

Birmingham City Council

# **Sustainability Appraisal of the Development Management Development Plan Document**

Interim Sustainability Report - DRAFT





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## Report for

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## Document Revisions

No.	Details	Date
1	Draft report	December 2018
2	Final Report	TBC



# Non-Technical summary

## Introduction

This Non-Technical Summary (NTS) provides an overview of the Sustainability Appraisal (SA) Report produced as part of the SA of the Development Management DPD (DM DPD) that is currently being prepared by Birmingham City Council (the Council). The SA is being carried out on behalf of the Council by Wood<sup>1</sup> to help integrate sustainable development into the emerging DPD.

The following sections of this NTS:

- ▶ Provide an overview of the DM DPD;
- ▶ Describe the approach to undertaking the SA of the DM DPD;
- ▶ Summarise the findings of the SA of the DM DPD; and
- ▶ Set out the next steps in the SA of the DM DPD including how to respond to the consultation on this SA Report.

## What is the Development Management DPD?

The Development Management DPD provides detailed policy guidance on a range of planning matters, covering environmental, social and economic topics, and will be a material consideration in the determination of planning applications. The DPD will be applicable to any location in the City, helping to deliver the BDP vision of Birmingham as *"an enterprising, innovative and green City that has delivered sustainable growth meeting the needs of its population"*, with an emphasis on supporting growth and creating high quality places. The objectives of the DPD mirror those of the BDP. The policies within the Development Management DPD reflect, and are in accordance with, the policies and guidance set out within the National Planning Policy Framework (NPPF) and the strategic spatial objectives and policies in the BDP. There are 15 proposed policies under the following themes:

- ▶ Environment and Sustainability
  - ▶ DM1 Air quality
  - ▶ DM2 Amenity
  - ▶ DM3 Land affected by contamination and hazardous substances
  - ▶ DM4 Landscaping and trees
  - ▶ DM5 Light pollution
  - ▶ DM6 Noise
- ▶ Economy and Network of Centres
  - ▶ DM7 Advertisements
  - ▶ DM8 Places of worship
  - ▶ DM9 Day nurseries and early years provision

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<sup>1</sup> Formerly Amec Foster Wheeler, which was acquired in October 2017 by Wood Group.

- ▶ Homes and Neighbourhoods
  - ▶ DM10 Houses in multiple occupation and other residential accommodation
  - ▶ DM11 Residential development
  - ▶ DM12 Self and custom build housing
- ▶ Connectivity
  - ▶ DM13 Highway safety and access
  - ▶ DM14 Parking
  - ▶ DM15 Telecommunications.

## What is Sustainability Appraisal?

National planning policy<sup>2</sup> states that local plans are key to delivering sustainable development. Sustainable development is that which seeks to secure net gains across economic, environmental and social objectives to meet the needs of the present without compromising the ability of future generations to meet their own needs.

The DM DPD should contribute to a sustainable future for the plan area. To support this objective, the Council is required to carry out a SA of the DPD<sup>3</sup>. SA is a means of ensuring that the likely social, economic and environmental effects of the DPD are identified, described and appraised and also incorporates a process set out under a European Directive<sup>4</sup> and related UK regulations<sup>5</sup> called Strategic Environmental Assessment (SEA). Where negative effects are identified, measures are proposed to avoid, minimise or mitigate such effects. Where any positive effects are identified, measures are considered that could enhance such effects. SA is therefore an integral part of the preparation of the DM DPD.

## How has the Development Management DPD been appraised?

A range of SA Objectives were developed in light of the baseline data, key sustainability issues identified for the City and reference to the sustainability objectives developed for the SA/SEA of the Birmingham Development Plan. These have been used to appraise the effects of DM DPD and to consider whether the Plan objectives, policies and proposals are sustainable.

Table NTS 1 Sustainability Appraisal Objectives

SEA Directive Topic Area(s)	DM DPD Sustainability Appraisal Objectives
Material assets	1. ENV1 Encourage development that optimises the use of previously developed land and buildings
Material assets	2. ENV2 To promote the application of high standards of design, construction and maintenance of buildings
Material assets	3. ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel

<sup>2</sup> See paragraph 16 of the National Planning Policy Framework (Ministry for Housing, Communities and Local Government, 2018).

<sup>3</sup> The requirement for SA of local plans is set out under section 19(5) of the Planning and Compulsory Purchase Act 2004.

<sup>4</sup> Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment.

<sup>5</sup> Environmental Assessment of Plans and Programmes Regulations 2004 (statutory instrument 2004 No. 1633).





SEA Directive Topic Area(s)	DM DPD Sustainability Appraisal Objectives
Landscape & townscape, cultural heritage, biodiversity & geodiversity	4. ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage, including resilient ecological networks able to meet the demands of current and future pressures.
Climatic Factors	5. ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly floodrisk management and reduction
Water resources, air quality, material assets	6. ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management
Population and health	7. ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all
Population and health	8. ECON2 To help promote the vitality of local centres
Population and health	9. ECON3 To promote the regeneration of areas across the City through appropriate development
Population and health	10. ECON4 To encourage investment in learning and skills development
Population and health	11. SOC1 To help ensure equitable access to community services and facilities
Population and health	12. SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs
Population and health	13. SOC3 To encourage development which promotes health and well-being
Population and health	14. SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour
Population and health	15. SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life

The DPD Objectives have been assessed for their compatibility with the SA objectives above. The policies have been appraised using matrices to identify likely significant effects on the SA objectives. A qualitative scoring system has been adopted which is set out in **Table NTS 2**.

**Table NTS 2** Scoring System Used in the Appraisal of the Draft DPD

Score	Description	Symbol
Significant Positive Effect	The proposed option/policy contributes significantly to the achievement of the objective.	++
Minor Positive Effect	The proposed option/policy contributes to the achievement of the objective but not significantly.	+
Neutral	The proposed option/policy does not have any effect on the achievement of the objective	0
Minor Negative Effect	The proposed option/policy detracts from the achievement of the objective but not significantly.	-
Significant Negative Effect	The proposed option/policy detracts significantly from the achievement of the objective.	--
No Relationship	There is no clear relationship between the proposed option/policy and the achievement of the objective or the relationship is negligible.	~
Uncertain	The proposed option/policy has an uncertain relationship to the objective or the relationship is dependent on the way in which the aspect is managed. In addition, insufficient information may be available to enable an appraisal to be made.	?

NB: where more than one symbol/colour is presented in a box it indicates that the appraisal has identified both positive and negative effects. Where a box is coloured but also contains a '?', this indicates uncertainty over whether the effect could be a minor or significant effect although a professional judgement is expressed in the colour used. A conclusion of uncertainty arises where there is insufficient evidence for expert judgement to conclude an effect.

## What are the likely significant effects of the Development Management DPD?

The results of the SA of the DM policies indicate that there are likely to be largely positive or significantly positive effects resulting from implementation of the policies. This reflects the positive intent of the policies and the need to deal systematically and objectively with planning issues arising day-to-day across the City, as well as the experience accumulated through their ongoing implementation through the UDP. More generally, the Development Management policies represent the lowest tier in a hierarchy of planning policies, adding local detail to implement the broader principles of policies within the NPPF and the BDP. As such they specifically address local issues and are designed to mitigate potential adverse effects associated with development.

No significant negative effects, either associated with specific sustainability objectives or cumulatively have been identified. This contrasts with the scores attributed to the absence of a policy which are typically significantly negative, reflecting the clear need to systematically control development and the likely consequences of the absence of such a policy framework which is to the benefit of applicants, residents and the City as a whole.

Some policies have been identified as holding some uncertainty as to their precise effects in respect of meeting sustainability objectives. These apply principally to whether significant positive effects are likely to be fully realised in respect of matters such as sustainable travel and construction, reflecting the case-by-case nature of individual developments and their particular circumstances. Nevertheless, the potential for the realisation of significant positive or positive effects exists. In other cases, there is uncertainty as to there is a relationship between the policy and the SA objective, for example between the construction of educational facilities and benefits to the community in respect of access to skills training, reflecting the specific nature of these developments.

## Proposed mitigation measures

No suggestions were made as to the specific wording of policies reflecting their positive intention. This reflects the positive scores, the absence of negative effects and the intention to use the policies in combination with the policies of the BDP, which for each policy are cross-referenced.

However, the following suggestions are made in respect of the presentation of the policies in order to make clearer how the policies will be implemented:

- ▶ ensure that, wherever possible, the specific criteria against which the policy will be implemented and monitored are included.
- ▶ For each DM policy, provide further detail against the cited BDP policies on how these will work together.
- ▶ Set out more clearly in paragraph 1.10 of the DPD which matters are covered by the BDP and which by the DM DPD, such as the control of various forms of retail development.
- ▶ Where possible, fully reference BCC strategies on various topics relating to specific policies, for example the City's Green Living Spaces Plan and Nature Conservation Strategy against the Landscaping and Trees Policy.
- ▶ Set out a summary table of how the policies will be monitored, indicating where this can be covered by the existing AMR.

## In Summary

The SA of the DM DPD has scrutinised the basis for, content and likely effects of the proposed suite of policies. The SA has ensured that there has been consideration of the likely environmental effects of various options associated with each policy, demonstrating how the performance of the proposed policy is likely to lead to positive outcomes for the location of proposed developments and for the City as a whole.

## Comments

This draft Sustainability Report which accompanies the Preferred Options DM DPD is subject to consultation for a period of 8 weeks from 4<sup>th</sup> February 2019. Comments on this Report should be sent to:

Planning Policy  
Birmingham City Council  
Planning and Development  
1 Lancaster Circus  
Queensway  
Birmingham  
B1 1TU

[www.consultationlink](http://www.consultationlink)

## Next Steps

Following consultation on the Preferred Options DM DPD, a SA Report will be produced to accompany the Submission Version of the Plan. This Report will take account of consultee responses and any changes to the scope and/or content of the proposed policies.



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# 1. Background

## 1.1 Introduction

- 1.1.1 The Birmingham Development Plan<sup>6</sup> (BDP) was adopted by Birmingham City Council (the Council) in 2017. The BDP provides the strategic planning policies for over 51,100 new homes and substantial amounts of employment land, retail and office development to be delivered by 2031. The Council has also been preparing the Development Management Development Plan Document (DPD). It will provide detailed planning policies for specific types of development and support the implementation of the BDP.
- 1.1.2 The Council issued an initial draft Development Management DPD in March 2015<sup>7</sup>. Following an analysis of the consultation responses and the adoption of the BDP, the Council has now prepared a Preferred Options Development Management DPD.
- 1.1.3 Wood Environment and Infrastructure Solutions Ltd. (Wood) has been commissioned by the Council to undertake a Sustainability Appraisal (SA) of the Development Management DPD. The SA will appraise the environmental, social and economic performance of the Development Management DPD and any reasonable alternatives.
- 1.1.4 This report presents the findings of the SA of the Preferred Options Development Management DPD. It sets out the results of the testing of the DPD's sustainability performance using a framework developed in the Scoping Report<sup>8</sup>.
- 1.1.5 This draft Sustainability Report accompanies the Preferred Options Development Management DPD and is subject to consultation for a period of 8 weeks from 4<sup>th</sup> February 2019. Comments on this Report should be sent to:

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B1 1TU

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## 1.2 What is Sustainability Appraisal?

- 1.2.1 Sustainability Appraisal (SA) is a process whereby the environmental, social and economic aspects of a proposed plan, policy or programme (and any reasonable alternatives) are systematically identified, described and evaluated to ensure that there is an optimal balance between them. In doing so, it will help to inform the selection of options and identify measures to avoid, minimise or mitigate any potential negative effects that may arise from the plan, policy or programme's implementation as well as opportunities to improve the contribution towards sustainability.

<sup>6</sup> Birmingham City Council (January 2017) *Birmingham Development Plan: Part of Birmingham's Local Plan, Planning for sustainable growth*.

<sup>7</sup> Birmingham City Council (June 2015) *Regulation 18 Consultation on Development Management DPD*

<sup>8</sup> Birmingham City Council (2018) *Sustainability Appraisal of the Development Management DPD: Scoping Report*

- 1.2.2 SA is required by government legislation which is combined with Strategic Environmental Assessment (SEA) of new plans, policies and programmes under European legislation (the SEA Directive)<sup>9</sup>.

## Legislation

- 1.2.3 Under Section 19(5) of the Planning and Compulsory Purchase Act (PCPA) 2004, a local planning authority (LPA) is required to
- a) carry out an appraisal of the sustainability of the proposals in each development plan document;
  - b) prepare a report of the findings of the appraisal.
- 1.2.4 The development plan documents referred to in Section 19 (5a) include Local Plans.
- 1.2.5 In developing the DPDs, LPAs must also address the requirements of European Union Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment, referred to as the SEA Directive, and its transposing regulations the Environmental Assessment of Plans and Programmes Regulations 2004 (statutory instrument 2004 No. 1633).
- 1.2.6 The criteria to determine whether the SEA requirements apply are contained in Article 3 of the SEA Directive, summarised as follows:
- ▶ Whether the plan or programme (PP) is to be prepared and/or adopted by a national, regional or local authority or prepared by an authority for adoption through a legislative procedure by Parliament or Government?
  - ▶ Whether the PP required by legislative, regulatory or administrative provisions?
  - ▶ Whether the PP is prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use and whether it set a framework for future development consent of projects contained in Annexes I and II to the EIA Directive?
  - ▶ Whether the PP determines the use of small areas at local level, or is it a minor modification of a PP? (If the answer is yes to either of these, the SEA requirements will not apply).
  - ▶ Whether the PP's sole purpose to serve national defence or civil emergency, OR is it a financial or budget PP, or is it co-financed by European structural funds? (If the answer is yes to either of these, the SEA requirements will not apply).
  - ▶ Is it likely to have a significant effect on the environment?
- 1.2.7 Responsible Authorities must carry out screening to determine whether SEA is required of PPs. The Responsible Authority must make its conclusions on a determination available to the public, including reasons for not requiring SEA. When forming a view on whether SEA is needed in these cases, Responsible Authorities must consult the statutory consultation bodies identified by the SEA Regulations (which for PPs whose activities and effects occur only within England are the Environment Agency, Natural England Historic England). For the purposes of the SEA Directive and the DPDs, LPAs are the Responsible Authority. In the case of the Development Management DPD, the Council considered that it was likely to have significant effects, and in consequence, this SA includes meeting the requirements of the SEA Directive and implementing regulations.

<sup>9</sup> Environmental Assessment of Plans and Programmes Regulations 2004 (the 'Strategic Environmental Assessment Regulations'), which implement the requirements of the European Directive 2001/42/EC (the 'Strategic Environmental Assessment Directive')

- 1.2.8 Section 39 of the PCPA requires that the authority preparing a DPD must do so “with the objective of contributing to the achievement of sustainable development”. On this, it echoes Article 1 of the SEA Directive, which states that the objective of SEA is:

*“to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development”.*

### National Planning Policy Framework and Guidance

- 1.2.9 At paragraph 16, the National Planning Policy Framework (NPPF) (2018)<sup>10</sup> sets out that local plans should be prepared with the objective of contributing to the achievement of sustainable development<sup>11</sup>. In this context, paragraph 32 of the NPPF reiterates the requirement for SA/SEA as it relates to local plan preparation:

*“Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements.<sup>12</sup> This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).”*

- 1.2.10 The Planning Practice Guidance (Local Plans paragraph 016) also makes clear that SA plays an important role in demonstrating that a local plan reflects sustainability objectives and has considered reasonable alternatives. In this regard, SA will help to ensure that a local plan is “justified”, a key test of soundness that concerns the extent to which the plan provides an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.

- 1.2.11 The PPG also states that “Sustainability appraisal *should be applied as an iterative process informing the development of the Local Plan.*” In this regard the PPG superseded previous Government guidance<sup>13</sup> on SA which included the following:

*“The development and appraisal of options will be an iterative process, with the options being revised to take account of the appraisal findings and consultation responses. This will inform the selection, refinement and publication of preferred options for consultation...”*

- 1.2.12 Therefore current legislation, planning policy and guidance all make clear that compliance with requirements of the SEA Directive through the completion of an integrated SA is critical to ensuring that a plan is found sound at Examination and can then be formally adopted.

## 1.3 Purpose of this SA Report

- 1.3.1 Specifically, this SA Report sets out:

- ▶ An overview of the Preferred Options Development Management DPD;

<sup>10</sup> Ministry of Housing, Communities and Local Government (2108) *National Planning Policy Framework*. Available from <https://www.gov.uk/government/collections/revised-national-planning-policy-framework> [Accessed November 2018]

<sup>11</sup> This is a legal requirement of local planning authorities exercising their plan-making functions (section 39(2) of the Planning and Compulsory Purchase Act, 2004)

<sup>12</sup> The reference to relevant legal requirements in the NPPF relates to Strategic Environmental Assessment.

<sup>13</sup> ODPM (2005), *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*, ODPM Publications

- ▶ A review of relevant international, national, regional, sub-regional and local plans, policies and programmes;
- ▶ Baseline information for the DPD area across key sustainability topics;
- ▶ Key economic, social and environmental issues relevant to the appraisal of the Preferred Options Development Management DPD;
- ▶ The approach to undertaking the appraisal of the Preferred Options Development Management DPD;
- ▶ The findings of the appraisal of the Preferred Options Development Management DPD; and
- ▶ Conclusions and an overview of the next steps in the SA process.

## 1.4 The Development Management DPD

1.4.1

The Development Management DPD provides detailed policy guidance on a range of planning matters, covering environmental, social and economic topics, and will be a material consideration in the determination of planning applications. The DPD will be applicable to any location in the City, helping to deliver the BDP vision of Birmingham as *“an enterprising, innovative and green City that has delivered sustainable growth meeting the needs of its population”*, with an emphasis on supporting growth and creating high quality places. The objectives of the DPD mirror those of the BDP, namely:

- ▶ To develop Birmingham as a City of sustainable neighbourhoods that are safe, diverse and inclusive with locally distinctive character.
- ▶ To make provision for a significant increase in the City's population.
- ▶ To create a prosperous, successful and enterprising economy with benefits felt by all.
- ▶ To promote Birmingham's national and international role.
- ▶ To provide high quality connections throughout the City and with other places including encouraging the increased use of public transport, walking and cycling.
- ▶ To create a more sustainable City that minimises its carbon footprint and waste, and promotes brownfield regeneration while allowing the City to grow.
- ▶ To strengthen Birmingham's quality institutions and role as a learning City and extend the education infrastructure securing significant school places.
- ▶ To encourage better health and well-being through the provision of new and existing recreation, sport and leisure facilities linked to good quality public open space.
- ▶ To protect and enhance the City's heritage assets and historic environment.
- ▶ To conserve and enhance Birmingham's natural environments, allowing biodiversity and wildlife to flourish.
- ▶ To ensure that the City has the infrastructure in place to support its future growth and prosperity.

### Evolution of the Development Management DPD

1.4.2

Consultation on the Issues and Options version of the DM DPD (Regulation 18 Stage) took place in Summer 2015. In total, 26 respondents provided a total of 91 responses, which have been taken



into consideration as the policies in the DPD was prepared. The proposed changes arising from the consultations were:

- ▶ The addition of a Transport Considerations policy (DM26);
- ▶ Amendments to the Design policy (now DM24) following the consultation responses from Police & Crime Commissioner West Midlands, and Turley on behalf of clients;
- ▶ The addition of introductory text to the Environmental Protection policies, including Hazardous Installations following the consultation response from HSE;
- ▶ Policy DM06 includes reference to ILE design requirements and low energy lighting following the consultation response from Highways England;
- ▶ Policy DM07 includes groundwater pollution and the precautionary principle, following the consultation response from the Environment Agency.
- ▶ In addition, Policy DM15 was divided into two policies (DM15 and DM16), to reflect the fact that hostels and residential homes fall into separate Use Classes, and different issues arise from each use.

1.4.3 However, in light of the consultation and re-appraisal of the relationship between the emerging DM DPD and the adopted BDP, various policies have been deleted and others merged.

**Table 1.1 Changes to the Suite of Policies from the Regulation 18 Document to the Preferred Options Document**

<b>Proposed policy in October 2015 Consultation</b>	<b>How this has been dealt with in the Preferred Options Document</b>
Hot food Takeaways (DM01)	Covered by DM2 Amenity, DM6 Noise and Vibration, DM13 Highway safety and access, DM14 Parking and Servicing
Sheesha Lounges (DM02)	Covered by DM2 Amenity, DM6 Noise and Vibration, Highway safety and access, DM14 Parking and Servicing
Restaurants/ Cafes/ Pubs (DM03)	Covered by DM2 Amenity, DM6 Noise and Vibration, Highway safety and access, DM14 Parking and Servicing
Private Hire and Taxi Booking Offices (DM08)	Covered by DM2 Amenity, DM6 Noise and Vibration, Highway safety and access, DM14 Parking and Servicing
Education Facilities – Use of Dwellings Houses (DM09)	Covered by DM9 Places of worship and faith related community uses, DM10 Day nurseries and early years provision, BDP Policy TP36 Education
Education Facilities Non-Residential Properties (DM10)	Covered by DM9 Places of worship and faith related community uses, DM10 Day nurseries and early years provision, BDP Policy TP36 Education
Hotels and Guest Houses (DM11)	Not considered necessary. Majority of impacts covered by DM2 Amenity, DM6 Noise and Vibration, DM13 Highway safety and access, DM14 Parking and Servicing
Flat Conversions (DM14)	Not considered necessary. Majority of impacts covered by DM2 Amenity, DM6 Noise and Vibration, DM13 Highway safety and access, DM14 Parking and Servicing
Hostels and Residential Homes (DM15)	Not considered necessary. Majority of impacts covered by DM2 Amenity, DM6 Noise and Vibration, DM13 Highway safety and access, DM14 Parking and Servicing
Planning Obligations (DM17)	Covered by BDP Policy TP47 Developer contributions

Proposed policy in October 2015 Consultation	How this has been dealt with in the Preferred Options Document
Aerodrome Safety (DM19)	Covered by ODPM Circular1/2003
Design (DM23)	Covered by BDP Policy PG Place-making

- 1.4.4 The proposed policies within the Development Management DPD reflect, and are in accordance with, the policies and guidance set out within the National Planning Policy Framework (NPPF) and the strategic spatial objectives and policies in the BDP. There are 15 proposed policies under the following themes:

#### **Environment and Sustainability**

DM1 Air quality

DM2 Amenity

DM3 Land affected by contamination and hazardous substances

DM4 Landscaping and trees

DM5 Light pollution

DM6 Noise

#### **Economy and Network of Centres**

DM7 Advertisements

DM8 Places of worship

DM9 Day nurseries and early years provision

#### **Homes and Neighbourhoods**

DM10 Houses in multiple occupation and other residential accommodation

DM11 Residential development

DM12 Self and custom build housing

#### **Connectivity**

DM13 Highway safety and access

DM14 Parking

DM15 Telecommunications

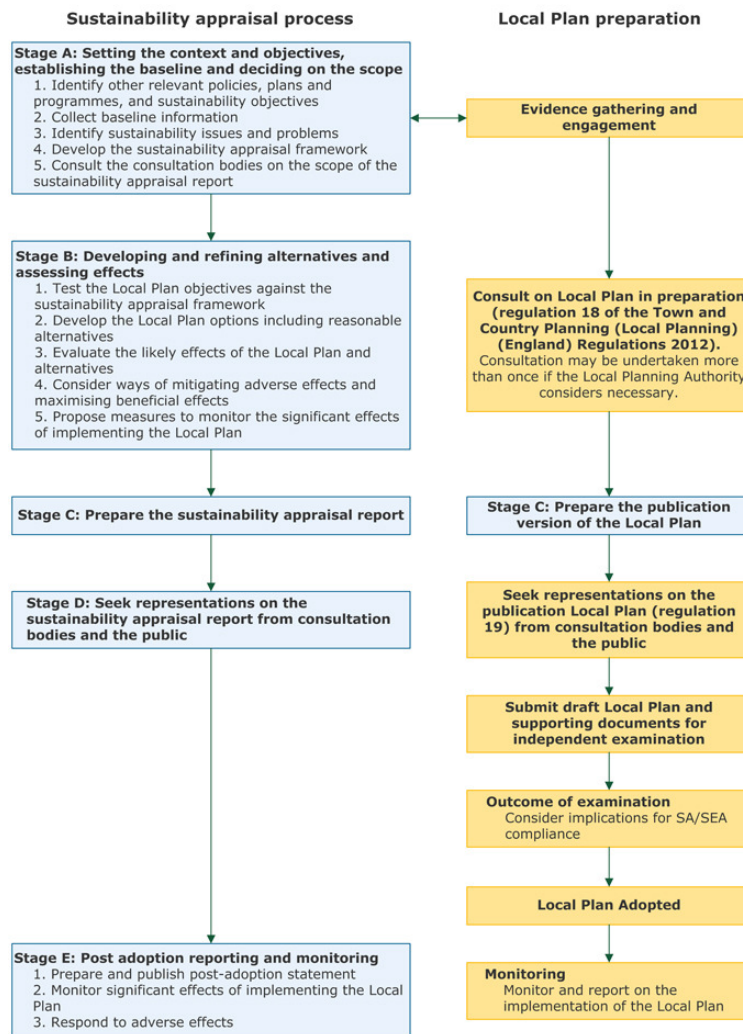
## **1.5 The Sustainability Appraisal process**

- 1.5.1 The appraisal of the DM DPD is an integral part of the plan preparation and has five sequential stages. These are highlighted in **Figure 1.1** below together with links to the development of the DPD.
- 1.5.2 The first stage (**Stage A**) led to the production of a SA Scoping Report<sup>14</sup>. Informed by a review of other relevant policies, plans and programmes as well as baseline information and the identification

<sup>14</sup> Birmingham City Council (2018) *Sustainability Appraisal of the Development Management DPD: Scoping Report*

- of key sustainability issues affecting the County, the Scoping Report set out the proposed framework for the appraisal of the DPD (termed the SA Framework).
- 1.5.3 The Scoping Report was subject to consultations that ran from Friday 12<sup>th</sup> December 2014 until Friday 22<sup>nd</sup> January 2015 and from 21<sup>st</sup> May and 29<sup>th</sup> June 2018. Responses were received to the consultation from the statutory SEA consultation bodies (Natural England, Historic England and the Environment Agency). Responses related to various aspects of the Scoping Report and resulted in amendments to the SA Framework. **Appendix C** contains a schedule of the consultation responses received on the Scoping Report, the Council's response and the subsequent action taken.
- 1.5.4 **Stage B** of the SA process is iterative and involves the development and refinement of the DPD by testing the sustainability strengths and weaknesses of the emerging policy options.
- 1.5.5 At **Stage C**, a final SA Report will be prepared to accompany the submission draft DPD. This will be available for consultation alongside the DPD itself prior to consideration by an independent planning inspector (**Stage D**).
- 1.5.6 Following Examination in Public, and subject to any significant changes to the draft DPD that may require appraisal, the Council will issue a Post Adoption Statement as soon as reasonably practicable after the adoption of the DPD. This will set out the results of the consultation and SA processes and the extent to which the findings of the SA have been accommodated in the adopted DPD. During the period covered by the DPD, the Council will monitor its implementation and any significant social, economic and environmental effects (**Stage E**).

Figure 1.1 The relationship between the SA process and Local Plan preparation



Source: Department for Communities and Local Government (DCLG) (2014) *Planning Practice Guidance*. Available at [http://planningguidance.planningportal.gov.uk/wp-content/uploads/2014/02/sea1\\_013.jpg](http://planningguidance.planningportal.gov.uk/wp-content/uploads/2014/02/sea1_013.jpg)

## 1.6 Habitats Regulations Assessment

1.6.1 Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations') requires that competent authorities assess the potential impacts of land use plans on the Natura 2000 network of European protected sites<sup>15</sup> to determine whether there will be any 'likely significant effects' (LSE) on any European site as a result of the plan's implementation (either alone or 'in combination' with other plans or projects); and, if so, whether these effects will result in any adverse effects on that site's integrity with reference to the site's conservation objectives. The

<sup>15</sup> Strictly, 'European sites' are any Special Area of Conservation (SAC) from the point at which the European Commission and the UK Government agree the site as a 'Site of Community Importance' (SCI); any classified Special Protection Area (SPA); any candidate SAC (cSAC); and (exceptionally) any other site or area that the Commission believes should be considered as an SAC but which has not been identified by the Government. However, the term is also commonly used when referring to potential SPAs (pSPAs), to which the provisions of Article 4(4) of Directive 2009/147/EC (the 'new wild birds directive') are applied; and to possible SACs (pSACs) and listed Ramsar Sites, to which the provisions of the Conservation of Habitats and Species Regulations 2017 are applied a matter of Government policy when considering development proposals that may affect them (NPPF para 176). 'European site' is therefore used in this report in its broadest sense, as an umbrella term for all of the above designated sites.

process by which the effects of a plan or programme on European sites are assessed is known as 'Habitats Regulations Assessment' (HRA)<sup>16</sup>.

- 1.6.2 In accordance with the Habitats Regulations, what is commonly referred to as a HRA screening exercise has been undertaken to identify the likely impacts of the emerging Local Plan upon European sites, either alone or 'in combination' with other projects or plans, and to consider whether these effects are likely to be significant. Where the possibility of significant effects could not be excluded, a more detailed Appropriate Assessment (AA) has been carried out to determine whether these effects would adversely affect the integrity of European sites.
- 1.6.3 The AA is reported separately from the SA of the DPD (although a summary of the findings is included in **Section 5.8** of this report) but importantly has helped to inform the appraisal process, particularly in respect of the potential effects of proposals on biodiversity.

## 1.7 Compliance with the SEA Directive/Regulations

- 1.7.1 This Sustainability Report has been compiled with reference to the legal requirements of the SEA and associated Regulations. Table 1.2 sets out where and how the requirements of the SEA Directive have been in producing this Report.

Table 1.2 Compliance with the requirements of the SEA Directive

SEA Directive requirement	Where covered in the Sustainability Report
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans.	Sections 1 and 2
b) The relevant aspects of the current states of the environment and the likely evolution thereof without implementation of the plan or programme.	Section 2
c) The environmental characteristics of areas likely to be significantly affected.	Section 2
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance.	Section 2
e) The environmental protection objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	Section 2
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material and archaeological heritage, landscape and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.	Section 4
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan.	Section 4
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information.	Section 4
i) A description of measures envisaged concerning monitoring.	Section 5
j) A non-technical summary of the information provided under the above headings.	This Report

<sup>16</sup> 'Appropriate Assessment' has been historically used as an umbrella term to describe the process of assessment as a whole. The whole process is now more usually termed 'Habitats Regulations Assessment' (HRA), and 'Appropriate Assessment' is used to indicate a specific stage within the HRA.





## 2. Review of Contextual Information

### 2.1 Plans, Policies and Programmes

- 2.1.1 The relationship between various policies, plans, programmes and environmental protection objectives may influence the DM DPD. The relationships are analysed to help:
- ▶ Identify any external social, environmental or economic objectives that should be reflected in the SA/SEA process;
  - ▶ Identify external factors that may have influenced the preparation of the plan; and
  - ▶ Determine whether the policies in other plans and programmes might lead to cumulative or synergistic effects when combined with policies in the plan.
- 2.1.2 This process enables the DM DPD to take advantage of any potential synergies and to respond to any inconsistencies and constraints. The plans and programmes to be considered include those at the international, national, regional and local scale.
- 2.1.3 The review aims to identify the relationships between the DM DPD and these other documents i.e. how the strategy could be affected by the other plans' and programmes' aims, objectives and/or targets, or how it could contribute to the achievement of any environmental and sustainability objectives. An understanding of the plans and programmes alongside which the DM DPD sits is important in developing a baseline approach to the assessment. It is also a valuable source of information to support the completion of the social, economic and environmental baseline and aid the determination of the key issues. The completed review of plans and programmes will also be used to provide the policy context for the subsequent assessment process and help to inform the development of objectives that comprise the assessment framework.
- 2.1.4 The principal documents which form the legislative context for the DM DPD are as follows:

#### European level

- 2.1.5 The [SEA Directive](#) is a European Union requirement that seeks to provide a high level of protection of the environment by integrating environmental considerations into the process of preparing certain plans and programmes. The aim of the Directive is *"to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment."*
- 2.1.6 The Strategic Environmental Assessment Directive is implemented through the [Environmental Assessment of Plans and Programmes Regulations 2004](#), which apply to a plan or programme related solely to England (or part of England), or to England (or part of England) and any other part of the United Kingdom. Where the Directive applies there are some specific requirements that must be complied with and which, in the case of [Local Plans](#), should be addressed as an integral part of the sustainability appraisal process.

#### The National Planning Policy Framework (NPPF) (July 2018)

- 2.1.7 [Section 19 of the Planning and Compulsory Purchase Act 2004](#) requires a local planning authority to carry out a sustainability appraisal of each of the proposals in a [Local Plan](#) during its preparation.

- More generally, section 39 of the Act requires that the authority preparing a Local Plan must do so "with the objective of contributing to the achievement of sustainable development."
- 2.1.8 Sustainability Appraisals incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the 'Strategic Environmental Assessment Regulations'), which implement the requirements of the European Directive 2001/42/EC (the 'Strategic Environmental Assessment Directive') on the assessment of the effects of certain plans and programmes on the environment. Sustainability appraisal ensures that potential environmental effects are given full consideration alongside social and economic issues.
- 2.1.9 Government guidance set out in paragraph 32 of the NPPF states that:
- "Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)."*
- 2.1.10 Throughout this document, where reference is made to SA, it denotes SA incorporating the requirements of the SEA Directive. The SA has been carried out taking account of *A Practical Guide to the Strategic Environmental Assessment Directive (2005)*<sup>17</sup> which provides guidance on SEA in the UK from the former ODPM and devolved administrations. SAs are an effective way to ensure that sustainable development principles are taken into account during the plan making process. By assessing the plan policies against a broad range of sustainability objectives, the appraisal process exposes sustainability strengths and weaknesses of the plan, which can help to develop recommendations for its improvement. As well as helping to enhance the plan, the appraisal process also provides a basis for informed discussion between stakeholders around a shared set of objectives.
- 2.1.11 Planning Practice Guidance (PPG) also makes clear that SA plays an important role in demonstrating that a local plan reflects sustainability objectives and has considered reasonable alternatives. In this regard, SA will help to ensure that a local plan is "justified", a key test of soundness that concerns the extent to which the plan is the most appropriate strategy<sup>18</sup>, when considered against the reasonable alternatives and available and proportionate evidence.

## Review of Plans, Programmes and Strategies

- 2.1.12 One of the first steps in undertaking SA is to identify and review other relevant plans and programmes that could influence the DM DPD. The requirement to undertake a plan and programme review and to identify the environmental and wider sustainability objectives relevant to the plan being assessed is set out in the SEA Directive. An 'environmental report' required under the SEA Directive should include: "An outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes" to determine "the environmental protection objectives, established at international (European) community or national level, which are relevant to the plan or programme ... and the way those objectives and any environmental considerations have been taken into account during its preparation" (Annex 1 (a), (e)).

<sup>17</sup> ODPM (2005) *A Practical Guide to the Strategic Environmental Assessment: Practical guidance on applying European Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment"*

<sup>18</sup> The NPPF makes it clear that a Plan should set out 'an' appropriate strategy rather than 'the most appropriate strategy'. The SEA requirements for consideration of reasonable alternatives will remain an important contribution to support the selection of the appropriate strategy despite this change in planning policy.

- 2.1.13 Plans and programmes relevant to the DPD may be those at an international/ European, UK, national, regional, sub-regional or local level, as relevant to the scope of the document. The review of relevant plans and programmes aims to identify the relationships between the DPD and these other documents, i.e. how the DPD could be affected by the other plans' and programmes' aims, objectives and/or targets, or how it could contribute to the achievement of their sustainability objectives. The review also ensures that the relevant environmental protection and sustainability objectives are integrated into the SA. Additionally, reviewing plans and programmes can provide appropriate information on the baseline for the plan area and help identify the key sustainability issues.
- 2.1.14 The SA Scoping Report (2015 and 2018 update) included a review of plans and programmes, consistent with the requirements of the SEA Directive, and which was used to inform the development of the SA Framework. Table 2.1 lists the plans, programmes and strategies at international, national, regional and local scale reviewed within the Scoping Report, whilst Table 2.2 sets out how the content of the plans, programmes and strategies reviewed have been translated into the Sustainability Objectives.

