and studies will be conducted, particularly in relation to the new local plan (BDP update). Providing a sound and comprehensive evidence is fundamental to developing sound planning documents. The key evidence base documents will be made available to be view when completed.

6.3 A range of studies which form the evidence base for the adopted BDP can be found on the City Council's website at:

[https://www.birmingham.gov.uk/directory/6/birmingham\\_development\\_plan](https://www.birmingham.gov.uk/directory/6/birmingham_development_plan)

### **Statement of Community Involvement (SCI)**

6.4 The SCI details how the Council will encourage local communities to participate in the planning system. The Council's current SCI was adopted in January 2020.

6.5 The SCI is not a DPD and is not subject to public examination. However, to ensure the SCI remains relevant and has regard to new methods of engagement, the SCI will continue to be subject to review and updating as necessary.

[https://www.birmingham.gov.uk/info/20054/planning\\_strategies\\_and\\_policies/69/local\\_development\\_framework/4](https://www.birmingham.gov.uk/info/20054/planning_strategies_and_policies/69/local_development_framework/4)

### **Sustainability appraisal**

6.6 Sustainability Appraisal (SA) is required for all DPDs and is an integral to the plan-making process. The purpose of the SA is to promote sustainable development

through better integration of sustainability considerations into the preparation and adoption of plans. The SA embraces economic, environmental and social objectives, including equalities and health impacts and therefore has a wider scope than Strategic Environmental Assessment (SEA) which is a requirement of an EU directive and is primarily concerned with environmental impacts.

- 6.7 Work on producing a DPD cannot proceed without corresponding work on the SA. Therefore, each DPD will be accompanied by a supporting SA. Both the DPD and the SA will be made available for consultation at the same time and comments invited. The findings of the SA will inform the DPD and will be a material consideration in determining the soundness of the DPD at examination.

### **Policies map**

- 6.8 The policies map illustrates the sites allocations and policies and other local and national land use designations on an Ordnance Survey base map. This is in accordance with Regulation 9 of the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended. The policies map is updated as new DPDs are prepared or revised so as to illustrate the application of policies across the area. A link to the interactive policies map is available at:  
<http://www.planvu.co.uk/bcc/index.php>

### **Authority Monitoring Report (AMR)**

- 6.9 The AMR monitors the progress of local plans and assesses the effectiveness of adopted local plan policies. The AMR sets out the list of documents that are included in the LDS, their timetable for preparation, the stage they are currently at, and if they are behind schedule the reasons for this. AMRs are also useful in identifying whether policies are meeting their stated objectives, identifying development trends, patterns of land use and reporting on the implementation of policies. The latest version on the AMR can be found on the Council's website:  
[https://www.birmingham.gov.uk/info/20054/planning\\_strategies\\_and\\_policies/69/local\\_development\\_framework/3](https://www.birmingham.gov.uk/info/20054/planning_strategies_and_policies/69/local_development_framework/3)

### **Supplementary Planning Documents (SPDs)**

- 6.10 SPDs add detail and guidance to policies contained within DPDs, which they must be consistent with. The production of SPDs follow a statutory process and are subject to public consultation, however there is no public examination and there is no requirement to undertake a Sustainability Appraisal. They do not form part of the statutory development plan; however, they are a material consideration in the determination of planning applications.
- 6.11 The Council also produce a range of other non-statutory documents such as frameworks and masterplans to promote development opportunities. They do not form part of the statutory development plan; however, the public are consulted on



them and they are evidence based so can be a material consideration in the determination of planning applications.

- 6.12 It is no longer a requirement to detail SPDs and their timetables for preparation within the LDS. A full list of adopted SPDs and other non-statutory documents can be found on the Council's website, as well as those that the Council intends to review or prepare.
- 6.13 The SPDs and non-statutory frameworks adopted since the previous LDS was published are:
- The Smethwick to Birmingham Corridor Framework adopted on 8 February 2022
  - Sutton Coldfield Town Centre Masterplan adopted in May 2021
  - Birmingham Parking SPD adopted on 9 November 2021
  - Houses in Multiple Occupation SPD adopted on 26 April 2022
  - Large Scale Shared Accommodation SPD adopted on 26 April 2022
  - Perry Barr Masterplan adopted on 8 February 2022
  - Birmingham Design Guide adopted 6 September 2022

## **7. Monitoring and review**

- 7.1 The Council will monitor progress of the work set out in the LDS and will publish the results in the Authority Monitoring Report (AMR) which is produced on an annual basis. The Council will closely monitor the progress of the preparation of the local plan. If issues are identified or unexpected events or changes occur, the LDS will be updated to reflect these changes in circumstances. A new or updated LDS must be approved by the Council's Executive.

## **8. Resources**

- 8.1 The staff resources for delivering the proposed programme of plan preparation are primarily located within the Planning and Development department of the Council's Inclusive Growth Directorate. Officers from across the Inclusive Growth Directorate and other parts of the Council also contribute to the process of plan preparation. External technical expertise may be utilised when necessary subject to appropriate funding being identified. The Council also works closely with a range of external partners and stakeholders in developing the local plan.

## **9. Risk Assessment**

- 9.1 The Council has carried out a risk assessment of the projects contained in this document as set out below. These risks will be kept under review to ensure that they are addressed quickly if they arise.

