



Assessments

Title of proposed EIA	Adoption of Urban Centres Framework
Reference No	EQUA354
EA is in support of	New Policy
Review Frequency	Annually
Date of first review	01/12/2020
Directorate	Inclusive Growth
Division	Planning and Development
Service Area	
Responsible Officer(s)	<input type="checkbox"/> Laura Spinks
Quality Control Officer(s)	<input type="checkbox"/> Richard Woodland
Accountable Officer(s)	<input type="checkbox"/> Simon Delahunty-Forrest
Purpose of proposal	Adoption of the Urban Centres Framework
Data sources	Survey(s); Consultation Results
Please include any other sources of data	
ASSESS THE POTENTIAL IMPACT AGAINST THE PROTECTED CHARACTERISTICS	
Protected characteristic: Age	Service Users / Stakeholders; Wider Community
Age details:	<p>To ensure residents of all ages (such as those in education or those with work commitments) would have the best possible chance of attending their local consultation events, the drop-in sessions each took place from 1pm-7pm.</p> <p>No comments were raised regarding potential negative impacts of the document on protected groups. A high-level masterplanning approach and infrastructure requirements are set out in the Framework for the specified Centres of Transformation, however technical design matters are addressed in other planning documents such as the Design Guide.</p>
Protected characteristic: Disability	Service Users / Stakeholders; Wider Community
Disability details:	<p>No comments were raised regarding potential negative impacts of the document on protected groups. A high-level masterplanning approach and infrastructure requirements are set out in the Framework for the specified Centres of Transformation, however technical design matters are addressed in other planning documents (e.g. Access for People with Disabilities SPD and Design Guide).</p>
Protected characteristic: Gender	Service Users / Stakeholders; Wider Community
Gender details:	No comments were raised regarding potential negative impacts of the document on protected groups.
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	Service Users / Stakeholders; Wider Community
Pregnancy and maternity details:	<p>No comments were raised regarding potential negative impacts of the document on protected groups. A high-level masterplanning approach and infrastructure requirements are set out in the Framework for the specified Centres of Transformation, however technical design matters are addressed in other planning documents such as the Design Guide.</p>
Protected characteristics: Race	Service Users / Stakeholders; Wider Community
Race details:	<p>Responses to the consultation were received from a variety of backgrounds, and no comments were raised regarding potential negative impacts of the document on protected</p>

groups. Profile of responses received through BeHeard online consultation portal as follows:

76% White background

8% Asian/Asian British

2% Other

1% Black African/Caribbean/Black British

1% Mixed/Multiple

12% not answered

Based on interim (2018) ward census data estimates calculated by BCC, the city-wide profile breaks down as follows:

58% White background

27% Asian/Asian British

9% Black African/Caribbean/Black British

4% Mixed/Multiple

2% Other

Given that 6 of the 10 Centres of Transformation set out in the framework have a majority of white residents (Sutton Coldfield, Stirchley, Northfield, Meadway, Erdington and Stechford), the response profile is considered to be generally representative of the population.

However, representation could be improved and officers across the department will be engaging in workshops to share lessons learnt and ideas for increasing participation and ensuring future consultations are inclusive.

Protected characteristics: Religion or Beliefs

Religion or beliefs details:

Service Users / Stakeholders; Wider Community

Some of the centres identified in the framework host places of worship.

A high-level masterplanning approach and infrastructure requirements are set out in the Framework for the specified Centres of Transformation, however technical design matters are addressed in other planning documents such as the Places of Worship SPD and the Design Guide.

Protected characteristics: Sexual Orientation

Sexual orientation details:

Please indicate any actions arising from completing this screening exercise.

Not Applicable

The Framework is in line with the Birmingham Development Plan (BDP) policies, which were subject to an Equalities Analysis and concluded that plans would contribute to equality of opportunity for all groups through provision of additional homes and places of work. The Assessment supports the objectives of the BDP and consultation has not identified any potential to disproportionately disadvantage any protected group. However, officers will continue to review ways in which representation could be improved and officers across the department will be engaging in workshops to share lessons learnt and ideas for increasing participation and ensuring future consultations are as genuinely inclusive as is possible.

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

Adverse impact on any people with protected characteristics.

Could the policy/proposal be modified to reduce or eliminate any adverse impact?