Table 2.1 Plans, Programmes and Strategies Relevant to the SA of the DM DPD

International	
<p>EU Directive on the Conservation of Wild Birds (79/409/EEC).          EU Directive on Waste (Directive 75/442/EEC, 2006/12/EC 2008/98/EC as amended).          EU (1991) Urban Waste Water Treatment Directive          EU (1992) Conservation of Natural Habitats and Wild Fauna and Flora (92/43/EEC, Habitats Directive)          EU Packaging and Packaging Waste Directive (94/62/EC).          The Pan-European Biological and Landscape Diversity Strategy (1995)          EU (1996) Ambient Air Quality Assessment and Management (96/62/EC, Air Quality Framework Directive)          EU Drinking Water Directive (98/83/EC).          EU Directive on the Landfill of Waste (99/31/EC).          European Commission (1999) The Landfill Directive          EU (2000) Directive on Establishing a Framework for Community Action in the Field of Water Policy (2000/60/EC, The Water Framework Directive)          EU (2000) The Water Framework Directive          EU 2001/42/EC on the Assessment of the Effects of Certain Plans and Programmes on the Environment (SEA Directive).          EU Directive 2002/91/EC (2002) Directive 2002/91/EC on the Energy Performance of Buildings.          EU Environmental Noise Directive (Directive 2002/49/EC).          Earth Summit (2002) Johannesburg Declaration on Sustainable Development          EU (2008) The Air Quality Directive          EU (2006) European Employment Strategy.          EU (2007) Floods Directive          EC (2007) Together for Health: A Strategic Approach for the EU 2008-2013          EU (2008) Directive on Waste (2006/12/EC, Waste Framework Directive)          EU (2010) The Industrial Emissions Directive          EU (2011) EU Biodiversity Strategy to 2020 – towards implementation.          EU (2013) Seventh Environmental Action Programme to 2020 'Living well, within the limits of our planet'.          EU (2015) Invasive Alien Species Regulation (1143/2014/EU).          UNFCCC (1997) Kyoto Protocol to the UN Framework Convention on Climate Change          UNFCCC (2009) Copenhagen Accord (Climate Change)          Council of Europe (2006) European Landscape Convention          Council of Europe (1985) Convention on the Protection of the Architectural Heritage of Europe</p>	
National	
<p>Committee on Climate Change (2017) UK Climate Change Risk Assessment.          DCLG (2011) The Localism Act          DCLG (2011) The Community Infrastructure Levy Regulations          DCLG (2012) National Planning Policy Framework (NPPF)          DCLG (2012) National Planning Policy Framework Technical Guidance          DCLG (2012) Planning Policy for Traveller Sites          DCLG (2014) Planning Practice Guidance          DCLG (2014) National Planning Policy for Waste          DCLG (2014) Written Statement on Sustainable Drainage Systems          DCLG (2017) Fixing Our Broken Housing Market          DECC (2008) UK Climate Change Act 2008</p>	

DCMS (2007) Heritage Protection for the 21<sup>st</sup> Century  
 DCMS 2013: Scheduled Monuments and Nationally Important but Non-Scheduled Monuments  
 Defra (2003) The Water Environment (Water Framework Directive) (England and Wales) Regulations  
 Defra (2007) Guidance for Local Authorities on Implementing Biodiversity Duty  
 Defra (2007) The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (Volume 2)  
 Defra (2008) Future Water, the Government's Water Strategy for England (Feb 08)  
 Defra (2009) Safeguarding our Soils: A Strategy for England  
 Defra (2011) Government Review of Waste Policy in England  
 Defra (2011) Natural Environment White Paper; The natural choice: securing the value of nature  
 Defra & HM Government (2011) Water White Paper; Water for Life  
 Defra and Environment Agency (2011) National Flood and Coastal Erosion Risk Management Strategy for England  
 Defra (2011) Securing the Future: Delivering UK Sustainable Development Strategy  
 Department for Culture, Media and Sport (DCMS) (2001) The Historic Environment: A Force for our Future  
 Historic England (2015) Historic Environment Good Practice Advice in Planning Notes 1 to 3.  
 HM Government (2006) Climate Change: The UK Programme  
 HM Government (2010) The Air Quality Standards 2010  
 HM Government (2010) Flood and Water Management Act, 2010  
 HM Government (2012) Draft Water Bill  
 HM Government (1979) Ancient Monuments and Archaeological Areas Act.  
 HM Government (1981) Wildlife and Countryside Act.  
 HM Government (1990) Planning (Listed Building and Conservation Areas) Act.  
 HM Government (2000) Countryside and Rights of Way Act 2000.  
 HM Government (2003) Sustainable Energy Act.  
 HM Government (2004 and revised 2006) Housing Act.  
 HM Government (2005) Securing the future - delivering UK sustainable development strategy.  
 HM Government (2006) The Natural Environment and Rural Communities (NERC) Act 2006.  
 HM Government (2008) The Climate Change Act 2008.  
 HM Government (2008) The Planning Act.  
 HM Government (2009) The UK Renewable Energy Strategy.  
 HM Government (2010) The Government's Statement on the Historic Environment for England.  
 HM Government (2010) Flood and Water Management Act 2010.  
 HM Government (2010) White Paper: Healthy Lives, Healthy People: Strategy for Public Health in England.  
 HM Government (2011) The Localism Act.  
 HM Government (2011) Water for Life: White Paper.  
 HM Government (2011) UK Marine Policy Statement.  
 HM Government (2011) Carbon Plan: Delivering our Low Carbon Future.  
 HM Government (2011) Water for Life, White Paper.  
 HM Government (2013) The Community Infrastructure Levy (Amendment) Regulations 2013.  
 HM Government (2014) Water Act.  
 HM Government (2015) Water Framework Directive (Standards and Classification) Directions (England and Wales) 2015.  
 HM Government (2015) Government Response to the Committee on Climate Change.  
 HM Government (2016) Environmental Permitting (England and Wales) Regulations 2016.  
 HM Government (2017) The Conservation of Habitats and Species Regulations 2017.  
 HM Government (2017) Heritage Statement  
 HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment.  
 Department for Education (DFE) (2014) Home to School Travel and Transport Guidance.  
 DfE (2016) Strategy 2015 – 2020: World Class Education and Care.  
 DfT (2008) Delivering a Sustainable Transport System (DaSTS).  
 English Heritage (2008) Conservation Principles, Policies and Guidance  
 English Nature: Climate Change Space for Nature (2006)  
 Environment Agency (2009) Water for people and the environment - Water resources strategy for England and Wales.  
 Environment Agency (2011) National Flood and Coastal Erosion Risk Management Strategy for England.  
 Environment Agency (2013) Managing Water Extraction (updated 2016).  
 Forestry Commission (2005): Trees and Woodlands Nature's Health Service  
 Forestry Commission (2016) Corporate Plan 2016-2017.  
 NHS (2014) Five Year Forward View.  
 NHS (2017) Next Steps on the Five Year Forward View.

## Regional

Severn Trent Water Resources Management Plan (2014)  
 Severn Trent Water Sewage Management Plan (2009)  
 Tame, Anker and Mease Abstraction Licensing Strategy (2013)  
 The Wildlife Trust for Birmingham and the Black Country (2017) Birmingham and Black Country Nature Improvement Area Ecological Strategy 2017-2022  
 Environment Agency Humber River Basin Management Plan (2009) and The Tame, Anker and Mease Management Catchment consultation (2014)  
 Environment Agency Trent Catchment Flood Management Plan (2010)  
 Environment Agency (2015) Severn River Basin District River Basin Management Plan  
 Energy Capital (2018) a Regional Approach to Clean Energy Innovation  
 The Greater Birmingham and Solihull Local Enterprise Partnership Strategy (2013)  
 Greater Birmingham & Solihull Local Enterprise Partnership (2016) Strategic Economic Plan 2016-2030  
 The 7 Authorities of the West Midlands Metropolitan Area (2011) West Midlands Local Transport Plan  
 Environment Agency (2009) A Water Resources Strategy Regional Action Plan for the West Midlands Region  
 Forestry Commission (2004) West Midlands Regional Forestry Framework



Energy Capital (2017) A Vision for the West Midlands – Renewable and Energy Efficient Future  
 Natural England (2012) National Character Area profile no. 67: Cannock Chase and Cank Wood  
 Natural England (2012) National Character Area profile no. 97: Arden  
 Peter Brett Associates LLP (2014) GBSLEP Joint Strategic Housing Study  
 West Midlands Combined Authority (2017) West Midlands Roadmap to a Sustainable Future in 2020 (Annual Monitoring Report)  
 West Midlands Combined Authority (2017) Thrive West Midlands – An Action Plan to drive better mental health and wellbeing in the West Midlands

## Local

Birmingham City Council (1992) Moseley and Sparkhill: Area of restraint  
 Birmingham City Council (1994) Handsworth, Sandwell and Soho: Areas of restraint  
 Birmingham City Council (1999) Wheelwright Road: Area of restraint  
 Birmingham City Council (2005) Developing Birmingham: An Economic Strategy for the City 2005-2015  
 Birmingham City Council (2006) Air Quality Action Plan  
 Birmingham City Council (2006) Municipal Waste Management Strategy.  
 Birmingham City Council (2007) Sustainable Management of Urban Rivers and Floodplains SPD  
 Birmingham City Council (2008) Birmingham Private Sector Housing Strategy 2008+ (updated 2010)  
 Birmingham City Council (2008) Contaminated Land Inspection Strategy for Birmingham Second Edition  
 Birmingham City Council (2010) Birmingham Climate Change Action Plan 2010+  
 Birmingham and Black Country Biodiversity Partnership (2010) Birmingham and the Black Country Biodiversity Action Plan  
 Birmingham City Council (2011) Birmingham Multi Agency Flood Plan  
 Birmingham City Council (2012) Level 1 & 2 Strategic Flood Risk Assessment  
 Birmingham City Council (2013) Green Living Spaces Strategy  
 Birmingham City Council (2013) Carbon Roadmap  
 Birmingham City Council (2013) Birmingham Health and Well-being Strategy  
 Birmingham City Council (2014) Local Flood Risk Management Strategy  
 Birmingham City Council (2014) Gypsy and Traveller Accommodation Assessment  
 Birmingham City Council (2014) Selly Oak, Edgbaston and Harborne: Houses in Multiple Occupation Article 4  
 Birmingham City Council (2014-19) Birmingham Heritage Strategy  
 Birmingham City Council (2015) Corporate Emergency Plan  
 Birmingham City Council (2015) Surface Water Management Plan  
 Birmingham City Council (2017) Air Quality Annual Status Report  
 Birmingham City Council (2017) Birmingham Development Plan  
 Birmingham City Council (2006) Access for People with Disabilities SPD  
 Birmingham City Council (2001) Affordable Housing SPG  
 Birmingham City Council (1993) Car park design guide  
 Birmingham City Council (2012) Car Parking guidelines SPD  
 Birmingham City Council (2007) Extending your home: Home extensions guide  
 Birmingham City Council (2000) Floodlighting of sports facilities, car parks and secure areas  
 Birmingham City Council (2003) High Places  
 Birmingham City Council (2008) Large format banner advertisements SPD  
 Birmingham City Council (2008) Lighting Places  
 Birmingham City Council (1999) Location of advertisement hoardings  
 Birmingham City Council (2006) Loss of industrial land SPD  
 Birmingham City Council (2008) Mature suburbs  
 Birmingham City Council (2000) Parking of vehicles at commercial and industrial premises adjacent to residential property  
 Birmingham City Council (2006) The Future of Birmingham's Parks and Open Space Strategy  
 Birmingham City Council (2001) Places for all  
 Birmingham City Council (2001) Places for living  
 Birmingham City Council (2011) Places of worship  
 Birmingham City Council (2007) Public open space in new residential development SPD  
 Birmingham City Council (1996) Shopfronts design guide  
 Birmingham City Council (2012) Shopping and Local Centres SPD  
 Birmingham City Council (2001) Specific needs residential uses SPG  
 Birmingham City Council (2008) Telecommunications development mobile phone infrastructure SPD  
 Birmingham City Council (2018) Council Plan and Budget 2018+  
 Birmingham City Council (2014) Birmingham Connected White Paper  
 Birmingham City Council (2008) Sustainable Community Strategy  
 Birmingham City Council (2012) Employment Land Review  
 Birmingham City Council (2013) Employment Land and Office Targets  
 Birmingham City Council (2013) Strategic Housing Market Assessment  
 Birmingham City Council (2018) SHLAA 2017  
 Birmingham City Council (2008) Statement of Community Involvement  
 Birmingham City Council (2017) Birmingham Cultural Strategy

Table 2.2 The Relationship between Plans, Programmes and Strategies and the Sustainability Objectives

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in Sustainability Objectives
<b>International</b>		
EU Directive on the Conservation of Wild Birds (79/409/EEC)	<p>Identifies 181 endangered species and sub-species for which the Member States are required to designate Special Protection Areas.</p> <p>Makes it a legal requirement that EU countries make provision for the protection of birds. This includes the selection and designation of Special Protection Areas.</p> <p>Target Actions include:</p> <ul style="list-style-type: none"> <li>• Creation of protected areas;</li> <li>• Upkeep and management; and</li> <li>• Re-establishment of destroyed biotopes.</li> </ul>	Incorporated in Sustainability Objective 4.
EU Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora (92/43/EEC) & Subsequent Amendments	<p>Directive seeks to conserve natural habitats. Conservation of natural habitats requires member states to identify special areas of conservation and to maintain, where necessary landscape features of importance to wildlife and flora.</p> <p>The amendments in 2007:</p> <ul style="list-style-type: none"> <li>• Simplify the species protection regime to better reflect the Habitats Directive;</li> <li>• Provide a clear legal basis for surveillance and monitoring of European protected species (EPS);</li> <li>• Toughen the regime on trading EPS that are not native to the UK; and</li> <li>• Ensure that the requirement to carry out appropriate assessments on water abstraction consents and land use plans is explicit.</li> </ul>	Incorporated in Sustainability Objective 4.
EU Directive on Waste (Directive 75/442/EEC, 2006/12/EC 2008/98/EC as amended)	<p>Promotes the development of clean technology to process waste, promoting recycling and re-use.</p> <p>The Directive contains a range of provision including:</p> <ul style="list-style-type: none"> <li>• The setting up of separate collections of waste where technically, environmentally and economically practicable and appropriate to meet the necessary quality standards for the relevant recycling sectors – including by 2015 separate collection for at least paper, metal, plastic and glass.</li> <li>• Household waste recycling target – the preparing for re-use and the recycling of waste materials such as at least paper, metal, plastic and glass from households and possibly other origins as far as these waste streams are similar to waste from households, must be increased to a minimum of 50% by weight by 2020.</li> </ul> <p>Construction and demolition waste recovery target – the preparing for re-use, recycling and other material recovery of non-hazardous construction and demolition waste must be increased to a minimum of 70% by weight by 2020.</p>	Incorporated in Sustainability Objective 6.
EU (1992) Conservation of Natural Habitats and Wild Fauna and Flora (92/43/EEC, Habitats Directive).	<p>The main aim of the Habitats Directive is to promote the maintenance of biodiversity by requiring Member States to take measures to maintain or restore natural habitats and wild species listed on the Annexes to the Directive at a favourable conservation status, introducing robust protection for those habitats and species of European importance. In applying these measures Member States are required to take account of economic, social and cultural requirements, as well as regional and local characteristics.</p>	Incorporated in Sustainability Objective 4
EU Packaging and Packaging Waste Directive (94/62/EC)	<p>This Directive aims to harmonize national measures concerning the management of packaging and packaging waste in order, on the one hand, to prevent any impact thereof on the environment of all Member States as well as of third countries or to reduce such impact, thus providing a high level of environmental protection, and, on the other hand, to ensure the functioning of the internal market and to avoid obstacles to trade and distortion and restriction of competition within the Community.</p> <p>To this end this Directive lays down measures aimed, as a first priority, at preventing the production of packaging waste and, as additional fundamental principles, at reusing packaging, at recycling and other forms of recovering packaging waste and, hence, at reducing the final disposal of such waste.</p> <p>No later than five years from the date by which this Directive must be implemented in national law (1996), between 50 % as a minimum and 65 % as a maximum by weight of the packaging waste will be recovered.</p>	Incorporated in Sustainability Objective 6.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in Sustainability Objectives
	Within this general target, and with the same time limit, between 25 % as a minimum and 45 % as a maximum by weight of the totality of packaging materials contained in packaging waste will be recycled with a minimum of 15 % by weight for each packaging material.	
EU (1996) Ambient Air Quality Assessment and Management (96/62/EC, Air Quality Framework Directive).	The Directive ensures that where pollutants exceed certain limit values, Member States take action to reduce pollution down to the limit values. The list of atmospheric pollutants to be considered includes: sulphur dioxide, nitrogen dioxide, particulate matter, lead, ozone, benzene, carbon monoxide, poly-aromatic hydrocarbons, cadmium, arsenic, nickel and mercury. Objectives: <ul style="list-style-type: none"> <li>Obtain adequate information on ambient air quality; and</li> <li>Maintain ambient air quality where it is good, and improve air quality where it is bad.</li> </ul>	Incorporated in Sustainability Objective 6
EU (1998) Aarhus Convention	The Aarhus Convention establishes a number of rights of the public (individuals and their associations) with regard to the environment. The Parties to the Convention are required to make the necessary provisions so that public authorities (at national, regional or local level) will contribute to these rights to become effective. The Convention provides for: <ul style="list-style-type: none"> <li>The right of everyone to receive environmental information that is held by public authorities ("access to environmental information"). This can include information on the state of the environment, but also on policies or measures taken, or on the state of human health and safety where this can be affected by the state of the environment. Applicants are entitled to obtain this information within one month of the request and without having to say why they require it. In addition, public authorities are obliged, under the Convention, to actively disseminate environmental information in their possession;</li> <li>The right to participate in environmental decision-making. Arrangements are to be made by public authorities to enable the public affected and environmental non-governmental organisations to comment on, for example, proposals for projects affecting the environment, or plans and programmes relating to the environment, these comments to be taken into due account in decision-making, and information to be provided on the final decisions and the reasons for it ("public participation in environmental decision-making");</li> <li>The right to review procedures to challenge public decisions that have been made without respecting the two aforementioned rights or environmental law in general ("access to justice").</li> </ul>	Incorporated in Sustainability Objective 15
EU Drinking Water Directive (98/83/EC)	Provides for the quality of drinking water. The standards are legally binding.	Incorporated in Sustainability Objective 6.
EU Directive on the Landfill of Waste (99/31/EC)	Sets out requirements to ensuring that where landfilling takes place the environmental impacts are understood and mitigated against. By 2006 biodegradable municipal waste going to landfills must be reduced to 75% of the total amount (by weight) of biodegradable municipal waste produced in 1995 or the latest year before 1995 for which standardised Eurostat data is available.	Incorporated in Sustainability Objective 6.
EU (2000) Directive on Establishing a Framework for Community Action in the Field of Water Policy (2000/60/EC, The Water Framework Directive).	The Directive establishes an integrated approach to protection, improvements and sustainable use of water bodies, introducing a statutory system of analysis and planning based upon the river basin. The Directive imposes a statutory responsibility on Member States to ensure all water bodies meet certain water quality standards. The four main stages of implementation are: <ul style="list-style-type: none"> <li>Environmental and economic assessment ('Characterisation') of river basin districts including identification of pressures and impacts;</li> <li>Environmental monitoring based on river basin district characterisation;</li> <li>Setting of environmental objectives; and</li> <li>Designing and carrying out a programme of measures to achieve these environmental objectives.</li> </ul> Targets: All water bodies in all Member States are to reach 'Good Ecological Status' by 2015. Good ecological status applies to natural water bodies and is defined as a slight variation from undisturbed natural conditions.	Incorporated in Sustainability Objectives 5 and 6

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in Sustainability Objectives
	Some water bodies are designated as 'artificial' or 'heavily modified'. This is because they may have been created or modified for a particular use such as water supply, flood protection, navigation or urban infrastructure. By definition, artificial and heavily modified water bodies are not able to achieve natural conditions. Instead the classification and objectives for these water bodies, and the biology they represent, are measured against 'ecological potential' rather than status. For an artificial or heavily modified water body to achieve good ecological potential, its chemistry must be good. In addition, any modifications to the structural or physical nature of the water body that harm biology must only be those essential for its valid use. All other such modifications must have been altered or managed to reduce or remove their adverse impact, so that there is the potential for biology to be as close as possible to that of a similar natural water body.	
EU 2001/42/EC on the Assessment of the Effects of Certain Plans and Programmes on the Environment (SEA Directive)	<p>The SEA Directive provides the following requirements for consultation:</p> <ul style="list-style-type: none"> <li>• Authorities which, because of their environmental responsibilities, are likely to be concerned with the effects of implementing the plan or programme, must be consulted on the scope and level of detail of the information to be included in the Environmental Report. These authorities are designated in the SEA Regulations as the Consultation Bodies (Consultation Authorities in Scotland).</li> <li>• The public and the Consultation Bodies must be consulted on the draft plan or programme and the Environmental Report, and must be given an early and effective opportunity within appropriate time frames to express their opinions.</li> <li>• Other EU Member States must be consulted if the plan or programme is likely to have significant effects on the environment in their territories.</li> </ul>	Directive sets the basis for SEA as a whole and therefore Indirectly covers all objectives.
EU (2005) Clean Air Strategy.	The strategy aims to extend clean air laws into new sectors - agriculture and transport - that were not covered before, targeting five main pollutants including fine-dust particles which are most harmful to human health.	Incorporated in Sustainability Objective 6
EU (2008) Directive on Waste (2006/12/EC, Waste Framework Directive).	The directive requires all Member States to take the necessary measures to ensure waste is recovered or disposed of without endangering human health or causing harm to the environment and includes permitting, registration and inspection requirements. The directive also requires Member States to take appropriate measures to encourage firstly, the prevention or reduction of waste production and its harmfulness and secondly the recovery of waste by means of recycling, re-use or reclamation or any other process with a view to extracting secondary raw materials, or the use of waste as a source of energy. The directive's overarching requirements are supplemented by other directives for specific waste streams.	Incorporated in Sustainability Objective 6
EU (2010) The Industrial Emissions Directive	<p>The Johannesburg Declaration on Sustainable Development was adopted at the World Summit on Sustainable Development (WSSD), sometimes referred to as Earth Summit 2002, at which the Plan of Implementation of the World Summit on Sustainable Development was also agreed upon.</p> <p>The Johannesburg Declaration builds on earlier declarations made at the United Nations Conference on the Human Environment at Stockholm in 1972, and the Earth Summit in Rio de Janeiro in 1992. While committing the nations of the world to sustainable development, it also includes substantial mention of multilateralism as the path forward.</p> <p>In terms of the political commitment of parties, the Declaration is a more general statement than the Rio Declaration. It is an agreement to focus particularly on <i>"the worldwide conditions that pose severe threats to the sustainable development of our people, which include: chronic hunger; malnutrition; foreign occupation; armed conflict; illicit drug problems; organized crime; corruption; natural disasters; illicit arms trafficking; trafficking in persons; terrorism; intolerance and incitement to racial, ethnic, religious and other hatreds; xenophobia; and endemic, communicable and chronic diseases, in particular HIV/AIDS, malaria and tuberculosis."</i> Johannesburg Declaration</p>	The principles of sustainable development are included in all of the sustainability objectives.
UNFCCC (1997) Kyoto Protocol to the UN Framework Convention on Climate Change.	The protocol shares the Convention's objective (to achieve stabilisation of greenhouse gas concentrations in the atmosphere at safe levels, so that ecosystems can adapt naturally, and food supply is not threatened) but strengthens the convention by committing Countries to legally-binding targets to limit or reduce their greenhouse gas emissions.	Incorporated in Sustainability Objective 5
UNFCCC (2009) Copenhagen Accord	The Copenhagen Accord is a treaty that is to take over from the Kyoto Protocol's targets, as of when it expires in 2012, for curbing the growth in greenhouse gas	Incorporated in Sustainability

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in Sustainability Objectives
(Climate Change).	<p>emissions sufficiently to avoid climate change impacts projected by the IPCC. The Copenhagen Accord commits Countries to legally binding targets including:</p> <ul style="list-style-type: none"> <li>To reduce global emissions so as to hold the increase in global temperature below 2°C;</li> <li>Commit developed countries to reducing greenhouse gas emissions;</li> <li>Projects to reduce greenhouse gas emissions in developing countries will be subject to international monitoring if they are internationally funded;</li> <li>Provide developing countries with financial incentives to preserve forests; and</li> <li>Implementation of the Accord to be reviewed in 2015 and an assessment to be made on whether the goal of keeping global temperature rise within 2°C needs to be strengthened to 1.5°C.</li> </ul>	Objective 5
Council of Europe (2006) European Landscape Convention	Aims to promote the protection, management and planning of Europe's landscapes, both rural and urban, and to foster European co-operation on landscape issues.	Incorporated in Sustainability Objective 4
Council of Europe (1985) Convention on the Protection of the Architectural Heritage of Europe	This convention commits signatories to protect their architectural heritage by means of identifying monuments, buildings and sites to be protected; preventing the disfigurement, dilapidation or demolition of protected properties; providing financial support by the public authorities for maintaining and restoring the architectural heritage on its territory; and supporting scientific research for identifying and analysing the harmful effects of pollution and for defining ways and means to reduce or eradicate these effects.	Incorporated in Sustainability Objective 4
EU (2007) Floods Directive	The Floods Directive aims to provide a consistent approach to managing flood risk across Europe. The approach is based on a 6 year cycle of planning which includes the publication of Preliminary Flood Risk Assessments, hazard and risk maps and flood risk management plans. The Directive is transposed into English law by the Flood Risk Regulations 2009.	Incorporated in Sustainability Objective 5
EU (1991) Urban Waste Water Treatment Directive.	<p>The Directive aims to protect the environment from the adverse effects of urban waste water discharges and discharges from certain industrial sectors and concerns the collection, treatment and discharge of:</p> <ul style="list-style-type: none"> <li>Domestic Waste Water;</li> <li>Mixture of Waste Water; and</li> <li>Waste Water from Certain Industrial Sectors.</li> </ul> <p>There are four main principles: planning, regulation, monitoring, and information and reporting.</p>	Incorporated in Sustainability Objective 6
European Commission (1999) The Landfill Directive.	The Directive aims to prevent or reduce as far as possible negative effects on the environment, in particular the pollution of surface water, groundwater, soil and air, and on the global environment, including the greenhouse effect, as well as any resulting risk to human health, from the landfilling of waste, during the whole lifecycle of the landfill.	Incorporated in Sustainability Objectives 1 and 6
EC (2007) Together for Health: A Strategic Approach for the EU 2008-2013	The Strategy aims to provide an overarching strategic framework spanning core issues in health as well as health in all policies and global health issues.	Incorporated in Sustainability Objective 13
The Pan-European Biological and Landscape Diversity Strategy (1995)	The strategy aims to address degradation of biological and landscape diversity across Europe reinstating these assets where possible.	Incorporated in Sustainability Objective 4
<b>National</b>		
CLG (2012) National Planning Policy Framework (NPPF)	The general thrust of the NPPF is aimed at contributing towards sustainable development through the planning system. There is a presumption in favour of sustainable development " <i>which should be seen as a golden thread running through both plan-making and decision-taking.</i> " There are three dimensions as to how the government aims to achieve sustainable development which gives rise to	Incorporated in Sustainability Objectives 1 - 15

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in Sustainability Objectives
NPPF – Biodiversity, Geodiversity and Soil	<p>the need for the planning system to perform in a number of roles. These roles are based around economic, environmental and social roles.</p> <p>The NPPF sets out 12 core planning principles for plan and decision making, including: 'Conserving and enhancing the natural environment'. The planning system should contribute and enhance the natural and local environment by:</p> <ul style="list-style-type: none"> <li>• Protecting and enhancing valued landscapes, geological conservation interests and soils;</li> <li>• Recognising the wider benefits of ecosystem services;</li> <li>• Minimising impacts on biodiversity and providing net gains in biodiversity where possible, including by establishing coherent ecological networks that are more resilient to current and future pressures;</li> <li>• Preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and</li> <li>• Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.</li> </ul> <p>Plans and decisions should encourage effective use of brownfield sites and take into account the economic benefits of agricultural land when assessing development, seeking to utilise areas of poorer quality land.</p> <p>Local planning authorities should plan positively for creation, protection, enhancement and management of networks of biodiversity and green infrastructure. Planning and decision making should occur at a landscape scale across local authority boundaries and assess noise, air and light pollution, considering cumulative impacts. Local planning authorities should protect and enhance biodiversity specifically regarding priority species/habitats, protected sites and potential/proposed/possible protected sites.</p>	Incorporated in Sustainability Objectives 1, 4 and 6
NPPF – Landscape	<p>The NPPF sets out 12 core planning principles for plan and decision making, including: 'Conserving and enhancing the natural environment'. The planning system should contribute and enhance the natural and local environment by:</p> <ul style="list-style-type: none"> <li>• Protecting and enhancing valued landscapes, geological conservation interests and soils;</li> <li>• Recognising the wider benefits of ecosystem services;</li> <li>• Minimising impacts on biodiversity and providing net gains in biodiversity where possible, including by establishing coherent ecological networks that are more resilient to current and future pressures;</li> <li>• Preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and</li> <li>• Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.</li> </ul> <p>Plans and decisions should encourage effective use of brownfield sites and take into account the economic benefits of agricultural land when assessing development, seeking to utilise areas of poorer quality land.</p> <p>Local planning authorities should plan positively for creation, protection, enhancement and management of networks of biodiversity and green infrastructure. Planning and decision making should occur at a landscape scale across local authority boundaries and assess noise, air and light pollution, considering cumulative impacts. Local planning authorities should protect and enhance biodiversity specifically regarding priority species/habitats, protected sites and potential/proposed/possible protected sites.</p>	Incorporated in Sustainability Objective 4
NPPF – Cultural Environment	<p>One of the NPPF's 12 core planning principles for plan and decision making is the conservation and enhancement of the historic environment. Local planning authorities are required to set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should</p>	Incorporated in Sustainability Objective 4



Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in Sustainability Objectives
	be wholly exceptional. Non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets. Proposals that preserve the setting, reveal the significance of the asset or make a positive contribution should be treated favourably.	
NPPF – Water	<p>Among the NPPF's core principles are 'conserving and enhancing the natural environment' and 'meeting the challenge of climate change, flooding and coastal change'; In fulfilling these objectives, the planning system should contribute to and enhance the natural and local environment by: preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability.</p> <p>In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment.</p> <p>Local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations.</p> <p>Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Local Plans should be supported by Strategic Flood Risk Assessment and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant flood risk management bodies, such as lead local flood authorities and internal drainage boards. Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, by:</p> <ul style="list-style-type: none"> <li>• Applying the Sequential Test;</li> <li>• If necessary, applying the Exception Test;</li> <li>• Safeguarding land from development that is required for current and future flood management;</li> <li>• Using opportunities offered by new development to reduce the causes and impacts of flooding; and</li> <li>• Where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to facilitate the relocation of development, including housing, to more sustainable locations.</li> </ul>	Incorporated in Sustainability Objectives 5 and 6
NPPF – Climate Change	One of the core principles of the NPPF is meeting the challenge of climate change, flooding and coastal change and encourages the adoption of proactive strategies to mitigate and adapt to climate change in line with the objectives and provisions of the Climate Change Act 2008, taking full consideration of flood risk, coastal change and water supply and demand. The NPPF also supports low carbon future by helping to increase the use of renewable and low carbon sources in line with the National Policy Statement for Renewable Energy Infrastructure. It seeks to ensure that all types of flood risk is taken into account over the long term at the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas of highest risk.	Incorporated in Sustainability Objective 5
NPPF - Air Quality	This Directive aims to improve air quality throughout Europe by controlling the level of certain pollutants and monitoring their concentrations. In particular the Directive aims to establish levels for different air pollutants; draw up common methods for assessing air quality; methods to improve air quality; and make sure that information on air quality is easily accessible to Member States and the public.	Incorporated in Sustainability Objective 6
NPPF - Minerals and Waste	One of the core principles of the NPPF is facilitating the sustainable use of minerals. Policy guidance suggests the need to: Identify policies for existing and new sites of national importance, the definition of Mineral Safeguarding Areas so that locations of mineral sources are not sterilised by other developments, safeguarding of existing and planned mineral infrastructure (rail links, wharfage, storage, processing etc.), environmental criteria to ensure there is not an unacceptable environmental impact and policies for reclaiming land and site	Incorporated in Sustainability Objective 1



Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in Sustainability Objectives
	aftercare.	
NPPF - Economy	<p>One of the NPPF's core planning principles for plan and decision making is building a strong competitive economy. The NPPF highlights the Government's commitment to securing economic growth to create jobs and prosperity, ensuring the planning system does everything it can to support sustainable economic growth. Local planning authorities are required to proactively meet development needs recognising potential barriers to invest (including infrastructure, housing and services) and regularly review land allocations. Economic growth in rural areas should be supported to create jobs and sustainable new developments, including expansion of all types of businesses, diversification of agriculture, supporting tourism and retention of local services.</p> <p>In drawing up local plans, local authorities should:</p> <ul style="list-style-type: none"> <li>• Set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth;</li> <li>• Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;</li> <li>• Support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances;</li> <li>• Plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries;</li> <li>• Identify priority areas for economic regeneration, infrastructure provision and environmental enhancement; and</li> <li>• Facilitate flexible working practices such as the integration of residential and commercial uses within the same unit.</li> </ul>	Incorporated in Sustainability Objectives 7 – 10
NPPF – Housing	<p>Two of the NPPF's core principles is the delivery of a wide choice of high quality homes and requiring good design. Local planning authorities are required to significantly boost the supply of housing through:</p> <ul style="list-style-type: none"> <li>• Affordable and meeting needs of the market, identifying accessible sites for 5, 6-10 and 11-15 years' worth of housing/growth;</li> <li>• Illustrating the expected rate of housing delivery through a housing trajectory and set out a strategy;</li> <li>• Deliver high quality housing, widen opportunities for home ownership and create sustainable inclusive and mixed communities;</li> <li>• Making allowance for windfall sites on the basis that such sites are consistently available;</li> <li>• Resisting inappropriate development of residential gardens; and</li> <li>• Avoid isolated country homes unless they were truly outstanding or innovative in design or enhance the surroundings.</li> </ul> <p>Sustainable development in rural areas housing should be located where it will enhance or maintain the vitality of rural communities.</p> <p>Planning policies and decisions should aim to ensure that developments:</p> <ul style="list-style-type: none"> <li>• Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;</li> <li>• Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;</li> <li>• Optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;</li> <li>• Respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging</li> </ul>	Incorporated in Sustainability Objective 12

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in Sustainability Objectives
	<p>appropriate innovation;</p> <ul style="list-style-type: none"> <li>• Create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and</li> <li>• Are visually attractive as a result of good architecture and appropriate landscaping.</li> </ul>	
NPPF - Health	<p>Amongst the planning principles of the NPPF is the promotion of healthy communities. The framework sets out open space, sport and recreation considerations for neighbourhood planning bodies which include an assessment of needs and opportunities; setting local standards; maintaining an adequate supply of open space and sports and recreational facilities; planning for new open space and sports and recreational facilities; and planning obligations. Local and neighbourhood plans should identify community green spaces of particular importance (including recreational and tranquillity) to them, ensuring any development of these areas is ruled out in a majority of circumstances.</p>	Incorporated in Sustainability Objective 13
NPPF – Transport & Accessibility	<p>Amongst the 12 planning principles of the NPPF are:</p> <ul style="list-style-type: none"> <li>• Promoting sustainable transport; Support sustainable transport development including infrastructure, large scale facilities, rail freight, roadside facilities, ports and airports.</li> </ul> <p>Protecting and exploiting opportunities for sustainable transport modes, including designing and locating developments to maximise sustainable modes and minimise day to day journey lengths.</p>	Incorporated in Sustainability Objective 3
NPPF – Quality of Life	<p>One of the 12 core planning principles of the NPPF is: Promoting healthy communities, and Supporting high quality communications infrastructure. The NPPF argues that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Local planning authorities should create a shared vision with communities of the residential environment and facilities they wish to see. Local policies and decisions should therefore promote: Safe and accessible environments and developments.</p> <ul style="list-style-type: none"> <li>• Opportunities for members of the community to mix and meet.</li> <li>• Plan for development and use of high quality shared public space.</li> <li>• Guard against loss of facilities.</li> <li>• Ensure established shops can develop in a sustainable way.</li> <li>• Ensure integrated approach to housing and community facilities and services.</li> </ul> <p>Local and neighbourhood plans should identify community green spaces of particular importance (including recreational and tranquillity) to them, ensuring any development of these areas is ruled out in a majority of circumstances.</p> <p>The framework sets out open space, sport and recreation considerations for neighbourhood planning bodies. These include an assessment of needs and opportunities; setting local standards; maintaining an adequate supply of open space and sports and recreational facilities; planning for new open space and sports and recreational facilities; and planning obligations.</p>	Incorporated in Sustainability Objectives 12 - 15
CLG (2012) NPPF Technical Guidance	<p>Provides technical detail the 'sequential test' to assist with fulfilling the requirements set out in the NPPF on ensuring that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.</p>	Incorporated in Sustainability Objective 1
CLG (2011) The Localism Act	<p>The Localism Bill includes five key measures that underpin the Government's approach to decentralisation.</p> <ul style="list-style-type: none"> <li>• Community rights;</li> <li>• Neighbourhood planning;</li> <li>• Housing;</li> <li>• General power of competence; and</li> <li>• Empowering cities and other local areas.</li> </ul>	Incorporated in Sustainability Objectives 11 - 15