<b>Risk</b>	<b>Impact</b>	<b>Mitigation</b>
Changes to national planning policies	Additional work to comply with new requirements  Abortive work undertaken	Respond to changes as quickly as possible  Ensure work undertaken can be easily adapted to new requirements, where possible
Greater level of public engagement than anticipated	Increased time required to analyse comments. Possible programme slippage	Build in flexibility in programme  Monitor progress  Draw in additional resources
Staff turnover and difficulties in recruitment	Reduced capacity will cause programme to slip	Fill vacancies promptly  Consider re-deployment to meet key targets  Consider recruitment incentives  Consider using consultants where specific expertise is required
Pressures on staff time for other work	Staff diverted to other work will cause slippage of programme	Local Plan to be a strategic priority  Ringfence policy team to plan production  Manage staff tasks and consider re-deployment
Insufficient financial resources	May result in poor quality evidence base and key milestones not being met	Ensure adequate budget and contingency  Closely monitor costs and manage contracts
Governance process	Delay to decisions being made on the plan	Establish a cross party Local Plan Working Group to ensure early understanding, buy-in and transparency
Evidence not prepared on	Key milestones will not be	Closely monitor

time	met	preparation of evidence studies
IT system issues e.g. consultation platform, land monitoring database, GIS	Delays to consultation	Ensure liaison with IT and GIS Team  Procure consultation platform early on and test
LDS programme too ambitious	Key milestones may not be met	Monitor progress of the LDS through AMR and adjust where necessary
Planning Inspectorate not able to meet post submission timetable	Delay to examination and receipt of inspector's report	Liaison with PINs to identify and resolve issues
Local Plan is found unsound	Additional work is required to rectify issues  Consultation on modifications may be required  Delay to the adoption of the plan	As far as possible, ensure evidence base is robust and up to date on submission  Engage with the community and stakeholders to resolve objections  Critical friend analysis
Legal challenge	Possible quashing of plan or requirement to re-do work	Ensure compliance with the regulations  Carefully consider Inspector's recommendations
Unforeseen circumstances (e.g. global pandemic)	Potential impact on evidence base development  Unable to attend face to face meetings or consultation	Ensure staff coverage and consultant team contingencies are in place  Utilise online consultation methods and video conferencing for meetings

## **Consultation and Engagement Plan for the Birmingham Local Plan – Issues and Options September 2022**

### **1. Introduction**

- 1.1. Planning for development within the city is a key responsibility of Birmingham City Council, in order to meet the aspirations of local communities and to reach the Council's overarching vision of creating an innovative, vibrant and sustainable city. The Council's objective is to tackle the social, economic and environmental challenges facing the city today and in the future. The City Council is highly committed to listening to local people in shaping the city and the services that they receive.
- 1.2. The Birmingham Development Plan (BDP) was adopted on 10 January 2017 and provides a spatial vision and development strategy for the city over the plan period 2011-2031. The BDP contains strategic policies and site allocations which are used to shape development and determine planning applications. The BDP forms a key part of Birmingham's Local Plan; a collection of documents that sets the planning framework for the city.
- 1.3. Local planning authorities are required by legislation to review Local Plan documents at least every five years from the date of adoption in order to ascertain if their policies need updating. There have been a number of changes to national planning policy and guidance since the plans were adopted, relating to a variety of issues such as affordable housing, climate change mitigation and biodiversity enhancement, as well as the introduction of a standard method to calculate local housing need and the Housing Delivery Test. Locally, the City Council declared a climate emergency in June 2019 and has committed to achieving carbon neutral status by 2030 or as soon thereafter as a 'just transition' allows.
- 1.4. Given the scale of changes to national policy and legislation and changes in local circumstances as set out above, it was recommended that a new Local Plan be prepared to replace the BDP. The new Local Plan, to be known as the Birmingham Local Plan, will involve evidence and information gathering and three main consultation stages before the Plan is submitted to the Secretary of State for Levelling Up, Communities and Local Government and subject to an Examination in Public carried out by the Planning Inspectorate. If, through that process, the Plan is found to be sound, the Birmingham Local Plan will then be adopted.

- 1.5. We are now at the 'Issues and Options stage of the plan-making process. This is the first public consultation stage, and this document sets out how we will undertake engagement at this stage.
- 1.6. The City Council's adopted Statement of Community Involvement sets out how we will engage at each stage of consultation. Consultation on the Issues and Options will be undertaken in accordance with the adopted Statement of Community Involvement and this document should be read alongside that.
- 1.7. The table below shows the overall timetable for the preparation of the Birmingham Local Plan and where the Issues and Options consultation sits within that timetable.

**Table 1: Proposed Timetable for the Birmingham Local Plan**

Key Stages	Scheduled Date	Minimum Consultation Period
Evidence gathering / Sustainability Appraisal scoping	June 2021	Ongoing
Issues and Options consultation (Regulation 18)	24 October – 5 December 2022	6 weeks
Preferred Options / Draft Plan consultation (Regulation 18)	October 2023	6 weeks
Publication/Pre-submission consultation (Regulation 19)	October 2024	6 weeks
Submission (Regulation 22)	June 2025	N/A
Examination (Regulation 24)	Autumn 2025	Ongoing during Examination period led by Planning Inspectorate
Adoption (Regulation 26)	Summer 2026	N/A

## **2. Issues and Options consultation (Regulation 18)** **Consultation dates: 24<sup>th</sup> October 2022 – 5<sup>th</sup> December 2022**

- 2.1 The Issues and Options stage is usually the first round of consultation in the development of a Local Plan. Issues and Options documents set out the scope and parameters of the Local Plan and the specific issues which need to be addressed as well as broad options to tackle the issues. The consultation also allows for the initial evidence gathered to accompany and inform the Issues and Options document to be published.
- 2.2 The consultation will cover general issues to be addressed without going into detail on any policy content or specific site allocations and geographic detail. To this extent, the consultation will be broad in its approach and not be targeted towards specific areas.
- 2.3 At this stage, initial engagement will be established with local communities, businesses and other stakeholders to help refine the issues and formulate a collaborative approach to how the Birmingham Local Plan will evolve. The Issues and Options Consultation will provoke interest from groups and communities, particularly in presenting opportunities for social value enhancement.