How will the effect(s) of this policy/proposal on equality be monitored?

What data is required in the future?

Are there any adverse impacts on any particular group(s)

No

If yes, please explain your reasons for going ahead.

Initial equality impact assessment of your proposal

Consulted People or Groups

Informed People or Groups

Summary and evidence of findings from your EIA

The Framework has been informed by an evidence base, including evidence collected on the health of all centres in the city (such as vacancy rates and mix of uses), opportunities of investment and development linked to the BDP opportunities, key public transport corridors for investment and the potential of the centres to adapt to meet the needs of their communities and businesses.

There will be positive outcomes for the local population from having successful centres, including new homes, job opportunities and infrastructure delivery. There is reference in the Framework on matters which do not require a Full Equalities Assessment, with specific points set out under the protected characteristic sections.

Any projects identified in the Framework will need to be subject to their own Equalities Analysis as part of their development where the City Council has involvement (e.g. considering mobility issues and the protected characteristics in developing transport projects). Equalities issues will also be assessed in relevant ways as part of the determination of planning applications for developments in the centres.

Public consultation was undertaken as set out in the engagement strategy, in line with the requirements and guidance in the Statement of Community Involvement (2008). The strategy was based on two key approaches: methods to inform and methods to engage.

Public consultation on the draft Framework was carried out for 16 weeks, from 26th November 2018 to 18th March 2019, when views were sought from stakeholders and the public on the strategies contained within the documents.

Methods to Inform

- The draft Framework was uploaded onto the City Council's website with an opportunity to comment via BeHeard (the City Council's engagement website) through a structured survey.
- This was publicised through a press release that was also put on the City Council's social media channels.
- Emails and / or letters were sent to all contacts on the Planning and Development Consultation Database, including:
 - Residents associations
 - Community groups
 - Neighbourhood forums
 - Ward Councillors
 - Local Members of Parliament
 - Local educational institutions
 - West Midlands Combined Authority
 - Neighbouring Local Authorities
 - Sutton Coldfield Town Council
 - Chambers of Commerce
 - Local Business Improvement Districts (BIDs)
 - Greater Birmingham and Solihull Local Enterprise Partnership
 - Disability User Groups
 - Landowners
 - Developers and agents
- Copies of the draft Framework were on display in each of the Council's libraries, as well as being available to view in the Council House and Lancaster Circus receptions.
- Copies of the draft Framework were delivered to all Ward Councillors.

Methods to Engage

- Public drop-in sessions were held in a number of local areas. This provided the local community an opportunity to discuss the plans with officers and to provide their comments. The events were held in the afternoon into the evening to allow people to attend after work. The venues were:
 - Northfield Leisure Centre
 - Stechford Leisure Centre
 - Erdington Leisure Centre
 - Stirchley Baths
 - Small Heath Wellbeing Centre
- Officers attended a Perry Barr Ward Forum meeting where they presented an overview of the document and followed with a question and answer session. Officers

took notes to document the discussion and comments were incorporated into the consultation responses. Attendees were also encouraged to review the documents thoroughly and submit detailed responses online via BeHeard.

- Officers held a joint briefing session for the Sutton Coldfield Chamber of Commerce and Sutton Coldfield BID where they presented an overview of the document and answered questions. Both organisations were encouraged to share the consultation with their members and encourage them to respond.

The consultation received responses from over 250 people and organisations. A summary of the main points raised are as follows:

- A number of requests were made to understand the criteria used to select the centres covered by the Framework.
- A number of representations also sought clarification over the status of the document.
- Some respondents felt that more detail should be included in the document around the health of centres and the challenges they face.
- The Environment Agency requested that the Framework makes reference to flood risk and that cross-references are made to policies within the Birmingham Development Plan. They also suggest a drainage strategy is developed for each centre and consideration is given to blue/green corridors to reduce the risk of flooding and support wildlife.
- The Council for British Archaeology raised the issue that a number of the sites identified as opportunities in the Framework are likely to have archaeology remains and Historic England made representations on the need to protect and enhance the historic environment in centres.
- A number of general comments were made about the need to prioritise public transport and in support of sustainable modes of transport, walking and cycling. This includes support for the Framework from West Midlands Trains and Transport for West Midlands.
- There were also a number of respondents who made an argument for additional/improved car parking in centres in order to support businesses.
- A number of representations focussed on the need to support local identity. This included supporting independent businesses and supporting cultural uses in centres.
- A number of representations focussed on the need to have safe and secure centres that reduce crime.
- Sports England made representations supporting the overall approach but requested inclusion of sport and recreation as an activity that should be encouraged within centres. They also made a number of detailed comments around guidance and schemes they support.
- Some respondents raised concerns about the lack of detail on delivery and the lack of committed funding.