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in Sustainability Objectives
CLG (2011) The Community Infrastructure Levy Regulations	The Community Infrastructure Levy is a new levy that local authorities in England and Wales can choose to charge on new developments in their area. The money can be used to support development by funding infrastructure that the council, local community and neighbourhoods want - for example new or safer road schemes, park improvements or a new health centre. The system applies to most new buildings and charges are based on the size and type of the new development.	Incorporated in Sustainability Objectives 11 - 15
DCLG (2014) Planning Policy for Traveller Sites (updated August 2015)	<p>This document sets out the Government's planning policy for Traveller sites. It identifies the following aims:</p> <ul style="list-style-type: none"> <li>• That local planning authorities should make their own assessment of need for the purposes of planning;</li> <li>• To ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites;</li> <li>• To encourage local planning authorities to plan for sites over a reasonable timescale;</li> <li>• That plan-making and decision-taking should protect Green Belt from inappropriate development;</li> <li>• To promote more private Traveller site provision while recognising that there will always be those Travellers who cannot provide their own sites;</li> <li>• That plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective;</li> <li>• For local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies;</li> <li>• To increase the number of Traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply;</li> <li>• To reduce tensions between settled and Traveller communities in plan making and planning decisions;</li> <li>• To enable provision of suitable accommodation from which Travellers can access education, health, welfare and employment infrastructure; and <ul style="list-style-type: none"> <li>• For local planning authorities to have due regard to the protection of local amenity and local environment.</li> </ul> </li> </ul>	Incorporated in Sustainability Objective 12.
DCLG (2014) Planning Practice Guidance	Planning Practice Guidance is designed to support the NPPF. It reflects the objectives of the NPPF which are not repeated here.	All of the Objectives reflect NPPF and PPG.
DCLG (2014) National Planning Policy for Waste	<p>This document sets out detailed waste planning policies for local authorities. States that planning authorities need to:</p> <ul style="list-style-type: none"> <li>• Use a proportionate evidence base in preparing Local Plans.</li> <li>• Identify sufficient opportunities to meet the identified needs of their area for the management of waste streams.</li> </ul> <p>Identifying suitable sites and areas.</p> <p>The overall objective of the document is to work towards a more sustainable and efficient approach to resource use and management. Planning plays a pivotal role e.g. by ensuring the design and layout of new development and other infrastructure complements sustainable waste management.</p>	Incorporated in Sustainability Objective 6
DCLG (2014) Written Statement on Sustainable Drainage Systems	This statement sets out that it is the Government's expectation that sustainable drainage systems will be provided in new developments wherever this is appropriate.	Incorporated in Sustainability Objective 6.
DCLG (2017) Fixing Our Broken Housing Market	<p>The White Paper makes the following proposals as 'step 1':</p> <ul style="list-style-type: none"> <li>• Making sure every part of the country has an up-to-date, sufficiently ambitious plan so that local communities decide where development should go;</li> <li>• Simplifying plan-making and making it more transparent, so it's easier for communities to produce plans and easier for developers to follow them;</li> <li>• Ensuring that plans start from an honest assessment of the need for new homes, and that local authorities work with their neighbours, so that difficult decisions are not ducked;</li> <li>• Clarifying what land is available for new housing, through greater transparency over who owns land and the options held on it;</li> </ul>	Incorporated in Sustainability Objective 12.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in Sustainability Objectives
	<ul style="list-style-type: none"> <li>• Making more land available for homes in the right places, by maximising the contribution from brownfield and surplus public land, regenerating estates, releasing more small and medium-sized sites, allowing rural communities to grow and making it easier to build new settlements;</li> <li>• Maintaining existing strong protections for the Green Belt, and clarifying that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements;</li> <li>• Giving communities a stronger voice in the design of new housing to drive up the quality and character of new development, building on the success of neighbourhood planning; and</li> </ul> <p>Making better use of land for housing by encouraging higher densities, where appropriate, such as in urban locations where there is high housing demand; and by reviewing space standards.</p>	
DECC (2008) UK Climate Change Act 2008.	<p>The 2008 Climate Change Act seeks to manage and respond to climate change in the UK, by:</p> <ul style="list-style-type: none"> <li>• Setting ambitious, legally binding targets;</li> <li>• Taking powers to help meet those targets;</li> <li>• Strengthening the institutional framework;</li> <li>• Enhancing the UK's ability to adapt to the impact of climate change; and</li> <li>• Establishing clear and regular accountability to the UK Parliament and to the devolved legislatures.</li> </ul>	Incorporated in Sustainability Objective 5
DCMS (2007) Heritage Protection for the 21 <sup>st</sup> Century.	<p>This White Paper responds to the public call for change, and to this changing policy context. It sets out a vision for a new heritage protection system. The proposals in the White Paper reflect the importance of the heritage protection system in preserving heritage for people to enjoy now and in the future. They are based around three core principles:</p> <ul style="list-style-type: none"> <li>• Developing a unified approach to the historic environment;</li> <li>• Maximising opportunities for inclusion and involvement; and</li> <li>• Supporting sustainable communities by putting the historic environment at the heart of an effective planning system.</li> </ul>	Incorporated in Sustainability Objective 4
DCMS (2013) <i>Scheduled Monuments &amp; Nationally Important but Non-Scheduled Monuments</i>	<p>This policy statement sets out Government policy on the identification, protection, conservation and investigation of nationally important ancient monuments, under the provisions of the Ancient Monuments and Archaeological Areas Act 1979. It includes principles relating to the selection of scheduled monuments and the determination of applications for scheduled monument consent.</p>	Incorporated in Sustainability Objective 4.
DCMS (2016) The Culture White Paper	<p>The White Paper is structured around four core themes:</p> <ul style="list-style-type: none"> <li>• Everyone should enjoy the opportunities culture offers, no matter where they start in life;</li> <li>• The riches of our culture should benefit communities across the country;</li> <li>• The power of culture can increase our international standing; and</li> <li>• Cultural investment, resilience and reform.</li> </ul>	Incorporated in Sustainability Objective 4
DCMS (2017) Heritage Statement	<p>This statement sets out how the government will support the heritage sector and help it to protect and care for our heritage and historic environment in the coming years.</p> <p>There are no formal targets or objectives in this statement.</p>	Incorporated in Sustainability Objective 4
Defra (2003) The Water Environment (Water Framework Directive) (England and Wales) Regulations	<p>Requires all inland and coastal waters to reach "good status" by 2015. This is being done by establishing a river basin structure with ecological targets for surface waters.</p>	Incorporated in Sustainability Objective 6
Defra (2006) The Natural Environment and Rural Communities Act 2006	<p>The Act is primarily intended to implement key aspects of the Government's Rural Strategy published in July 2004; it also addresses a wider range of issues relating broadly to the natural environment.</p> <p>The Act established an independent body – Natural England – responsible for</p>	Incorporated in Sustainability Objectives 4, 7, 8 and 9f

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in Sustainability Objectives
	<p>conserving, enhancing and managing England's natural environment for the benefit of current and future generations.</p> <p>The Act also established the Commission for Rural Communities ("the Commission"). The Commission will be an independent advocate, watchdog and expert adviser for rural England, with a particular focus on people suffering from social disadvantage and areas suffering from economic under-performance. It will provide information, advice, monitoring and reporting to Government and others on issues and policies affecting rural needs.</p> <p>The Act also reconstitutes the Joint Nature Conservation Committee and renames and reconstitutes the Inland Waterways Amenity Advisory Council (which becomes the Inland Waterways Advisory Council).</p> <p>In line with the 2004 Rural Strategy, the Act extends both the Secretary of State's funding powers for functions within Defra's remit, and the ability to authorise other bodies to carry out those functions. Public bodies for which Defra is responsible are given the power to enter agreements to enable various other designated bodies to perform functions on their behalf. These various powers are intended to be used to simplify and devolve delivery arrangements and to improve their effectiveness and efficiency.</p> <p>The Act makes provision in respect of biodiversity, pesticides harmful to wildlife and the protection of birds, and in respect of invasive non-native species. It alters enforcement powers in connection with wildlife protection, and extends time limits for prosecuting certain wildlife offences. It addresses a small number of gaps and uncertainties which have been identified in relation to the law on sites of special scientific interest. It amends the functions and constitution of National Park authorities, the functions of the Broads Authority and the law on rights of way.</p>	
Defra (2007) Guidance for Local Authorities on Implementing Biodiversity Duty	<p>The Duty is set out in Section 40 of the Natural Environment and Rural Communities Act (NERC) 2006, and states that: <i>"Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity"</i>. Particular areas of focus include: Policy, Strategy and Procurement; Management of Public Land and Buildings; Planning, Infrastructure and Development; and Education, Advice and Awareness.</p>	Incorporated in S Sustainability Objective 4
Defra (2007) The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (Volume 2).	<p>The Strategy sets out standards and objectives for the 8 main health-threatening air pollutants in the UK. The standards are based on an assessment of the effects of each pollutant on public health. They are based on recommendations by the Expert Panel on Air Quality Standards, The European Union Air Quality Daughter Directive and the World Health Organisation. Local Authorities are responsible for seven of the eight air pollutants under Local Air Quality Management (LAQM). National objectives have also been set for the eighth pollutant, ozone, as well as for nitrogen oxides and sulphur dioxide.</p>	Incorporated in Sustainability Objective 6
Defra (2007) The Air Quality Strategy for England, Scotland, Wales and Northern Ireland	<p>The Strategy:</p> <ul style="list-style-type: none"> <li>• Sets out a way forward for work and planning on air quality issues;</li> <li>• Sets out the air quality standards and objectives to be achieved;</li> <li>• Introduces a new policy framework for tackling fine particles; and</li> <li>• Identifies potential new national policy measures which modelling indicates could give further health benefits and move closer towards meeting the Strategy's objectives.</li> </ul> <p>The Air Quality Strategy sets out objectives for a range of pollutants. As these are quite extensive they have not been reproduced here.</p>	Incorporated in Sustainability Objectives 3 and 12.
Defra (2007) Strategy for England's Trees, Woods and Forests	<p>Key aims for government intervention in trees, woods and forests are:</p> <ul style="list-style-type: none"> <li>• To secure trees and woodlands for future generations;</li> <li>• To ensure resilience to climate change;</li> <li>• To protect and enhance natural resources;</li> <li>• To increase the contribution that trees, woods and forests make to our quality of life; and</li> <li>• To improve the competitiveness of woodland businesses and products.</li> </ul> <p>These aims will form the basis on which the Delivery plan will be developed by Natural England and the Forestry Commission England (FCE). The strategy provides a national policy direction, which can be incorporated alongside regional</p>	Incorporated in Sustainability Objective 4.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in Sustainability Objectives
	<p>priorities within regional forestry frameworks.</p> <p>Strategy aims to create 2,200 hectares of wet woodland in England by 2010.</p>	
Defra (2009) Safeguarding our Soils: A Strategy for England	<p>The Strategy is underpinned by the following vision:</p> <p>By 2030, all England's soils will be managed sustainably and degradation threats tackled successfully. This will improve the quality of England's soils and safeguard their ability to provide essential services for future generations.</p> <p>Achieving this vision will mean that:</p> <ul style="list-style-type: none"> <li>• Agricultural soils will be better managed and threats to them will be addressed;</li> <li>• Soils will play a greater role in the fight against climate change and in helping us to manage its impacts;</li> <li>• Soils in urban areas will be valued during development, and construction practices will ensure vital soil functions can be maintained; and</li> </ul> <p>Pollution of our soils is prevented, and our historic legacy of contaminated land is being dealt with.</p> <p>There are no specific objectives or targets in this strategy.</p>	Incorporated in Sustainability Objective 4.
Defra (2011) Biodiversity 2020: A strategy for England's wildlife and ecosystem	<p>This is a new biodiversity strategy for England that builds on the Natural Environment White Paper and provides a comprehensive picture of the Government is implementing the international and EU commitments. It sets out the strategic direction for biodiversity policy for the next decade on land (including rivers and lakes) and at sea. The Strategy has as its mission to halt overall biodiversity loss, support healthy well-functioning ecosystems, and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people.</p>	Incorporated in Sustainability Objective 4
Defra (2011) Review of Waste Policy in England	<p>Building on waste reduction targets established in the 2007 Waste Strategy, the Review sets out a range of commitments relating to:</p> <ul style="list-style-type: none"> <li>• Sustainable use of materials;</li> <li>• Waste prevention, re-use and recycling;</li> <li>• Regulation and enforcement;</li> <li>• Householders and local authorities working together;</li> <li>• Business waste collection;</li> <li>• Energy recovery;</li> <li>• Landfill; and</li> <li>• Infrastructure and planning.</li> </ul>	Incorporated in Sustainability Objective 2
Defra (2008) Future Water, the Government's Water Strategy for England	<p>Objectives:</p> <p>By 2030 at the latest, we have:</p> <ul style="list-style-type: none"> <li>• Improved the quality of our water environment and the ecology which it supports, and continued to provide high levels of drinking water quality from our taps;</li> <li>• Sustainably managed risks from flooding and coastal erosion, with greater understanding and more effective management of surface water;</li> <li>• Ensured a sustainable use of water resources, and implemented fair, affordable and cost reflective water charges;</li> <li>• Cut greenhouse gas emissions; and</li> <li>• Embedded continuous adaptation to climate change and other pressures across the water industry and water users.</li> </ul> <p>Targets: Key targets are within the objectives above and further a number of sub-targets are included within the document.</p>	Incorporated in Sustainability Objectives 5 and 6
Defra (2009) Safeguarding our Soils: A Strategy for England	<p>The Soil Strategy for England provides a vision to guide future policy development across a range of areas and sets out the practical steps that are needed to take to prevent further degradation of our soils, enhance, restore and ensure their resilience, and improve understanding of the threats to soil and best practice in responding to them. Key objectives of the strategy include:</p> <ul style="list-style-type: none"> <li>• Better protection for agricultural soils;</li> </ul>	Incorporated in Sustainability Objective 1



Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in Sustainability Objectives
	<ul style="list-style-type: none"> <li>Protecting and enhancing stores of soil carbon;</li> <li>Building the resilience of soils to a changing climate;</li> <li>Preventing soil pollution;</li> <li>Effective soil protection during construction and development; and</li> <li>Dealing with the legacy of contaminated land.</li> </ul>	
Defra (2011) Natural Environment White Paper; The natural choice: securing the value of nature	<p>The Natural Environment White paper sets out the Government's plans to ensure the natural environment is protected and fully integrated into society and economic growth. The White Paper sets out four key aims:</p> <ul style="list-style-type: none"> <li>(i) protecting and improving our natural environment;</li> <li>(ii) growing a green economy;</li> <li>(iii) reconnecting people and nature; and</li> <li>(iv) international and EU leadership, specifically to achieve environmentally and socially sustainable economic growth, together with food, water, climate and energy security and to put the EU on a path towards environmentally sustainable, low-carbon and resource-efficient growth, which is resilient to climate change, provides jobs and supports the wellbeing of citizens.</li> </ul>	Incorporated in Sustainability Objectives 4 and 7
Defra (2011) Biodiversity 2020: a Strategy for England's Wildlife and Ecosystem Services	<p>The Strategy is designed to help to deliver the Natural Environment White Paper and include the following priorities:</p> <ul style="list-style-type: none"> <li>Creating 200,000 hectares of new wildlife habitats by 2020;</li> <li>Securing 50% of SSSIs in favourable condition, while maintaining at least 95% in favourable or recovering condition;</li> <li>Encouraging more people to get involved in conservation by supporting wildlife gardening and outdoor learning programmes; and</li> <li>Introducing a new designation for local green spaces to enable communities to protect places that are important to them.</li> </ul>	Incorporated in Sustainability Objective 3
Defra & HM Government (2011) Water White Paper; Water for Life	<p>Water for Life describes a vision for future water management in which the water sector is resilient, in which water companies are more efficient and customer focused, and in which water is valued as the precious and finite resource it is.</p>	Incorporated in Sustainability Objective 5
Defra & Environment Agency (2001) National Flood and Coastal Erosion Risk Management Strategy for England	<p>The strategy describes what needs to be done by all organisations involved in flood and coastal erosion risk management. The strategy sets out a statutory framework that will help communities, the public sector and other organisations to work together to manage flood and coastal erosion risk.</p>	Incorporated in Sustainability Objective 5
HM Government (1979) Ancient Monuments and Archaeological Areas Act	<p>The Act defines sites that warrant protection as ancient monuments. They can be a Scheduled Ancient Monuments or <i>"any other monument which in the opinion of the Secretary of State is of public interest by reason of the historic, architectural, traditional, artistic or archaeological interest attaching to it"</i>.</p> <p>There are no specific targets or objectives identified.</p>	Incorporated in Sustainability Objective 4.
HM Government (1981) Wildlife and Countryside Act	<p>The main UK legislation relating to the protection of named animal and plant species includes legislation relating to the UK network of nationally protected wildlife areas: Site of Special Scientific Interest (SSSIs).</p> <p>There are no specific targets or objectives identified.</p>	Incorporated in Sustainability Objective 4.
HM Government (1990) Planning (Listed Building and Conservation Areas) Act	<p>The Planning (Listed Buildings and Conservation Areas) Act 1990 provides specific protection for buildings and areas of special architectural or historic interest.</p> <p>There are no specific targets or objectives identified.</p>	Incorporated in Sustainability Objective 4.
HM Government (2000) Countryside and Rights of Way Act 2000	<p>This Act:</p> <ul style="list-style-type: none"> <li>Gives people greater freedom to explore open country on foot;</li> <li>Creates a duty for Highway Authorities and National Park Authorities to establish Local Access Forums;</li> <li>Provides a cut-off date of 1 January 2026 for the recording of certain rights of way on definitive maps and the extinguishment of those not so recorded by</li> </ul>	Incorporated in Sustainability Objective 4.



Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in Sustainability Objectives
	<p>that date;</p> <ul style="list-style-type: none"> <li>Offers greater protection to wildlife and natural features, better protection for Sites of Special Scientific Interest (SSSIs) and more effective enforcement of wildlife legislation; and</li> <li>Protects Areas of Outstanding Natural Beauty with legislation similar to that for National Parks.</li> </ul> <p>There are no specific objectives or targets in the Act.</p>	
HM Government (2003) Sustainable Energy Act	<p>The Act aims to promote sustainable energy development and use and report on progress regarding cutting the UK's carbon emissions and reducing the number of people living in fuel poverty.</p> <p>Specific targets are set by the Secretary of State as energy efficiency aims.</p>	Incorporated in Sustainability Objective 4.
HM Government (2004 and revised 2006) Housing Act	<p>Energy efficiency must be at least 20% greater in properties by 2010 than compared with 2000.</p>	Incorporated in Sustainability Objective 4.
HM Government (2005) Securing the Future – the UK Sustainable Development Strategy	<p>The Strategy contains a new set of indicators to monitor progress towards sustainable development in the UK. Those most relevant at the local authority level include:</p> <ul style="list-style-type: none"> <li>Greenhouse gas emissions</li> <li>Road freight (CO2 emissions and tonne km, tonnes and GDP)</li> <li>Household waste (a) arisings (b) recycled or composted</li> <li>Local environmental quality</li> </ul>	Incorporated in Sustainability Objectives 1, 2, 3, 4, and 6.
HM Government (2006) The Natural Environment and Rural Communities (NERC) Act 2006	<p>The Act:</p> <ul style="list-style-type: none"> <li>Makes provision about bodies concerned with the natural environment and rural communities;</li> <li>Makes provision in connection with wildlife, Sites of Special Scientific Interest (SSSIs), National Parks and the Broads;</li> <li>Amends the law relating to rights of way;</li> <li>Makes provision as to the Inland Waterways Amenity Advisory Council; and</li> <li>Provides for flexible administrative arrangements in connection with functions relating to the environment and rural affairs and certain other functions; and for connected purposes.</li> </ul> <p>There are no specific objectives or targets in the Act.</p>	Incorporated in Sustainability Objective 4.
HM Government (2008) The Climate Change Act 2008	<p>The Act sets:</p> <ul style="list-style-type: none"> <li>Legally binding targets - greenhouse gas emission reductions through action in the UK and abroad of at least 80% by 2050, and reductions in CO2 emissions of at least 26% by 2020, against a 1990 baseline. The 2020 target will be reviewed soon after Royal Assent to reflect the move to all greenhouse gases and the increase in the 2050 target to 80%.</li> </ul> <p>Further, the Act provides for a carbon budgeting system which caps emissions over five year periods, with three budgets set at a time, to set out our trajectory to 2050.</p>	Incorporated in Sustainability Objective 5.
HM Government (2008) The Planning Act	<p>Introduces a new system for nationally significant infrastructure planning, alongside further reforms to the Town and Country Planning system. A major component of this legislation is the introduction of an independent Infrastructure Planning Commission (IPC), to take decisions on major infrastructure projects (transport, energy, water and waste). To support decision-making, the IPC will refer to the Government's National Policy Statements (NPSs), which will provide a clear long-term strategic direction for nationally significant infrastructure development.</p> <p>There are no specific objectives or targets in the Act.</p>	This act is not specifically relevant to any of the objectives.
HM Government (2009) The UK Renewable Energy Strategy	<p>A vision is set out in the document whereby by 2020:</p> <ul style="list-style-type: none"> <li>More than 30% of our electricity is generated from renewables;</li> <li>12% of our heat is generated from renewables; and</li> <li>10% of transport energy is generated from renewables.</li> </ul>	Incorporated in Sustainability Objective 5.
HM Government (2010) The Government's	<p>The Vision of the Statement is "that the value of the historic environment is recognised by all who have the power to shape it; that Government gives it</p>	Incorporated in Sustainability

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in Sustainability Objectives
Statement on the Historic Environment for England	<p><i>proper recognition and that it is managed intelligently and in a way that fully realises its contribution to the economic, social and cultural life of the nation."</i></p> <p>This vision is supported by six aims:</p> <ol style="list-style-type: none"> <li>1 Strategic Leadership: Ensure that relevant policy, guidance, and standards across Government emphasize our responsibility to manage England's historic environment for present and future generations.</li> <li>2 Protective Framework: Ensure that all heritage assets are afforded an appropriate and effective level of protection, while allowing, where appropriate, for well managed and intelligent change.</li> <li>3 Local Capacity: Encourage structures, skills and systems at a local level which: promote early consideration of the historic environment; ensure that local decision makers have access to the expertise they need; and provide sufficiently skilled people to execute proposed changes to heritage assets sensitively and sympathetically.</li> <li>4 Public Involvement: Promote opportunities to place people and communities at the centre of the designation and management of their local historic environment and to make use of heritage as a focus for learning and community identity at all levels.</li> <li>5 Direct Ownership: Ensure all heritage assets in public ownership meet appropriate standards of care and use while allowing, where appropriate, for well managed and intelligent change.</li> <li>6 Sustainable Future: Seek to promote the role of the historic environment within the Government's response to climate change and as part of its sustainable development agenda.</li> </ol> <p>No key targets.</p>	Objective 4..
HM Government (2010) The Air Quality Standards 2010	The Regulations largely implement Directive 2008/50/EC on ambient air quality and cleaner air for Europe.	Incorporated in Sustainability Objective 6
HM Government (2010) Flood and Water Management Act	<p>The Act takes forward a number of recommendations from the Pitt Review into the 2007 floods and places new responsibilities on the Environment Agency, local authorities and property developers (among others) to manage the risk of flooding.</p> <ul style="list-style-type: none"> <li>• The Environment Agency is responsible for developing and applying a flood risk management strategy for England and Wales. Every other agency with a flood risk management function across England and Wales must take account of this strategy.</li> <li>• Local authorities across England and Wales are required to develop, maintain, apply and monitor a strategy for local flood risk management in their areas. These local strategies must include the risk of flooding from surface water, watercourse and groundwater flooding.</li> <li>• Lead local authorities must establish and maintain a register of structures which have an effect on flood risk management in their areas.</li> <li>• The Act introduces a requirement to improve the flood resistance of existing buildings by amending the Building Act 1984.</li> <li>• The Act introduces the provision for residential landlords to be charged the cost of their tenant's unpaid water bills should the landlord fail to pass on the tenants details to the respective water company for the local area.</li> <li>• The Act introduces the requirements for developers of property to construct Sustainable Drainage Systems (SUDS).</li> <li>• Local authorities have a duty to adopt these SUDS once completed. By adoption, the Act means that they become responsible for maintaining the systems.</li> </ul>	Incorporated in Sustainability Objective 5
HM Government (2010) The Conservation of Habitats and Species Regulations	This is the UK transposition of EC Directive 92/43/EC on the conservation of natural habitats and of wild fauna and flora. The Regulations provide for the designation and protection of 'European sites', the protection of 'European protected species', and the adaptation of planning and other controls for the protection of European Sites.	Incorporated in Sustainability Objective 4
HM Government (2010)	Those key targets related to water resources, include:	Incorporated in

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in Sustainability Objectives
Flood and Water Management Act 2010	<ul style="list-style-type: none"> <li>To widen the list of uses of water that water companies can control during periods of water shortage, and enable Government to add to and remove uses from the list.</li> <li>To encourage the uptake of sustainable drainage systems by removing the automatic right to connect to sewers and providing for unitary and county councils to adopt SUDS for new developments and redevelopments.</li> <li>To reduce 'bad debt' in the water industry by amending the Water Industry Act 1991 to provide a named customer and clarify who is responsible for paying the water bill.</li> <li>To make it easier for water and sewerage companies to develop and implement social tariffs where companies consider there is a good cause to do so, and in light of guidance that will be issued by the Secretary of State following a full public consultation.</li> </ul>	Sustainability Objective 6.
HM Government (2010) White Paper: Healthy Lives, Healthy People: Strategy for Public Health in England	<p>Aims to create a 'wellness' service (Public Health for England) and to strengthen both national and local leadership.</p> <p>No formal targets or objectives.</p>	Incorporated in Sustainability Objective 13.
HM Government (2011) The Localism Act	<p>The Localism Bill includes five key measures that underpin the Government's approach to decentralisation.</p> <ul style="list-style-type: none"> <li>Community rights;</li> <li>Neighbourhood planning;</li> <li>Housing;</li> <li>General power of competence; and</li> </ul> <p>Empowering cities and other local areas.</p> <p>No key targets or indicators.</p>	Incorporated in Sustainability Objective 15.
HM Government (2011) Water for Life: White Paper	<p><i>Water for Life</i> describes a vision for future water management in which the water sector is resilient, in which water companies are more efficient and customer focused, and in which water is valued as the precious and finite resource it is.</p> <p><i>Water for Life</i> includes several proposals for deregulating and simplifying legislation, to reduce burdens on business and stimulate growth. Ofwat's proposals for reducing its regulatory burdens complement these.</p> <p>No key targets or objectives.</p>	Incorporated in Sustainability Objective 6.
HM Government (2011) Carbon Plan: Delivering our Low Carbon Future	<p>This sets out how the UK will achieve decarbonisation within the framework of energy policy:</p> <ul style="list-style-type: none"> <li>To make the transition to a low carbon economy while maintaining energy security, and minimising costs to consumers, particularly those in poorer households.</li> </ul> <p>There are no formal objectives or targets.</p>	Incorporated in Sustainability Objective 5.
HM Government (2013) The Community Infrastructure Levy (Amendment) Regulations 2013	<p>The Community Infrastructure Level (CIL) is a charge which may be applied to new developments by local authorities. The money can be used to support development by funding infrastructure that the council, local community and neighbourhoods want.</p> <p>There are no formal objectives or targets.</p>	Not specifically applicable to any of the objectives.
HM Government (2014) Water Act 2014	<p>The provisions in the Act enable the delivery of Government's aims for a sustainable sector as set out in the Water White Paper in a way that this is workable and clear. This Act aims to make steps towards reducing regulatory burdens, promoting innovation and investment, giving choice and better service to customers and enabling more efficient use of scarce water resources.</p> <p>There are no formal objectives or targets.</p>	Incorporated in Sustainability Objective 6.
HM Government (2015) Water Framework Directive (Standards and Classification) Directions (England and Wales) 2015.	<p>The regulations implement provisions of the Water Framework Directive (Directive 2000/60/EC), the Environmental Quality Standards Directive (Directive 2008/105/EC) and the priority substances amendment of these directives (Directive 2013/39/EU). This includes directions for the classification of surface water and groundwater bodies, monitoring requirements, standards for ecological and chemical status of surface waters, and environmental quality standards for priority substances.</p>	Incorporated in Sustainability Objective 6.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in Sustainability Objectives
	There are no formal objectives or targets.	
HM Government (2015) Government Response to the Committee on Climate Change.	<p>In June 2015 the Committee on Climate Change and the Adaptation Sub-Committee published the seventh progress report on Government's mitigation activity and the first statutory assessment of the National Adaptation Programme. This included five recommendations and it is those recommendations that are responded to within this response.</p> <p>There are no formal objectives or targets.</p>	Incorporated in Sustainability Objective 5.
HM Government (2016) Environmental Permitting (England and Wales) Regulations 2016.	<p>The Regulations provide a consolidated system of environmental permitting in England and Wales, and transpose the provisions of 15 EU Directives. It provides a system for environmental permits and exemptions for industrial activities, mobile plant, waste operations, mining waste operations, water discharge activities, groundwater activities, flood risk activities and radioactive substances activities. It also sets out the powers, functions and duties of the regulators.</p> <p>Certain flood risk activities are now regulated under the Environmental Permitting Regulations, with environmental permits required for some activities. There are slight variations between England and Wales.</p> <p>There are no formal objectives or targets.</p>	Not specifically relevant to any of the objectives.
HM Government (2016) Housing and Planning Act 2016	<p>This Act makes widespread changes to housing policy and the planning system. It introduces legislation to allow the sale of higher value local authority homes, introduce starter homes and "Pay to Stay" and other measures intended to promote home ownership and boost levels of housebuilding.</p> <p>The Act introduces numerous changes to housing law and planning law:</p> <ul style="list-style-type: none"> <li>• A proposal to abolish secure and assured tenancies for new tenancies, and replace them with fixed term tenancies lasting between two and five years. However, following an amendment, this was later extended to tenancies of up to 10 years with the possibility of for longer tenancies for families with children.[3] The Act requires where there is a succession to the tenancy that unless they are a spouse or civil partner the new tenancy has to be fixed term rather than secure. Housing associations are not affected by this change.</li> <li>• The promotion of self-build and custom build housebuilding.</li> <li>• The building of 200,000 starter homes which will be obtainable to first time buyers between 23 and 40 for sale at 20% below market prices.</li> <li>• The extension of right to buy to include housing association properties. Due to a deal with the National Housing Federation right to buy will be extended to housing association tenants on a voluntary basis with the Government making payments to housing associations to compensate for the discounts on offer.</li> <li>• A policy dubbed "pay to stay" that would see some council tenants pay higher rent. Income of £31,000 or £40,000 in London would see someone hit by "Pay to Stay". Tenants in receipt of housing benefit would not be affected by this change and neither would housing association tenants.</li> <li>• The forced sale of high value empty local authority properties. The stated aim of this policy was to fund right-to-buy for housing associations in order to promote home ownership. The Act states that lost social housing will be replaced with "affordable housing" which could be a starter home. In London two properties will be built for every one sold.</li> <li>• The speeding up of the planning system so as to deliver more housing. A concept called "permission in principle" is being introduced which is "an automatic consent for sites identified in local plans and new brownfield registers subject to further technical details being agreed by authorities". It is hoped that this will speed up house building.</li> <li>• Powers to force local authorities to have a Local Plan where they do not have one.</li> <li>• Changes to banning orders on "rogue landlords" The Act allows a local authority to apply for a banning order when a landlord or letting agent commits certain offences. The Act also creates a database of rogue landlords that will be maintained by local authorities.</li> <li>• Changes relating to Rent Repayment Orders allowing a local authority to</li> </ul>	Incorporated in Sustainability Objective 12.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in Sustainability Objectives
	<p>apply for one where a landlord has committed certain offences.</p> <ul style="list-style-type: none"> <li>A law allowing recovery of abandoned properties. A private landlord will be allowed to do this without serving a section 21 notice and without serving a court order.</li> </ul>	
HM Government (2017) The Conservation of Habitats and Species Regulations 2017	<p>The purpose of these Good Practice Advice notes is to provide information on good practice to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing biodiversity policy in the National Planning Policy Framework (NPPF) and the related guidance given in the National Planning Practice Guide (PPG).</p> <p>There are no formal objectives or targets.</p>	Incorporated in Sustainability Objective 4.
DfT (2008) Delivering a Sustainable Transport System (DaSTS).	<p>Objectives:</p> <ul style="list-style-type: none"> <li>To support national economic competitiveness and growth, by delivering reliable and efficient transport networks;</li> <li>To reduce transport's emissions of carbon dioxide and other greenhouse gases, with the desired outcome of tackling climate change;</li> <li>To contribute to better safety and health and longer life-expectancy by reducing the risk of death, injury or illness arising from transport and by promoting travel modes that are beneficial to health;</li> <li>To promote greater equality of opportunity for all citizens, with the desired outcome of achieving a fairer society; and</li> <li>To improve quality of life for transport users and non-transport users, and to promote a healthy natural environment.</li> </ul>	I Incorporated in Sustainability Objectives 3, 7 – 9, 13
English Heritage (2008) Conservation Principles, Policies and Guidance	<p>A framework for the sustainable management of the historic environment based on the following principles:</p> <ul style="list-style-type: none"> <li>The historic environment is a shared resource;</li> <li>Everyone should be able to participate in sustaining the historic environment;</li> <li>Understanding the significance of places is vital;</li> <li>Significant places should be managed to sustain their values;</li> <li>Decisions about change must be reasonable, transparent and consistent; and</li> <li>Documenting and learning from decisions is essential.</li> </ul>	Incorporated in Sustainability Objective 3
English Nature (2006) Climate Change Space for Nature	Context for the next 80 years in terms of the likely effects of climate change on biodiversity. Prescribes suggested actions to be taken in preparation for change.	Incorporated in Sustainability Objective 3 and 5
Environment Agency (2009) Water for people and the environment - Water resources strategy for England and Wales.	<p>Objectives:</p> <ul style="list-style-type: none"> <li>Enable habitats and species to adapt better to climate change;</li> <li>Allow the way we protect the water environment to adjust flexibly to a changing climate;</li> <li>Reduce pressure on the environment caused by water taken for human use;</li> <li>Encourage options resilient to climate change to be chosen in the face of uncertainty;</li> <li>Better protect vital water supply infrastructure;</li> <li>Reduce greenhouse gas emissions from people using water, considering the whole life-cycle of use; and</li> <li>Improve understanding of the risks and uncertainties of climate change.</li> </ul> <p>Target: In England, the average amount of water used per person in the home is reduced to 130 litres each day by 2030.</p>	Incorporated in Sustainability Objective 3 and 6
Environment Agency (2011) The National Flood and Coastal Erosion Risk Management Strategy for England	<p>The strategy encourages more effective risk management by enabling people, communities, businesses, infrastructure operators and the public sector to work together to:</p> <ul style="list-style-type: none"> <li>Ensure a clear understanding of the risks of flooding and coastal erosion, nationally and locally, so investment risk can be prioritised more effectively;</li> </ul>	Incorporated in sustainability objective 5.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in Sustainability Objectives
	<ul style="list-style-type: none"> <li>Set out clear and consistent plans for risk management so that communities and business can make informed decisions about the management of the remaining risk;</li> <li>Manage flood and coastal erosion risks in an appropriate way, taking account of the needs of communities and the environment;</li> <li>Ensure that emergency plans and responses to flood incidents are effective and that communities are able to respond effectively to flood forecasts, warnings and advice; and</li> <li>Help communities to recover more quickly and effectively after incidents.</li> </ul>	
Forestry Commission (2005): Trees and Woodlands Nature's Health Service	An advisory document which provides detailed examples of how the Woodland Sector (trees, woodlands and green spaces) can significantly contribute to people's health, well-being (physical, psychological and social) and quality of life. Increasing levels of physical activity is a particular priority.	Incorporated in Sustainability Objective 4 and 13
HM Government (2006) Climate Change The UK Programme	<p>The Climate Change Programme aims to tackle climate change by setting out policies and priorities for action in the UK and internationally.</p> <p>Aims and Objectives:</p> <ul style="list-style-type: none"> <li>To reduce carbon dioxide emissions by 20% below 1990 levels by 2010 (more than is required by the Kyoto Agreement);</li> <li>Make agreements with other countries as to how they will tackle climate change together;</li> <li>Report annually to Parliament on UK emissions, future plans and progress on domestic climate change; and</li> <li>Set out the adaptation plan for the UK, informed by additional research on the impacts of climate change.</li> </ul>	Incorporated in Sustainability Objective 5
<b>Regional</b>		
Severn Trent Water Resources Management Plan (2010)	Guidance on the approach to water management over the period 2010-2035, focused on achieving and maintaining the level of headroom necessary to ensure we can deliver our target levels of service at least cost to customers, whilst minimizing the impact on the environment. This is to be achieved in part by reducing leakage and managing the demand for water, and partly by developing new resources. The Strategy identifies that: <i>"Our best estimates of future supply/demand pressures show that we will need additional water resources and treatment capacity in the longer term. The schemes being delivered through our wider supply resilience investment strategy will provide a deployable output benefit and these form a key part of our longer term supply / demand plans. However, we have identified the likely need for further leakage reductions and water resource schemes during in the 2025-2035 period. Our analysis shows that the most significant risk to our long term supply/demand balance is the impact of climate change."</i>	Incorporated in Sustainability Objectives 2 and 5
Energy Capital (2018) a Regional Approach to Clean Energy Innovation	<p>The report states the main focus of the (Energy Improvement Zones) EIZs will be to integrate low carbon technologies, to develop the business models and infrastructure needed to support new approaches to clean energy as well as overcome the regulatory barriers necessary for them to flourish. They will be designed to stimulate local clean energy innovation and drive productivity within the region, exports and growth.</p> <p>The EIZs aim to demonstrate new technologies, and to turn them into fully commercial propositions, breeding regional markets and supply chains that provide a platform for exports and growth. They will also offer a controlled environment in which innovators of all types can trial new services, technologies and business models.</p>	Incorporated in sustainability objective 5.
Environment Agency Humber River Basin Management Plan (2009)	<p>A strategic document summaries key issue by river catchment. For the Tame, Anker and Mease these are to:</p> <ul style="list-style-type: none"> <li>Improve sewage treatment works at a number of locations to reduce the levels of phosphate, for the River Trent designation.</li> <li>Target pollution prevention campaigns around industrial areas in the urban areas, particularly around Birmingham and the Black Country.</li> <li>Improve sewage treatment works at a number of locations in the River</li> </ul>	Incorporated in Sustainability Objectives 5 and 6



Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in Sustainability Objectives
Mease catchment to reduce the levels of phosphate in the SAC site.		
Environment Agency The Tame, Anker and Mease Management Catchment (2014 consultation)	<p>A summary document forming the background to updating the River Basin Management Plan and the work of the Catchment Partnership. The following objectives are proposed:</p> <ul style="list-style-type: none"> <li>Identifying and remediating point source pollution;</li> <li>Identifying opportunities and tackling diffuse run-off;</li> <li>Restoring and enhancing watercourses, wetlands and floodplains</li> <li>Ensuring water bodies, the water environment and network contribute green infrastructure;</li> <li>Ensuring that the water environment contributes to the local economy and social well-being; and</li> <li>Using the planning system to maximise benefits to the water environment and catchment.</li> </ul> <p>The document notes that: "It is disappointing to see that water quality has declined between 2009 and 2014, despite the significant improvements that have occurred throughout parts of the catchment."</p>	Incorporated in Sustainability Objectives 5 and 6
Environment Agency Trent Catchment Flood Management Plan (2010)	A strategic planning document that provides an overview of the main sources of flood risk in the Trent catchment and how these can be managed in a sustainable framework for the next 50 to 100 years. The CFMP covers Birmingham and the Black Country and identifies that Birmingham should "take further action to reduce flood risk".	Incorporated in Sustainability Objective 5
Environment Agency (2015) Severn River Basin District River Basin Management Plan	This River Basin Management Plan seeks to protect the River Severn so that it can be enjoyed by different Districts the river runs through without each District affecting the others ability to enjoy the river. It also seeks to conserve and enhance the quality of the River Severn environment and maintain its high water quality and habitats, as the River Severn benefits from having particularly rich and diverse wildlife and habitats.	Incorporated in Sustainability Objective 6.
The Greater Birmingham and Solihull Local Enterprise Partnership Strategy (2013)	<p>The Greater Birmingham &amp; Solihull LEP is a partnership of businesses, local authorities and universities which supports private sector growth and job creation. Set up to strengthen local economies, encourage economic development and enterprise, and improve skills across the region. The LEP has set out plans to:</p> <ul style="list-style-type: none"> <li>Increase economic output (GVA) in the area by £8.25 billion by 2020;</li> <li>Create 100,000 private sector jobs by 2020;</li> <li>Stimulate growth in the business stock and business profitability;</li> <li>Boost indigenous and inward investment;</li> <li>Become global leaders in key sectors, including: automotive assembly, low carbon R&amp;D, business and professional services, clinical trials, creative and digital sectors; and</li> <li>Increase the proportion of adults with appropriate qualifications to meet employment needs.</li> </ul>	Incorporated in Sustainability Objectives 7, 8, 9 and 10.
Greater Birmingham & Solihull Local Enterprise Partnership (2016) Strategic Economic Plan 2016-2030	<p>This Strategic Economic Plan sets out a mission for the West Midlands Region: <i>'To create jobs and grow the economy of Greater Birmingham and in so doing raise the quality of life for all of the LEP's population.'</i></p> <p>This plan includes the following targets:</p> <ul style="list-style-type: none"> <li>Create 250,000 private sector jobs by 2030 and be the leading Core City LEP for private sector job creation;</li> <li>Increase GVA by £29bn by 2030;</li> <li>Decrease unemployment to the National Average by 2020 and to have the lowest unemployment amongst the LEP Core Cities by 2030;</li> <li>GBSLEP to be the leading Core City by 2030 for GVA per head;</li> <li>Increase % of working age population with NVQ3+ to the National Average by 2025;</li> <li>Increase productivity rates to the National Average by 2030; and</li> <li>GBSLEP to be the Leading Core City LEP for Quality of Life by 2030.</li> </ul>	Incorporated in Sustainability Objectives 7, 8, 9 and 10.



Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in Sustainability Objectives
Natural England (2012) National Character Area profile no. 67: Cannock Chase and Cank Wood	Cannock Chase and Cank Wood National Character Area (NCA) extends north of the Birmingham and Black Country conurbation and includes a major area of this city. It is situated on higher land consisting of sandstone and the South Staffordshire Coalfield. The NCA principally coincides with the historical hunting forest of Cannock Chase, with major remnants surviving within the Cannock Chase Area of Outstanding Natural Beauty (AONB), which supports internationally important heathland Special Areas of Conservation (SAC) and the Sutton Park National Nature Reserve.	Incorporated in sustainability objective 4.
Natural England (2012) National Character Area profile no. 97: Arden	Arden National Character Area (NCA) comprises farmland and former wood-pasture lying to the south and east of Birmingham, including part of the West Midlands conurbation. Traditionally regarded as the land lying between the River Tame and the River Avon in Warwickshire, the Arden landscape also extends into north Worcestershire to abut the Severn and Avon Vales. To the north and northeast it drops down to the open landscape of the Mease/Sence Lowlands. The eastern part of the NCA abuts and surrounds Coventry, with the fringes of Warwick and Stratford-upon-Avon to the south. This NCA has higher ground to the west, the Clent and Lickey Hills and to the east, the Nuneaton ridge.	Incorporated in sustainability objective 4.
The 7 Authorities of the West Midlands Metropolitan Area (2011) West Midlands Local Transport Plan	<p>The West Midlands Local Transport Plan 2011 - 2026 (LTP) is a statutory document which looks at the transport needs of the Metropolitan Area and sets out a way forward to deliver those needs through short, medium and long term transport solutions.</p> <p>The LTP sets out how our transport network can play its part in the transformation of the West Midlands economy. It demonstrates how this will bring real benefits to people through its contribution to economic revival, creation of jobs, improved accessibility, improved local and national connections by road and rail and better quality of life. The Plan's specific objectives are:</p> <ul style="list-style-type: none"> <li>• Prioritising investment on those interventions which will have greatest economic benefit;</li> <li>• Improving the delivery of our transport priorities;</li> <li>• Effectively maintaining and managing our transport assets ;</li> <li>• Enhancing the efficiency, and reliability of our transport networks for the movement of people and freight;</li> <li>• Improving safety and security; and</li> <li>• Promoting low carbon corridors and Smarter Choices to influence travel behaviour.</li> </ul>	Incorporated in Sustainability Objective 3
Environment Agency (2009) A Water Resources Strategy Regional Action Plan for the West Midlands Region	<p>The EA Water Resources Strategy for England and Wales, <i>Water for People and the Environment</i>, sets out a number of actions that are reflected in the Regional Action Plan. This Plan takes the aims and objectives of the strategy and identifies Regional actions that will enable:</p> <ul style="list-style-type: none"> <li>• Water to be abstracted, supplied and used efficiently;</li> <li>• The water environment to be restored, protected and improved so that habitats and species can better adapt to climate change;</li> <li>• Supplies to be more resilient to the impact of climate change, including droughts and floods;</li> <li>• Water to be shared more effectively between abstractors;</li> <li>• Improved water efficiency in new and existing buildings;</li> <li>• Water to be valued and used efficiently;</li> <li>• Additional resources to be developed where and when they are needed in the context of a twin-track approach with demand management;</li> <li>• Sustainable, low carbon solutions to be adopted; and</li> <li>• Stronger integration of water resources management with land, energy, food and waste.</li> </ul>	Incorporated in Sustainability Objective 2
Forestry Commission (2004) West Midlands Regional Forestry	The Framework sets out priorities for activity across the private, public and voluntary sector, and includes priorities and actions based around the following	Incorporated in Sustainability Objectives 4, 5, 6 and

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in Sustainability Objectives
Framework	<p>themes:</p> <ul style="list-style-type: none"> <li>• Tree and Woodland Cover;</li> <li>• Trees Woodland and Forestry Industry;</li> <li>• Wood Energy and Recycling;</li> <li>• Recreation and Tourism;</li> <li>• Health and Wellbeing;</li> <li>• Fostering Social Inclusion;</li> <li>• Enhancing Biodiversity;</li> <li>• Climate Change; and</li> <li>• Green Infrastructure.</li> </ul>	13
Peter Brett Associates LLP (2014) GBSLEP Joint Strategic Housing Study.	<p>This study outlined the oversights of past population projections for the Birmingham area and its surrounding districts/regions. It highlights a need for a considerable amount of housing building needed each year and a need for more housebuilding in the regions and districts surrounding Birmingham.</p> <ul style="list-style-type: none"> <li>• Preferred scenario 2011-31 – 165,000 dwellings.</li> </ul>	Incorporated in Sustainability Objective 12.
West Midlands Combined Authority (2017) West Midlands Roadmap to a Sustainable Future in 2020 (Annual Monitoring Report)	<p>This report is an annual monitoring report of the progress the West Midlands Roadmap to Sustainability and includes the following objective:</p> <ul style="list-style-type: none"> <li>• Reverse the rise in health inequalities for women</li> </ul>	Incorporated in Sustainability Objective 13.
West Midlands Combined Authority (2017) Thrive West Midlands – An Action Plan to drive better mental health and wellbeing in the West Midlands	<p>This Action Plan forms an agreement between the key organisations of the West Midlands to work together to improve the mental health and wellbeing of the residents of the West Midlands:</p> <ul style="list-style-type: none"> <li>• Improve the accessibility of jobs for people with mental health issues and their general wellbeing.</li> </ul>	Incorporated in Sustainability Objective 13.
<b>Local</b>		
Birmingham City Council (1994) Handsworth, Sandwell and Soho: Areas of Restraint	<p>Review of the concentration of residential care and nursing homes, hostels and non-family dwelling house uses within Handsworth, Sandwell and Soho wards. Proposed a restraint policy in respect of the concentration of hotel, institutional and non-family dwellinghouse uses within the Handsworth, Sandwell and Soho Wards.</p>	Incorporated in Sustainability Objectives 9 and 15.
Birmingham City Council (1999) Wheelwright Road: Area of Restraint	<p>Restricts non family dwellinghouse uses in Wheelwright Road.</p>	Incorporated in Sustainability Objectives 9 and 15
Birmingham City Council (2005) Developing Birmingham: An Economic Strategy for the City 2005-2015.	<p>The vision of the Economic Strategy is: <i>"To build on Birmingham's renaissance and secure a strong and sustainable economy for our people."</i></p> <p>The strategy identifies four key areas to focus on:</p> <ol style="list-style-type: none"> <li>1) development and Investment;</li> <li>2) creating a skilled workforce;</li> <li>3) fostering business development and diversification; and</li> <li>4) creating sustainable communities and vibrant urban villages.</li> </ol>	Incorporated in Sustainability Objectives 7, 8, 9 and 10.
Birmingham City Council (2006) Air Quality Action Plan.	<p>The Action Plan sets out 41 actions which follow the objectives below:</p> <ul style="list-style-type: none"> <li>• Reducing vehicle emissions;</li> <li>• Improving public transport to reduce traffic volumes;</li> <li>• Improving the road network to reduce congestion;</li> <li>• Using area planning measures to reduce traffic volumes;</li> <li>• Reducing air pollution from industry, commerce and residential areas; and</li> </ul>	Incorporated in Sustainability Objective 6.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in Sustainability Objectives
	<ul style="list-style-type: none"> <li>Changing levels of travel demand/promotion of alternative modes of transport.</li> </ul>	
Birmingham City Council (2006) Municipal Waste Management Strategy.	<p>The Strategy sets out the following vision for delivering its municipal waste management services:</p> <p><i>"To run a city that produces the minimum amount of waste that is practicable, and where the remainder is re-used, recycled or recovered to generate energy. The material recovered through composting, recycling, re-use and from the energy recovery process will replace the need for extraction of virgin materials.</i></p> <p><i>The waste management strategy will be sensitive to local needs and will provide a service to help Birmingham become as clean and green a city as it can be. Birmingham City Council and the Constituency partners will provide a service that citizens are pleased to support, and where there is malpractice or deliberate misuse of the service, that this is dealt with efficiently to maintain a clean, safe and healthy environment."</i></p> <p>The Strategy has the following objectives:</p> <ul style="list-style-type: none"> <li>The Council will explore ways of reducing the amount of waste sent to landfill to an absolute minimum, recovering value from waste wherever economically and environmentally practicable through energy recovery and measures to increase re-use, recycling and composting;</li> <li>The City Council and its partners will raise awareness among the wider community to view waste as a resource and will deliver communications activities and work with relevant stakeholders (such as community groups and schools) to promote the cultural change needed to significantly increase recycling and re-use and reduce the overall quantity of waste requiring treatment or disposal;</li> <li>The City Council will develop recycling and composting system that meet the targets set out in this strategy through methods that are acceptable and accessible to the residents of Birmingham;</li> <li>the City Council will explore ways of working with other local authorities and will expand its partnership activities with the private voluntary sectors to assist in delivery of this strategy; and</li> <li>The City Council will work with its partners and other agencies to provide efficient and effective enforcement of its services to contribute to a clean, green, safe and healthy environment.</li> </ul>	Incorporated in Sustainability Objective 6.
Birmingham City Council (2007) Sustainable Management of Urban Rivers and Floodplains SPD	<p>A Supplementary Planning Document which responds to the demands of the Water Framework Directives and sets out policies for development near to river corridors relating to:</p> <ul style="list-style-type: none"> <li>Water Quality;</li> <li>Water Pollution Prevention;</li> <li>Sustainable Urban Drainage Systems (SUDS) and Surface Water Run-Off;</li> <li>Character of the River Corridors;</li> <li>The Floodplain;</li> <li>Nature Conservation and Landscaping;</li> <li>The Historic Environment;</li> <li>Design of Developments;</li> <li>Access;</li> <li>Education and Recreation;</li> <li>Safety and Litter; and</li> <li>Community Involvement.</li> </ul>	Incorporated in Sustainability Objective 5.
Birmingham City Council (2008) Birmingham Private Sector Housing Strategy 2008+ (updated 2010).	<p>The strategy details priority issues and actions to increase levels of decent homes in owner-occupied and private rented sector housing; promote domestic energy efficiency and affordable warmth; and address the growing demand from elderly and disabled residents for assistance to live independently in their own homes. It also set out how the council will fulfil its regulatory role in the licensing and inspection of Houses in Multiple Occupation (HMOs) as prescribed by the Housing Act (2004) and promote better standards of management within the</p>	Incorporated in Sustainability Objective 12.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in Sustainability Objectives
	private rented sector (PRS).	
Birmingham City Council (2008) Contaminated Land Inspection Strategy for Birmingham Second Edition	To identify any contaminated land as defined by the legislation. To take steps to control any risk from any contaminated land identified using voluntary or enforcement action. To liaise with the Environment Agency regarding sites that may be polluting controlled waters or other special sites.	Incorporated in Sustainability Objective 6.
Birmingham City Council (2010) Birmingham Climate change action plan 2010+	<ul style="list-style-type: none"> <li>Birmingham becoming a 'Low Carbon Transition' city;</li> <li>Improving the energy efficiency of the city's <b>'Homes and Buildings'</b>;</li> <li>Reducing the city's reliance on unsustainable energy through 'Low Carbon Energy Generation';</li> <li>Reducing the city's impact on the non-renewable resources through 'Resource Management';</li> <li>Reducing the environmental impact of the city's mobility needs through 'Low Carbon Transport';</li> <li>Making sure the city is prepared for climate change through 'Climate Change Adaptation'; and</li> <li>Making sure that this action plan 'Engages with Birmingham Citizens and Businesses'.</li> </ul>	Incorporated in Sustainability Objective 5.
Birmingham and Black Country Biodiversity Partnership (2010) Birmingham and the Black Country Biodiversity Action Plan	<p>Objectives are to:</p> <ul style="list-style-type: none"> <li>Maintain and increase biodiversity of key sites and landscapes through appropriate protection and management;</li> <li>Restore degraded habitats and key species populations by restoring key areas;</li> <li>Link key areas with ecological corridors to reconnect wildlife populations and make them less vulnerable;</li> <li>Promote and support the use of the natural environment to mitigate against, and adapt to the effects of climate change;</li> <li>Enable the sustainable use of the natural environment to benefit health and wellbeing of residents, workers and visitors as well as improving the local economy.</li> </ul>	Incorporated in Sustainability Objectives 4 and 5.
Birmingham City Council (2011) Multi-agency Flood Plan	A plan outlining flood risk, warnings mechanisms, the actions, roles and responsibilities of those organisations and communities with a key response role in the event, or threat of flooding in the Birmingham local authority area.	Incorporated in Sustainability Objective 5.
Birmingham City Council (Jan 2012) Level 1 & 2 Strategic Flood Risk Assessment	Assesses and maps all known sources of flood risk, including fluvial, surface water, sewer, groundwater and impounded water bodies, taking into account future climate change predictions, to allow the Council to use this as an evidence base to locate future development primarily in low flood risk areas. The outputs from the SFRA will also assist in preparing sustainable policies for the long term management of flood risk.	Incorporated in Sustainability Objective 5.
Birmingham City Council (2015) Birmingham Surface Water Management Plan	A study undertaken in consultation with key local partners who are responsible for surface water management and drainage in their area. Partners work together to understand the causes and effects of surface water flooding and agree the most cost effective way of managing surface water flood risk for the long term. The process of working together as a partnership is designed to encourage the development of innovative solutions and practices.	Incorporated in Sustainability Objective 5.
Birmingham City Council (2013) Health and Well-being Strategy (Updated Priorities 2017)	<p>Improve the wellbeing of children</p> <ul style="list-style-type: none"> <li>•Detect and prevent Adverse Childhood Experiences (ACEs).</li> </ul> <p>Improve the independence of adults.</p> <p>Improve the wellbeing of the most disadvantaged.</p> <p>Make Birmingham a Healthy City.</p>	Incorporated in Sustainability Objective 13.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in Sustainability Objectives
Birmingham City Council (2013) Green Living Spaces Strategy	Includes seven green living spaces principles but no formal objectives or targets.	Incorporated in Sustainability Objectives 4 and 13.
Birmingham City Council (2013) Birmingham Health and Wellbeing Strategy	Identifies priorities and delivery mechanisms for addressing acute and chronic health and well-being issues across the City, some of which are closely related to spatial planning. These include aspirations to: <ul style="list-style-type: none"> <li>• Create fair employment and good work for all;</li> <li>• Ensure Healthy Standard of living for all; and</li> <li>• Create and develop healthy sustainable homes and communities</li> </ul>	Incorporated in Sustainability Objectives 1, 2,
Birmingham City Council (2013) Carbon Roadmap	60% reduction in CO2 emissions by 2027.	Incorporated in sustainability objective 5.
Birmingham City Council (2014) Gypsy and Traveller Accommodation Assessment	Estimates a need for 4 additional pitches during the period 2014-2031.	Incorporated in Sustainability Objective 12.
Birmingham City Council (2014) Protecting the Past – Informing the Present. Birmingham's Heritage Strategy (2014-2019)	The strategy sets a direction for the City's heritage sector for the next 5 years and is a partnership document for the city as a whole, not a Council strategy and reflects the need to attract funding and other kinds of support from a wider constituency of interest and the opportunity to work with partners outside the authority in promoting the city's heritage tourism assets.  The strategy contains no formal objectives or targets.	Incorporated in Sustainability Objective 4
Birmingham City Council (2015) Corporate Emergency Plan	Aim of the plan delivered through the following objectives: <ul style="list-style-type: none"> <li>• To provide an overview of the civil emergency risks which can give rise to emergencies / major business disruptions requiring activation of this plan;</li> <li>• To outline emergency management and business continuity responsibilities of the Council at a corporate and directorate level, including specialist capabilities, such as emergency welfare provision, information and communication systems;</li> <li>• To provide a summary of equipment and facilities available for corporate emergency response actions;</li> <li>• To clarify wider resilience structures for both planning and response; and</li> <li>• To summarise corporate training and exercises and other assurance processes.</li> </ul>	Not specifically relevant to anyone objective but covered in general terms by the majority of the Objectives.
Birmingham City Council (2017) Local Flood Risk Management Strategy	Includes the following objectives: <ul style="list-style-type: none"> <li>• Identify all stakeholders with a role in flood risk management , set out their responsibilities and work with them to adopt a partnership approach to managing local flood risk;</li> <li>• Develop a clear understanding of flood risk from surface water, groundwater and ordinary watercourses and set out how this information will be communicated and shared;</li> <li>• Outline how flood risk assets are identified, managed and maintained and develop a clear understanding of riparian responsibilities;</li> <li>• Define the criteria and for responding to and investigating flooding incidents, and set out the role of emergency planning, flood action groups and individual property owners;</li> <li>• Define the criteria for how and when flood risk management measures will be promoted to ensure that they provide value for money whilst minimising long-term revenue costs and maximising external funding contributions;</li> <li>• Minimise the impact of development on flood risk by developing guidance, policies and standards that manage flood risk and reduce the risk to existing communities; and</li> <li>• Adapt a sustainable approach to managing local flood risk by ensuring actions deliver wider environmental benefits.</li> </ul>	Incorporated in Sustainability objective 5.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in Sustainability Objectives
Birmingham City Council (2017) Birmingham Development Plan	A Development Plan Document which sets the long-term spatial planning vision and objectives for Birmingham. It contains a set of strategic policies that are required to deliver the vision including the broad approach to development.	Incorporated in Sustainability Objectives 1 – 15
Birmingham City Council (2006) Access for People with Disabilities SPD	Provides guidance under Part M of the Building Regulations and their obligations under the Disability Discrimination Act around: <ul style="list-style-type: none"> <li>• Works in the Public Realm</li> <li>• Approaches to buildings and open areas within an application site</li> <li>• Entrances into buildings used by the public</li> <li>• Signage</li> <li>• Access onto upper floors</li> </ul>	Incorporated in SOC1, SOC3 and SOC5.
Birmingham City Council (2001) Affordable Housing SPG	The purpose of this supplementary planning guidance is to provide an additional, complementary mechanism for securing affordable homes in response to recent government advice.	Incorporated in sustainability objectives ECON 2, ECON 3 and SOC 2.
Birmingham City Council (?) Car park design guide	A design guide providing detail on the design objectives and components of car park design required by the council. Includes a provision for those with mobility difficulties and takes into account issues around safety and security.	Incorporated in sustainability objectives ENV 2, ECON 3, SOC 1 and SOC 4.
Birmingham City Council (2012) Car Parking guidelines SPD	A Development Plan Document providing detail on car parking standards. The parking standards guidance is intended to be considered alongside a number of other local policies. Encourages the use of sustainable travel, including electric vehicles, car clubs and cycling.	Incorporated in sustainability objectives ENV 2, ENV 3 and SOC 1.
Birmingham City Council (2007) Extending your home: Home extensions guide	A guide to tell the public about the council's policies on good design and explain what we are looking for when we assess planning applications for home extensions. Outlines three main principles: <ol style="list-style-type: none"> <li>1. Respect the appearance of the local area and your home.</li> <li>2. Ensure the extension does not adversely affect your neighbours.</li> <li>3. Minimise the impact on the environment.</li> </ol> Provides detailed guidance on the three principles, as well as specific guidance on types of extensions, for example back extensions and dormers.	Incorporated in sustainability objectives ENV 2, ENV 4 and ECON 3.
Birmingham City Council (2000) Floodlighting of sports facilities, car parks and secure areas	Supplementary planning guidance for the installation of flood lighting. Flood lighting should: <ul style="list-style-type: none"> <li>• Point downwards.</li> <li>• Minimise the flood of light near to or above the horizontal to reduce potential glare.</li> <li>• The main floodlight beam should, where possible, be directed towards below a 70° arc from a vertical column.</li> <li>• Use asymmetrical beams that permit the front glazing to be kept at or near parallel to the surface being lit.</li> </ul>	Not specifically relevant to anyone objective but covered in general terms by the majority of the Objectives.
Birmingham City Council (2003) High Places	This supplementary planning guidance provides policy and design guidance for tall buildings in Birmingham. It provides guidance on the location, form and appearance of tall buildings. It provides information on: <ul style="list-style-type: none"> <li>• The location of tall buildings.</li> <li>• The design of tall buildings.</li> <li>• Conservation Areas and Listed Buildings where tall buildings are inappropriate</li> <li>• The sustainability of proposals.</li> </ul>	Incorporated in sustainability objectives ENV 2, ENV 5,.
Birmingham City Council (2008) Large format banner advertisements SPD	A supplementary planning document detailing the policy around large banners. States that: <ul style="list-style-type: none"> <li>• A large format banner will only normally be permitted where a building is to be scaffolded for building or related work, and that such scaffolding covers an entire elevation.</li> </ul>	Incorporated in sustainability objective ENV 2.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in Sustainability Objectives
	<ul style="list-style-type: none"> <li>A commercial advertisement element should occupy no more than 40% of the extent of the scaffolded elevation. No elevation should normally contain an advertisement element greater than 500sq.m in area or 40% of the scaffolded elevation, whichever is the lesser.</li> <li>Within sensitive areas such as conservation areas, or on, facing or in close proximity to a listed building, the entire scaffolding mesh must be covered by a 1:1 scale image of the building being constructed/refurbished, or other similar appropriate image. The use of 1:1 scale images will be encouraged in other locations.</li> <li>Scaffolded elevations shall have the whole elevation covered by mesh to a good quality of workmanship, and shall have any commercial element sitting within, and framed by, the mesh.</li> <li>The scaffold and associated banner advert(s) should be removed as soon as the relevant work, as described in 3.1 above, is complete. The advertisement consent will last no longer than the agreed building programme or one year, whichever is the shorter. Consent for continued display in accordance with this policy would not be unreasonably withheld.</li> <li>Such adverts will not normally be permitted in predominantly residential areas.</li> </ul>	
Birmingham City Council (2008) Lighting Places	<p>A supplementary planning document detailing how Birmingham's city centre should be lit. The objectives are as follows:</p> <ul style="list-style-type: none"> <li>To foster multilateral exchange of experience, ideas, creations, technologies and expertise.</li> <li>To encourage exchange of technical experts.</li> <li>To organise theme based meetings.</li> <li>To help public authorities undertake concerted action to promote illumination projects.</li> <li>To provide a structure for this exchange within the scope of an international network of local public authorities.</li> <li>To create arenas for research and experimentation and/or operations.</li> <li>To include lighting issues within a perspective that is both environmentally friendly and in favour of sustainable development.</li> <li>To enable the cities to develop an identity by means of their artistic or technical choices.</li> <li>To impose lighting as a tool for promotion of the cities.</li> </ul>	Incorporated in sustainability objectives ENV 2, ENV 6, ECON 1 and ECON 2.
Birmingham City Council (1999) Location of advertisement hoardings	<p>Guidelines for outdoor advertisement hoardings, including those with mechanically changing displays, ranging from 96 sheet size to smaller 12 sheet panels, and will be used to control the display of existing and proposed hoardings. States that applications must be treated on their own individual merits, with regards to the general characteristics of the locality in which they will be displayed. Also provides specific guidance on location and land use guidelines.</p>	Incorporated in sustainability objectives ENV 2 and ECON 1.
Birmingham City Council (2006) Loss of industrial land SPD	<p>This document provides guidance on the information required by the City Council where a change of use from industrial to an alternative use is being proposed. The SPD applies to all industrial land.</p>	Incorporated in sustainability objectives ENV 1 and ECON 2.
Birmingham City Council (2008) Mature suburbs	<p>The purpose of these guidelines is to set out the City Council's aspirations for such types of development within the City's mature suburbs and residential areas. It sets out key design issues for housing intensification and what is expected from developers and designers when submitting planning applications. Aims for buildings in mature suburbs to be assessed against:</p> <ul style="list-style-type: none"> <li>Plot Size</li> <li>Building Form and Massing</li> <li>Building Siting</li> <li>Landscape and Boundary Treatment</li> <li>Plot Access</li> <li>Parking Provision and Traffic Impact</li> <li>Design Styles</li> <li>Public Realm</li> <li>Archaeology, Statutorily Listed and Locally Listed Buildings</li> </ul>	Incorporated in sustainability objectives ENV 6, ECON 3, and SOC 2.



Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in Sustainability Objectives
	<ul style="list-style-type: none"> <li>• Design Out</li> <li>• Renewable Energy and Climate</li> <li>• Cumulative Impact</li> </ul>	
Birmingham City Council (2000) Parking of vehicles at commercial and industrial premises adjacent to residential property	These guidelines apply to car parking proposals relating to commercial and industrial premises which could cause noise and disturbance to occupants in adjoining residential accommodation.	Incorporated in sustainability objective ENV 2.
Birmingham City Council (2006) The Future of Birmingham's Parks and Open Space Strategy	This Strategy is intended to protect and guide the planning, design, management, maintenance and provision of parks and public open spaces in the city over the next 10-15 years. Contains 30 policies around the provision and use of green spaces and parks.	Incorporated in sustainability objectives ENV 4, ENV 6, ECON2 and SOC3.
Birmingham City Council (2001) Places for all	<p>The guide was produced as a response to the lack of general design guidance that relates to all types of development throughout the city. Good design should apply everywhere not just in key locations such as the city centre and conservation areas.</p> <p>The main targets are:</p> <ol style="list-style-type: none"> <li>1. Creating diversity - The aim must be to create or build within places that have an accessible choice of closely mixed complementary activities.</li> <li>2. Moving around easily - Places should be linked up with short, direct public routes overlooked by frontages.</li> <li>3. Safe places, private spaces - Places must be safe and attractive with a clear division between public and private space.</li> <li>4. Building for the future - Buildings and spaces should be adaptable to enhance their longterm viability and built so they harm the environment as little as possible.</li> <li>5. Build on local character - Development must consider the context and exploit and strengthen the characteristics that make an area special.</li> </ol>	Incorporated in sustainability objectives ENV 2, ENV 5, ENV 6, ECON 3 and SOC 3.
Birmingham City Council (2001) Places for living	<p>Residential development is the major land use in Birmingham and the majority of new development proposals within the city will continue to be for new homes. It is important that residential areas are desirable, sustainable and enduring. They should provide good quality accommodation in a safe and attractive environment, which people.</p> <ol style="list-style-type: none"> <li>1. Places not estates - Successful developments must address wider issues than simply building houses and create distinctive places that offer a choice of housing and complementary activities nearby</li> <li>2. Moving around easily - Places should be linked up with short, direct public routes overlooked by frontages.</li> <li>3. Safe places, private spaces - Places must be safe and attractive with a clear division between public and private space</li> <li>4. Building for the future - Buildings and spaces should be adaptable to enhance their longterm viability and built so they harm the environment as little as possible.</li> <li>5. Build on local character - Developers must consider the context and exploit and strengthen the characteristics that make an area special.</li> </ol>	Incorporated in sustainability objectives ENV 2, ENV 3, ENV 5, ENV 6, ECON 3 and SOC 2.
Birmingham City Council (2011) Places of worship	The document provides clearer and proactive guidance to communities seeking to establish a place of worship and looking to submit applications for planning permission. Its main aim is to ensure a consistent approach to planning applications, not only for places of worship, but also for faith-related community and educational use.	Incorporated in sustainability objectives ENV 4 and SOC 1.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in Sustainability Objectives
Birmingham City Council (2007) Public open space in new residential development SPD	<ul style="list-style-type: none"> <li>An amount of open space equivalent pro rata, to 2 ha per 1000 population will be required.</li> <li>As part of the overall requirement, a children's play area will be required where there is no existing provision within walking distance of the new development (defined as 400m, taking into account barriers such as main roads, railways and canals, which restrict access).</li> <li>Public open space should be sited where it will be overlooked, safe, useable and accessible to all residents and designed to local authority criteria. It should take into account the needs of people with disabilities and any cultural needs identified in consultation with local residents.</li> <li>The key aim of large scale redevelopments is to achieve a good quality environment overall coupled with a good housing stock.</li> </ul>	Incorporated in sustainability objectives ENV 2, ECON 2, ECON 3, SOC 1, SOC 3 and SOC 4.
Birmingham City Council (1996) Shopfronts design guide	These guidelines set out the principles of good shopfront design. They help establish the ground rules for the design of shop fronts and advertisements.	Incorporated in sustainability objective ENV 2, ECON 2 and ECON 3.
Birmingham City Council (2012) Shopping and Local Centres SPD	<p>This expands on policies for shopping and local centres in the UDP and to bring Birmingham's policies for shopping and local centres up to date and in line with national planning policy.</p> <ul style="list-style-type: none"> <li>Within the Primary Shopping Areas at least 55 % of all ground floor units in the Town and District Centres should be retained in retail (Class A1 use) and 50% of all ground floor units in the Neighbourhood Centres should be retained in retail (Class A1) use.</li> <li>Applications for change of use out of A1 will normally be refused if approval would have led to these thresholds being lowered, unless exceptional circumstances can be demonstrated in line with Policy 3.</li> <li>No more than 10% of units within the centre or frontage shall consist of hot food takeaways.</li> <li>Applications for new A3, A4 and A5 uses are encouraged within the Centre Boundary of Town, District and Neighbourhood Centres, subject to avoiding an over concentration or clustering of these uses that would lead to an adverse impact on residential amenity.</li> </ul>	Incorporated in sustainability objectives ENV 2, ECON 1, ECON 2 and ECON 3.
Birmingham City Council (2001) Specific needs residential uses SPG	<p>Guidance relating to the use of land and buildings for residential accommodation, and in certain cases associated care, to people whose housing needs may be termed 'specific'.</p> <p>Targets:</p> <ol style="list-style-type: none"> <li>1 Parking space per 3 beds. <ol style="list-style-type: none"> <li>a) Single room used for living/sleeping/cooking – 15.0sq.m.</li> <li>b) Two room letting as living/sleeping room and separate kitchen One individual: 12.50sq.m (135 sq.ft.) floor area Two individuals: 18.0sq.m (190sq.ft.)</li> <li>c) Two room letting with kitchen/living room and separate bedroom One individual bedroom: 6.50sq.m (70sq.ft.) floor area One individual kitchen/living area: 11.50sq.m (120sq.ft) floor area Two individual's bedroom: 12.50sq.m. (135 sq.ft.) floor area Two individual's kitchen/living room: 15.0sq.m. (160sq.ft.) floor area</li> </ol> </li> </ol>	Incorporated in sustainability objectives ENV 2 and SOC 2.
Birmingham City Council (2008) Telecommunications development mobile phone infrastructure SPD	This Supplementary Planning Document (SPD) is intended to provide guidance to the public, licensed telecommunications operators and planners on the process for the control of telecommunications development and for its siting and appearance within Birmingham.	Incorporated in sustainability objective ENV 4.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in Sustainability Objectives
Birmingham City Council (2018) Council Plan and Budget 2018+	Birmingham City Council's Council Plan and Budget for 2018/19 – 2021/22 setting the objectives, priorities and spending plans of the City Council and the tough decisions that have been made for the 2018/19 financial year ensure a balanced financial position and long-term financial sustainability.	Incorporated in Sustainability Objectives 1 – 15
Birmingham City Council (2014) Birmingham Connected White Paper	<p>Birmingham Connected is directly linked to the strategies and policies of the BDP. Investing in a radically improved integrated transport system will realise the city's potential to support sustainable economic growth, job creation and linking communities.</p> <p>As well as the above Birmingham Connected covers a number of other agendas. Its vision is to create a transport system which puts the user first and delivers the connectivity that people and businesses require. We will improve people's daily lives by making travel more accessible, more reliable, safer and healthier and using investment in transport as a catalyst to improve the fabric of our city. We also want to use the transport system as a way of reducing inequalities across the city by providing better access to jobs, training, healthcare and education as well as removing barriers to mobility.</p>	Incorporated in Sustainability Objectives ENV 3, ENV 6, ECON 2, SOC 1 and SOC 3.
Birmingham City Council (2008) Sustainable Community Strategy	<p>The document's vision is to make Birmingham the first sustainable global city in modern Britain. It will be a great place to live, learn, work and visit: a global city with a local heart.</p> <p>Five outcomes Birmingham people will be enabled to: 1. Succeed economically 2. Stay safe in a clean, green city 3. Be healthy 4. Enjoy a high quality of life 5. Make a contribution</p>	Incorporated in Sustainability Objectives ENV 2, ENV 6, SOC 3, ECON 2, SOC 4, SOC 5.
Birmingham City Council (2012) Employment Land Review	<p>The Employment Land Review (ELR) provides an analysis of the employment land supply position in Birmingham, recent completions, key conclusions and recommendations for future action.</p> <p>As the supply of best urban employment land has declined over recent years. There is a need to identify new employment land opportunities to ensure that an adequate supply of land is maintained.</p> <ul style="list-style-type: none"> <li>• The Washwood Heath sites be excluded from the potential best urban supply at present due to the proposed HS2 route safeguarding.</li> <li>• Given that the supply of good urban land is low and the scope for new opportunities is limited, existing good urban employment land be retained in industrial use and new opportunities safeguarded.</li> <li>• That the approach for the Protection of Employment land set out in the Supplementary Planning Document on the 'Loss of Industrial Land to Alternative Uses' be maintained. This aims to protect good quality sites whilst recognising that poor quality and outdated sites should either be upgraded or used for new development where appropriate</li> <li>• Maximise the use of available funding sources to promote the delivery of key employment sites such as the Regional Investment Site at East Aston.</li> <li>• The City Council continues to work proactively with property agents, major companies, landowners and developers to bring sites forward for development. The use of Compulsory Purchase Orders to assemble land to facilitate employment development be considered where necessary.</li> <li>• Where developments involve the loss of employment land an appropriate Section 106 contribution should be secured and utilised to improve other 5 industrial sites. When the Community Infrastructure Levy is adopted a proportion of the monies raised should also be used to improve existing industrial sites.</li> <li>• The Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP) consider the supply of land for strategic sites such as Major Investment Sites and Regional Logistic Sites and the mechanism for delivery.</li> </ul>	Incorporated in Sustainability Objectives ECON 1 and ECON 3.
Birmingham City Council (2013) Employment Land and Office Targets	This evidence based document provides robust evidence in relation to future requirements for industrial land and office space up to the year 2031. The study helped to inform TP17-TP21 in the Birmingham Development Plan.	Incorporated in Sustainability Objectives ECON 1, ECON 3 and ECON 4.

Plan, Programme or Strategy	Objectives and Targets identified in the Document	Use in Sustainability Objectives
Birmingham City Council (2013) Strategic Housing Market Assessment	<p>This evidence based document was commissioned by Birmingham City Council in March 2012 to enable the Council to develop planning and housing policies and take decisions which encourage the provision of the most appropriate mix of housing (in terms of type, size, tenure, and affordability)</p> <p>The study bears directly on two areas of Council policy, housing and planning. It should inform affordable housing policies, by assessing both the total need for affordable housing and the profile of that need in terms of household sizes and types. It should also inform planning policies in the emerging Core Strategy, in particular the housing target, showing how much housing development the Council should provide land for in the next 20 years, in both the market and affordable sectors.</p> <p>The study established that for the housing market area (comprising Birmingham, the Black Country, Bromsgrove, Coventry, Lichfield and Solihull), the best available estimate of objectively assessed housing need to 2031 is for some 9,300 net new homes per annum.</p>	Incorporated in Sustainability Objective SOC 2.
Birmingham City Council (2018) SHLAA 2017	The SHLAA is a study of sites within Birmingham that have the potential to accommodate housing development. Its purpose is to provide evidence to support the Local Development Framework, in particular the Birmingham Development Plan. It is a key component of the evidence base to support the delivery of land to meet the need for new homes within the city. It is not a decision making document and it does not allocate land for development.	Incorporated in Sustainability Objective SOC 2.
Birmingham City Council (2008) Statement of Community Involvement	<p>The Statement of Community Involvement (SCI) sets out how we will encourage more people to participate in decision-making in Planning. The document sets out our minimum standards for consultation on new policies and planning applications. The key objectives are:</p> <p>a) We will consult early in the development process - this will help to ensure that the views of the community, specific consultation bodies, developers and businesses are fed into the process at the outset. Early engagement is one of the government's objectives in reviewing the planning system.</p> <p>b) Use appropriate consultation methods for each document and for each community.</p> <p>c) Use plain English for all documents.</p> <p>d) Be prepared to experiment with a wide range of innovative consultation methods. e) Ensure that everyone, including people from under-rep</p>	Incorporated in Sustainability Objective SOC 5.
Birmingham City Council (2017) Birmingham Cultural Strategy	<p>Our strategy 'Imagination, Creativity and Enterprise' represents the cultural fabric of Birmingham. It was developed in partnership with many cultural sector organisations, businesses, educational institutions and individuals. Multiple agencies use it to deliver the agreed actions and outcomes and advocate on behalf of the cultural sector.</p> <p>The strategy has five themes through which the vision will be delivered:</p> <ol style="list-style-type: none"> <li>1. Culture on Our Doorstep Becoming a leader in cultural democracy where people come together to co-create, commission, lead and participate in a wide range of locally relevant, pluralistic and community driven cultural ventures.</li> <li>2. Next Generation Ensuring that all children and young people have opportunities to engage with a diverse range of high quality arts and cultural experiences at every stage of their development and which they value as worth it.</li> <li>3. A Creative City Supporting and enabling the growth of creative and cultural SMEs and micro-businesses and individuals through business support, skills and talent development and access to finance.</li> <li>4. Our Cultural Capital Cementing Birmingham's role and reputation as a centre of imagination, innovation and enterprise, with local roots and international reach.</li> <li>5. Our Cultural Future Adapting our business models to ensure they are capable of sustaining and growing the sector into the future through collaboration, diversification, rebalancing and devolution</li> </ol>	Incorporated in Sustainability Objectives ENV 4, SOC 1, and ECON 4 .