### **Objectives of the Issues and Options Consultation**

- 2.4 The objectives of consultation and engagement at the Issues and Options stage are as follows:
  - Identify key policy areas to update and renew in more detail
  - Identify any specific areas which require particular focus
  - Establish levels of growth across the City
  - Work with neighbouring planning authorities on cross-boundary issues.
  - Continue to develop engagement and support from community and stakeholder groups as well as any focus groups and see if alternative solutions can be identified
  - Continue to gain input from directorates within the City Council including Members and Senior managers in refining the issues to be addressed and establish alternative solutions



**Table 2: How we will undertake the Issues and Options Consultation (Regulation 18)**

Who is consulted	How will the consultation be done
<b>Consultation on Issues and Options Document to consider issues and alternatives (see table below for more details on events)</b>	
Communities, businesses, stakeholder groups and organisations, Duty to Cooperate (DtC) bodies and other local authorities.	<p>Dedicated website page including 'an online version of the document on which comments can be made electronically</p> <p>Email / post notification to all on the Planning Policy Consultation Database</p> <p>Press release/article</p> <p>Hard copies of documents at Councils' receptions and libraries where possible (known as the 'deposit' locations)</p> <p>Officer advice and assistance over the telephone, e-mail and post</p> <p>Posters / leaflets in appropriate locations such as libraries.</p> <p>Promoting the consultation on social media (Facebook, Twitter etc)</p> <p>Newsletters and social media of partner organisations e.g. community groups, BIDs, housing associations, Birmingham and Solihull LEP, Birmingham Chamber of Commerce</p> <p>Other City Council newsletters / bulletins</p> <p>Short video on the Council's You Tube Channel</p> <p>Online forums</p> <p>Drop in events at prominent venues in the city (one venue in each of the 10 constituencies of Birmingham plus the city centre) See below.</p> <p>Other online events throughout the consultation period, number subject to demand.</p>

<b>Carry out the 'Duty to Co-operate' requirement</b>	
Duty to Cooperate (DtC) bodies and neighbouring local authorities. (See Appendix 1 for full list)	<p>Exchange of letters / emails with DtC bodies and neighbouring local authorities.</p> <p>Meetings with DtC bodies</p> <p>Raise awareness at relevant meetings involving WM Combined Authority and neighbouring local authorities.</p>
<b>Internal consultation</b>	
<p>BCC Departments relevant to policy areas (Neighbourhoods, Public Health, Transport, Education, Housing, Route to Zero)</p> <p>Senior Officer Groups, working groups and Members</p>	<p>Birmingham Local Plan Members Working Group; Birmingham Local Plan Board; Birmingham Plan Officer Working Group.</p> <p>Briefing sessions and meetings</p>

**Table 3: Specific events for the Issues and Options document consultation**

All weekday drop in events are schedule to take place from early afternoon to early evening and weekend events will take place from mid-morning to late afternoon. The full details will be confirmed and publicised via the Council's website and social media as a minimum. Venues will be subject to final confirmation of availability.

<b>Event and Format</b>	<b>Constituency and Venue</b>
Pop-up Public Consultation Event - Face to face	<b>Erdington</b> - Co-op Supermarket, Erdington
Pop-up Public Consultation Event - Face to face	<b>Hodge Hill</b> - The Shard, Library Shard End
Pop-up Public Consultation Event - Face to face	<b>Perry Barr</b> - One Stop Shopping Centre, Perry Barr
Pop-up Public Consultation Event - Face to face	<b>Northfield</b> - The Northfield Centre
Pop-up Public Consultation Event - Face to face	<b>Sutton Coldfield</b> - Gracechurch Shopping Centre, Sutton Coldfield

Pop-up Public Consultation Event - Face to face	<b>Selly Oak</b> - Morrisons supermarket, Stirchley
Pop-up Public Consultation Event - Face to face	<b>Yardley</b> - Swan Centre, Yardley
Pop-up Public Consultation Event - Face to face	<b>Ladywood</b> - Ladywood Leisure Centre
Pop-up Public Consultation Event - Face to face	<b>City Centre</b> - Grand Central
Pop-up Public Consultation Event - Face to face	<b>Edgbaston</b> - Waitrose Supermarket, Harborne
Pop-up Public Consultation Event - Face to face	<b>Hall Green</b> - Moseley Hive, Moseley
Online presentation sessions with opportunity for Q&A	The number of sessions will depend on demand and they will be held at different times during the day and early evening.
Sutton Coldfield Town Council - Presentation with Q&A	<b>Sutton Coldfield</b> - Online Teams Meeting or attendance at a Town Council Meeting
Business Improvement Districts - Presentation with Q&A	Cross City - Online Teams Meeting
Birmingham City Council Members - Presentation with Q&A	In person presentation to Planning Committee members with Q&A  Cross City - Online Teams Meeting
'Duty to Co-operate' partners including officers from neighbouring local authorities  Presentation with Q&A	West Midlands - Online Teams Meeting

## **Appendix 1: Duty to Cooperate bodies relevant to Birmingham City Council**

The bodies prescribed for the purposes of section 33A(1)(c) of the Act relevant to Birmingham City Council are:

- The Environment Agency;
- Historic England;
- Natural England;
- The Homes and Communities Agency;
- Highways England
- The Civil Aviation Authority
- NHS Black Country and west Birmingham Clinical Commissioning Group
- NHS Birmingham & Solihull Clinical Commissioning Group
- The Office of Rail Regulation
- Transport for West Midlands
- Greater Birmingham and Solihull Local Enterprise Partnership
- West Midlands Combined Authority
- Neighbouring Local Authorities
  - Solihull MBC
  - Dudley MBC
  - Sandwell MBC
  - Walsall Council
  - Wolverhampton City Council
  - Bromsgrove District Council
  - Redditch District Council
  - Stratford-upon-Avon District Council
  - North Warwickshire District Council
  - Tamworth Borough Council
  - Lichfield District Council
  - Cannock District Council
  - South Staffordshire District Council
  - Wyre Forest District Council
  - Coventry City Council
  - Shropshire Council
  - Telford & Wrekin Council
  - Rugby Borough Council
  - Warwick District Council



Title of proposed EIA	The Birmingham Local Plan - Issues and Options Consultation
Reference No	EQUA970
EA is in support of	New Policy
Review Frequency	Annually
Date of first review	04/09/2023
Directorate	Inclusive Growth
Division	Planning and Development
Service Area	Planning Policy
Responsible Officer(s)	<input type="checkbox"/> Martin Dando
Quality Control Officer(s)	<input type="checkbox"/> Richard Woodland
Accountable Officer(s)	<input type="checkbox"/> Uyen-Phan Han
Purpose of proposal	Consultation on the Birmingham Local Plan which will provide strategic policies for the future growth of the City
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:	The Birmingham Local Plan (BLP) will provide strategic policies for the future growth of the City over the next 20 years to ensure the creation of a sustainable, inclusive, connected and resilient city. Overall, this will have positive impacts on people of all ages. At this stage, detailed policies are yet to emerge and will evolve and be adapted following various stages of consultation in accordance with the Council's Statement of Community Involvement (2020). The approach to public consultation will be City wide but made as relevant as possible to the community profile of the City as well as targeting citizens of different ages to ensure specific needs are met and adverse impacts on any particular age group are minimised or eliminated.