All comments have been analysed and a summary of the resultant key changes to the Framework are as follows:

- Additional wording to state that further centres will be identified for inclusion in future versions of the Urban Centres Framework, where they are considered to meet the criteria.
- Additional wording in the introduction to clarify that the Urban Centres Toolkit applies to all centres regardless of their size or whether they are prioritised by the Framework. The Toolkit will also now be web based rather than a document, allowing information and guidance to be updated regularly.
- References have been included in the document to state that any proposals requiring planning permission will need to accord with the policies set out in the adopted Local Plan. This is further supported by references to the forthcoming Car Parking Supplementary Planning Document and Design Guide. Additional wording has also been included in the introduction to clarify the status of the document.
- A new section in the introduction and cross references throughout the document to set out how the Framework will support wider Council priorities. These include addressing air pollution and tackling climate change, along with supporting communities' health and wellbeing.
- Removal of the text included in the draft document around centres of 'current transformation'.
- Changes to the format and additional text to clarify the criteria used to identify the initial centres of transformation.
- A new section under the core theme 'activity' within the

- A new section under the core theme 'activity' within the strategy chapter of the document to set out the role culture plays in centres and their vitality.
- Extension of the uses included under the core theme 'activity' to cover sport and recreation.
- Additional wording under the core theme 'connectivity' to cover cycle hire and improved cycle parking. Also, additional wording to set out the City Council's approach towards achieving a balance between providing the appropriate amount of parking to support businesses and to cater for those with mobility needs whilst encouraging sustainable modes of transport.
- Additional wording has been included in the section on Sutton Coldfield to reference the City Council's commitment to delivering a masterplan for the town centre.
- Throughout the document, updates have been made to investments in public transport, including additional or amended rapid transport routes and proposals to open new rail stations. Updates on cycling routes have also been included. The associated maps have been updated to reflect these changes.
- Throughout the document, additional text has been added to strengthen walking and cycling links from the centres to destinations, facilities and opportunities that had not been previously identified. These have also been updated on the associated maps. A link will be provided to the Walking and Cycling Strategy in the Toolkit.
- Additional wording has been added to a number of centres where there are opportunities for improvements to the quality of open spaces within the centre and also the potential for improved connectivity to open spaces within and nearby to the centres.
- Throughout the document, updates have been made to provide the latest information on schemes that have progressed since the draft version and either now have planning permission or have been implemented.

A number of revisions will also be made to the toolkit to make it more practical. It will be updated to include further reference on funding and recent guidance. Additional topics such as the historic environment and culture will also be covered to ensure the Toolkit provides information on all elements that make up vibrant centres.

In addition to the comments on the centres included in the draft framework, a number of representations requested additional centres to be covered by the document. The centres proposed and the City Council's response is included in Appendix 2. As a result of a number of these representations, it is proposed that the strategy set out in the Urban Centres Framework should be applied to further centres that are considered to meet the agreed criteria and that are not covered by another appropriate strategy. At present it is considered there is need for an additional two stages of the Framework covering:

- Centres that will benefit from new railway stations following the reopening of the Camp Hill passenger line. This would cover Kings Heath and Moseley, looking to maximise the potential benefits of the improved connectivity. A planning application for a new train station at Kings Heath was received in September 2019 and it is anticipated that a planning application for Moseley will be received later in 2019/early 2020.
- Centres within Hall Green, including Hall Green Parade, Highfield Road, and Robin Hood Island. This will provide a strategy to maximise on the improved connectivity and capitalise on the links to the surrounding residential developments.

Overall the equalities analysis concludes that the framework will contribute to equality of opportunity for all by helping create the conditions for local centres viability and greater levels of development. In addition, through the consultation process no potential for disproportionately disadvantaging protected groups was identified.

QUALITY CONTROL 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