## 2.2 Environmental, social and economic baseline and evolution without the Plan

- 2.2.1 The SEA Regulations require that information is provided on "... the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan."
- 2.2.2 The analysis of the baseline information led to the identification of a number of issues relevant to the Development Management DPD, as set out in Table 2.3. These issues are used in combination with the review of plans and programmes and the SA/SEA of the Birmingham Development Plan to inform the development of the Sustainability Objectives and the Assessment Framework as set out in chapter 3.

Table 2.3 Baseline summary and issues relevant to the Development Management DPD

Topic	Summary of Baseline	Issues Arising	Supporting Evidence	Likely evolution without the Plan
Biodiversity and geodiversity	<p>The City has 2 SSSIs and a number of other statutory and non- statutory designated sites which cover approximately 10% of the City. There is one Local Nature Reserve designated in order to protect its geodiversity. The Birmingham and Black Country Nature Improvement Area (NIA) Ecological Strategy provides a landscape-scale framework for action to conserve and enhance biodiversity and geodiversity and to improve ecological networks across the City. The Cannock Chase to Sutton Park Project is another example of landscape-scale action.</p> <p>Biodiversity and Geodiversity is linked to issues related to air quality, water quality, soil quality, health and natural landscape.</p>	Biodiversity and greenspace resources, including locally and nationally important sites, across the City are mapped and managed. Development Management policies will be important in protecting the integrity of biodiversity and geodiversity assets, including designated sites, important habitats and legally protected and notable species both directly and indirectly. For example, continued monitoring of developments on the periphery of designated sites will be important to determine potential indirect and cumulative impacts. Monitoring the potential effects of developments on biodiversity and geodiversity assets more generally is also important because of the potential for these to be influenced by a variety of environmental pathways.	BDP; AMR, Birmingham and Black Country NIA Ecological Strategy, and BCC and EcoRecord data.	In the absence of the DM DPD, there is likely to be less opportunity for the scrutiny of the impacts of specific development in specific locations on biodiversity and geodiversity.
Population and health	Birmingham is the major employment centre for the West Midlands. Birmingham has a high proportion of economically inactive people e.g.	The population of Birmingham is predicted to grow considerably over the	ONS population estimates	In the absence of the DM DPD, there is likely

Topic	Summary of Baseline	Issues Arising	Supporting Evidence	Likely evolution without the Plan
	<p>students, people caring full-time for relatives. Unemployment is higher than the national average. The economic activity rate for Black and Minority Ethnic residents is far higher than that for white residents.</p> <p>There is significant disparity in terms of average household income between Birmingham's constituencies. About 40% of Birmingham's residents live in areas that are in the most deprived 10% in England. Concentrations are very high in wards to the east, north and west of the City Centre and also in Tyburn and Kingstanding Wards to the north of the M6 motorway. Unemployment rates are above the national average.</p> <p>Economy and Equality is linked to issues related to poverty, learning and skills, equality, housing and community involvement.</p> <p>Birmingham faces several issues relating to housing: there are large numbers of homeless people, social housing is in need of updating and relocating, and the number of households is increasing. House prices in Birmingham peaked in January 2008 and sharply declined through to 2010, and now have stabilised. This suggests that the affordability of housing for poorer families and first-time buyers has declined due to other national economic conditions.</p> <p>Housing is linked to issues related to poverty, equality, built and historic environment, natural landscape, sense of place, resource use, energy efficiency and sustainable design, construction and maintenance.</p> <p>The number of residents feeling in poor health is higher than the national average, and people in Birmingham have generally less healthy lifestyles than the English average. Life expectancy in Birmingham is below the England average.</p> <p>Health is linked to issues related to air quality, water quality, biodiversity, natural landscape, culture, sport and recreation, equality and crime.</p> <p>Air quality is an issue as the whole City is designated as an Air Quality Management Area (AQMA); the main source pollutant being nitrogen dioxide as a result of pollution from vehicle emissions. There is a strong correlation between traffic congestion and poor air quality. Given the allocation of an AQMA, and the requirement to maintain an Air Quality Action Plan (AQAP) to direct compliance with national objectives, air quality should improve within the City. In order to deliver compliance, Government has determined the need for Birmingham to introduce a Clean Air Zone (CAZ) to control road transport related emissions particularly Nitrogen Dioxide. A Clean Air Zone feasibility</p>	<p>next 20 years and the emerging Birmingham Development Plan is responding to this change through the provision of housing and employment land across the City. The locations of this development could place greater and different demands on the application of Development Management policies, requiring, for example, that they facilitate development in areas of need and cumulatively do not result in negative effects on specific population groups, areas of the City or key issues such as health through, for example, access to greenspace or reductions in motor transport. Consideration of the wider effects of policy application, such as on health, will also be important through, for example, the control of certain kinds of development in local centres.</p>	BDP	<p>to be less opportunity for the scrutiny of the impacts of specific development in specific locations on the health and well-being of the City's population.</p>

Topic	Summary of Baseline	Issues Arising	Supporting Evidence	Likely evolution without the Plan
	<p>study to determine the type and extent of the zone is underway.</p> <p>Air Quality is linked to issues related to biodiversity, health, sustainable transport reducing the need to travel, climate change mitigation and adaptation).</p> <p>Noise pollution is a problem in some parts of the city, with Birmingham airport and traffic being the principal sources. It is anticipated this trend will continue.</p> <p>Noise is linked to issues related to sustainable transport and housing.</p>			
Water resources and quality	<p>New additional water management measures or water resources needed to ensure there is sufficient water for new housing proposed in the Birmingham Plan. New foul drainage infrastructure will also be required to support the proposed level of growth.</p> <p>Resource Use is linked to issues related to water quality.</p>	<p>Water resources are under pressure in Birmingham and across the regional generally, with reliance on external sources such as Wales. Development Management policies, in combination with the BDP, should contribute to the protection of water resources and quality through the application of development standards which encourage prudent water resource use and guard against pollution.</p>	<p>Catchment Abstraction Management Strategies (CAMS)</p> <p>Humber River Basin Management Plan</p> <p>Severn Trent Water Resources Management Plan</p> <p>BDP</p>	<p>In the absence of the DM DPD, there is likely to be less opportunity for the scrutiny of the impacts of specific development on water management matters.</p>
Climate change	<p>CO<sub>2</sub> emissions and the heat island effect are significant climate related issues which need to be actively managed to avoid their effects becoming more detrimental in the coming decades. Use of the City's Green Infrastructure network will be particularly important in addressing this issue.</p> <p>Reducing and Managing Climate Change is linked to issues related to sustainable transport, reducing the need to travel, air quality, biodiversity health and natural landscape.</p> <p>Recent developments have shown evidence of energy efficiency, but the large number of old properties in the City will need improving to make them more energy efficient, building on current initiatives.</p> <p>Energy Efficiency is linked to issues related to renewable energy, sustainable design construction and maintenance, housing and social and environmental responsibility.</p> <p>Although the city has good public transport infrastructure, it needs expanding</p>	<p>Climate change impacts for Birmingham are likely to consist of higher temperatures and more extreme events, including rainfall leading to flooding. Whilst it is challenging for Development Management policies to be specific on climate change adaptation measures, the design of buildings for example will be important, as will the continued encouragement of CO<sub>2</sub> reductions through energy efficiency measures and encouraging pedestrian, cycling and public transport access wherever possible.</p>	<p>UKCP09 predictions</p> <p>Birmingham Climate Change Action Plan 2010, Carbon Roadmap 2013</p> <p>BDP</p>	<p>In the absence of the DM DPD, there is likely to be less opportunity for the scrutiny of the impacts of specific development on climate change matters.</p>



Topic	Summary of Baseline	Issues Arising	Supporting Evidence	Likely evolution without the Plan
	<p>and upgrading to help minimise the high level of car use in Birmingham. A commitment is set out to achieve this. Emphasis will be placed on 'smarter travel', discouraging unnecessary journeys and encouraging people to use public transport. Congestion is a significant issue at certain times on both road and rail.</p> <p>Sustainable Transport is linked to issues related to air quality, reducing the need to travel, health, climate change mitigation and adaptation.</p> <p>A very small proportion of people who work and live in the city (one tenth) work from home and therefore avoid travelling to work. There is little evidence of people being actively encouraged to work from home. More emphasis needs to be placed on 'smarter travel', discouraging unnecessary journeys, encouraging people to use public transport, and the provision of new/enhanced footways and cycleways.</p> <p>Reducing the need to travel is linked to issues related to sustainable transport, air quality, health, climate change mitigation and adaptation and noise.</p>			
Flood risk, incidences of flooding and flood defences	<p>Birmingham City Council has a good record of taking on board Environment Agency comments in terms of permitting development in flood risk areas. It is recognised by the City Council that measures will need to be put in place to manage and where possible reduce flood risk. Use of the City's Green Infrastructure network will be particularly important in addressing this issue.</p> <p>Managing and Reducing Flood Risk is linked to issues related to health and well-being, biodiversity and infrastructure provision.</p>	<p>Sources of flood risk are from river flooding, surface water flooding, sewer flooding and groundwater flooding.</p> <p>There are around 9,000 properties at risk from fluvial flooding and 30,000 from surface water flooding (1 in 100 year event). These risks will be taken into account as part of the assessment of applications for development.</p>	<p>Birmingham Strategic Flood Risk Assessment</p> <p>BCC records</p>	<p>In the absence of the DM DPD, there is likely to be less opportunity for the scrutiny of the impacts of specific development on water management matters.</p>
Material Assets (housing, economy, key infrastructure, minerals and waste)	<p>Good use is being made of previously developed land as a very high proportion of new housing and office development has taken place on previously developed land. Multifunctional use of land is also important with the City's Green and Blue Infrastructure network having an important role to play in achieving this.</p> <p>Efficient Use of Land is linked to issues related to soil quality, flood risk, water quality, natural landscape, built and historic environment, biodiversity culture, sport and recreation and sense of place. Use of renewable energy could be significantly improved.</p> <p>Renewable Energy is linked to issues related to climate change mitigation and</p>	<p>Development Management policies, in combination with those of the BDP, will be influential in promoting the efficient use of material assets through, for example, attention on energy efficiency standards, the use of recycled aggregates and promotion of waste management.</p> <p>The effects are likely to be cumulative and long term in character, associated with the progressive replacement of the City's housing stock through renewal and</p>	<p>ONS data</p> <p>BDP</p>	<p>In the absence of the DM DPD, there will be less opportunity to monitor and evaluate the specific effects on material assets of developments, and in turn promote more sustainable management of these.</p>

Topic	Summary of Baseline	Issues Arising	Supporting Evidence	Likely evolution without the Plan
	<p>adaptation.</p> <p>Landfill diversion rates are increasing in the City, and past targets for recycling have been met.</p> <p>The percentage of waste sent to landfill within the City has decline to one third of its level ten years ago, whilst recycling has trebled. Given European and National targets it is likely these trends will continue.</p> <p>Waste Reduction and Minimisation is linked to issues related to air quality, soil quality, natural landscape and built and historic environment.</p>	<p>new build.</p> <p>There is high demand for housing in Birmingham and not all of it can be met within Birmingham itself and demand for housing is likely to continue to increase with forecast population growth.</p>		
Cultural heritage	<p>Birmingham has a large amount of land designated as Conservation Areas, some of which are nationally recognised such as the Jewellery Quarter and Bournville. The City also has an extensive number of archaeological remains Listed Buildings and Registered Parks &amp; Gardens.</p> <p>Built and Historic Environment is linked to issues related to sense of place, housing, sustainable design, construction and maintenance, crime and poverty.</p>	<p>Cultural heritage is a diverse, City-wide asset which can be vulnerable to the effects of development, both direct and indirect, short-term and cumulative. Criteria guiding Development Management policies will help to avoid immediate impacts, but monitoring will be required to ensure that there are no unintended consequences for example in relation to the wider setting of cultural heritage assets which can be affected by cumulative development.</p>	BDP	<p>In the absence of the DM DPD, there is likely to be less scrutiny of the impacts of development on cultural heritage, relying on the more general policies of the BDP.</p>
Landscape and townscape	<p>Although much of Birmingham is built up, there is a significant amount of open land within the City including areas of agricultural land to the north east and south west of the City. The City falls within the National Character Areas (NCAs) of Arden to the south and Cannock Chase and Cank Wood to the north. The assessment of these areas for the Countryside Quality Counts project for Natural England indicates that they are subject to a high rate of change. Most of Birmingham is built up, but 15% of the City is designated as Green Belt.</p> <p>Natural landscape is linked to issues related to biodiversity, health, soil quality, sense of place, culture, sport and recreation, climate change mitigation and adaptation, managing and reducing flood risk.</p>	<p>Although much of Birmingham is built up, there is a significant amount of open land within the City. Landscape character is a key contributor to regional and local identity, influencing sense of place, shaping the settings of people's lives and providing a critical stimulus to their engagement with the natural environment. The Development Management DPD, in combination with the BDP, will be influential in helping to retain a sense of character across the City in the context of development pressures.</p>	BDP	<p>In the absence of the DM DPD, there is likely to be less scrutiny of the impacts of development on landscape and townscape, relying on the more general policies of the BDP.</p>



## 3. Methodology

### 3.1 The SA Framework

- 3.1.1 The SA Framework comprises of 15 objectives and associated guide questions. Broadly, the SA objectives present the preferred environmental, social or economic outcome which typically involves minimising detrimental effects and enhancing positive effects. They have been developed to enable a comprehensive assessment of the likely significant effects of the implementation of the Development Management DPD by covering key environmental, social and economic issues.
- 3.1.2 The development of the SA objectives has been informed by the review of plans and programmes, the analysis of the baseline evidence and the consideration of the key sustainability issues for Birmingham (presented in Table 2.3). In addition, they also reflect comments received during the Regulation 18 consultation of the SA Scoping Report (summarised in **Appendix C**) and the DM DPD (June 2015).
- 3.1.3 Table 3.1 sets out the Framework for assessing the sustainability performance of the Development Management DPD, specifically evaluating whether there are likely to be any significant effects associated with implementation of the DPD.

Table 3.1 Sustainability Objectives, Guide Questions and Indicators

SEA Directive Topic Area(s)	Sustainability Objectives	Guide Questions	Potential Indicators
Material assets	ENV1 To encourage development that optimises the use of previously developed land and buildings	Will the use of previously developed land be encouraged? Will development densities be maximised?	Proportion of new development on previously developed land used Development densities achieved
Material assets	ENV2 To promote the application of high standards of design, construction and maintenance of buildings	Will development be encouraged to meet and where possible exceed standards for energy efficiency?	Proportion of developments meeting energy efficiency standards for design, construction and maintenance
Material assets	ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	Will development be encouraged to incorporate measures which promote sustainable transport? Will development help to reduce the need to travel?	Work place travel plans Measures to promote sustainable transport such as provision for cyclists
Landscape & townscape, cultural heritage, biodiversity & geodiversity	ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	Will development protect and where possible enhance the City's cultural and natural heritage?	Development affecting historic assets Development affecting natural assets including open space
Climatic Factors	ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing	Will development help to reduce flood risk? Will development take	Renewable energy installed Other measures installed such as SUDS

SEA Directive Topic Area(s)	Sustainability Objectives	Guide Questions	Potential Indicators
	floodrisk	into account and actively mitigate climate change impacts?	Flooding events Approvals made contrary to EA advice
Water resources, air quality, material assets	ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	Will development incorporate water efficiency measures? Will development actively avoid creating additional pollution burdens?	Water use and technologies Changes in water quality Change to/within Air Quality Management Areas Noise complaints Sustainable waste management
Population and health	ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	Will development promote growth in key economic sectors? Will development contribute to encouraging a culture of enterprise and innovation?	Employment creation by area and type Business start-ups
Population and health	ECON2 To help promote the vitality of local centres	Will development contribute to the maintenance and enhancement of the vitality of local centres?	Local centre health checks
Population and health	ECON3 To promote the regeneration of areas across the City through appropriate development	Will development contribute to regeneration of areas of the City most in need?	Location and type of development
Population and health	ECON4 To encourage investment in learning and skills development	Will development contribute to investment in learning and skills?	Local initiatives to promote skills development
Population and health	SOC1 To help ensure equitable access to community services and facilities	Will development help to promote equitable access to services?	Accessibility indices of key facilities
Population and health	SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	Will development help to promote access to a range of housing types which meet the needs of residents?	Development types and spatial distribution
Population and health	SOC3 To encourage development which promotes health and well-being	Will development help to promote a healthier, more active population?	Activity levels by area and sector of the population
Population and health	SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	Will development help to discourage crime?	Crime levels by area and type
Population and health	SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	Will public participation be encouraged as part of the planning of new development?	Participation in consultations

## 3.2 Appraisal Methodology

3.2.1 Based on the contents of the Development Management DPD detailed in Section 1.4, the SA Framework has been used to appraise the DPD Objectives and Development Management policies. The approach to the appraisal of each of the elements listed above is set out in the sections that follow.

### DPD Objectives

3.2.2 It is important that the Objectives of the DPD are aligned with the SA objectives. The Objectives contained in the DPD (see **Section 1.4**) have therefore been appraised for their compatibility with the objectives that comprise the SA Framework to help establish whether the proposed general approach to the DPD is in accordance with the principles of sustainability. A compatibility matrix has been used to record the appraisal, as shown in **Table 3.2** below.

Table 3.2 Compatibility matrix

SA Objective	DPD Objective			
	Objective 1	Objective 2	Objective 3	Objective 4
ENV1 To encourage development that optimises the use of previously developed land and buildings	0	0	+	?
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	+	-	+	+
Etc...	+	0	+	?

#### Key

+	Objectives are potentially compatible	?	Uncertain if Objectives are related	~	No clear relationship between Objectives	-	Objectives are potentially incompatible
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### DPD Policies

3.2.3 The proposed Development Management policies have been appraised against each of the SA objectives that comprise the SA Framework using an appraisal matrix. The matrix includes:

- The SA objectives;
- A score indicating the nature of the effect for each option on each SA objective;
- A commentary on significant effects (including consideration of the cumulative, synergistic and indirect effects as well as the geography, duration, temporary/permanence and likelihood of any effects) and on any assumptions or uncertainties; and
- Recommendations, including any mitigation or enhancements measures.

3.2.4 The format of the matrix that has been used in the appraisal is shown in **Table 3.3**. A qualitative scoring system has been adopted which is set out in **Table 3.4**. The proposed policies contained in the DPD have been appraised against the SA objectives with a score awarded both for each

constituent policy and for the cumulative effect of each policy. The appraisal matrices are presented at **Appendix A**.

Table 3.3 Appraisal matrix

SA Objective	Score	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	-	-	<p><b><u>Likely Significant Effects</u></b></p> <p>A description of the likely significant effects of the preferred option on the SA objective has been provided here, drawing on baseline information as appropriate.</p> <p><b><u>Mitigation</u></b></p> <ul style="list-style-type: none"> <li>Mitigation and enhancement measures are outlined here.</li> </ul> <p><b><u>Assumptions</u></b></p> <ul style="list-style-type: none"> <li>Any assumptions made in undertaking the appraisal are listed here.</li> </ul> <p><b><u>Uncertainties</u></b></p> <ul style="list-style-type: none"> <li>Any uncertainties encountered during the appraisal are listed here.</li> </ul>
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	+	+	<p><b><u>Likely Significant Effects</u></b></p> <p>A description of the likely significant effects of the preferred option on the SA objective has been provided here, drawing on baseline information as appropriate.</p> <p><b><u>Mitigation</u></b></p> <ul style="list-style-type: none"> <li>Mitigation and enhancement measures are outlined here.</li> </ul> <p><b><u>Assumptions</u></b></p> <ul style="list-style-type: none"> <li>Any assumptions made in undertaking the appraisal are listed here.</li> </ul> <p><b><u>Uncertainties</u></b></p> <p>Any uncertainties encountered during the appraisal are listed here.</p>
Etc.			

Table 3.4 Appraisal Scoring system

Score	Description	Symbol
Significant Positive Effect	The proposed option/policy contributes significantly to the achievement of the objective.	++
Minor Positive Effect	The proposed option/policy contributes to the achievement of the objective but not significantly.	+
Neutral	The proposed option/policy does not have any effect on the achievement of the objective	0
Minor Negative Effect	The proposed option/policy detracts from the achievement of the objective but not significantly.	-
Significant Negative Effect	The proposed option/policy detracts significantly from the achievement of the objective.	--



Score	Description	Symbol
No Relationship	There is no clear relationship between the proposed option/policy and the achievement of the objective or the relationship is negligible.	~
Uncertain	The proposed option/policy has an uncertain relationship to the objective or the relationship is dependent on the way in which the aspect is managed. In addition, insufficient information may be available to enable an appraisal to be made.	?

NB: where more than one symbol/colour is presented in a box it indicates that the appraisal has identified both positive and negative effects. Where a box is coloured but also contains a '?', this indicates uncertainty over whether the effect could be a minor or significant effect although a professional judgement is expressed in the colour used. A conclusion of uncertainty arises where there is insufficient evidence for expert judgement to conclude an effect.

### 3.3 Geographical and temporal scope

- 3.3.1 The geographical scope of the SA principally relates to administrative area of the City of Birmingham, but also takes into account sub-regional, regional and national impacts where appropriate. Birmingham's position as the principal settlement of the West Midlands means that its environmental, social and economic role and impact reach far beyond its immediate boundaries, with attendant implications for key sustainability issues such as carbon emissions, housing provision and wealth creation. The assessment considers sustainability issues and effects in relation to the short term (1-5 years), medium term (5-10 years) and longer term, (10-20 years), the latter being the intended lifespan of the Development Management DPD (to 2031).

### 3.4 Mitigation

- 3.4.1 Identifying effective mitigation measures will also be an important part of the Environmental Report. **Box 3.1** provides information on types and examples of mitigation measures that might be proposed and includes an overview of the mitigation hierarchy. The mitigation hierarchy is based on the principle that it is preferable to prevent the generation of an impact rather than counteract its effects. It thus suggests that mitigation measures higher up the hierarchy should be considered in preference to those further down the list.

#### Box 3.1 Mitigation Hierarchy and Example Measures

Mitigation measures should be consistent with the mitigation hierarchy (after DETR 1997<sup>19</sup> and CLG 2006<sup>20</sup>):

- Avoidance - making changes to a design (or potential location) to avoid adverse effects on an environmental feature. This is considered to be the most acceptable form of mitigation.
- Reduction - where avoidance is not possible, adverse effects can be reduced through sensitive environmental treatments/design.
- Compensation - where avoidance or reduction measures are not available, it may be appropriate to provide compensatory measures (e.g. an area of habitat that is unavoidably damaged may be compensated for by recreating similar habitat elsewhere). It should be noted that compensatory measures do not eliminate the original adverse effect, they merely seek to offset it with a comparable positive one.
- Remediation - where adverse effects are unavoidable, management measures can be introduced to limit their influence.
- Enhancement - where there are no negative impacts, but measures are adopted to achieve a positive move towards the sustainability objectives e.g. through innovative design.

Examples of how mitigation measures could be incorporated into DM DPD proposals could include:

- Ensuring that development management decisions are scrutinised for consistency, cumulative impacts and potential unintended consequences at site, neighbourhood and City-wide levels.

<sup>19</sup> Department of the Environment, Transport and the Regions (1997) *Mitigation Measures in Environmental Statements*. London: DETR

<sup>20</sup> Department for Communities and Local Government (2006): *Consultation Document - EIA: A guide to good practice and procedures*. London: CLG

**Box 3.1 Mitigation Hierarchy and Example Measures**

- Monitoring the scope the DM DPD and its relationship with the BDP, and where there could be policy gaps.
- Monitoring the impacts of particular policies and their effectiveness, particularly in respect of the criteria used to help define the policy.

### 3.5 Who carried out the appraisal

3.5.1 The SA has been undertaken by Wood on behalf of Birmingham City Council.

### 3.6 Difficulties encountered

The SEA Directive requires the identification of any difficulties (such as technical deficiencies or lack of knowledge) encountered during the appraisal process. These uncertainties and assumptions are detailed in the appraisal matrices. Those uncertainties and assumptions common across the appraisal are outlined below.

#### Uncertainties

- ▶ The case-by-case character of individual development proposals which although of a similar type could yield different sustainability outcomes depending on their location.
- ▶ The cumulative sustainability impacts of developments in a particular area.
- ▶ The trade-offs which might be required between environmental, social and economic sustainability outcomes in light of the specific character of developments.
- ▶ Notwithstanding monitoring of various indicators (as part of the BDP as a whole), the difficulty of precisely measuring the sustainability impacts (positive and negative) of specific developments in particular localities and over time.

#### Assumptions

- ▶ That all development proposals will be consistently judged against the policy requirements of the DM DPD and the BDP more widely, including wider statutory measures relating, for example, to energy efficiency in buildings and air pollution.
- ▶ That monitoring of the environmental, social and economic impacts of development will enable judgements to be made on the overall sustainability of development in the City, and in turn feed back into policy evolution.
- ▶ That policy will be implemented consistently across the City and the results of DM decisions monitored accordingly.

## 4. Appraisal of the Draft Development Management DPD and Reasonable Alternatives

### 4.1 Compatibility between the DPD Objectives and the SA Objectives

4.1.1 Testing the compatibility between the SA Objectives and Plan Objectives is a requirement of the SA/SEA process. It helps to identify at an early stage where there could be conflict between the two sets of objectives, particularly in respect of economic and social objectives which can sometimes be at odds with environmental objectives.

4.1.2 The following Objectives (mirroring those of the BDP) have been set for the emerging Development Management DPD:

1. To develop Birmingham as a City of sustainable neighbourhoods that are safe, diverse and inclusive with locally distinctive character.
2. To make provision for a significant increase in the City's population.
3. To create a prosperous, successful and enterprising economy with benefits felt by all.
4. To promote Birmingham's national and international role.
5. To provide high quality connections throughout the City and with other places including encouraging the increased use of public transport, walking and cycling.
6. To create a more sustainable City that minimises its carbon footprint and waste, and promotes brownfield regeneration while allowing the City to grow.
7. To strengthen Birmingham's quality institutions and role as a learning City and extend the education infrastructure securing significant school places.
8. To encourage better health and well-being through the provision of new and existing recreation, sport and leisure facilities linked to good quality public open space.
9. To protect and enhance the City's heritage assets and historic environment.
10. To conserve and enhance Birmingham's natural environments, allowing biodiversity and wildlife to flourish.
11. To ensure that the City has the infrastructure in place to support its future growth and prosperity.

4.1.3 **Table 4.1** presents an assessment of the compatibility between these Objectives and the SA Objectives.

Table 4.1 Compatibility between the Development Management DPD Objectives and the SA Objectives

Sustainability Objectives	Plan Objectives										
	1. Sustainable Neighbourhoods	2. Population Growth	3. Prosperity	4. National & International Role	5. Connectivity	6. Sustainable City	7. Education	8. Health & Well-being	9. Heritage	10. Natural Environment	11. Infrastructure
ENV1 To encourage development that optimises the use of previously developed land and buildings	+	+	?	?	~	+	~	+	~	?	~
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	+	~	~	+	~	~	~	~	+	~	~
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	+	~	+	?	+	+	~	+	~	~	+
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage, including resilient ecological networks able to meet the demands of current and future pressures.	+	?	~	+	+	+	+	+	+	+	~
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	+	?	?	~	~	+	~	+	?	?	?
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	+	?	?	~	~	+	~	+	~	+	~
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	+	+	+	+	~	+	+	+	?	?	~
ECON2 To help promote the vitality of local centres	+	~	+	~	~	+	~	~	~	~	~
ECON3 To promote the regeneration of areas across the City through appropriate development	+	+	+	~	+	+	~	+	~	~	+
ECON4 To encourage investment in learning and skills development	~	~	+	~	~	~	+	~	~	~	~
SOC1 To help ensure equitable access to community services and facilities	+	~	+	~	+	+	+	+	~	~	+
SOC2 To help provide decent and affordable housing for all, of the right	+	+	~	~	~	~	~	+	~	~	~

	Plan Objectives										
Sustainability Objectives	1. Sustainable Neighbourhoods	2. Population Growth	3. Prosperity	4. National & International Role	5. Connectivity	6. Sustainable City	7. Education	8. Health & Well-being	9. Heritage	10. Natural Environment	11. Infrastructure
quantity type, tenure and affordability to meet local needs											
SOC3 To encourage development which promotes health and well-being	+	~	~	~	+	+	~	+	~	+	~
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	+	~	~	~	~	~	~	+	~	~	~
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	+	~	~	~	~	~	~	+	~	~	~
+	Objectives are potentially compatible	?	Uncertain if Objectives are related	~	No clear relationship between Objectives	-	Objectives are potentially incompatible				

4.1.4 **Table 4.1** identifies a number of potential uncertainties between the Sustainability Objectives and those of the emerging Development Management DPD, principally related to the relationship between appropriate business locations and environmental considerations such as reducing the need to travel; contributions to environmental considerations in respect of local centre viability and regeneration; and development which contributes to local distinctiveness and reducing the need to travel. These relationships are unproven, but highlighted as issues which could require monitoring.

4.1.5 The compatibility analysis reveals that the great majority of SA Objectives and Plan Objectives are either compatible or have no direct relationship with one another. No potential incompatibilities between objectives have been identified, although there are a number of uncertain relationships relating to:

- ▶ Plan Objective 2 (population growth);
- ▶ Plan Objective 3 (prosperity);
- ▶ Plan Objective 4 (national and international role);
- ▶ Plan Objective 9 (heritage);
- ▶ Plan Objective 10 (natural environment); and
- ▶ Plan Objective 11 (infrastructure).

4.1.6 The potential uncertainties principally relate to dilemmas in reconciling the need and demand for development with environmental protection (ENV1, 3, 4, 5 and 6 and ECON 1). In many instances, any potential conflicts arising will have to be determined on a case-by-case basis given the particular character and context of development. These uncertainties are not regarded as barriers to

development although particular attention will have to be paid to the application of policy in light of these relationships.

## 4.2 Policies and alternatives

4.2.1 The Development Management DPD proposes 15 policies to manage various aspects of development across the City. The policies have emerged through a process of consultation within Birmingham City Council and with interested parties. In reaching the proposed policies, options have been considered in most cases. This took account of the following factors:

- ▶ To what extent the policy is required in light of the City Council's corporate objectives and national planning policy.
- ▶ To what extent there is a reasonable need to update the existing policy (which is the most common instance).
- ▶ To what extent a potential alternative approach would ensure efficient and effective management of development to meet local needs and priorities to address the specific issues identified in the Scoping Report.
- ▶ To what extent a potential alternative could be pursued without placing an unreasonable burden on applicants or the decision making process (such as through requirements for supporting information).

4.2.2 In consequence, alternatives that have been considered have included:

- ▶ Having no policy;
- ▶ Reliance on national policy (i.e. the NPPF);
- ▶ Using the existing UDP policy;
- ▶ Variations on the proposed policy.

## 4.3 Summary of results and the reasons for selecting/rejecting the alternatives

4.3.1 **Table 4.2** summarises the results of the appraisal of policies, drawn from the analysis in Appendix A which appraises the proposed policies against reasonable alternatives.

Table 4.2 Summary of the results of the appraisal of the preferred policy option

Policy	Summary of Appraisal of the Proposed Policy	Alternatives Considered
<b>Environment and Sustainability</b>		
DM1 Air Quality	A policy which clearly address environmental protection issues will help to reinforce existing regulatory regimes. The outcome is likely to be enhanced sustainability performance across most indicators, reflecting greater certainty for developers in respect of both minimum standards and good practice. No likely	<b>No alternative</b> has been identified to this policy - National policy requires planning to contribute towards compliance with relevant limit values or national objectives for pollutants and take into account local AQMA and Clean Air Zones (CAZ). Therefore in order to comply with national policy it is considered necessary to

Policy	Summary of Appraisal of the Proposed Policy	Alternatives Considered
	significant negative effects have been identified. The policy could benefit from the inclusion of examples of measures against which the policy will be implemented and measured.	set policy aimed at improving air quality and mitigating the impacts of development on air quality. Having no air quality policy will risk undermining the AQMA and CAZ and failure to deliver relevant actions within the City's air quality action plan, transport strategy and the objectives of the BDP in promoting sustainable development, and helping to address climate change.
DM2 Amenity	Good design is important to securing sustainable development through balancing a wide variety of considerations. The detailed criteria within DM01 against which developments will be considered serve as a reference point against which specific proposals can be considered, thereby helping to ensure that development takes account of the specific matters which help to make the City and its neighbourhoods attractive and successful places to live. The specific requirements of DM02 complement the overarching principles set out in DM01. There are no suggested changes to the content of the policies arising from the appraisal. The option of developing a new policy to address design issues yields more positive sustainability outcomes than the reasonable alternatives presented.	<b>No policy</b> on amenity and rely instead on the NPPF and ad hoc considerations of proposals on a case by case basis.  Reason for rejection: The Council believes the preferred approach will provide a more transparent, consistent and fairer basis for considering planning proposals than having no policy. To ensure the successful delivery of the BDP, amenity considerations are considered important. The NPPF is clear that planning should seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.
DM3 Land affected by Contamination and Hazardous Substances	A policy which clearly addresses environmental protection issues will help to reinforce existing regulatory regimes. The outcome is likely to be enhanced sustainability performance across most indicators, reflecting greater certainty for developers in respect of both minimum standards and good practice. No likely significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal.	<b>No alternative</b> to this policy has been identified - Environmental health legislation requires local authorities to identify contaminated land and ensure it is managed in an appropriate manner. The NPPF also stresses the need for policies to ensure that new development is compatible with its location. The NPPF makes clear that developers and landowners are responsible for securing safe development where a site is affected by contamination.
DM4 Landscaping and Trees	Trees and landscaping are fundamental to a high quality and ultimately sustainable environment, contributing aesthetically and functionally to the quality of life across the City. Specification of expectations for design and use of trees and landscaping as part of new development will ensure that, in combination with other policies, high quality design is realised and wider sustainability enhancements are secured. There are no suggested changes to the content of the policy arising from the appraisal, other than cross-referencing Council Strategies relating to Green Infrastructure, for example. The option of developing a new policy to address trees and landscape issues yields more positive sustainability outcomes than the reasonable	<b>No alternative</b> to this policy has been identified - The NPPF and BDP provide strong support for protecting and enhancing valued landscapes. Local planning authorities are advised to set criteria based policies against which proposals for any development on or affecting protected wildlife or landscape areas will be judged.