A Sustainability Appraisal (SA) is being undertaken alongside the BLP. The SA assesses the social, environmental and economic effects of the BLP. An appraisal of the Issues and Options Document has been undertaken which identifies likely positive effects in relation to the SA topics of equality, diversity and community due to the policy proposals that are being considered to address the housing needs of different groups (such as older people, families with children, affordable housing, students) and open space and playing fields.

One of the BLP is to improve access to health and social care facilities, high quality open spaces, and sports and recreation facilities to support healthy lifestyles and to improve our air and water quality. This will benefit people of all ages but particularly younger and older people.

Protected characteristic: Disability

Disability details:

Wider Community

In general, the BLP will provide strategic policies which seek to ensure the creation of a sustainable, inclusive, connected and resilient city. We are still in the early stages of the plan-making process - the Issues and Options Stage - which sets out the issues and opportunities the city faces, a draft vision and objectives for the BLP to address and the high level options or approaches that could be considered to meet the challenges. The older person (65+) population is projected to increase by 32% in the future and an ageing population means that the number of people with disabilities is likely to increase substantially. This would suggest there is a clear need to increase the supply

of accessible and adaptable dwellings and wheelchair user dwellings as well as providing specific provision of older persons housing (e.g. sheltered housing, extra-care). . Policy DM10 in the Development Management in Birmingham requires housing development of 15 or more dwellings to provide 30% as accessible and adaptable dwellings in accordance with Building Regulation Part M4(2) but there is currently no provision for housing to support wheelchair users. To help meet the housing needs of wheelchair users, the BLP is considering having a policy which requires residential development of a certain threshold to provide a percentage (e.g. 10-15%) of wheelchair accessible homes. The financial viability of this potential policy requirement will need to be tested.

Public consultation will be carried out on the Issues and Options Document in line with the Council's Statement of Community Involvement (2020). The approach to public consultation will be 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 including consideration in the provision for the needs of people with disabilities within all planning policy areas.

Protected characteristic: Sex

Gender details:

Wider Community

The Birmingham Local Plan (BLP) will provide strategic policies for the future growth of the City over the next 20 years to ensure the creation of a sustainable, inclusive, connected and resilient city. Overall, this will have positive impacts on all people. At this stage, detailed policies are yet to emerge and will evolve and be

adapted following various stages of consultation in accordance with the Council's Statement of Community Involvement (2020).

The draft vision and objectives of the BLP includes delivering a city of growth for all, where everyone can reach their full potential regardless of who they are or where they live. It seeks to create safe, secure and sustainable places where walking, cycling and use of public transport are the natural first choice. This will benefit all people. The Plan will also seek to ensure development contributes to reducing health inequalities and maximising health and well-being.

A Sustainability Appraisal (SA) is being undertaken alongside the BLP. The SA assesses the social, environmental and economic effects of the BLP. An appraisal of the Issues and Options Document has been undertaken which identifies likely positive effects in relation to the SA topics of equality, diversity and community due to the policy proposals that are being considered to address the housing needs of different groups (such as older people, families with children, students) and open space and playing fields.

Protected characteristics: Gender Reassignment

Gender reassignment details:

Wider Community

The Birmingham Local Plan (BLP) will provide strategic policies for the future growth of the City over the next 20 years to ensure the creation of a sustainable, inclusive, connected and resilient city. Overall, this will have positive impacts on all people. At this stage, detailed policies are yet to emerge and will evolve and be adapted following various stages of

consultation in accordance with the Council's Statement of Community Involvement (2020).

The draft vision and objectives of the BLP includes delivering a city of growth for all, where everyone can reach their full potential regardless of who they are or where they live. It seeks to create safe, secure and sustainable places. This will benefit all people. The Plan will also seek to ensure development contributes to reducing health inequalities and maximising health and well-being.

A Sustainability Appraisal (SA) is being undertaken alongside the BLP. The SA assesses the social, environmental and economic effects of the BLP. An appraisal of the Issues and Options Document has been undertaken which identifies likely positive effects in relation to the SA topics of equality, diversity and community due to the policy proposals that are being considered to address the housing needs of different groups (such as older people, families with children, students) and open space and playing fields.

Protected characteristics: Marriage and Civil Partnership

Not Applicable

Marriage and civil partnership details:

Protected characteristics: Pregnancy and Maternity

Wider Community

Pregnancy and maternity details:

The Birmingham Local Plan (BLP) will provide strategic policies for the future growth of the City over the next 20 years to ensure the creation of a sustainable, inclusive, connected and resilient city. At this stage, detailed policies are yet to emerge and will evolve and be adapted following various stages of consultation in accordance with the Council's Statement of Community Involvement (2020).

The draft vision of the BLP includes the creation a healthy city and under this objective the relevant priorities proposed include ensuring development contributes to reducing health inequalities and maximising health and well-being and improving access to health and social care facilities, high quality open spaces, and sports and recreation facilities to support healthy lifestyles.

The Plan also recognises that healthcare infrastructure planning is necessarily an on-going process and Birmingham will continue to work closely with healthcare partners and the development industry to assess and meet existing and new healthcare infrastructure needs.

The Issues and Options Document is considering a requirement for development proposals of a certain threshold to be subject to Health Impact Assessment (HIA). HIA can help to enhance the benefits and minimise the risks to health of a development.

A Sustainability Appraisal (SA) is being undertaken alongside the BLP. The SA assesses the social, environmental and economic effects of the BLP. An appraisal of the Issues and Options Document has been undertaken which identifies likely positive effects in relation to the SA topics of equality, diversity and community and health and wellbeing due to the policy proposals that are being considered to address the housing needs of different groups (such as older people, families with children, students), open space and playing fields, and healthy neighbourhoods.

## Race details:

The Birmingham Local Plan (BLP) will provide strategic policies for the future growth of the City over the next 20 years to ensure the creation of a sustainable, inclusive, connected and resilient city. Overall, this will have positive impacts on all people. At this stage, detailed policies are yet to emerge and will evolve and be adapted following various stages of consultation in accordance with the Council's Statement of Community Involvement (2020).

The draft vision and objectives of the BLP includes delivering a city of growth for all, where everyone can reach their full potential regardless of who they are or where they live. It seeks to develop and grow the city in fair and inclusive way, meeting the needs of all of Birmingham's citizens and provide local economic opportunities through skill development and job creation as well as foster community cohesion, social interaction and the creation of inclusive and safe environments.

A Sustainability Appraisal (SA) is being undertaken alongside the BLP. The SA assesses the social, environmental and economic effects of the BLP. An appraisal of the Issues and Options Document has been undertaken which identifies likely positive effects in relation to the SA topics of equality, diversity and community due to the policy proposals that are being considered to address the housing needs of different groups (such as older people, families with children, students) and open space and playing fields.

## Protected characteristics: Religion or Beliefs

Religion or beliefs details:

## Wider Community

At this stage of the plan-making



religion or sexual details:

At this stage of the plan making process, detailed policies are yet to emerge and will evolve and be adapted following various stages of consultation in accordance with the Council's Statement of Community Involvement (2020). However, the draft vision and objectives within the Issues and Options Document recognises the layers of diversity, character and culture in the city and the importance of planning for community facilities such as health, education and cultural facilities.

At this stage, detailed policies are yet to emerge and will evolve and be adapted following various stages of consultation in accordance with the Council's Statement of Community Involvement (2020). The approach to public consultation will be 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.

Protected characteristics: Sexual Orientation

Sexual orientation details:

Wider Community

The Birmingham Local Plan (BLP) will provide strategic policies for the future growth of the City over the next 20 years to ensure the creation of a sustainable, inclusive, connected and resilient city. Overall, this will have positive impacts on people . At this stage, detailed policies are yet to emerge and will evolve and be adapted following various stages of consultation in accordance with the Council's Statement of Community Involvement (2020).

The draft vision and objectives of the BLP includes delivering a city of growth for all, where everyone can reach their full potential regardless of who they are or where they live. It seeks to create safe, secure and sustainable places where walking, cycling and use of public transport are the natural first

choice. This will benefit all people. The Plan will also seek to ensure development contributes to reducing health inequalities and maximising health and well-being.

## Socio-economic impacts

The BLP will provide the strategic framework for the future development of the City and so will have a large socio-economic impact. The new Local Plan will be subject to extensive consultation and be underpinned by robust evidence and testing of options to minimise negative effects and maximise positives.

Please indicate any actions arising from completing this screening exercise.

At this early stage in the formulation of the BLP, there are no actions arising.

Please indicate whether a full impact assessment is recommended

YES

What data has been collected to facilitate the assessment of this policy/proposal?

The BLP is supported by a detailed Sustainability Appraisal of the work carried out so far and is in line with government guidance and the Planning Advisory Service Local Plan Route Mapper and Toolkit. The new plan will be prepared in accordance with the relevant planning regulations, the Council's SCI and based on an extensive evidence base to justify each proposed policy within the document. It will also be informed by national and local planning policies, guidance and evidence produced by the Government, the Council and its partners. The BLP will also be subject to two more rounds of consultation. At each stage the consultation feedback provided will be considered and used to inform the Plan and this assessment.

## Consultation analysis

Initial consultation has been carried out with neighbouring local authorities and Duty to Cooperate Prescribed bodies in line with The Town and Country Planning (Local Planning)

(England) Regulations 2012. All of the responses received have supported the need for the new local plan to replace the current BDP.

A consultation statement will also be developed in parallel with the plan to set out how the public consultation has been carried out and provide a summary of the comments received. A database of consultees for planning documents has also been developed to ensure that a wide range of groups, organisations and individuals are consulted representing local communities and protected characteristics.

Adverse impact on any people with protected characteristics.

At this early stage of the plan-making process, the impacts are uncertain as the policies have not yet been fully developed. The Issues and Options Document summarises the key planning issues and invites views on how these should be addressed. It also sets out a draft vision and series of objectives for the BLP to achieve and invites people to help shape the direction of the Plan. However, overall it is considered that the vision, objectives and proposed policy directions in the BLP will have a positive impact on all people including those with protected characteristics by ensuring that development is guided to the right location, is of a high standard, enhances quality of life and protects the environment. This will be further tested through a public examination of the document by the Government's Planning Inspectorate once it has been finalised in its later stages.

It is anticipated that consultation and engagement with the wide range of people on the Planning Policy Consultation Database will also help to reveal any potential negative

impacts which we will seek to avoid or minimise.

Could the policy/proposal be modified to reduce or eliminate any adverse impact? At this early stage, the new plan policies have yet to be developed. As they do, they will be shaped by the emerging evidence base and consultation responses to ensure that they will not negatively impact on any groups or individuals with the protected characteristics.

How will the effect(s) of this policy/proposal on equality be monitored? The new Plan, once developed, will contain a monitoring framework to monitor the effectiveness of the policies once adopted. This will be reported annually through the City Council's Authority Monitoring Report (AMR).

What data is required in the future? Data and information gathered through consultation and evidence gathering will enable any necessary modifications to be made.

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 At this early stage of the plan-making process, the new plan policies have yet to be fully developed. As they do, they will be shaped by the emerging evidence base and consultation responses to ensure that they will not negatively impact on any groups or individuals with the protected characteristics.

Consulted People or Groups Following Cabinet approval consultation on the Issues and Options Document is scheduled to start on the 24th October 2022 for a period of 6 weeks.

Informed People or Groups All those groups and individuals on the Planning Policy Consultation Database will be consulted.