Policy	Summary of Appraisal of the Proposed Policy	Alternatives Considered
	alternative presented.	
DM5 Light Pollution	A policy which clearly address environmental protection issues will help to reinforce existing regulatory regimes. The outcome is likely to be enhanced sustainability performance across most indicators, reflecting greater certainty for developers in respect of both minimum standards and good practice. No likely significant negative effects have been identified. There are no suggested changes to the content of the policies arising from the appraisal. The option of developing a new policy to address environmental protection issues yields more positive sustainability outcomes than the reasonable alternative presented.	<b>No alternative</b> to this policy has been identified - The NPPF is clear that planning policy should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation. The draft policy provides a detailed approach for achieving this.
DM6 Noise and Vibration	A policy which clearly address environmental protection issues will help to reinforce existing regulatory regimes. The outcome is likely to be enhanced sustainability performance across most indicators, reflecting greater certainty for developers in respect of both minimum standards and good practice. No likely significant negative effects have been identified. There are no suggested changes to the content of the policies arising from the appraisal. The option of developing a new policy to address environmental protection issues yields more positive sustainability outcomes than the reasonable alternative presented.	<b>No alternative</b> has been identified to this policy - National planning policy requires development to contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability. In addition the BDP seeks to create well designed, healthy and safe environments. It is therefore considered necessary to include this policy.
<b>Economy and Network of Centres</b>		
DM7 Advertisements	A specific policy which clearly controls the siting and design of advertisements will provide an important reference point for ensuring that a range of sustainability benefits are secured, focused on enhancing economic development in the City whilst ensuring that residential amenity and City-wide amenity is protected. In all cases, the greater certainty and precision associated with an updated policy is likely to yield positive sustainability effects. No likely significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing a new policy to address siting and design of these uses yields more positive sustainability outcomes than the reasonable alternatives presented.	<b>No policy on advertisements</b> Reasons for rejection: Not having a policy and relying upon applications being considered against the National Planning Policy Framework would not be favoured since there would be no safeguard against inappropriate advertisements and signs.
DM8 Places of	Ensuring the appropriate location and design	<b>Retain the wording of existing policy</b> in paragraphs

Policy	Summary of Appraisal of the Proposed Policy	Alternatives Considered
Worship	of these uses will help to ensure that sustainable development is promoted, particularly having regard to equitable access through public transport and sensitive design ensuring that impacts on local amenity are minimised. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing a new policy to address siting and design of these uses yields more positive sustainability outcomes than the reasonable alternatives presented.	<p>8.31 - 8.35 of the Saved Unitary Development Plan 2005 and Places for Worship and Faith-related Community and Educational Facilities SPD (2011)</p> <p>Reasons for rejection: This policy needs to be updated to reflect Policy TP21 of the BDP which states that the preferred location for community facilities (e.g. health centres, education and social services and religious buildings) is within the network of defined centres.</p> <p><b>No policy</b> on places of worship and faith related community uses.</p> <p>Reasons for rejection: Birmingham has a diverse mix of faiths and cultures. A policy is required to ensure that development for places of worship and faith related community uses takes place in the appropriate locations and their impacts on the local area are managed.</p>
<b>Homes and Neighbourhoods</b>		
DM9 Nurseries and Childcare	A policy which ensures the consistent provision of educational facilities of various kinds across the City will help to ensure that there is equitable access (for example through sustainable locations) and in a fashion which maintains and enhances local amenity. The precise effects of the policy will have to be monitored to determine whether the policy objectives are being realised in practice. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing a new policy to address education-related development issues yields more positive sustainability outcomes than the reasonable alternatives presented.	<p><b>Retain existing UDP policy</b></p> <p>Reasons for rejection: The policy requires updating as it refers to out of date policies. The existing policy does not reflect the Policy TP21 in the BDP which states that the preferred location for community facilities (e.g. health centres, education and social services and religious buildings) is within the network of defined centres.</p> <p><b>No policy</b> on day nurseries and child care provision</p> <p>Reasons for rejection: Without a policy on the development of day nurseries and childcare provision, development may result in adverse impacts on the vitality of local centres, residential amenity and character of an area.</p>
DM10 Houses in Multiple Occupation and other Residential Accommodation	The sustainability effects of a clear policy which seeks to control Houses in Multiple Occupation (HMO) is likely be positive, reflecting the potential issues associated with them. The sustainability effects relate to ensuring that local amenity and design quality is appropriately protected, whilst providing for the needs of those in need. No likely significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing a new policy to address siting and design of these uses yields more positive sustainability outcomes than the reasonable alternatives presented.	<p><b>Retain existing UDP policy</b></p> <p>Reasons for rejection: This policy requires updating as it refers to out of date UDP policies, but the main thrust of the policy remains unchanged in DM11.</p> <p><b>No policy</b> on HMO</p> <p>Reasons for rejection: Without a HMO policy, development could result in concentrations of HMOs which can lead to a number of negative impacts on local communities, for example more frequent noise nuisance, depopulation of neighbourhoods during academic vacations, and increased pressure on parking due to higher population densities.</p> <p><b>Less prescriptive policy</b></p> <p>Reasons for rejection: Defining cumulative impact by using a threshold against which applications will be assessed will aid in transparency and consistency in decision-making.</p>

Policy	Summary of Appraisal of the Proposed Policy	Alternatives Considered
DM11 Residential Development	This policy will yield a range of sustainability benefits, associated with ensuring that there is consistent high quality residential development throughout the City. No likely significant negative effects have been identified. There are no suggested changes to the content of the policies arising from the appraisal. The option of developing new policy to address residential design matters yields more positive sustainability outcomes than the reasonable alternatives presented.	<p><b>Retain existing UDP policy</b> in paragraph 8.39-8.44 of the Saved Unitary Development Plan regarding house extensions. There is no existing policy on housing technical standards for internal space, outdoor amenity space or accessible and adaptable housing.</p> <p>Reasons for rejection: The policy requires updating to achieve good standards of amenity for the occupiers of new residential buildings and protect the amenity of nearby occupiers and residents. The general thrust of the existing policy regarding residential extensions is taken forward into the new policy.</p> <p><b>No minimum space standards or policy</b> on separation distances, outdoor amenity space and accessible and adaptable housing.</p> <p>Reasons for rejection: Having no such policy would risk developments not achieving a reasonable level of amenity therefore impacting on quality of life. Minimum space standards will help to ensure that there is sufficient space, privacy and storage facilities to ensure the long term sustainability and usability of homes. DM9 is consistent with the NPPF requires local planning authorities to seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.</p>
DM12 Self and Custom-build Housing	Promoting self- and custom-build housing through a specific policy is likely to yield positive sustainability effects City-wide with no adverse effects identified. There are no suggested changes to the content of the policy arising from the appraisal. The option of having no specific policy could result in some minor adverse effects relating to social indicators.	<p><b>No policy</b> on self and custom build housing.</p> <p>Reasons for rejection: The Council wishes to take a proactive approach to supporting individuals or groups of individuals that wish to build their own homes as a more affordable means by which to access home ownership. It is also a duty upon local authorities to have regard to the Self and Custom Build Register in carrying out their planning, housing, land disposal and regeneration functions.</p>
<b>Connectivity</b>		
DM13 Highway Safety and Access	Ensuring that there is a rounded approach to transport planning across the City should yield a broad range of sustainability benefits, notably in respect on enhancing the City's economic performance through ensuring more efficient and effective movement. In turn and more broadly, the well-being of residents is enhanced through the greater opportunities for efficient travel within the City. No likely significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing new policy to address siting and design of these uses yields more positive sustainability outcomes than the reasonable alternatives presented.	<p><b>No alternative</b> to this policy has been identified - the NPPF requires development to provide for safe and suitable access to the site for all users. It states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.</p>

Policy	Summary of Appraisal of the Proposed Policy	Alternatives Considered
DM14 Parking and Servicing	Ensuring that there is a rounded approach to transport planning across the City should yield a broad range of sustainability benefits, notably in respect on enhancing the City's economic performance through ensuring more efficient and effective movement. In turn and more broadly, the well-being of residents is enhanced through the greater opportunities for efficient travel within the City. No likely significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing new policy to address siting and design of these uses yields more positive sustainability outcomes than the reasonable alternatives presented.	<b>No policy</b> Reasons for rejection: National policy makes clear that parking standards should be determined at the local level in response to local circumstances. The proposed policy supports the implementation of the BDP in developing a sustainable, high quality, integrated transport system. It is considered essential that appropriate parking is provided to contribute to traffic reduction and ensure safety, inclusive development and manage any impact on amenity.
DM15 Telecommunications	Ensuring that the City has an up-to-date telecommunications infrastructure will ensure sustainability benefits across a range of objectives, notably the contribution to the City's economic performance, creating opportunities for travel reduction and ensuring that all residents have equitable access to high quality services that enable them to fulfil their economic and social potential. No likely significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing new policy to address telecommunications siting matters yields more positive sustainability outcomes than the reasonable alternatives presented.	<b>No policy</b> Reasons for rejection: policy supports the implementation of the Policy TP46 Digital Communications of the BDP. The Council supports well-designed and located high quality communications infrastructure and this policy is intended to facilitate provision in line with this aspiration.

4.3.2 **Table 4.3** summarises the scores, by SA Objective, attributed to the preferred policy option and then provides an overall assessment of the cumulative effects of the 15 preferred policies against each SA Objective.

4.3.3 The results set out in Tables 4.2 and 4.3 demonstrate the overwhelming likely positive or significantly positive effect resulting from implementation of the policies. This reflects their positive intent and the need to deal systematically and objectively with planning issues arising day-to-day across the City, as well as the experience accumulated through their ongoing implementation through the UDP. More generally, the Development Management policies represent the lowest tier in a hierarchy of planning policies, adding local detail to implement the broader principles of policies within the NPPF and the Birmingham Development Plan. As such they specifically address local issues and are designed to mitigate potential adverse effects associated with development.

4.3.4 No significant negative effects, either associated with specific sustainability objectives or cumulatively have been identified. This contrasts with the scores attributed to the absence of a policy which are typically significantly negative (see **Appendix A**), reflecting the clear need to systematically control development and the likely consequences of the absence of such a policy framework which is to the benefit of applicants, residents and the City as a whole.

4.3.5

Some policies have been identified as having some uncertainty as to their precise effects in respect of contributing to the SA Objectives. These apply principally to whether significant positive effects are likely to be fully realised in respect of matters such as sustainable travel and construction, reflecting the case-by-case nature of individual developments and their particular circumstances. Nevertheless, the potential for the realisation of a significant positive or positive effect exists. In other cases, there is uncertainty as to there is a relationship between the policy and the SA Objective, for example between the construction of educational facilities and benefits to the community in respect of access to skills training, reflecting the specific nature of these developments.

Table 4.3 Summary of scores attributed to the Preferred Policy Options

	ENV1 optimise use of previously developed land	ENV2 apply high standards of design, construction and maintenance	ENV3 encourage sustainable methods of transport and reduce the need to travel	ENV4 protect and enhance Birmingham's cultural and natural heritage	ENV5 anticipate and respond to the challenges associated with climate change, particularly managing and reducing floodrisk	ENV6 make best use of water resources, reduce pollution and encourage sustainable waste management	ECON1 improve the performance of the local and City-wide economy to provide opportunity for all	ECON2 promote the vitality of local centres	ECON3 promote the regeneration of areas across the City	ECON4 encourage investment in learning and skills development	SOC1 ensure equitable access to community services and facilities	SOC2 provide decent and affordable housing for all meet local needs	SOC3 promotes health and well-being	SCO4 reduce crime, the fear of crime and antisocial behaviour	SOC5 enable communities to influence the decisions that affect their neighbourhoods and quality of life
DM1 Air Quality	~	++?	+	~	~	++?	+	~	+	~	~	~	++	~	~
DM2 Amenity	~	++	~	++	~	~	++	++	++	~	~	~	++	~	~
DM3 Contamination and Stability	++	~	~	~	~	++?	+	~	+	~	~	~	++	~	~
DM4 Trees, Landscape and Development	~	++	~	++	++	++	++	++	++	~	~	~	++	++	~
DM5 Light Pollution	~	+	~	++	~	~	~	+	~	~	~	~	~	+	~
DM6 Noise and Vibration	~	+	~	~	~	~	~	~	~	~	~	~	++	~	~

	ENV1 optimise use of previously developed land	ENV2 apply high standards of design, construction and maintenance	ENV3 encourage sustainable methods of transport and reduce the need to travel	ENV4 protect and enhance Birmingham's cultural and natural heritage	ENV5 anticipate and respond to the challenges associated with climate change, particularly managing and reducing floodrisk	ENV6 make best use of water resources, reduce pollution and encourage sustainable waste management	ECON1 improve the performance of the local and City-wide economy to provide opportunity for all	ECON2 promote the vitality of local centres	ECON3 promote the regeneration of areas across the City	ECON4 encourage investment in learning and skills development	SOC1 ensure equitable access to community services and facilities	SOC2 provide decent and affordable housing for all meet local needs	SOC3 promotes health and well-being	SCO4 reduce crime, the fear of crime and antisocial behaviour	SOC5 enable communities to influence the decisions that affect their neighbourhoods and quality of life
DM7 Advertisements	~	++?	~	++?	~	~	++?	++?	~	~	~	~	~	~	+
DM8 Places of Worship	++?	++?	++?	++?	~	~	~	++?	++?	~	++?	~	++?	~	++?
DM9 Education Facilities – Change of Use	~	+	++?	~	~	~	+	+	~	+	+	~	+	~	~
DM10 Houses in Multiple Occupation – City wide	++?	~	~	++?	~	~	~	~	~	~	~	++?	~	++?	++?
DM11 Residential Development	~	++?	~	~	~	~	++?	++?	~	~	~	~	++?	~	~
DM12 Self and custom-build housing	+	+	~	~	~	~	~	~	+	++?	~	++	+	~	++?



	ENV1 optimise use of previously developed land	ENV2 apply high standards of design, construction and maintenance	ENV3 encourage sustainable methods of transport and reduce the need to travel	ENV4 protect and enhance Birmingham's cultural and natural heritage	ENV5 anticipate and respond to the challenges associated with climate change, particularly managing and reducing floodrisk	ENV6 make best use of water resources, reduce pollution and encourage sustainable waste management	ECON1 improve the performance of the local and City-wide economy to provide opportunity for all	ECON2 promote the vitality of local centres	ECON3 promote the regeneration of areas across the City	ECON4 encourage investment in learning and skills development	SOC1 ensure equitable access to community services and facilities	SOC2 provide decent and affordable housing for all meet local needs	SOC3 promotes health and well-being	SCO4 reduce crime, the fear of crime and antisocial behaviour	SOC5 enable communities to influence the decisions that affect their neighbourhoods and quality of life
DM13 Highway Safety and Access	~	+	++	+	~	~	~	++	~	~	+	~	+	~	++?
DM14 Parking	~	+	++?	+	~	~	~	++	~	~	+	~	+	~	++
DM15 Telecommunications	~	+	+	+	~	~	+	+	+	+	+	~	+	~	+
Cumulative Effect of all Policies	~/+/++?	+/++?	~/+/++?	+/++?	~/++	~/++	~/+/++?	+/++?	~/+/++	~/+	~/+	~/++?	+/++?	~/++?	~/+/++?

### Sustainability Appraisal Scoring

Score Key:	++ Significant positive effect	+ Minor positive effect	0 No overall effect	- Minor negative effect	-- Significant negative effect	? Score uncertain	~ No clear relationship
NB: where more than one symbol is presented in a box it indicates that the appraisal has found more than one score for the category. Where a box is coloured but also contains a '?', this indicates uncertainty over whether the effect could be a minor or significant effect although a professional judgement is expressed in the colour used. A conclusion of uncertainty arises where there is insufficient evidence for expert judgement to conclude an effect.							

## 4.4 Proposed mitigation measures

- 4.4.1 When considering planning policies, mitigation can usually be in the form of policy amendments. For the Development Management DPD preferred policies, there are no recommendations for the modification of the range of policies. This reflects the positive scores, the absence of negative effects and the intention to use the policies in combination with the policies of the BDP, which for each policy are cross-referenced.
- 4.4.2 Whilst there are no recommendations for the amendment of policy wording, the following general points can be made in respect of the presentation of the policies in order to make clearer how they will be implemented:
- ▶ ensure that, wherever possible, the specific criteria against which the policy will be implemented and monitored are included.
  - ▶ For each Development Management policy, provide further detail against the cited BDP policies on how these will work together.
  - ▶ Set out more clearly in paragraph 1.10 of the DPD which matters are covered by the BDP and which by the Development Management DPD, such as the control of various forms of retail development.
  - ▶ Where possible, fully reference BCC strategies on various topics relating to specific policies, for example the City's Green Living Spaces Plan and Nature Conservation Strategy against the Landscaping and Trees Policy.
  - ▶ Set out a summary table of how the policies will be monitoring, indicating where this can be covered by the existing Authority Monitoring Report. Some suggestions are given in **Section 5**.

## 4.5 Uncertainties and risks

- 4.5.1 The principal uncertainties centre on the implementation of the policies and the inevitable variability associated with case-by-case judgements. However, any unintended sustainability effects are likely to be localised, and monitoring of implementation is an important part of development management. It is through this mechanism that consistency of implementation and unintended consequences (and hence potential effects on sustainability) should be identified. Monitoring activity has been undertaken for policies applied as part of the Unitary Development Plan and lessons learnt in the development of new policies. It can be assumed therefore that the new policies are more sophisticated and should therefore yield more sustainable effects. Nevertheless, many of the scores retain a '?' to indicate that there is uncertainty associated with their effects.

## 5. Next steps

### 5.1 Preparation of the Submission Development Management DPD

- 5.1.1 Following consultation and an analysis of the responses, the Council will revise the Preferred Options Development Management DPD to produce a Submission Development Management DPD. This will be submitted for consideration by an independent planning inspector. Following Examination in Public (EiP), and subject to any significant changes to the DPD, the Council will then adopt the final DPD.

### 5.2 Finalising the SA Report and Post Adoption Statement

- 5.2.1 A final Sustainability Report will be produced to accompany the Submission version of the Development Management DPD. Following EiP, and subject to any significant changes to the draft DPD that may require appraisal, the Council will issue a Post Adoption Statement (PAS) as soon as reasonably practicable after the adoption of the DPD. The PAS will set out the results of the consultation and SA processes and the extent to which the findings of the SA have been accommodated in the adopted DPD.

### 5.3 Monitoring Requirements

- 5.3.1 Following adoption of the Development Management DPD, there will need to be monitoring of any significant effects identified. Monitoring the sustainability effects of implementing the Development Management DPD should be conducted as part of an overall approach to monitoring the sustainability effects of the BDP and various SPDs across the City. An Authority Monitoring Report is already produced for the BDP and this could be refined to reflect the content of the Development Management DPD and combined with the monitoring of potential sustainability effects.
- 5.3.2 **Table 5.1** sets out a number of suggested indicators for monitoring the potential significant sustainability effects of implementing the Development Management DPD, drawing on indicators that are also used for the Birmingham Development Plan where relevant. Note that the indicators proposed are included as suggestions at this stage, as it is recognised that many datasets may not be available for monitoring some of the sustainability effects of the Development Management DPD, and that the indicators included may change the City Council finalises the monitoring framework for the DPD itself. In addition, the data used for monitoring in many cases will be provided by outside bodies. Information collected by other organisations (e.g. the Environment Agency) can also be used as a source of indicators.

Table 5.1 Proposed monitoring indicators for the Development Management DPD

Policy	Proposed Indicator(s)
DM1 Air Quality	BDP AQ monitoring
DM2 Amenity	Development Management (DM) statistics on applications refused as contrary to policy

Policy	Proposed Indicator(s)
DM3 Contamination and Stability	DM statistics on applications with contamination/stability issues
DM4 Trees, Landscape and Development	BDP monitoring of city-greening DM statistics on conditions attached to applications
DM5 Light Pollution	DM statistics on applications refused as contrary to policy
DM6 Noise and Vibration	DM statistics on applications refused as contrary to policy
DM7 Advertisements	DM statistics on applications refused as contrary to policy
DM8 Places of Worship	DM statistics on applications
DM9 Education Facilities – Change of Use	DM statistics on applications refused as contrary to policy
DM10 Houses in Multiple Occupation – City wide	DM statistics on applications refused as contrary to policy
DM11 Residential Development	DM statistics on applications refused as contrary to policy
DM12 Self and custom-build housing	DM statistics on applications
DM13 Highway Safety and Access	DM statistics on applications refused as contrary to policy
DM14 Parking	DM statistics on applications refused as contrary to policy
DM15 Telecommunications	DM statistics on applications

## 5.4 Quality Assurance Checklist

- 5.4.1 The Government's Guidance on SEA<sup>21</sup> contains a quality assurance checklist to help ensure that the requirements of the SEA Directive are met. This has been completed for the Development Management DPD in **Table 5.2**.

<sup>21</sup> (Former) Office of the Deputy Prime Minister (2005) *A Practical Guide to the Strategic Environmental Assessment Directive*.

Table 5.2 Completed Quality Assurance Checklist for the Development Management DPD

Objectives and Context	
<ul style="list-style-type: none"> <li>The plan's purpose and objectives are made clear.</li> </ul>	Section 1.4
<ul style="list-style-type: none"> <li>Sustainability issues, including international and EC objectives, are considered in developing objectives and targets.</li> </ul>	Key sustainability issues identified through a review of relevant plans and programmes (see Section 2) and analysis of baseline conditions (see Section 2) have informed the development of the SA Framework presented in Section 3.
<ul style="list-style-type: none"> <li>SEA objectives are clearly set out and linked to indicators and targets where appropriate.</li> </ul>	Section 3.1 presents the SA objectives and guide questions.
<ul style="list-style-type: none"> <li>Links with other related plans, programmes and policies are identified and explained.</li> </ul>	A review of related plans and programmes is presented in Section 2 of this SA Report.
Scoping	
<ul style="list-style-type: none"> <li>The environmental consultation bodies are consulted in appropriate ways and at appropriate times on the content and scope of the Environmental Report.</li> </ul>	The environmental bodies were consulted on the Scoping Report in March 2015 and August 2018.
<ul style="list-style-type: none"> <li>The assessment focuses on significant issues.</li> </ul>	Sustainability issues have been identified in the baseline analysis contained in Section 2 of this SA Report on a topic-by-topic basis. Section 2.2 summarises the key sustainability issues identified.
<ul style="list-style-type: none"> <li>Technical, procedural and other difficulties encountered are discussed; assumptions and uncertainties are made explicit.</li> </ul>	As set out in Section 3.6 of this SA Report, no substantive difficulties were encountered during its preparation.
<ul style="list-style-type: none"> <li>Reasons are given for eliminating issues from further consideration.</li> </ul>	No issues have been knowingly eliminated from this SA Report.
Baseline Information	
<ul style="list-style-type: none"> <li>Relevant aspects of the current state of the environment and their likely evolution without the plan are described.</li> </ul>	Section 2 and Appendix B of this SA Report presents the baseline analysis of the County's social, economic and environmental characteristics including their likely evolution without the Local Plan.
<ul style="list-style-type: none"> <li>Characteristics of areas likely to be significantly affected are described, including areas wider than the physical boundary of the plan area where it is likely to be affected by the plan where practicable.</li> </ul>	Throughout Section 2 of this SA Report, reference is made to areas which may be affected by the Local Plan.
<ul style="list-style-type: none"> <li>Difficulties such as deficiencies in information or methods are explained.</li> </ul>	As set out in Section 3.6 of this SA Report, no difficulties were encountered during its preparation.
Prediction and evaluation of likely significant effects	
<ul style="list-style-type: none"> <li>Likely significant social, environmental and economic effects are identified, including those listed in the SEA Directive (biodiversity, population, human health, fauna, flora, soil, water, air, climate factors, material assets, cultural heritage and landscape), as relevant.</li> </ul>	Section 4 summarises the appraisal of the sustainability performance of the Pre-Submission Local Plan in terms of the Local Plan Vision and Spatial Principles, preferred development requirements and Spatial Strategy, site allocations and policies. Detailed appraisal matrices are set out in Appendix A that have been developed to meet the requirements of the SEA Directive.
<ul style="list-style-type: none"> <li>Both positive and negative effects are considered, and where practicable, the duration of effects (short, medium or long-term) is addressed.</li> </ul>	Positive and negative effects are considered within the appraisal matrices and within Section 4. Potential effects are identified in the short, medium and long-term.

- |  |   |
|--|---|
| <ul style="list-style-type: none"> <li>● Likely secondary, cumulative and synergistic effects are identified where practicable.</li> </ul>                                 | The cumulative effects of the Plan are considered in Section 4.                                     |
| <ul style="list-style-type: none"> <li>● Inter-relationships between effects are considered where practicable.</li> </ul>  | Inter-relationships between effects are identified in the assessment commentary, where appropriate. |
| <ul style="list-style-type: none"> <li>● Where relevant, the prediction and evaluation of effects makes use of accepted standards, regulations, and thresholds.</li> </ul> | These are identified in the commentary, where appropriate.  |
| <ul style="list-style-type: none"> <li>● Methods used to evaluate the effects are described.</li> </ul>  | These are described in Section 3.   |

### Mitigation measures

- |  |   |
|--|---|
| <ul style="list-style-type: none"> <li>● Measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the plan are indicated.</li> </ul> | These are identified within the appraisal matrices. |
| <ul style="list-style-type: none"> <li>● Issues to be taken into account in development consents are identified.</li> </ul>  | These are identified within the appraisal matrices. |

### The SA Report

- |  |  |
|--|--|
| <ul style="list-style-type: none"> <li>● Is clear and concise in its layout and presentation.</li> </ul>   | The SA Report is clear and concise.  |
| <ul style="list-style-type: none"> <li>● Uses simple, clear language and avoids or explains technical terms. Uses maps and other illustrations where appropriate.</li> </ul> | Maps and tables have been used to present the baseline information in Section 2 where appropriate.                                 |
| <ul style="list-style-type: none"> <li>● Explains the methodology used. Explains who was consulted and what methods of consultation were used.</li> </ul>                    | Section 3 presents the proposed methodology to be used for assessment whilst consultation arrangements are discussed in Section 1. |
| <ul style="list-style-type: none"> <li>● Identifies sources of information, including expert judgement and matters of opinion.</li> </ul>                                    | Information is referenced throughout the SA Report.  |
| <ul style="list-style-type: none"> <li>● Contains a non-technical summary</li> </ul>   | Included.  |

### Consultation

- |   |   |
|---|---|
| <ul style="list-style-type: none"> <li>● The SEA is consulted on as an integral part of the plan-making process.</li> </ul>   | This SA Report is being consulted upon following adoption of the Birmingham Development Plan.         |
| <ul style="list-style-type: none"> <li>● The consultation bodies, other consultees and the public are consulted in ways which give them an early and effective opportunity within appropriate time frames to express their opinions on the draft plan and SA Report.</li> </ul> | The emerging Plan and SA have been made available for consultation in line with planning regulations. |

### Decision-making and information on the decision

- |   |  |
|---|--|
| <ul style="list-style-type: none"> <li>● The SA Report and the opinions of those consulted are taken into account in finalising and adopting the plan.</li> </ul> | Responses received to this SA Report will inform the preparation of the Submission Plan. |
| <ul style="list-style-type: none"> <li>● An explanation is given of how they have been taken into account.</li> </ul>   | This information will be provided in subsequent reports.                                 |
| <ul style="list-style-type: none"> <li>● Reasons are given for choices in the adopted plan, in the light of other reasonable options considered.</li> </ul>       | These will be present in the Environmental Report.                                       |

# Appendix A

## Policy Appraisal

### Sustainability Appraisal Scoring

Score Key:	++ Significant positive effect	+ Minor positive effect	0 No overall effect	- Minor negative effect	-- Significant negative effect	? Score uncertain	~ No clear relationship
<p>NB: where more than one symbol is presented in a box it indicates that the appraisal has found more than one score for the category. Where a box is coloured but also contains a '?', this indicates uncertainty over whether the effect could be a minor or significant effect although a professional judgement is expressed in the colour used. A conclusion of uncertainty arises where there is insufficient evidence for expert judgement to conclude an effect.</p> <p>S – short term (0 - 10 years), M – medium term (between 10 and 25 years) and L – long term (&gt;25 years)</p>							

#### Policy

#### Reasonable Alternatives

DM1 Air Quality

- None – a policy is required by National Policy

DM2 Amenity

- No policy – rely on National Policy

DM3 Land affected by Contamination and Hazardous Substances

- None – a policy is required by Legislation

DM4 Landscaping and Trees

- None – a policy is required by National Policy

DM5 Light Pollution

- None – a policy is required by National Policy

DM6 Noise and Vibration

- None – a policy is required by National Policy

DM7 Advertisements

- No policy



Policy	Reasonable Alternatives
DM8 Places of Worship and Faith-related Community Uses	<ul style="list-style-type: none"><li>• Retain existing UDP policy</li><li>• No policy</li></ul>
DM9 Day Nurseries and Childcare Provision	<ul style="list-style-type: none"><li>• Retain existing UDP policy</li><li>• No policy</li></ul>
DM10 Houses in Multiple Occupation and other Residential Accommodation	<ul style="list-style-type: none"><li>• Retain existing UDP policy</li><li>• No policy</li><li>• Less prescriptive policy</li></ul>
DM11 Residential Development	<ul style="list-style-type: none"><li>• Retain existing UDP policy</li><li>• No minimum space standards or policy</li></ul>
DM12 Self and Custom-Build Housing	<ul style="list-style-type: none"><li>• No policy</li></ul>
DM13 Highway safety and access	<ul style="list-style-type: none"><li>• None – a policy is required by National Policy</li></ul>
DM14 Parking and Servicing	<ul style="list-style-type: none"><li>• No policy</li></ul>
DM15 Telecommunications	<ul style="list-style-type: none"><li>• No policy</li></ul>

## Policy DM1 Air Quality

Policy Content	Options Considered
<ol style="list-style-type: none"> <li>The Council will promote measures to improve air quality and seek to ensure that exposure to poor air quality is reduced.</li> <li>Development proposals will need to take into account its impact on air quality and support the objectives of the Council's Air Quality Action Plan and Clean Air Zone.</li> <li>Air quality assessments are required in line with the Local Information Requirement. Development that would result in an unacceptable adverse impact on air quality will not be supported unless it can be demonstrated that measures can be implemented that will mitigate these effects. Development that would result in deterioration of the City's nitrogen dioxide pollution levels will be resisted. Similarly, developments that introduce sensitive receptors (i.e. housing, schools) in locations of poor air quality will not be acceptable unless designed to mitigate the impact.</li> <li>Development that involves significant demolition, construction or earthworks will also be required to assess the risk of dust and emissions impacts in and air quality assessment and include appropriate mitigation measures to be secured in a Construction Management Plan.</li> <li>The development of fuelling stations for low emission vehicles will be supported in principle where they establish a network of facilities to support the City's transport and air quality objectives. New or extended fuelling stations for petrol and diesel vehicles would need to be justified on the basis of addressing clear gaps in existing provision, are away from sensitive areas for air quality and provide fuelling for low emission vehicles.</li> </ol>	<ul style="list-style-type: none"> <li>None – a policy is required by National Policy</li> </ul>

SA Objective	New Policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	~		No clear relationship
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	++?	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Consistent application of standards which encourage high environmental quality will help to secure better quality buildings across the city to the benefit of sustainability over the longer term. The speed and depth of this change is uncertain, however.

SA Objective	New Policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	+	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Measures to reduce air pollution through the use of Travel Plan will help to promote sustainable transport, contributing sustainability across the City. However, these measures are unlikely to significantly address air quality issues generated by road traffic.
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	~		No clear relationship
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~		No clear relationship
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	++?	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Consistent application of standards which encourage high environmental quality will help to secure better quality buildings across the city to the benefit of sustainability over the longer term. The speed and depth of this change is uncertain, however.
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	+	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Enhancement of the City's environmental quality will make a contribution to the City's economic success.
ECON2 To help promote the vitality of local centres	~		No clear relationship
ECON3 To promote the regeneration of areas across the City through appropriate development	+	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Enhancement of the City's environmental quality will make a contribution to the City's economic success.

SA Objective	New Policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
ECON4 To encourage investment in learning and skills development	~		No clear relationship
SOC1 To help ensure equitable access to community services and facilities	~		No clear relationship
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~		No clear relationship
SOC3 To encourage development which promotes health and well-being	++	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Clear, consistent policies which seek high environmental standards in new development will contribute to health and well-being.
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~		No clear relationship
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	~		No clear relationship

## Commentary

A policy which clearly address environmental protection issues will help to reinforce existing regulatory regimes. The outcome is likely to be enhanced sustainability performance across most indicators, reflecting greater certainty for developers in respect of both minimum standards and good practice. No likely significant negative effects have been identified. The policy could benefit from the inclusion of examples of measures against which the policy will be implemented and measured.

**BCC Evidence DM1 Air Quality:** The large number of approvals with relevant conditions suggests that the new Policy DM06 should provide clear decision making considerations and criteria, as well as providing a basis for any necessary conditions. A sample of 10 approvals associated with air quality conditions were considered as part of the evidence base for this policy, with the intention to draw out recurring themes and understand the use of the relevant conditions when permission was expected to have an impact on the air quality of the city. The sample concluded that a number of proposals which are likely to have an impact on air quality are subject to conditions, with the key conditions imposed relating to odour and extraction thereby having a more “tangible” impact on citizens, and hours of operation, thereby limiting traffic generation by virtue of the operating hours of the proposal. Although it is understood that Regulatory Services have requested conditions relating to vehicle charging points on a number of planning applications seeking permission for residential development, there are few instances where this has been imposed as schemes have not warranted such a condition. On this basis, it is considered appropriate that some level of threshold is presented in policy, particularly relating to proposed residential development in the City Centre as this is the AQMA area, designated due to high numbers of vehicle emissions. Discouraging residents in the City Centre to operate high emission cars and providing alternatives is necessary to ensure that the issue is not exacerbated whilst seeking to achieve a diverse City Centre with a large range of mixed uses. The issue of vehicle charging points is already in BDP Policy TP42. The proportion of refusals based on non-standard reasons suggests that many require a tailored justification. There will continue to be a need for non-standard reasons for refusal as the potential impact of a development on air quality needs to be weighed against the benefits of that development. Consequently, a standard reason for refusal would be unlikely to be appropriate. The policy should therefore provide a basis for non-standard reasons which can be clearly related to individual proposals. Any detrimental impact of development on air quality would need to be considered and identified individually. Appeal dismissal decisions do not consistently relate to a theme in relation to air quality and the likely reason for refusal. The sample reviewed grounds did not draw anything conclusive, however, traffic generation and increase in the amount of vehicle trips are recurring issues in appeal considerations.

**Policy DM2 Amenity**

Policy Content	Options Considered
<p>All development should be appropriate to its location and ensure it would not result in adverse impacts on the amenity of occupiers and neighbours. In assessing the impact of development on amenity, the following will be considered:</p> <ol style="list-style-type: none"> <li>Visual privacy and overlooking;</li> <li>Sunlight, daylight, overshadowing and overbearing impact;</li> <li>Aspect, outlook and perception of enclosure;</li> <li>Access to high quality and useable amenity space</li> <li>Artificial lighting levels</li> <li>Noise and vibration;</li> <li>Odour, fumes, and dust</li> <li>Safety considerations, crime, fear for crime and anti-social behaviour;</li> <li>Compatibility of adjacent uses; and</li> <li>The individual and cumulative impacts of development proposals on amenity</li> </ol>	<ul style="list-style-type: none"> <li>No policy – rely on National Policy</li> </ul>

SA Objective	No policy	New policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	~	~		No clear relationship
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	-	++	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Clear design and environmental quality expectations will help to ensure that there is strong reference point against which development proposals can be assessed for their quality and contribution to achieving sustainable neighbourhoods and design quality across the City.
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	~	~		No clear relationship

SA Objective	No policy	New policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	-	++	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Implicit in the criteria-based approach of the policies is sensitivity towards the context into which new development will be placed.
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	~		No clear relationship
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~	~		No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	-	++	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Attractive and sustainable design will contribute to the City's image as a progressive and responsible place in which to invest.
ECON2 To help promote the vitality of local centres	-	++	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Attractive and sustainable design will contribute to the success and rejuvenation of local centres.
ECON3 To promote the regeneration of areas across the City through appropriate development	-	++	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Attractive and sustainable design will contribute to the regeneration of the City through helping to produce attractive and successful places.
ECON4 To encourage investment in learning and skills development	~	~		No clear relationship



SA Objective	No policy	New policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
SOC1 To help ensure equitable access to community services and facilities	~	~		No clear relationship
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~	~		No clear relationship
SOC3 To encourage development which promotes health and well-being	-	++	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Good design, by its nature, promotes health and well-being, through the promotion of amenity and local environmental quality.
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~	~		No clear relationship
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	~	~		No clear relationship

### Commentary

Good design is important to securing sustainable development through balancing a wide variety of considerations. The detailed criteria within DM01 against which developments will be considered serve as a reference point against which specific proposals can be considered, thereby helping to ensure that development takes account of the specific matters which help to make the City and its neighbourhoods attractive and successful places to live. The specific requirements of DM02 complement the overarching principles set out in DM01. There are no suggested changes to the content of the policies arising from the appraisal. The option of developing a new policy to address design issues yields more positive sustainability outcomes than the reasonable alternatives presented.

**BCC Evidence Analysis DM2 Amenity:** There are a large number of applications where design was an important consideration. It could be argued that it is a consideration for almost every planning application. There is significant use of standard conditions and reasons for refusal, as well as a large number of



appeals (most of which were dismissed). This indicates the need for up-to-date DPD Policy. Appeals allowed seem to follow a pattern of individual subjective assessment of each case on its merits, rather than any obvious weakness of policy.



## Policy DM3 Land Affected by Contamination and Hazardous Substances

Policy Content	Options Considered
<ol style="list-style-type: none"><li>Proposals for new development will need to ensure that risks associated with land contamination and instability are fully investigated and addressed by appropriate measures to minimise or mitigate any harmful effects to human health and the environment.</li><li>All proposals for new development on land which is known to be, or potentially, contaminated or unstable, will be required to submit a preliminary risk assessment, and where appropriate, a risk management and remediation strategy based on detailed site investigation.</li><li>Proposals for development of new hazardous installations, or development located within the vicinity of existing installations, will only be permitted where it is demonstrated that necessary safeguards, in consultation with the HSE, are incorporated to ensure the development is safe; and that it supports the spatial delivery of growth as set out in the Birmingham Development Plan.</li></ol>	<ul style="list-style-type: none"><li>None – a policy is required by National Policy</li></ul>

SA Objective	New Policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	++	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Redevelopment of brownfield land is a priority of the Birmingham Plan and environmental quality policies will be an important part of realising this key objective through ensuring that the development process and its outputs are undertaken with reference to clear standards. A specific policy on contamination and stability is particularly important in respect of use the previously developed land.
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	~		No clear relationship
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	~		No clear relationship
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and	~		No clear relationship

SA Objective	New Policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
natural heritage			
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~		No clear relationship
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	++?	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Consistent application of standards which encourage high environmental quality will help to secure better quality buildings across the city to the benefit of sustainability over the longer term. The speed and depth of this change is uncertain, however.
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	+	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Enhancement of the City's environmental quality will make a contribution to the City's economic success.
ECON2 To help promote the vitality of local centres	~		No clear relationship
ECON3 To promote the regeneration of areas across the City through appropriate development	+	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Enhancement of the City's environmental quality will make a contribution to the City's economic success.
ECON4 To encourage investment in learning and skills development	~		No clear relationship
SOC1 To help ensure equitable access to community services and facilities	~		No clear relationship

SA Objective	New Policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~		No clear relationship
SOC3 To encourage development which promotes health and well-being	++	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Clear, consistent policies which seek high environmental standards in new development will contribute to health and well-being.
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~		No clear relationship
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	~		No clear relationship

### Commentary

A policy which clearly addresses environmental protection issues will help to reinforce existing regulatory regimes. The outcome is likely to be enhanced sustainability performance across most indicators, reflecting greater certainty for developers in respect of both minimum standards and good practice. No likely significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal.

**BCC Evidence DM3 Contamination and Hazardous Substances:** The large number of approvals with relevant conditions suggests that the new Policy should provide clear decision making considerations and criteria which relate to the relevant standard conditions, as well as providing a basis for any necessary bespoke conditions. The proportion of refusals based on non-standard reasons suggests that many require a tailored justification. The policy should therefore provide a basis for non-standard reasons which can be clearly related to individual proposals. Land contamination is a generally lesser noted reason for refusal – other reasons tend to outweigh the land contamination issues as being unresolvable. Land contamination is an issue which applicants would seek to resolve for the benefit of the development. If a developer is faced with a land contamination issue on a site and is not willing to address it, then it is a fundamental issue that cannot be resolved. Support cannot be provided for the development of sites with land stability or contamination issues as it poses a danger to



human health and the deliverability of development. Appeal decisions show that amenity of residents is a recurring theme, particularly with regard to noise and disturbance, and parking. This indicates that the new Policy DM7 should provide clear decision making considerations and criteria to address these issues. There are very few appeals which relate to land contamination specifically, with other environmental issues forming the key concerns of development, particularly noise and disturbance.