Summary and evidence of findings from your EIA At this early stage of the plan-making process, the new plan policies have

yet to be fully developed. As they do, they will be shaped by the emerging evidence base and consultation responses to ensure that they will not negatively impact on any groups or individuals with the protected characteristics.

#### 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

13/09/2022

Reasons for approval or rejection

Approve

Please print and save a PDF copy for your records

Yes

Content Type: Item

Version: 41.0

Created at 25/08/2022 05:25 PM by ☐ Martin Dando

Last modified at 13/09/2022 10:48 PM by Workflow on behalf of ☐ Uyen-Phan Han

Close

## Appendix 6 – Risk Assessment

Risk No	Risk description	Risk mitigation	Residual / current risk			Additional steps to be taken
			Likelihood	Impact	Prioritisation	
1.	BCC does not proceed with updating the Birmingham Development Plan (BDP) in a timely manner	Where relevant Local Plan policies are out of date, the presumption in favour of development will apply and the Council's ability to deliver on its strategic objectives would be harmed. Ensure robustness of the review and provide sound evidence-based reasons for the recommendation.	Low	High	Tolerable	Report Recommendation is to approve the initial consultation for a new Local Plan to replace the current BDP. This recommendation is based on evidence suggesting local and national circumstances have changed sufficiently to warrant the replacement of the BDP.
2.	Delays in publishing an up-to-date Local Development Scheme (LDS)	The Council has a statutory duty to maintain and update an LDS. Report seeks approval for an updated LDS with an up-to-date timetable for the delivery of the new Local Plan. Not to approve the LDS could undermine public and stakeholder confidence about the Council's plan-making programme.	Low	Medium	Tolerable	Timetable for the adoption of the new Local Plan will be carefully monitored as it progresses to ensure that the Local Plan proceeds in a timely manner. Any future changes to the LDS can be reported to Cabinet at future consultation stages if necessary.
3.	Insufficient financial resources	Ensure adequate budget and contingency. This will ensure that enough staff and budget resources can be programmed and set aside	Low	High	Material	Closely monitor costs and manage contracts. Ringfence policy team to plan production.



		over the near future to be able to successfully complete this work.				
4.	Changes to national planning policies could create additional work	Respond to changes as quickly as possible.	High	High	Material	Ensure work undertaken can be easily adapted to new requirements, where possible.

**Measures of likelihood/ Impact:**

Description	Likelihood Description	Impact Description
High	Almost certain, is expected to occur in most circumstances. Greater than 80% chance.	Critical impact on the achievement of objectives and overall performance. Critical opportunity to innovate/improve performance missed/wasted. Huge impact on costs and/or reputation. Very difficult to recover from and possibly requiring a long term recovery period.
Significant	Likely, will probably occur in most circumstances. 50% - 80% chance.	Major impact on costs and objectives. Substantial opportunity to innovate/improve performance missed/wasted. Serious impact on output and/or quality and reputation. Medium to long term effect and expensive to recover from.
Medium	Possible, might occur at some time. 20% - 50% chance.	Waste of time and resources. Good opportunity to innovate/improve performance missed/wasted. Moderate impact on operational efficiency, output and quality. Medium term effect which may be expensive to recover from.
Low	Unlikely, but could occur at some time. Less than 20% chance.	Minor loss, delay, inconvenience or interruption. Opportunity to innovate/make minor improvements to performance missed/wasted. Short to medium term effect.

**Prioritisation:**

<b>Severe</b>	Immediate control improvement to be made to enable business goals to be met and service delivery maintained / improved
<b>Material</b>	Close monitoring to be carried out and cost effective control improvements sought to ensure service delivery is maintained
<b>Tolerable</b>	Regular review, low cost control improvements sought if possible

# Birmingham City Council

## Report to Cabinet

Date: 11<sup>th</sup> October 2022



**Subject:** NON-KEY DECISION PLANNED PROCUREMENT ACTIVITIES (NOVEMBER 2022 – JANUARY 2023) AND QUARTERLY CONTRACT AWARDS (APRIL 2022 – JUNE 2022)

**Report of:** ASSISTANT DIRECTOR – PROCUREMENT

**Relevant Cabinet Member:** Councillor Yvonne Mosquito, Finance and Resources

**Relevant O & S Chair(s):** Councillor Akhlaq Ahmed, Chair of Resources O & S

**Report author:** Steve Sandercock, Assistant Director, Procurement  
Email Address: [steve.sandercock@birmingham.gov.uk](mailto:steve.sandercock@birmingham.gov.uk)

Are specific wards affected?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No – All wards affected
If yes, name(s) of ward(s):		
Is this a key decision?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
If relevant, add Forward Plan Reference:		
Is the decision eligible for call-in?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Does the report contain confidential or exempt information?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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)		

## 1 Executive Summary

- 1.1 This report provides details of the planned procurement activity for the period November 2022 – January 2023 which are not key decisions and all contract award decisions made under Chief Officer's delegation during the previous quarter. 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 £500,000, unless TUPE applies to current Council staff.
- 1.3 Appendix 4 informs Cabinet of the contract award decisions made under Chief Officers delegation during the period April 2022 – June 2022.

## **2 Recommendations**

- 2.1 To note the planned procurement activities as set out in Appendix 1 and Chief Officer delegations, set out in the Constitution, for the subsequent decisions around procurement strategy and contract awards.
- 2.2 Notes the contract award decisions made under Chief Officers delegation during the period April 2022 – June 2022 as detailed in Appendix 4.

## **3 Background**

- 3.1 The report approved by Council Business Management Committee on 16 February 2016 set out the case for introducing this process.
- 3.2 At the 12<sup>th</sup> July 2022 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 £500,000 for non-key decisions 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.
- 3.3 In line with the Procurement and Contract Governance Rules 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.
- 3.4 This report sets out the planned procurement activity over the next few months where the contract value is between the procurement threshold £177,897.50 (excluding VAT) and £500,000 (excluding VAT) for non-key decisions. 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.
- 3.5 It should be noted that the procurement threshold has changed from £189,330 to £177,897.50 (excluding VAT) and applies from 1st January 2022 for a period of 2 years.
- 3.6 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.