## Policy DM4 Landscaping and Trees

Policy Content	Options Considered
<p><b>Landscaping</b></p> <p>All developments must take opportunities to provide high quality landscapes that enhance existing landscape character and the green infrastructure network, contributing to the creation of high quality places.</p> <p>The composition of the landscape shall be appropriate to the setting and the development, as set out in a Landscape Plan, with opportunities taken to maximise the provision of new trees and other green infrastructure.</p> <p><b>Trees, woodland and hedgerow protection</b></p> <p>Development proposals must seek to avoid the loss of, and minimise the risk of harm to, existing trees, woodland, and/or hedgerows of visual or nature conservation value, including but not limited to ancient woodland, and ancient and veteran trees. Where trees and/or woodlands are to be lost as a part of development this loss must be justified as a part of an Arboricultural Impact Assessment (AIA) submitted with the application.</p> <p>Where a proposed development retains existing trees or hedgerows on site, or where development occurs within a tree root protection area, provision must be made for their care and protection during the demolition and construction phase of development with mitigation measures being put in place to ensure that development works do not have a harmful impact on existing trees, hedgerows and wildlife.</p> <p>Development proposals should not result in the loss of trees or woodland which are subject to a Tree Preservation Order, or which are designated as Ancient Woodland, Ancient/Veteran trees, or which are considered worthy of protection.</p> <p>To ensure that the benefits of the proposed development outweigh the harm resulting from the loss of trees, woodlands or hedgerows, the Council will seek at least equivalent replacement to the satisfaction of the Council. This should be provided on-site unless the developer can justify replacement provision elsewhere. Where this level of tree planting is not achievable on site, it may be appropriate to contribute to Council tree planting in the City through a financial contribution.</p>	<ul style="list-style-type: none"> <li>None – a policy is required by National Policy</li> </ul>

SA Objective	New Policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	~		No clear relationship



SA Objective	New Policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	++	Effects likely to be City-wide and be cumulative over the short, medium and long term.	Tress and landscaping are very often a critical aspect of good design.
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	~		No clear relationship
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	++	Effects likely to be City-wide and be cumulative over the short, medium and long term.	Trees and landscaping can very often be central to achieving high quality development which contributes to its context.
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	++	Effects likely to be City-wide and be cumulative over the short, medium and long term.	Trees and landscaping will be increasingly important in ensuring that climate change is managed, such as through shading and part of wider flood risk management for vulnerable locations.
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	++	Effects likely to be City-wide and be cumulative over the short, medium and long term.	Trees and landscaping are central to assisting pollution reduction and mitigation through filtration of air and water, for example.
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	++	Effects likely to be City-wide and be cumulative over the short, medium and long term.	Trees and landscaping contribute to a high quality environment which is attractive to investors, in turn enhancing prosperity.
ECON2 To help promote the vitality of local centres	++	Effects likely to be City-	Trees and landscaping contribute to a high quality environment which is attractive

SA Objective	New Policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
		wide and be cumulative over the short, medium and long term.	to investors, in turn enhancing prosperity.
ECON3 To promote the regeneration of areas across the City through appropriate development	++	Effects likely to be City-wide and be cumulative over the short, medium and long term.	Trees and landscaping contribute to a high quality environment which is attractive to investors, in turn enhancing prosperity.
ECON4 To encourage investment in learning and skills development	~		No clear relationship
SOC1 To help ensure equitable access to community services and facilities	~		No clear relationship
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~		No clear relationship
SOC3 To encourage development which promotes health and well-being	++	Effects likely to be City-wide and be cumulative over the short, medium and long term.	Trees and landscaping contribute to a high quality environment which contributes to health and well-being through aesthetic, pollution control and climate regulation functions.
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	++	Effects likely to be City-wide and be cumulative over the short, medium and long term.	Trees and landscaping contribute to a high quality environment in which people can take pride.

SA Objective	New Policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	~		No clear relationship

### Commentary

Trees and landscaping are fundamental to a high quality and ultimately sustainable environment, contributing aesthetically and functionally to the quality of life across the City. Specification of expectations for design and use of trees and landscaping as part of new development will ensure that, in combination with other policies, high quality design is realised and wider sustainability enhancements are secured. There are no suggested changes to the content of the policy arising from the appraisal, other than cross-referencing Council Strategies relating to Green Infrastructure, for example. The option of developing a new policy to address trees and landscape issues yields more positive sustainability outcomes than the reasonable alternative presented.

**BCC Evidence Analysis DM4 Landscaping and Trees:** Tree-related conditions have been applied to an average of 120 planning consents per annum in recent years. This figure may decrease marginally as more relevant information regarding tree protection etc. is required via the validation criteria at application stage which is then, when satisfactory, incorporated into the consent notice. The high ratio of approvals to refusals appears to indicate that trees and landscape considerations are adequately addressed by conditions. This policy should continue to provide the basis for such conditions. However, it is also possible that the low number of refusals on tree grounds could indicate that tree protection/retention lacks sufficient weight in existing policy.

## Policy DM5 Light Pollution

1. Development incorporating external lighting must mitigate any potential adverse impacts from such lighting. Development which would result in light pollution that would have a harmful impact on local amenity, nature conservation, heritage assets or highway safety will not be permitted.
  - None – a policy is required by National Policy
2. Proposals for external lighting will need to demonstrate that the lighting is:
  - a. Appropriate for its purpose in its setting;
  - b. Designed to minimise any harmful impact on privacy or amenity, particularly to sensitive receptors such as residential properties and natural habitats;
  - c. Designed to preserve or enhance the character or appearance of any heritage assets which are affected;
  - d. Designed to a high standard and well integrated into the proposal; and
  - e. Energy efficient
3. Adherence with the Birmingham Design Guide will be encouraged to aid compliance with this policy.

SA Objective	New Policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	~		No clear relationship
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	+		Well designed, low maintenance lighting will be encouraged as part of this policy.
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	~		No clear relationship
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	++	Effects likely to be City-wide and be cumulative over the short, medium and long term.	Sensitively designed lighting should ensure the protection and enhancement of the City's cultural heritage.

SA Objective	New Policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~		No clear relationship
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~		No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	~		No clear relationship
ECON2 To help promote the vitality of local centres	+	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Ensuring appropriate lighting design will contribute to the overall character of local centres.
ECON3 To promote the regeneration of areas across the City through appropriate development	~		No clear relationship
ECON4 To encourage investment in learning and skills development	~		No clear relationship
SOC1 To help ensure equitable access to community services and facilities	~		No clear relationship
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~		No clear relationship
SOC3 To encourage development which promotes	~		No clear relationship

SA Objective	New Policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
health and well-being			
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	+	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Ensuring appropriate lighting design will contribute to crime reduction.
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	~		No clear relationship

## Commentary

A policy which clearly address environmental protection issues will help to reinforce existing regulatory regimes. The outcome is likely to be enhanced sustainability performance of developments reflecting greater certainty for developers in respect of both minimum standards and good practice. No likely significant negative effects have been identified. There are no suggested changes to the content of the policies arising from the appraisal.

**BCC Evidence DM5 Light Pollution:** The standard conditions relating to lighting are sufficient justification in themselves for a specific area of policy. The new Policy DM5 should provide clear decision making considerations and criteria relating to lighting, as well as providing a basis for any tailored conditions which may be necessary for individual circumstances. In addition, the policy should consider: The impact of any lighting proposals on the surrounding area; and the impact of existing lighting on the development proposal itself. Analysis of refusals that were specifically related to light generating development, specifically floodlighting, conclude that development which would create a detrimental impact on the level of light pollution in a historically dark / unlit area would not be accepted. It is therefore considered that where a proposal would significantly change the night-time character of an area, development should not be permitted where adequately mitigated. Existing conditions are in place which can limit hours of floodlighting and intensity of illumination so it considered that appropriate mitigation can be imposed to make development acceptable. Analysis of a sample of approvals concluded that the specific conditions relate to the mitigation of lighting to be implemented as part of the development. Standard conditions are used on this basis. Where additional information is required, the non-standard conditions offer this flexibility. There are no appeals to be considered in this case.

## Policy DM6 Noise and Vibration

1. Development should be designed, managed and operated to reduce exposure to noise and noise generation.
  2. Noise-generating development that would have an impact on amenity or biodiversity will not be supported unless an appropriate scheme of mitigation is provided.
  3. Noise-sensitive development (such as residential uses, hospitals and schools) will need to be appropriately mitigated or adequately separated from major sources of existing or planned sources of noise and vibration, including transport infrastructure and commercial activity.
  4. The following will be taken into account when assessing development proposals:
    - a. The location, design, layout and materials;
    - b. Positioning of building services and circulation spaces;
    - c. Measures to reduce or contain generated noise (e.g. sound insulation);
    - d. Existing levels of background noise; and
    - e. Hours of operation and servicing.
- None – a policy is required by National Policy

SA Objective	New Policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	~		No clear relationship
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	+	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Consistent application of standards which encourage high environmental quality will help to secure better quality buildings across the city to the benefit of sustainability over the longer term. The speed and depth of this change is uncertain, however.
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	~		No clear relationship
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and	~		No clear relationship



SA Objective	New Policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
natural heritage			
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~		No clear relationship
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~		No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	~		No clear relationship
ECON2 To help promote the vitality of local centres	~		No clear relationship
ECON3 To promote the regeneration of areas across the City through appropriate development	~		No clear relationship
ECON4 To encourage investment in learning and skills development	~		No clear relationship
SOC1 To help ensure equitable access to community services and facilities	~		No clear relationship
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~		No clear relationship
SOC3 To encourage development which promotes	++	Effects likely to be City-	Clear, consistent policies which seek high environmental standards in new

SA Objective	New Policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
health and well-being		wide and cumulative, over the short, medium and long term.	development will contribute to health and well-being.
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~		No clear relationship
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	~		No clear relationship

### Commentary

A policy which clearly address environmental protection issues will help to reinforce existing regulatory regimes. The outcome is likely to be enhanced sustainability performance of developments reflecting greater certainty for developers in respect of both minimum standards and good practice. No likely significant negative effects have been identified. There are no suggested changes to the content of the policies arising from the appraisal.

**BCC Evidence DM6 Noise and Vibration:** The large number of approvals with relevant conditions suggests that the new Policy DM6 should provide clear decision making considerations and criteria which relate to the relevant standard conditions, as well as providing a basis for any necessary bespoke conditions. A sample of approvals were assessed in detail which concluded that the existing standard conditions are predominantly used with the non-standard condition providing flexibility to refer to specific situations and the positions of the proposal. For the most part, standard conditions were used, which suggests that the wording of these is sufficient for the purposes of determining planning applications. As there are technical standards and measurements to be met in terms of noise protection, it is considered that the standards are sufficient and assessments should be made on this basis. The proportion of refusals based on non-standard reasons suggests that many require a tailored justification. The policy should therefore provide a basis for non-standard reasons which can be clearly related to individual proposals. A sample of refusals were assessed in detail which concluded that the noise impact reason for refusal is sufficient and the non-standard conditions offer the flexibility to add more information or make the reason specific to the application proposal. Appeal decisions show that amenity of residents is a recurring theme, particularly with regard to noise and disturbance, and parking. This indicates that the new Policy DM6 should provide clear decision making considerations and criteria to address these issues. For example, the promotion of complementary uses within immediate proximity of the



site, and resistance towards development which would have a detrimental effect on neighbouring properties. Although this has not yet been raised in relation to noise refusals or appeals, regard should be had towards the possibility that a proposal would prejudice a long term development commitment in respect of future noise generation and potential disturbance.

**Policy DM7 Advertisements**

Policy Content	Options Considered
<ol style="list-style-type: none"> <li>1. Proposals for advertisements should be designed to a high standard and meet the following criteria: <ol style="list-style-type: none"> <li>a. Suitably located, sited and designed having no detrimental impact on public and highway safety or to the amenity of the area;</li> <li>b. Sympathetic to the character and appearance of their location, adjacent buildings and the building on which they are displayed having regard to their size, materials, construction, location and level of illumination; and</li> <li>c. Avoid proliferation or clutter of signage on the building and in the vicinity.</li> <li>d. Not obscure architectural features of a building or extend beyond the edges or the roofline of buildings and respect the building's proportions and symmetry;</li> <li>e. Not create a dominant skyline feature when viewed against the immediate surroundings.</li> </ol> </li> <li>2. Illuminated advertisement and signs should not adversely affect the safety and amenity of the surrounding area.</li> <li>3. Areas sensitive to impacts on visual amenity, including open space, public squares, key public routes, nature conservation areas, conservation areas or in proximity to listed buildings and other heritage assets will require particularly sensitive treatment and will need to be more carefully sited and designed so they do not have an adverse impact on these.</li> <li>4. The siting of advertisements hoardings will not normally be acceptable where visible from the M6 motorway or A38 Aston Expressway where they are purposefully designed to be read from the roadway and the attention of drivers is likely to be distracted.</li> </ol>	<ul style="list-style-type: none"> <li>• No policy – allow the market to select the location of such uses and use Environmental and Highway Regulations to control any nuisance.</li> <li>• Develop a new policy</li> </ul>

SA Objective	No policy	New policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	~	~		No clear relationship
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	-?	++?	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Clear specification of design expectations will serve to enhance standards of implementation across the City.

SA Objective	No policy	New policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	~	~		No clear relationship
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	-?	++?	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Clear specification of design expectations will serve to enhance standards of implementation across the City.
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	~		No clear relationship
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~	~		No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	-?	++?	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Well controlled and sited advertising plays an important role in promoting the City's commercial vibrancy and image at local and City-wide scales.
ECON2 To help promote the vitality of local centres	-?	++?	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Well controlled and sited advertising plays an important role in promoting the City's commercial vibrancy and image at local and City-wide scales.
ECON3 To promote the regeneration of areas across the City through appropriate development	~	~		No clear relationship

SA Objective	No policy	New policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
ECON4 To encourage investment in learning and skills development	~	~		No clear relationship
SOC1 To help ensure equitable access to community services and facilities	~	~		No clear relationship
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~	~		No clear relationship
SOC3 To encourage development which promotes health and well-being	~	~		No clear relationship
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~	~		No clear relationship
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	-	+	Effects likely to be City-wide and cumulative, over the short, medium and long term.	An updated policy will provide the reference point for the consideration of likely effects on local amenity.

## Commentary

A specific policy which clearly controls the siting and design of advertisements will provide an important reference point for ensuring that a range of sustainability benefits are secured, focused on enhancing economic development in the City whilst ensuring that residential amenity and City-wide amenity is protected. In all cases, the greater certainty and precision associated with an updated policy is likely to yield positive sustainability effects. No likely significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing a new policy to address siting and design of these uses yields more positive sustainability outcomes than the reasonable alternatives presented.

**BCC Evidence Analysis DM7 Advertisements:** 8.3% of all applications 2009-15 (2,300 out of 27,667) were advertisement related, of which 92.3% were approved. 7.7% of applications were refused, of which just over 1/3 were appealed. The appeal success rate was 13.4% of refusals, 2/3 of appeals, but just 0.1% of all applications. This demonstrates the continuing importance of a fit-for-purpose advertisement policy to underpin decisions. There were no approvals involving standard conditions, and few refusals on standard grounds. Looking at appeal decisions, the following trends are clear: In dismissed appeals, the determining factors are

- highway safety
- visual amenity
- adverse impact on the character or appearance of a Conservation Area and/or Listed Building
- the cumulative adverse visual impact of the advertisements on the street scene, and
- public safety.

For allowed appeals, the determining factors are whether the proposed advertisement would

- have an acceptable impact on the character and appearance of the area
- not be detrimental to the interests of amenity
- be unduly obtrusive
- be out of scale, or out of context with the character of the area
- be acceptable, with the standard conditions in place
- materially detract from the setting of a listed building
- require conditions necessary to restrict the intensity of illumination
- not adversely affect highway safety.

Many of these considerations are relevant to both approved and refused applications. It is reasonable to conclude that many decisions will depend on individual circumstances, and therefore the policy should provide a basis for reasoned decision making.

## Policy DM8 Places of Worship

Policy Content	Options Considered
<ol style="list-style-type: none"> <li>The Council's preferred locations for the development of places of worship and faith related community uses are in the network of centres as defined in Policy TP21 of the Birmingham Development Plan. Locations outside of the network of centres will only be considered where it is demonstrated that a suitable site* cannot be found within an identified centre.</li> <li>Premises to serve a regional or city-wide need are likely to be used for larger gatherings attracting substantial numbers of people and should be located in a sub-regional or district centre which is well served by public transport. Where it is demonstrated that a suitable site cannot be found within an identified sub-regional or district centre, a site which is on a key transport corridor may be considered.</li> <li>Premises to serve a local need are likely to be used for smaller gatherings and should be located in a district or local centre or a parade. Where it is demonstrated that a suitable site* cannot be found within an identified centre, a site within a 15 minute walk from the population the local place of worship serves may be acceptable subject to the considerations below. The use of mid terraced houses for places of worship and faith related community uses will not be acceptable.</li> <li>Proposals will need to demonstrate that the site is suitable for the number of proposed users and the scale of development, identifying whether it serves local, city-wide or regional need.</li> </ol>	<ul style="list-style-type: none"> <li>Retain existing UDP policy</li> <li>No policy</li> </ul>

\* means suitable for the development proposed.

SA Objective	Existing Policy	No policy	New policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	+	-	++	Effects likely to be City-wide and cumulative, over the short, medium and long term.	There are opportunities to make productive re-use of buildings for these uses and a clear policy establishes the reference point for how this might best be achieved.
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	+	-	++	Effects likely to be City-wide and cumulative, over the short, medium and long term.	A clear policy establishes the reference point for how design of these uses might best be achieved.



SA Objective	Existing Policy	No policy	New policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
				long term.	
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	+	-	++	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Location of these uses will be considered in respect of their relationship with public transport network, thus encouraging sustainable travel patterns.
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	+	-	++	Effects likely to be City-wide and cumulative, over the short, medium and long term.	
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	~	~		No clear relationship
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~	~	~		No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	~	~	~		No clear relationship
ECON2 To help promote the vitality of local centres	+	-	++	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Potential beneficial effects on local centres, particularly outside commercial hours.
ECON3 To promote the regeneration of areas across the City through appropriate development	+	-	++	Effects likely to be City-wide and cumulative, over	Potential beneficial effect resulting from the re-use of

SA Objective	Existing Policy	No policy	New policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
				the short, medium and long term.	buildings and the creation of a focus of activity.
ECON4 To encourage investment in learning and skills development	~	~	~		No clear relationship
SOC1 To help ensure equitable access to community services and facilities	++?	-?	+++?	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Having regard to the location of these facilities will help to promote equitable access.
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~	~	~		No clear relationship
SOC3 To encourage development which promotes health and well-being	++?	-?	+++?	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Part of the creation of a community focus wider beneficial effects.
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~	~	~		No clear relationship
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	++?	-?	+++?	Effects likely to be City-wide and cumulative, over the short, medium and long term.	The policy sets out a clear reference point for how the location of these facilities will be considered.

## Commentary

Ensuring the appropriate location and design of these uses will help to ensure that sustainable development is promoted, particularly having regard to equitable access through public transport and sensitive design ensuring that impacts on local amenity are minimised. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing a new policy to address siting and design of these uses yields more positive sustainability outcomes than the reasonable alternatives presented.

**BCC Evidence Analysis DM8 Places of Worship:** Less than 10% refusal rate for relevant applications, 1% appeal rate. From the evidence there are no clear indications of recurring policy weaknesses. There are no existing standard conditions or refusal reasons, suggesting that there are no common issues and each case is considered on its own merits. The majority of applications are approved, which suggests they meet the requirements of the current UDP policy and the SPD. Two dismissed appeals both failed on the grounds of poor design, adverse impact on the area and public safety, and an adverse impact on the living conditions of adjacent residential properties. In the case of the allowed appeal, the loss of availability of the application premises for industrial use was the refusal reason, but the Inspector considered that the upper floor location and restricted access was unlikely to be attractive to potential business users. This is not a significant issue. On that basis, and in the absence of contradictory evidence, it would be reasonable to conclude that the direction of current policy appears to be fit for purpose and no significant changes are required. However, the new policy needs to be updated to reflect the existence of the Places of Worship and Faith Related Community and Educational Uses SPD (adopted in 2011) and the detail it contains.

## Policy DM9 Day Nurseries and Childcare Provision

Policy Content	Options Considered
<ol style="list-style-type: none"> <li>The Council's preferred locations for the development of day nurseries and facilities for the care, recreation and education of children are in the network of centres as defined in Policy TP21 of the Birmingham Development Plan. Locations outside of the network of centres will only be considered where it is demonstrated that a suitable site* cannot be found within an identified centre.</li> <li>The development of day nurseries and facilities for the care, recreation and education of children will need to provide for sufficient outdoor play space to meet the needs of the children.</li> </ol>	<ul style="list-style-type: none"> <li>Retain existing UDP policy</li> <li>No policy</li> </ul>

\* means suitable for the development proposed

SA Objective	No change	No policy	New policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
ENV1 Encourage development that optimises the use of previously developed land and buildings	~	~	~		No clear relationship
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	+	-	+	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Complementing wider development management policies which encourage high quality design, these policies will help to ensure that there is consistent application across the City for these particular uses.
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	+	-	++	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Consideration of the location of these uses should ensure that matters such as catchment areas are considered with attendant positive effects through travel reduction. The extent of the benefits is uncertain however, reflecting parental choice and wider catchment planning issues.
ENV4 To encourage high quality development which protects	~	~	~		No clear relationship

SA Objective	No change	No policy	New policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
and enhances Birmingham's cultural and natural heritage					
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	~	~		No clear relationship
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~	~	~		No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	+	-	+	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Provision of consistent policy on the location of such facilities will help to ensure that there is access for all, although the precise effects are uncertain.
ECON2 To help promote the vitality of local centres	+	-	+	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Control of such uses should be of benefit to local centres, helping to produce balanced property uses which complement one another.
ECON3 To promote the regeneration of areas across the City through appropriate development	~	~	~		No clear relationship
ECON4 To encourage investment in learning and skills development	+	-	+	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Provision of consistent policy on the location of such facilities will help to ensure that there is access for all, although the precise effects are uncertain.
SOC1 To help ensure equitable access to community services and facilities	+	-	+	Effects likely to be City-wide and cumulative, over	Provision of consistent policy on the location of such facilities will help to ensure that there is access for all,

SA Objective	No change	No policy	New policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
				the short, medium and long term.	although the precise effects are uncertain.
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~	~	~		No clear relationship
SOC3 To encourage development which promotes health and well-being	+	-	+	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Provision of consistent policy on the location of such facilities will help to ensure that there is access for all, although the precise effects are uncertain.
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~	~	~		No clear relationship
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	~	~	~		No clear relationship

## Commentary

A policy which ensures the consistent provision of day nurseries and facilities for the care, recreation and education of children across the City will help to ensure that there is equitable access (for example through sustainable locations) and in a fashion which maintains and enhances local amenity. The precise effects of the policy will have to be monitored to determine whether the policy objectives are being realised in practice. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing a new policy to address education-related development issues yields more positive sustainability outcomes than the reasonable alternatives presented.

**BCC Evidence DM9 Day Nurseries and Childcare Provision:** The majority of approvals subject to standard conditions suggests that they are fit for purpose and do not require significant alteration. Consequently, the new policy DM9 should continue to provide clear decision making considerations and criteria related to those conditions, as well as providing a basis for any necessary non-standard conditions. With regard to refusals and appeal dismissals, the common



themes of amenity (especially noise and disturbance), access & parking, and highway safety are noted. There were also issues of loss of employment uses and lack of outdoor play space.

## Policy DM10 Houses in Multiple Occupation (HMO) and other Residential Accommodation

Policy Content	Options Considered
<p>Applications for HMOs (C4, mixed C3/C4 or Sui Generis HMO use) and other non-family residential accommodation (C1 and C2 Use) will be permitted where the development:</p> <ul style="list-style-type: none"> <li>would not result in this type of accommodation being over 10% of the number of properties within a 100 metre radius of the application site;</li> <li>would not result in a family dwellinghouse (C3 Use) being sandwiched between two non-family residential uses*;</li> <li>would not lead to a continuous frontage of three or more non-family residential uses;</li> <li>supports mixed and balanced communities;</li> <li>relates well to the uses in the area they are located; and</li> <li>complies with Policy DM11 Residential Development;</li> </ul> <p>* All development falling within Class C1 and C2 Use</p>	<ul style="list-style-type: none"> <li>Retain existing UDP policy</li> <li>No policy</li> <li>Less prescriptive policy</li> </ul>

SA Objective	Existing UDP policy	No policy	Less prescriptive Policy	New Policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	+	-	+	++?	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Positive policies on siting and design will help to ensure re-use of buildings is appropriately undertaken.
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	~	~	~	~		No clear relationship
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	~	~	~	~		No clear relationship
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	+	-	+	++?	Effects likely to be City-wide and cumulative, over the short, medium and	Positive policies on siting and design will help to ensure re-use of buildings is



SA Objective	Existing UDP policy	No policy	Less prescriptive Policy	New Policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
					long term.	appropriately undertaken.
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	~	~	~		No clear relationship
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~	~	~	~		No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	~	~	~	~		No clear relationship
ECON2 To help promote the vitality of local centres	~	~	~	~		No clear relationship
ECON3 To promote the regeneration of areas across the City through appropriate development	~	~	~	~		No clear relationship
ECON4 To encourage investment in learning and skills development	~	~	~	~		No clear relationship
SOC1 To help ensure equitable access to community services and facilities	~	~	~	~		No clear relationship
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	+	-	+	++?	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Positive policies on siting and design will help to ensure re-use of buildings is appropriately undertaken.

SA Objective	Existing UDP policy	No policy	Less prescriptive Policy	New Policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
SOC3 To encourage development which promotes health and well-being	~	~	~	~		No clear relationship
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	+	-	+	++?	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Positive policies on siting and design will help to ensure re-use of buildings is appropriately undertaken.
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	+	-	+	++?	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Positive policies on siting and design will help to ensure re-use of buildings is appropriately undertaken.

### Commentary

The sustainability effects of a clear policy which seeks to control HMOs is likely be positive, reflecting the potential issues associated with them. The sustainability effects relate to ensuring that local amenity and design quality is appropriately protected, whilst providing for the needs of those in need. No likely significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing a new policy to address siting and design of these uses yields more positive sustainability outcomes than the reasonable alternatives presented.

**BCC Evidence DM10 Houses in Multiple Occupation (HMO) and other Residential Accommodation:** C3-C4 HMO conversions are Permitted Development and do not require planning permission. Between 2009-15 there were 24 applications for small HMO conversions from other uses, 19 of which were approved. There were 5 refusals, and one appeal was dismissed. In that case, the Council had no objection to the change of use, and the Inspector had no reason to take a different view. The principal matter in dispute was the likely visual impact of the proposed extension, which involved virtually doubling the existing footprint and mass of the existing building. This is more a matter of design, rather than any HMO considerations. Large Sui Generis HMOs are a greater concern, with 66 applications (45 approved, 21 refused). No refusals were taken to appeal. A considerable proportion of refusals (7/21 or 1/3) were retrospective Lawful Use applications. For approvals, the proportion is 7/45, or 1/6.5. This indicates that unauthorised HMOs and retrospective applications are a significant issue, and therefore there is a need for strong, up-to-date policy. There are no common reasons for refusal, although amenity of occupiers does feature for several reasons such as outlook, living conditions, noise and space. Design of extensions is also an issue, with size, layout and the 45 degree code all being

considered. The quantitative impact of HMOs is not often quoted as a reason for refusal, and the only noticeable cumulative impact issue appears to be based on design considerations. The question of balanced communities and over-concentration of HMOs is addressed by Policy DM13, Article 4 Direction areas. At present, this applies in parts of Harborne and Selly Oak, but other areas may be subject to similar Direction in future. Changes of use out of HMO use are subject to other policies and are not a concern in principle. In **Article 4 Areas**: C3-C4 HMO conversions are Permitted Development and do not require planning permission. Applications for small HMO conversions from other uses do not seem to appear in large numbers. Large Sui Generis HMOs are a greater concern, with a considerable percentage of refusals being retrospective or failed Lawful Use applications. This indicates the need for strong, up-to-date policy. Changes of use out of HMO use are subject to other policies and are not a concern in principle.

## Policy DM11 Residential Development

Policy Content	Options Considered
<ol style="list-style-type: none"> <li>The design and operation of residential development must achieve good standards of amenity for the occupiers of new residential buildings and protect the amenity of nearby occupiers and residents (see Policy DM2).</li> <li>All residential development (including extensions) must comply with the technical requirements of the Nationally Described Space Standard (Appendix 1) in order to ensure that internal spaces are of sufficient size to meet occupiers' needs. Exceptions will only be considered in order to deliver innovative high quality design, deal with exceptional site issues or specialised user requirements, where it can be demonstrated that residents' quality of life will not be compromised.</li> <li>Residential development must comply with the Building Control Part M4 (2) standard for accessible and adaptable housing in order to meet the occupiers' future needs. The Council will only consider exemptions to this requirement where the applicant can provide evidence to robustly demonstrate that it is not practically achievable given the physical characteristics of the site or it would significantly harm the financial viability of the scheme.</li> <li>There should be adequate separation distances, between buildings and surrounding uses to protect residents' privacy and outlook, to ensure appropriate levels of daylight to internal and external living spaces and to prevent undue enclosure, overshadowing, noise and disturbance, unless an alternative approach is justified to the Council's satisfaction.</li> <li>New residential development must provide an adequate amount of useable outdoor amenity space appropriate to the location of the proposal, its function and the character of the area within which it is situated.</li> <li>Development will need to ensure adequate outlook and daylight to dwellings, in line with the approach of the '45 degree Code'. This includes potential impacts on existing houses, where development should not cross the line from an angle of 45 degrees from the nearest window providing the main source of natural light to a 'habitable room' of dwellings that could be affected.</li> <li>Adherence with the Birmingham Design Guide SPD will be required to ensure compliance with this policy.</li> </ol>	<ul style="list-style-type: none"> <li>Retain the existing UDP Policy</li> <li>No policy</li> </ul>

SA Objective	Retain UDP Policy	No policy	New Policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	~	~	~		No clear relationship
ENV2 To promote the application of high standards of design,	+	-	++	Effects likely to be City-	Clear policies for residential design will help to ensure

SA Objective	Retain UDP Policy	No policy	New Policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
construction and maintenance of buildings				wide and cumulative, over the short, medium and long term.	a consistent and progressive approach across the City.
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	~	~	~		No clear relationship
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	~	~	~		No clear relationship
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	~	~		No clear relationship
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~	~	~		No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	+	-	++	Effects likely to be City-wide and cumulative, over the short, medium and long term.	A clear policy for residential amenity and design will help to ensure a consistent and progressive approach across the City, contributing to its economic success through the provision of high quality development.
ECON2 To help promote the vitality of local centres	+	-	++	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Where residential development is encouraged in local centres, clear policy will help to ensure that it is part of good quality mixed uses.
ECON3 To promote the regeneration of areas across the City through appropriate development	~	~	~		No clear relationship

SA Objective	Retain UDP Policy	No policy	New Policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
ECON4 To encourage investment in learning and skills development	~	~	~		No clear relationship
SOC1 To help ensure equitable access to community services and facilities	~	~	~		No clear relationship
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~	~	~		No clear relationship
SOC3 To encourage development which promotes health and well-being	+	-	++	Effects likely to be City-wide and cumulative, over the short, medium and long term.	The policy will help to ensure that residential development of whatever kind is well-designed and constructed.
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~	~	~		No clear relationship
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	~	~	~		No clear relationship

## Commentary

This policy will yield a range of sustainability benefits, associated with ensuring that there is consistent high quality residential development throughout the City. No likely significant negative effects have been identified. There are no suggested changes to the content of the policies arising from the appraisal. The option of developing new policy to address residential design matters yields more positive sustainability outcomes than the reasonable alternatives presented.

**BCC Evidence Analysis DM11 Residential Development:** A significant number of applications are refused under the 45 degree code – almost 600 over the 6 year period 2009-15. This equates to around 100 per year. Of these, only 48 (approx. 8%) were taken to appeal in the same period. Almost three quarters of appeals (35) were dismissed, while 10 were allowed and 3 partly allowed. The appeal dismissals appear to show two distinct themes: a) relating to wider

design issues as well as the 45 degree code, and b) where the 45 degree code was the key factor in the appeal failing. The low proportion of appeals, and the evidence from appeals dismissed indicates that the current policy in paragraphs 8.39-8.43 of the UDP is generally accepted, and is sufficiently strong. For it to remain so, it is important for the policy to be maintained in the light of current national policy and incorporated into the DM DPD. In terms of design, there are a large number of applications where design was an important consideration. It could be argued that it is a consideration for almost every planning application. There is significant use of standard conditions and reasons for refusal, as well as a large number of appeals (most of which were dismissed). This indicates the need for up-to-date DPD Policy. Appeals allowed seem to follow a pattern of individual subjective assessment of each case on its merits, rather than any obvious weakness of policy.

## Policy DM12 Self and Custom Build Housing

Policy Content	Options Considered
<ol style="list-style-type: none"> <li>The Council will actively support the development of self and custom-build homes in suitable locations where they support the delivery of the Birmingham Development Plan and do not conflict with other policies in the Local Plan.</li> <li>The Council will encourage developers to consider whether an element of self-build plots can be incorporated into development schemes as part of the housing mix. The Council's self-build register will be used as a source of evidence of the demand for self-build and custom build housing locally, and the level of demand will be a material consideration in determining proposals.</li> <li>Affordable self-build plots will be considered and encouraged as a suitable product within the affordable housing requirement on larger sites.</li> </ol>	<ul style="list-style-type: none"> <li>No policy</li> </ul>

SA Objective	No policy	New policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	-?	+		Self-build could be part of land and building re-use where traditional solutions have failed.
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	-?	+	Effects likely to be City-wide and cumulative, over the short, medium and long term.	A policy on self-build should encourage innovation in design standards.
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	~	~		No clear relationship
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	~	~		No clear relationship



SA Objective	No policy	New policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	~		No clear relationship
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~	~		No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	~	~		No clear relationship
ECON2 To help promote the vitality of local centres	~	~		No clear relationship
ECON3 To promote the regeneration of areas across the City through appropriate development	-?	+	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Self-build could be part of the wider solution to realising housing development in regeneration areas.
ECON4 To encourage investment in learning and skills development	-?	++	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Self-build can be the focus for individual training and skills development.
SOC1 To help ensure equitable access to community services and facilities	~	~		No clear relationship
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	-?	++	Effects likely to be City-wide and cumulative, over the short, medium and	A proactive approach to self-build should contribute to providing more diverse routes to housing provision which meet individual circumstances.

SA Objective	No policy	New policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
			long term.	
SOC3 To encourage development which promotes health and well-being	-?	+	Effects likely to be City-wide and cumulative, over the short, medium and long term.	A proactive approach to self-build should contribute to realising individual ambitions and needs.
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~	~		No clear relationship
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	-?	++	Effects likely to be City-wide and cumulative, over the short, medium and long term.	A proactive approach to self-build should contribute to helping communities realise aspirations for more diverse housing delivery models.

### Commentary

Promoting self- and custom-build housing through a specific policy is likely to yield positive sustainability effects City-wide with no adverse effects identified. There are no suggested changes to the content of the policy arising from the appraisal. The option of having no specific policy could result in some minor adverse effects relating to social indicators.

**BCC Evidence Analysis DM12 Self and Custom Build Housing:** none available.



Policy DM13 Highway Safety and Access

Policy Content	Options Considered
<div>1. Development must ensure that the safety of highway users is properly taken into consideration and that any new development would not have an adverse impact on highway safety.</div> <div>2. Development must ensure that safe, convenient and appropriate access arrangements are in place for all users, including the needs of people with disabilities and reduced mobility within the development and onto the highway network, both during the construction and operation stages of the development. Priority shall be given to the needs of sustainable transport modes.</div> <div>3. Developments should provide for the efficient delivery of goods and access by service and emergency service vehicles. Where it is demonstrated that this is not feasible, an appropriate alternative solution must be agreed with the City Council and secured.</div> <div>4. Development proposals that will generate significant amounts of traffic should be accompanied by a Transport Assessment and should be located where the need to travel will be minimised, and is in a location that is readily accessible by a variety of transport modes. Development proposals that generate significant amounts of traffic will be required to provide a Travel Plan that sets out the means by which the developer will encourage users to adopt more sustainable modes of travel.</div> <div>5. Vehicle access points (including private driveways) will be supported where it would not result in:<ul style="list-style-type: none"><li>a reduction in pedestrian or highway safety;</li><li>detrimental impact on public transport, cycling and walking routes;</li><li>adverse impact on the quality of the street scene and local character of the area;</li><li>the loss of important landscape features, including street trees and significant areas of green verge; and</li><li>the prevention or restriction of the implementation of necessary or future transport improvements.</li></ul></div> <div>5. On Birmingham’s strategic highway network, and other principle and main distributor routes, development must seek opportunities to remove unnecessary access points. New direct vehicular accesses will be supported where there are no practical alternatives (including consideration of impacts on public transport, walking and cycling routes). Any new access point must allow for access and egress in a forward gear.</div>	<div><ul style="list-style-type: none"><li>Retain the existing UDP Policy</li><li>No policy</li></ul></div>

SA Objective	No change	No policy	New policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
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SA Objective	No change	No policy	New policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	~	~	~		No clear relationship
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	+	-	+	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Attention to the design of transport infrastructure complements that applied to other aspects of the built environment.
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	+	-	++	Effects likely to be City-wide and cumulative, over the short, medium and long term.	An efficient and effective transport system contributes enhancing sustainable travel, through the requirements for production of Travel Plans, for example.
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	+	-	+	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Attention to the design of transport infrastructure complements that applied to other aspects of the built environment.
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	~	~		No clear relationship
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~	~	~		No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	~	~	~		No clear relationship

SA Objective	No change	No policy	New policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
ECON2 To help promote the vitality of local centres	+	-	++	Effects likely to be City-wide and cumulative, over the short, medium and long term.	An efficient and effective transport system contributes significantly to economic growth and thereby the well-being of residents through job opportunities.
ECON3 To promote the regeneration of areas across the City through appropriate development	~	~	~		No clear relationship
ECON4 To encourage investment in learning and skills development	~	~	~		No clear relationship
SOC1 To help ensure equitable access to community services and facilities	+	-	+	Effects likely to be City-wide and cumulative, over the short, medium and long term.	An efficient and effective transport system enables access to services and facilities by residents.
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~	~	~		No clear relationship
SOC3 To encourage development which promotes health and well-being	+	-	+	Effects likely to be City-wide and cumulative, over the short, medium and long term.	An efficient and effective transport system contributes significantly to economic growth and thereby the well-being of residents through job opportunities.
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~	~	~		No clear relationship
SOC5 To enable communities to influence the decisions that	+	-	++	Effects likely to be City-wide and cumulative, over	The policy could assist local neighbourhoods in

SA Objective	No change	No policy	New policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
affect their neighbourhoods and quality of life				the short, medium and long term.	realising greater control over highway-related issues.

### Commentary

Ensuring that there is a rounded approach to transport planning across the City should yield a broad range of sustainability benefits, notably in respect on enhancing the City's economic performance through ensuring more efficient and effective movement. In turn and more broadly, the well-being of residents is enhanced though the greater opportunities for efficient travel within the City. No likely significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing new policy to address siting and design of these uses yields more positive sustainability outcomes than the reasonable alternatives presented.

**BCC Evidence Analysis DM13 Highway Safety and Access:** There are a large number of applications where transport was an important consideration. It could also be argued that it is a consideration for almost every planning application. The appeal decisions seem to follow a pattern of individual subjective assessment of each case on its merits, rather than any obvious weakness of policy. The common theme is highway safety, with secondary considerations of character and appearance of the area, and shortfall in parking provision.