- 3.7 Procurements below £500,000 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.
- 3.8 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 options considered are:
- To identify specific individual procurements as listed in appendix 1 for further consideration, along with clear reason(s) for such additional consideration, to Cabinet around the procurement strategy and contract award.
  - To note the planned procurement activities for all the projects listed in appendix 1 and the Chief Officer delegations as set out in the Constitution, for the subsequent decisions around procurement strategy and contract awards.– 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 Members should note that in respect of any procurement projects which are sought to be referred back to Cabinet for further considerations these may impact on timescales around the delivery of those projects.
- 6.2 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 Members are reminded that as a Local Authority the Council has specific duties under public sector procurement, specifically the Public Contract Regulations 2015.

7.2.2 Specific details of any implications related to public sector procurement Regulations are set out- in the individual reports appended to this report.

### **7.3 Financial Implications**

7.3.1 Specific details of how decisions will be carried out within existing finances and resources will be set out in the individual reports.

7.3.2 Any cashable savings generated as a result of the procurement exercises are detailed in Appendix 2 to the delivery of procurement related savings and be removed from Directorate where identified in addition to the existing service area savings target as set out in the Medium Term Financial Plan (MTFP) in line with the principles to treatment of identified savings against third party contracts as agreed by CLT on 24th January 2022.

### **7.4 Procurement Implications (if required)**

7.4.1 As noted under the Legal Implications the Council has a duty to ensure that public sector procurement activity is in line with public sector legislation, specifically the Public Contracts Regulations 2015.

7.4.2 For each of the individual projects the specific procurement implications associated to the legislation are set out and 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 which should also give consideration to application of Equality Impact Assessments in line with Council Policy

## **8 Background Documents**

8.1 List of Appendices accompanying this Report (if any):

- 1. Appendix 1 - Planned Procurement Activity November 2022 – January 2023
- 2. Appendix 2 – Background Briefing Paper
- 3. Appendix 3 – Exempt Information
- 4. Appendix 4 – Quarterly Awards Schedule (April 2022 – June 2022)

## APPENDIX 1 – PLANNED PROCUREMENT ACTIVITIES (NOVEMBER 2022 – JANUARY 2023)

No.	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
1	Strategy / Award	Pre-Employment Checks	TBC	An outsourced digitalised pre-employment check service provided by a third party. This includes Right To Work, References, DBS and all associated checks required for employment with BCC.	2 years	Council Management	Finance and Resources	Lee Bickerton	Sherrie Watkins / Richard Tibbatts	21/11/2022

### Notification of Minor Amendments

This appendix notes there is an amendment to the brief description and contract duration previously agreed by Cabinet on 6<sup>th</sup> September 2022. The change to the revised PPAR highlights the changes made to the original and revised PPAR items below for reference.

No.	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
1	Approval to Tender Strategy	Technology Enabled Care (TEC) Support Service Specification	TBC	<del>The aim of the procurement is for a one single, consolidated learning management system that provides a comprehensive learning offer to its employees whilst also having the ability to trade the same offer with a level of reporting to an external audience.</del> To support the creation and development of a transformational TEC service for Birmingham. The service required will involve working closely with Council colleagues and experts by experience and includes revising the TEC commissioning strategy, undertaking market engagement and the creation of a robust service specification to share with the market to procure a transformational TEC service for Birmingham.	<del>1 year, 6 months</del> 1 year with option to extend for a further 1 year	Adult Social Care	Health and Social Care	Andrew Healey	Julie Harrison / Marie Kennedy	01/11/2022

## APPENDIX 2

### BRIEFING NOTE ON PLANNED PROCUREMENT ACTIVITIES CABINET – 11<sup>th</sup> October 2022

<b>Title of Contract</b>	<b>Pre-Employment Checks</b>
<b>Contact Officers</b>	<p><b>Director / Assistant Director:</b> Darren Hockaday, Director of HR and Organisation Development</p> <p><b>Client Officer:</b> Sherrie Watkins, HR Services Manager</p> <p><b>Procurement Officer:</b> Richard Tibbatts, Head of Category - Corporate</p>
Briefly describe the service required	<p>An outsourced digitalised pre-employment check service provided by a third party. This includes Right To Work, References, DBS and all associated checks required for employment with the Council.</p> <p>Right To Work Checks are moving to a digital solution as from 1<sup>st</sup> October and removing the opportunity for online checks to remain, in response to Covid-19. In the event that we do not move to a digitalised solution, face to face right to work checks will need to take place for all line managers. Reverting to this approach, based on NwOW potentially opens up further risk of pre-employment checks not carried out in line with our statutory obligations, particularly relating to Right To Work. It is a legal requirement that monitoring, controls and reporting for Right To Work and other pre-employment checks may potentially result in statutory fines up to £20,000 in the event that BCC have employed an illegal worker and unable to use our “statutory excuse” as part of the defence due to the check not taking place prior to employment.</p> <p>Procuring a digitalised service delivery will mitigate organisational risks. Ownership of all checks remains with the candidate and the recruitment team. The line manager will no longer be expected to carry out Right To Work checks.</p>
What is the proposed procurement route?	The proposed route to market will be via G Cloud Framework.
What are the existing arrangements? Is there an existing contract? If so when does that expire?	At present the service is done in house via line managers which presents a risk to the council in relation to appropriate checks being carried out correctly and in line with new legislative requirements. Failure to have appropriate systems and checks in place can result in significant fines and possible imprisonment. In procuring a new service delivery approach we will mitigate the risks.
Will any savings be generated?	No cashable savings will be generated by this project.
Has the In-House Preferred Test been carried out?	This requirement is currently undertaken by internally by line managers which can create a risk of errors. With the implementation of the new legislation outsourcing this service will eliminate these current risks.
How will this service assist with the Council’s commitments to Route to Zero?	There will be no detrimental impact on the City’s carbon emissions as result of implementing this new service.
How do these activities assist the Council with Everybody’s Battle; Everybody’s Business?	This will ensure that the organisation is adhering to its legal obligation in ensuring appropriate pre-employment checks are in place.
Is the Council under a statutory duty to provide this service? If not, what is the justification for providing it?	Whilst there is not a statutory duty to provide a digital service, there is a statutory requirement to ensure all pre-employment checks are carried out, in particular statutory obligations related to Immigration to deliver controls, monitoring and reporting are in place.



What budget is the funding from for this service?	This is funded from the People Services budget.
Proposed start date and duration of the new contract	The proposed start date is November 2022 for a period of 2 years.

### **NO CHANGE FROM PREVIOUS PPAR**

<b>Title of Contract</b>	<b>Technology Enabled Care (TEC) Support Service Specification</b>
Director / Assistant Director	<b>Director:</b> Graeme Betts, Corporate Director - Adult Social Care <b>Client Officer:</b> Michael Walsh and Julie Harrison, Commissioning – Adult Social Care <b>Procurement Officer:</b> Marie Kennedy, Sub Category Manager
Briefly describe the service required	To support the creation and development of a transformational TEC service for Birmingham. The service required will involve working closely with Council colleagues and experts by experience and includes revising the TEC commissioning strategy, undertaking market engagement and the creation of a robust service specification to share with the market to procure a transformational TEC service for Birmingham.  The appropriate use of TEC can positively change the way services are provided offering greater choice to the person, improving their ability to live independently at home and by meeting their agreed outcomes and improving confidence, whilst also providing assurance to their family and unpaid carer that they are living well.
What is the proposed procurement route?	A procurement process will be undertaken advertised on Find a Tender, Contracts Finder and <a href="http://www.finditinbirmingham.com">www.finditinbirmingham.com</a>
What are the existing arrangements? Is there an existing contract? If so when does that expire?	This is a new requirement.
Will any savings be generated?	Changes can be realised in the way care plans are provided to meet the needs of the person by reducing the need for more formal care plans or services, such as residential care, which could generate savings.  Other Councils (Hampshire, Suffolk and Dorset) have identified savings by introducing a transformed TEC service. However, it is important to note the key driver for TEC is to improve outcomes for our citizens and enable them to thrive.
Has the In-House Preferred Test been carried out?	Yes, however there is a very small TEC team in ASC and this team is focused on the current TEC delivery. The introduction of much needed additional skills, knowledge, ability to add value and provide much needed capacity around the use of technology enabled care across the UK would be really beneficial in ensuring a transformational TEC service is procured for Birmingham.
How will this service assist with the Council's commitments to Route to Zero?	TEC can enable remote monitoring in a person's home and therefore reduce the number of journeys to a person's property as dashboards of activity can be reviewed by both the practitioner and their family and some systems can also provide two-way communication reducing the need to visit, if this is not required.
Is the Council under a statutory duty to provide this service? If not, what is the justification for providing it?	The provision of the council to undertake assessed care plans is a statutory requirement. The introduction of TEC can change the way we currently provide these care plans and can enable people to remain independent at home with the right support, for as long as possible. It is widely known that by enabling the citizen to live in their own home has a positive impact both on their outcomes

	and can alter the services that they require to ensure that they are adequately supported and live well.
What budget is the funding from for this service?	This is funded from Better Care Transformation Fund.
Proposed start date and duration of the new contract	The proposed start date is November 2022 for a period of 1 year, plus the option to extend for a further year, based on the availability of funding and innovative performance during the first year.

## APPENDIX 4 - QUARTERLY CONTRACT AWARD SCHEDULE (APRIL 2022 – JUNE 2022)

Type of Report	Title of Procurement	Ref	Brief Description	Contract Duration	Directorate	Portfolio Finance and Resources	Finance Officer	Contact Name	Comments - including any request from Cabinet Members for more details	Contractor(s) Awarded to	Value of Contracts	Chief Officer	Actual Go Live date
Delegated Award Report	Private Finance Initiative (PFI) Savings Identification	P0826	A saving initiative to identify benefits realisation across portfolio of education PFIs:- <input type="checkbox"/> School Contribution Parity Across the whole School Estate <input type="checkbox"/> Benchmarking/Market testing Public Private Partnership2 & Building Schools for the Future Contracts <input type="checkbox"/> Insurance Gain Share Maximised Returns <input type="checkbox"/> Soft Services Removal <input type="checkbox"/> Additional Hours removal <input type="checkbox"/> Lifecycle Remodelling and Furniture Fixtures and Equipment removal Refinancing	Up to 4 years	Education and Skills	Children, Young People & Families	Clare Sandland	Nadia Majid / Carol Woodfield	Presented to Cabinet for info 07/09/2021. Approval to Tender Strategy signed 26/11/2021 and delegated the award to CO. Delegated Award Report signed 21/04/2022.	Inscyte Limited	£400,000	Steve Sandercock/ Sue Harrison	01/05/2022
Delegated Award Report	Afghan citizens resettlement scheme and Afghan relocation and assistance policy - Birmingham Pledge		provision of 'Refugee Resettlement and Coordination' services to Birmingham Sponsors and Ukrainian refugees for a period of 12 months after the last arrival under the Homes for Ukraine Scheme.	up to 2 years	Adults Social Care	Health and Social Care	Andrew Healey	Natasha Bhandal / Marie Kennedy	Approval to enter into single contractor negotiations was authorised via Cabinet on 27th July 2021 Afghan Interpreters Relocation Scheme Report – Cabinet 27th July 2021). Delegated Award Report signed 21/04/2022.	Refugee Action	£435,061	Graeme Betts / Steve Sandercock	01/11/2022
Strategy / Award	Property Advice for the Druids Heath Regeneration Scheme	P0908	To provide advice on property and estate services.	2 years	Place, Prosperity and Sustainability	Housing	Andrew Healey	Debbie Greenhill / Charlie Short	Cabinet approved the procurement strategy for this project in the Druids Heath Regeneration report dated 21st December 2021 and delegated the award to CO. Delegated Award Report signed 27/06/2022.	Gerald Eve LLP	£230,000	Paul Kitson/ Steve Sandercock	28/06/2022