## Policy DM14 Parking and Servicing

Policy Content	Options Considered
<ol style="list-style-type: none"><li>1. All development proposals will be required to follow the standards in the Parking SPD (and any subsequent revisions). This includes provision for people with disabilities, cycle parking and infrastructure to support the use of low emission vehicles.</li><li>2. Proposals for parking and servicing shall avoid highway safety problems and protect local amenity and character of the area.</li><li>3. For development where no standards exist, parking shall be provided to ensure that the operational needs of the development are adequately met, having regard to the need to points above.</li><li>4. Development should include transport infrastructure that improves equality of access to travel and supports the efficient use of space, such as cycle hire and car club schemes.</li><li>5. Parking proposals should have regard to the Birmingham Design Guide and be designed to be fully accessible to all users.</li><li>6. Proposals for standalone parking facilities must demonstrate that there is a deficit in local publicly available off-street parking, or that it will help to relieve on-street parking problems.</li></ol>	<ul style="list-style-type: none"><li>• Retain the existing UDP Policy</li><li>• No policy</li></ul>

SA Objective	No change	No policy	New policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	~	~	~		No clear relationship
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	+	-	+	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Attention to the design of transport infrastructure complements that applied to other aspects of the built environment.

SA Objective	No change	No policy	New policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	+	-	++	Effects likely to be City-wide and cumulative, over the short, medium and long term.	An efficient and effective transport system contributes enhancing sustainable travel, through provision for cycle parking and infrastructure, for example.
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	+	-	+	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Attention to the design of transport infrastructure complements that applied to other aspects of the built environment.
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	~	~		No clear relationship
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~	~	~		No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	~	~	~		No clear relationship
ECON2 To help promote the vitality of local centres	+	-	++	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Efficient and effective parking policy can have a significant effect on local centre viability.
ECON3 To promote the regeneration of areas across the City through appropriate development	~	~	~		No clear relationship



SA Objective	No change	No policy	New policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
ECON4 To encourage investment in learning and skills development	~	~	~		No clear relationship
SOC1 To help ensure equitable access to community services and facilities	+	-	+	Effects likely to be City-wide and cumulative, over the short, medium and long term.	An efficient and effective transport system enables access to services and facilities by residents.
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~	~	~		No clear relationship
SOC3 To encourage development which promotes health and well-being	+	-	+	Effects likely to be City-wide and cumulative, over the short, medium and long term.	An efficient and effective transport system contributes significantly to economic growth and thereby the well-being of residents through job opportunities.
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~	~	~		No clear relationship
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	+	-	++	Effects likely to be City-wide and cumulative, over the short, medium and long term.	The policy could assist local neighbourhoods in realising greater control over highway-related issues.

## Commentary

Ensuring that there is a rounded approach to transport planning across the City should yield a broad range of sustainability benefits, notably in respect of enhancing the City's economic performance through ensuring more efficient and effective movement. In turn and more broadly, the well-being of residents is

enhanced though the greater opportunities for efficient travel within the City. No likely significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing new policy to address siting and design of these uses yields more positive sustainability outcomes than the reasonable alternatives presented.

**BCC Evidence Analysis DM14 Parking and Servicing:** There are a large number of applications where transport was an important consideration. It could also be argued that it is a consideration for almost every planning application. The appeal decisions seem to follow a pattern of individual subjective assessment of each case on its merits, rather than any obvious weakness of policy. The common theme is highway safety, with secondary considerations of character and appearance of the area, and shortfall in parking provision.

## Policy DM15 Telecommunications

Policy Content	Options Considered
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The Council will promote the development of advanced, high quality communications infrastructure to support economic growth and more accessible, inclusive communities. This will be achieved by requiring new development proposals to:

- Demonstrate opportunities have been explored for sharing of masts or sites. Such evidence should accompany any application made to the local planning authority;
- Demonstrate that there are no suitable alternative sites for telecommunications development available in the locality including the erection of antennae on existing buildings or other suitable structures
- Be sited and designed in order to minimise impact on the visual and residential amenity, character and appearance of the surrounding areas;
- If on a building, apparatus and associated structures to be sited and designed in order to minimise impact to the external appearance of the building;
- Not have unacceptable harm on areas of ecological interest, areas of landscape importance, or heritage assets and their setting; and
- Conform to the International Commission on Non-Ionising Radiation Protection (ICNIRP) guidelines, taking account where appropriate of the cumulative impact of all operators' equipment located on the mast / site.**

- Retain the existing UDP Policy
- No policy

SA Objective	No change	No policy	New policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
ENV1 To encourage development that optimises the use of previously developed land and buildings	~	~	~		No clear relationship
ENV2 To promote the application of high standards of design, construction and maintenance of buildings	+	-	+	Effects likely to be City-wide and cumulative, over the short, medium and long term.	The policy should promote the efficient use of shared facilities, for example, and more widely help to realise good design.
ENV3 To encourage the use of sustainable methods of transport and reduce the need to travel	+	-	+	Effects likely to be City-wide and cumulative, over	Modern telecommunications infrastructure is an important part of helping to reduce the need to travel

SA Objective	No change	No policy	New policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
				the short, medium and long term.	through home-working and teleconferencing, for example.
ENV4 To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage	+	-	+	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Attention to the impacts on cultural and natural heritage will help to protect their interests.
ENV5 To promote development which anticipates and responds to the challenges associated with climate change, particularly managing and reducing floodrisk	~	~	~		No clear relationship
ENV6 To promote development which makes best use of water resources, reduces pollution and encourages sustainable waste management	~	~	~		No clear relationship
ECON1 To help improve the performance of the local and City-wide economy to provide opportunity for all	+	-	+	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Modern telecommunications infrastructure is an important part of promoting the City's economic performance.
ECON2 To help promote the vitality of local centres	+	-	+	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Modern telecommunications infrastructure is an important part of promoting the City's economic performance.
ECON3 To promote the regeneration of areas across the City through appropriate development	+	-	+	Effects likely to be City-wide and cumulative, over the short, medium and	Modern telecommunications infrastructure is an important part of promoting the City's economic performance.

SA Objective	No change	No policy	New policy	Cumulative, Secondary and Temporal Effects of the Proposed Policy	Commentary
				long term.	
ECON4 To encourage investment in learning and skills development	+	-	+	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Modern telecommunications infrastructure is an important part of promoting the City's economic performance.
SOC1 To help ensure equitable access to community services and facilities	+	-	+	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Modern telecommunications infrastructure is an important part of basic community services.
SOC2 To help provide decent and affordable housing for all, of the right quantity type, tenure and affordability to meet local needs	~	~	~		No clear relationship
SOC3 To encourage development which promotes health and well-being	+	-	+	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Modern telecommunications infrastructure helps to develop economic performance, employment opportunities and thereby the well-being of residents.
SOC4 To encourage development which helps to reduce crime, the fear of crime and antisocial behaviour	~	~	~		No clear relationship
SOC5 To enable communities to influence the decisions that affect their neighbourhoods and quality of life	+	-	+	Effects likely to be City-wide and cumulative, over the short, medium and long term.	Modern telecommunications infrastructure contributes to the development of advances in e-democracy.

## Commentary

Ensuring that the City has an up-to-date telecommunications infrastructure will ensure sustainability benefits across a range of objectives, notably the contribution to the City's economic performance, creating opportunities for travel reduction and ensuring that all residents have equitable access to high quality services that enable them to fulfil their economic and social potential. No likely significant negative effects have been identified. There are no suggested changes to the content of the policy arising from the appraisal. The option of developing new policy to address telecommunications siting matters yields more positive sustainability outcomes than the reasonable alternatives presented.

**BCC Evidence Analysis DM15 Telecommunications:** Majority of applications were approved, many under prior approval notification. The two standard conditions we have in the manual do not appear to be used, raising the question of whether they are appropriate or fit for purpose. 23% of applications refused. 19% of refusals appealed, all by same operator. The number of appeals is relatively low, but the success rate for appellants is high. In each case, the decision appears to revolve around the visual impact. Para 8.55 of the UDP, and standard reason REFL39 do not appear to be effective in these cases, so this is an area that should be given careful consideration in the new Policy. Of the 5 appeals allowed, in 4 cases the Inspector agreed there was some harm but not to the extent that justified refusal. In the remaining allowed appeal, the council judged the site to be in a sensitive location at 60m from a nursery school however the Inspector stated that the site does not fall within the list of sensitive locations as set out in 8.55A. This is inconsistent because the list does say "locations within or adjacent to the grounds of education and health institutions". The 1 dismissed appeal was dismissed because of the impact of the proposal on the nearby Conservation Area.

## Appendix B

# Scoping Report Baseline

Birmingham is the United Kingdom's second largest urban conurbation and neighboured by several other large conurbations, such as Solihull, Wolverhampton, and the towns of the Black Country. It is situated just to the west of the geographical centre of England on the Birmingham Plateau - an area of relatively high ground, ranging around 150-300 metres above sea level. With the Clent, Waseley and Lickey Hills towards the south-west of the City, Birmingham slopes gently to the east of the conurbation. Birmingham is at the heart of the West Midlands Region which also contains the city of Coventry and the Black Country city region. It is the major centre for economic activity and is the major contributor to the regional economy. The City has a vibrant city centre, a strong cultural mix and contains many prosperous areas. The continued urban renaissance of Birmingham, as the regional capital, has been crucial to the Region. This period of renaissance has brought about the successful delivery of key infrastructure projects such as the development of extended public transport networks. These have been vital to improving the City's local, regional and national accessibility. The city also has an international airport acting as a key gateway to the region and is well served by the M5, M6 and M40 providing access to a number of key cities across the UK.

## Material Assets

### Resource Use

There are no active mineral workings in Birmingham, and no extant planning permissions for mineral extraction. This is due to the lack of naturally-occurring minerals in Birmingham for which there is a demand. As a result, Secondary Aggregates are derived from a very wide range of materials that may be used as aggregates. Secondary aggregates include by-product waste, synthetic materials and soft rock used with or without processing. According to the Study<sup>22</sup>, in 2003, about 4.29 million tonnes of recycled aggregate and about 0.65 million tonnes of recycled soil were produced in the West Midlands.

Most of Birmingham is in the area served by Severn Trent Water with a small area to north served by the South Staffordshire Water Company. In 2004 domestic water consumption was 137 litres/head/day<sup>23</sup>. This was lower than the national average in 2007/08 of 14 litres/head/day (Audit Commission<sup>24</sup>).

The current Water Resources Plan<sup>25</sup>, prepared by Severn Trent Water for the Birmingham Water Resource Zone includes the development of four significant new water resources. These developments mean that the growth identified in the Water Resources Plan can be accommodated without the zone going into deficit. This zone requires new water resource developments to keep the zone in surplus without which the zone will go into a significant deficit by 2030. Abstraction is licensed by the Environment Agency on a catchment basis<sup>26</sup> which set show they will manage water resources in the Tame, Anker and Mease catchments. It provides information on how existing abstraction is regulated and whether water is available for further abstraction. The strategy details delivery commitments under the Water Framework Directive, ensuring no

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<sup>22</sup> Communities and Local Government (2007) Survey of Arisings and Use of Alternatives to Primary Aggregates in England, 2005: Construction, Demolition and Excavation Waste

<sup>23</sup> <http://www.defra.gov.uk/sustainable/government/progress/regional/summaries/16.htm>

<sup>24</sup> <http://www.defra.gov.uk/sustainable/government/progress/national/16.htm>

<sup>25</sup> Severn Trent Water (2013) Water Resources Management Plan

<sup>26</sup> Environment Agency (2013) Tame, Anker and Mease Licensing Strategy at: <https://www.gov.uk/government/publications/cams-tame-anker-and-mease-abstraction-licensing-strategy>

ecological deterioration of rivers. New additional water management measures or water resources will be needed to ensure water is available to meet the needs of new housing. New foul drainage infrastructure will also be required to support the proposed level of growth.

### Sustainable Design, Construction and Maintenance

Environmental improvements by the City Council during the late 1980s and early 1990s have improved the overall quality of the environment within the City Centre. There have been notable successes in relation to improving the quality of design and the environment, particularly in the City Centre. This was recognised by the award to the city of the RTPI Silver Jubilee Cup in 2004. Good design continues to be evident in recent and ongoing developments, such as the Birmingham High Performance Centre at the Alexander Stadium, the Attwood Green Area and Brindley Place.

Eastside was conceived as a demonstration of sustainable development principles. In addition to the CHP network, renewable energy technology like wind and solar power will be placed on site along with green roofs and sustainable urban drainage systems. Several large building schemes in Birmingham have achieved high BREEAM Buildings and Ecohomes/Code for Sustainable Homes ratings, exemplifying sustainable building practice. There are currently 39 BREEAM Excellent buildings within Birmingham. There are no BREEAM Outstanding buildings. Commercial buildings include 19 George Road (Excellent), Calthorpe House (Excellent) and Baskerville House (Excellent). The homes at Attwood Green received Excellent Ecohomes standard.

### Renewable Energy

Birmingham imports in the region of 22,800GWhr of energy per year costing the City's population and businesses over £1.5bn, with costs predicted to rise along with fuel prices over the coming years.<sup>27</sup> The city currently produces just 1% of the £1.3bn of energy that its residents and businesses purchase and consume each year. This not only represents a significant loss of money from the local economy, more critically, it leaves the city exposed to threats from energy security, low levels of resilience, as well as price fluctuations in global energy trading which affect energy bills, having a significant impact upon fuel poverty. BCC has therefore committed to developing energy activity in the city to bring about a more decentralised energy system, and to improve the social and economic opportunities of its residents by addressing fuel poverty and decarbonisation of energy. BCC has begun to tackle this through a focus on energy, and understanding where and how decentralised energy systems could provide major opportunities for the city to produce, control and distribute heat and power networks.

The Climate Change Strategic Framework<sup>28</sup> identifies that 46% of Birmingham's CO<sub>2</sub> emissions come from industry, 33% from domestic energy and 21% from road transport. The Framework outlines that Birmingham has limited scope for large-scale renewable energy projects; however, energy users can support developments elsewhere through their purchasing decisions. Furthermore, it is acknowledged in the Annual Monitoring Report<sup>1</sup> that the City Council currently does not monitor the provision of new renewable energy capacity although consideration is being given by the Council to ways of monitoring additional renewable energy capacity installed through new development. Photovoltaic panels are currently fitted to some buildings as part of the 'Birmingham Energy Savers Scheme' BES resulted in the construction of 3,000 (5%) of its planned energy saving measures.

The largest renewable energy scheme currently operating in Birmingham is the Tyseley Energy from Waste Plant facility which produced a total of over 95,030.50 tonnes of ash between April 2010 and March 2011 and generates 25MWh per annum, from the thermal treatment of waste. A total of 80,241.22 tonnes of bottom ash that was produced was sent for recycling in Castle Bromwich where metals are removed and recycled

<sup>27</sup> Birmingham City Council website 'Renewable Energy'

<sup>28</sup> Birmingham City Council (2009) Cutting CO<sub>2</sub> for a Smarter Birmingham Strategic Framework



with the remaining material used within the construction industry. This is substantially short of the target for renewable energy to account for 15% of energy produced by 2020 in the Climate Change Strategy and Action Plan Consultation 2007. The City has a number of operational 'Combined Heat and Power' (CHP) facilities, such as Birmingham Children's Hospital and Aston University which are part of an award-winning CHP scheme, which are able to generate and supply heat and electricity for local consumption. Birmingham District Energy Scheme is a co-joint co-operation between ENGIE and Birmingham City Council. The scheme is the fastest growing in the UK, with the Council House, ICC, Aston University and Birmingham Children's Hospital among the buildings benefitting from more efficient energy. It incorporates three district energy networks, all built and operated by ENGIE through the Birmingham District Energy Company (BDEC):

1. Broad Street – a tri-generation (heat, power and cooling) system;
2. Aston University – CHP (combined heat and power) system; and
3. Birmingham Children's Hospital – CHP system.

The Council signed a 25-year energy supply agreement in 2006. The scheme helps Birmingham to save more than 15,000 tonnes of CO<sub>2</sub> emissions every year. Two residential towers are connected to the District Heat network - Crescent and Cambridge towers, situated at the rear of the ICC. The secondary delivery to these blocks is owned by BCC. The 'total cost of ownership' of access to heat and power infrastructure, servicing, maintenance, as well as heating and power costs are currently estimated at around 5% less per year. Developers have also shown an interest in bringing forward Anaerobic Digestion (AD) energy generating schemes. As set out in the AMR 2013, the Council will work positively with developers to realise the opportunities that AD hold and emphasise the potential of AD technology for use within Birmingham City Centre as it is a technology seen by the Government as a sustainable and viable waste management solution which utilises waste as a valuable resource.

The city also has a number of district heat networks. An energy network feasibility study is currently in progress to help with the development of up to 3 potential energy network opportunities. The Langley Sustainable Urban Extension (SUE) is currently underway and will deliver approximately 6,000 new homes, with a focus on family housing. As stated in the Birmingham Development Plan, adopted January 2017, the new neighbourhood will provide for a mix of housing sizes, types and tenures, including affordable housing in line with the requirements in Policy TP31 (35%). The site is adjacent to a BCC owned site called Peddimore; a large industrial development location; and energy networks are currently being considered in both locations with a potential interconnection at a new junction on the A38. BCC has recently secured feasibility funding from HNDU to further refine this significant network opportunity and consider the potential to deliver affordable and low carbon heat to businesses and residents alike. Selly Oak's large energy demands of the acute care NHS sites in Selly Oak has been under consideration for some time as a potential connection since HNDU funding was secured in 2016. BCC owned housing blocks Thirlmere House and Windemere House are in close proximity to the hospital trust site and are currently heated via electric storage heaters. As this study continues, the potential to convert these buildings to wet heating systems and adopt them onto a local network will be assessed.

## Energy Use

There are 100,000 dwellings in the city which are more than 80 years old according to the Birmingham Sustainability Strategy and Action Plan 2000-2005. As a result, the construction form is intrinsically energy-poor. Recent developments, such as the Birmingham High Performance Centre at the Alexander Stadium, have incorporated innovative, energy-efficient design. Although they are not referred to as 100% sustainable energy systems, CHP can be a more efficient energy system generating and supplying heat and electricity for local consumption. Heating is by far the largest domestic use of energy in Birmingham. Space heating accounts for 62% of use, while water heating accounts 22%. This is exacerbated by a large number of homes that do not meet Decent Homes standards, including 49,250 Council-owned homes and an estimated 35,000 private sector dwellings.

Only a very small fraction of Birmingham's building stock is built new each year, so new building standards will take decades to have a significant impact on resource use across the city, making the condition of the existing building stock very important. There are no indicators of the age or quality of the building stock as a

whole in Birmingham, but energy use data suggest there are a large number of homes of poor quality that contribute to high energy usage. The Sustainable Community Strategy sets out a vision for Birmingham in 2026 to become the first sustainable global city in Britain. The strategy envisages that in 2026 Birmingham will lead on Climate Change with local energy generation from CHP and cooling schemes will reduce CO<sub>2</sub> emissions. If Birmingham is to become the first sustainable global city it needs to dramatically increase deployment in low carbon energy generation technologies. The UK has signed up to the European Renewable Energy Directive, which sets a target of 15% of all energy generated to be sourced from renewable sources by 2020.

The Climate Change Framework aims that by 2026 Birmingham will provide an improved quality and choice of housing and 'decent' standard for virtually all housing, with efficient heating systems and insulation in line with the best UK cities.

## Sustainable Transport

### Rail and Metro

The BDP sets out the transport improvements required to deliver the growth agenda to support development and attract investment. Birmingham Connected provides the long-term strategy for improving the City's transport system. This includes measures challenging the car culture, significant investment in walking and cycling and new high quality public transport routes such as Metro, 'Sprint' (the bus rapid transit system) and heavy rail. This is being supplemented by a number of proposals including the Birmingham Cycle Revolution, 20mph zones and the West Midlands Bus Alliance.

The proposed High Speed 2 (HS2) rail link, initially between Birmingham and London, will bring radically improved rail connections into the City Centre when it opens in 2026, as well as a significant number of new jobs and visitors to the City. This will be supported by the HS2 Connectivity Programme to ensure that the wider region has access to the benefits that HS2 will bring.

Birmingham is at the heart of the rail network and in easy reach of millions of people. The £600m redevelopment of New Street Station was opened in 2016 providing a bright modern transport hub and enhanced facilities. There is also a network of suburban and freight rail services.

The Midland Metro is a light-rail/tram line in the county of West Midlands, England, operating between the cities of Birmingham and Wolverhampton via the towns of West Bromwich and Wednesbury. The Midland Metro extension from Snow Hill to New Street Station was completed in 2016. Upwards of £300 million is being invested in extending the network that will link key city centre destinations - New Street Station with HS2 at Birmingham Curzon, the business district at Snow Hill, the civic areas around Victoria Square and Centenary Square, Digbeth and Birmingham Smithfield.

The line has potential to extend across a wider area running from Birmingham Smithfield to the south of the City to the University of Birmingham, Life Sciences Campus and Queen Elizabeth Hospital. And also from Birmingham through east Birmingham to Birmingham Airport.

### Road

Birmingham has a complex road network with around 12 major radial roads and ring roads traversing the city. There are also three busy motorways: the M5, M6 and M42, located towards the west, north and east of the city respectively. Although there has been a recent rise in the use of the car, there has been a reduction in average travel speeds. Much of this is due to outward migration of people, which has in turn led to longer car journeys; there have also been a number of out-of-town developments in recent years which have encouraged additional car journeys to be made. Increased congestion has however resulted in lower average vehicle speeds. Congestion is a significant issue and demand exceeds available capacity at certain times and in some locations, both on road and rail. Congestion has indirect and cumulative effects on the economy, on people's health and well being and on air quality. Congestion can make deliveries less reliable and deter investment. Congestion also affects the wider transport of goods and services via the M5 and M6 and whilst

the opening of the M6 Toll has provided an alternative for some trips, there are still significant peak hour demands that require management.

The Highways Agency (HA) Midlands Motorway Box (MMB) Route Management Strategy highlights a number of problems and issues that affect both the HA and the local authority networks. The MMB network caters for a mixture of commuter and long distance strategic traffic, the M5 and M6 form part of the Trans-European Network, with a peak hour period of around 18 hours. The route has a high regularity of junctions, 13 miles of the route is elevated making it difficult to plan and carry out maintenance and the MMB is sensitive to changes in demand and flow when large scale events are held such as those at the National Exhibition Centre (West Midlands Local Transport Plan 2006). Casualties are disproportionately higher in deprived areas. The West Midlands Metropolitan Area is on course to reduce the number of people killed or seriously injured by 2010 by 40%, reduce the number of children killed or seriously injured by 50%. This good progress is reflected in the area's designation as a Centre of Excellence for Integrated Transport specialising in road safety.

### Bus and Coach

Approximately 85% of all public transport trips in Birmingham are handled by the city's buses. The bus network is operated by a number of companies, with services along the main radial routes providing good coverage to the City Centre. There are priority measures in place on a number of these routes, such as Digbeth High Street, while others are planned. Pedestrianisation limits bus traffic to a few key corridors in the City Centre, which reduces capacity and creates significant environmental problems along these routes. Coach travel is also important, particularly in providing an inexpensive means of longer distance travel for those on low incomes. The city has a number of on-street coach set down and pick up points around the City Centre. The Brewery Street Lorry and Coach Park has capacity for up to 32 18.5m/14m vehicles.

### Travel Behaviour

Birmingham has a relatively high percentage of households without a car – 35.8% compared to the English average of 25.6%<sup>29</sup>. However, despite this fact, just over half of people who both live and work in the City use their car to get to work, only a fifth use the bus, and a tenth walk or work from home<sup>18</sup>. In contrast, over three quarters of people commuting into the city use a car, about a tenth use the train, and a further tenth travel by bus. Table 4.2 shows statistics for people travelling to work in Birmingham.

**Table 4.2 Means of Travel to Work in Birmingham, 2001 (Census 2001)**

Travel to Work - Method	% of those working		
	Live in Birmingham, works outside	Live and work in Birmingham	Work in Birmingham, live outside
Work at/from home	0	9.5	0
Train	2.9	2.4	10.3
Bus	12.8	22.1	10.2
Car	78.3	52.4	75.5
Walk	2.7	10.4	1.2
Other	3.3	3.2	2.8
Total (100%)	79,000	288,000	162,000

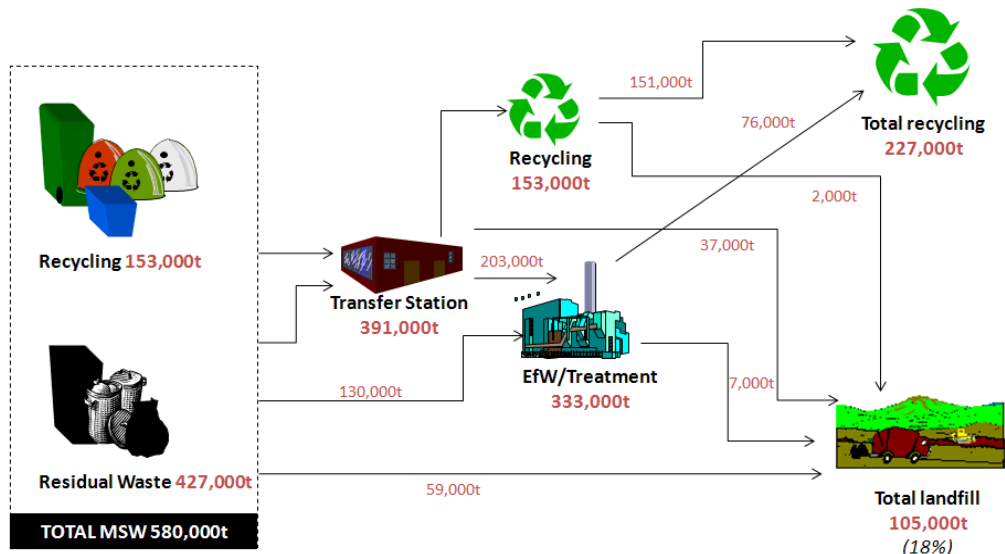
Source: ONS 2001 Census

<sup>29</sup> Birmingham City Council (2014) Annual Monitoring Report 2013

The picture is different for trips to the city centre with over 60% of trips arriving by non-car modes. According to the Birmingham Cordon Surveys, the total number of car trips entering Birmingham City Centre during the morning peak hours (07:30-09:30 hrs) has decreased in the past ten years. However, the number of bus trips remained relatively constant with a slight decrease since 2005, while the number of rail trips has increased since 2001. In 2006/7 some 62.7% of bus users in the West Midlands metropolitan areas were satisfied with services which already exceeds the target of 60% by 2009/10 (West Midlands Local Transport Plan Delivery Report 2006-2008). Bus punctuality<sup>30</sup> in 2006/7 was about 65%, marginally below the target. Performance has tended to vary from year to year and from corridor to corridor (West Midlands Local Transport Plan Delivery report 2006-2008). In 2011, 8 out of 10 journeys made by public transport were made by bus. The Bus Alliance is committed to ensuring that all buses in the region are a minimum of Euro V by 2020 (West Midlands Local Transport Plan Delivery Report 2017/18). The Transportation and Street Services Overview and Scrutiny Committee set a target of 83% by 2010/11.

**Waste Management.** In 2012/13 there was 488,867 tonnes of municipal waste collected of which 70.48% was used to recover heat and power from the Tyseley EfW facility. Municipal waste is a significant part of the waste stream, but only represents a small proportion of the total amount of waste produced in Birmingham (Figure 4.1).

Figure 4.1 Destination of Birmingham's Waste Stream



Note: Tonnage figures are rounded to nearest '000 & are based on calendar year 2008 in order to cross match figures with data in the Environment Agency waste data interrogator 2008

Source: [http://www.bebirmingham.org.uk/documents/Birmingham\\_Total\\_Waste\\_Strategy\\_Final\\_Report\\_24.11.10.pdf](http://www.bebirmingham.org.uk/documents/Birmingham_Total_Waste_Strategy_Final_Report_24.11.10.pdf)

Birmingham's recycling and composting rates have been improving over the past ten years and the current performance (for 2012/13) is 32%. The percentage of waste sent to landfill is 7.48% for the 2012/13. Both rates represent a significant improvement in performance over the past decade (Table 4.3).

According to the Municipal Waste Management Strategy, the amount of household waste generated per person is lower in Birmingham than in other metropolitan authorities, and its rate of growth has also been lower than the national growth. Birmingham City Council recovers energy from the majority of its 'residual' municipal waste through the Tyseley Energy from Waste Plant (EfW)<sup>31</sup>. This reduces reliance on landfill as a disposal option. The Strategy identifies that the City Council has sufficient municipal waste treatment capacity up to 2019.

<sup>30</sup> Birmingham City Council (2007) Building Bus Use: A Report from Overview & Scrutiny

<sup>31</sup> Birmingham City Council (2006) Municipal Waste Management Strategy 2006-2026

Table 5.3 Municipal Waste Arising in Birmingham and Methods of Management 2002 - 2013

Year	Waste Arising (tonnes)	Waste Recycled/Composted		Waste Recovered EFW		Waste sent to Landfill		% of 2001 level sent to landfill
		Tonnes	%	Tonnes	%	Tonnes	%	
2002/3	536,191	50,519	9.42	352,535	72.80	123,347	23.00	63.08
2003/4	551,691	58,442	10.70	337,491	61.20	126,778	22.97	64.83
2004/5	568,035	69,924	12.30	340,127	59.87	112,726	19.84	57.65
2005/6	557,810	77,744	13.93	338,605	60.70	102,588	18.39	52.46
2006/7	570,591	96,929	18.39	313,775	47.92	101,372	17.76	51.82
2007/8	565,548	123,572	26.43	325,167	51.96	107,699	19.04	55.05
2007/8	543,645	140,541	30.59	335,346	61.68	77,763	14.30	39.75
2008/9	527,207	138,589	31.78	334,409	63.47	64,748	12.28	33.10
2010/11	508,884	131,001	32.00	341,684	67.15	52,800	10.37	26.94
2011/12	484,099	124,537	31.28	348,157	71.92	23,804	4.92	12.18
2012/13	488,867	130,035	32.31	344,526	70.48	36,584	7.48	18.72

Source: BCC AMR 2013

### Efficient Use of Land

Since 2002/03, the proportion of new housing developed on previously developed land (PDL) has been high (at over 90%) and generally increasing with the exception of 2008/9 when slightly less housing completions (89%) took place on PDL. No housing completions taking place on greenfield land in 2009/10. The density of new housing completions over the decade to 2011/12 has been 65% for 50+ dwellings per ha, 28% for 30-50 dph and 7% for less than 30 dph. The average density of development over the decade to 2011/12 is 59.6 dph, falling from a peak of 80dph in 2008/09 reflecting the fall in apartment development.

### Soil Quality

As most of Birmingham is built-up, there is very little soil of a high quality. There is agricultural land situated to north-east of the City at Sutton Coldfield and a lesser amount is to be found at Woodgate Valley to the south-west. In terms of agricultural land classification, almost the whole of Birmingham is classified as Urban and just a small area in the north and north east are classified as Grade 3 agricultural land (MAGIC website).

There are a number of sites which could be subject to land contamination within Birmingham. This includes a total of 67 former known landfill sites that have been identified in the City since the 1960s although risk and remediation schemes have already been carried out on many of these sites. The majority of identified landfill sites are situated next to housing and some are located on Birmingham's major aquifer. Public open space within the city, except for the 85ha that former landfills, this land is not likely to be affected by contamination<sup>32</sup>.

Historically, Birmingham has had a very broad spectrum of manufacturing industries. Many of these have the potential to leave a legacy of land contamination. As with many industrial cities, energy requirements have changed as new technologies have become available. Birmingham is no exception. The production of energy from coal to produce town gas or electricity has obvious contamination issues and there are several areas of

<sup>32</sup> Birmingham City Council (2008) Contaminated Land Inspection Strategy for Birmingham Second Edition

Birmingham where historically such activities have been undertaken. At the heart of the United Kingdom's road and rail network Birmingham has considerable areas of land which may be contaminated due to transportation activities. These include roads, canals, railways and airports.

Waste disposal activities in Birmingham range from complex waste treatment plants dealing with highly hazardous waste to waste transfer stations handling inert building waste and soil. The potential land contamination issues in respect of landfill sites have been considered previously, but all waste disposal activities will be the subject of assessment.

The Council is required under Section 78R of Part IIA of the Environmental Protection Act 1990 to maintain a Public Register of Contaminated Land of which there are 121 entries.

### Influence of the DM DPD on Material Assets

The DM DPD is likely to have a mixed and indirect influence on material assets through the granting of planning permission which will entail additional resource use. However, the requirements for increasingly demanding standards of energy efficiency and waste management in the construction and running of buildings will bring about improved resource use overall as will the maintenance of the preference for the use of previously developed land. Detailed design requirements and conditions associated with the granting of planning permission could also be influential in encouraging more sustainable travel, for example in restricting parking spaces.

## Climatic Factors

### Climate Change

UK Climate Change Projections (UKCP09)<sup>33</sup> suggest that mean summer temperatures could rise by 2.6°C, summer rainfall could decrease by 17% and winter rainfall could increase by 13% in the West Midlands by the 2050s. These are the central estimates for a medium emissions scenario. By the 2050s central England could have irrigation needs similar to those currently seen in central and southern Europe. Mean monthly river flows could decrease by 50% to 80%. However, by the 2080s, the latest UK climate projections (UKCP09) are that there could be around three times as many days in winter with heavy rainfall (defined as more than 25mm in a day). It is plausible that the amount of rain in extreme storms (with a 1 in 5 annual chance, or rarer) could increase locally by 40%<sup>34</sup>. The impact of wetter winters and more of this rain falling in wet spells may increase river flooding. More intense rainfall causes more surface runoff, increasing localised flooding and erosion. In turn, this may increase pressure on drains, sewers and water quality. Storm intensity in summer could increase even in drier summers.

More generally, according to the UK's Climate Change Risk Assessment<sup>35</sup> the following key impacts associated with climate change are likely:

- ▶ Flood risk is projected to increase across the UK. Expected annual damages increase from a current baseline of £1 billion to between £1.8 and £5.6 billion by the 2080s for England (not including the effects of projected population growth);
- ▶ Risk of increased pressure on the country's water resources. The current public water supply surplus of around 900MI/day on average is projected to turn into a water supply deficit of around 1,250MI/day by the 2020s and 5,500MI/day by the 2050s, with large regional variations;
- ▶ Potential health risks related to hotter summer conditions, but potential benefits from milder winters;

<sup>33</sup> UKCP09 <http://ukclimateprojections.defra.gov.uk/content/view/515/499/>

<sup>34</sup> Birmingham City Council (2011) Preliminary Flood Risk Assessment

<sup>35</sup> [http://www.sustainabilitywestmidlands.org.uk/media/resources/adaptation\\_sub-committee\\_report.pdf](http://www.sustainabilitywestmidlands.org.uk/media/resources/adaptation_sub-committee_report.pdf)

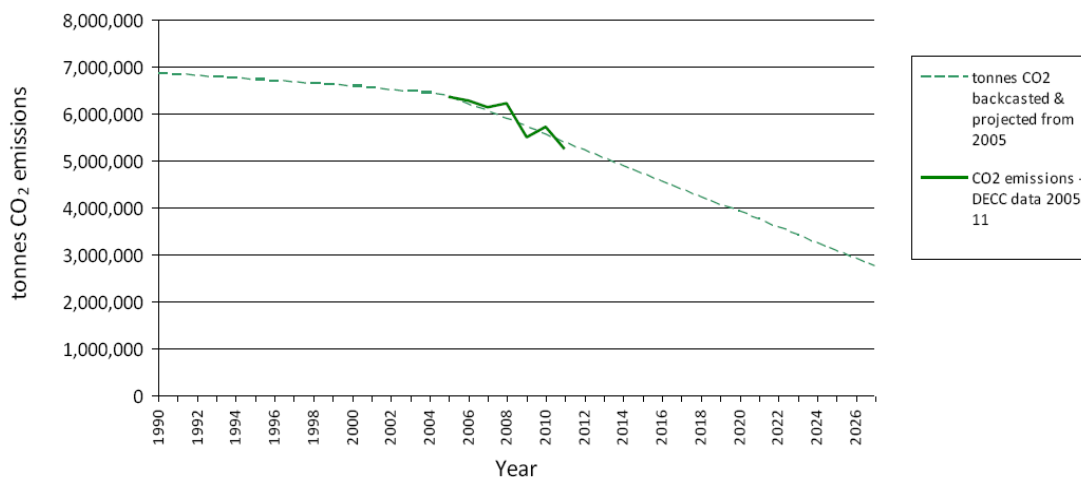


- ▶ There are projected to be between 580 to 5,900 additional premature deaths per year by the 2050s in hotter summer conditions. Conversely, between 3,900 and 24,000 premature deaths are projected to be avoided per year with milder winters by the 2050s;
- ▶ Sensitive ecosystems that have already been degraded by human activity may be placed under increasing pressure due to climate change. The main direct impacts relate to changes in the timing of life-cycle events, shifts in species distributions and ranges, and potential changes in hydrological conditions. While some species would benefit from these changes, many more would suffer; and
- ▶ Some climate changes projected for the UK provide opportunities to improve sustainable food and forestry production. Some agri-businesses may be able to increase yields of certain types of crops and introduce new crops in some parts of the country, as long as pests and diseases are effectively controlled and sustainable supplies of water are available.

The UK is at risk of both water supply deficits (too little water) and greater risk of flooding (too much water). While this can seem counterintuitive, it arises due to changes in the timing and extent of when rain falls. Water supplies (groundwater and reservoirs) need sustained rainfall over a period of time, particularly in winter, to remain at required levels. The intense rain that can lead to flooding from rivers and surface water does not necessarily replenish these large stores, as the water may flow rapidly downstream before it is captured, and not fall in sufficient quantity over a prolonged period.

Birmingham imports in the region of 22,800GWhr of energy per year costing the city's population and businesses over £1.5bn, with costs predicted to rise along with fuel prices over the coming years<sup>36</sup>. The Climate Change Strategic Framework<sup>37</sup> identifies that 46% of Birmingham's CO<sub>2</sub> emissions come from industry, 33% from domestic energy and 21% from road transport. Between 2005 and 2011, there was a 12.5% decrease in per capita carbon emissions (Figure 4.2). The Birmingham Climate Change Framework provides a key target to produce a 60% reduction in carbon dioxide (CO<sub>2</sub>) emissions produced in the City by 2026. The overall actual and projected reduction in CO<sub>2</sub> emissions is illustrated in Figure 4.2 where a halving of emissions over the next ten years is anticipated.<sup>38</sup>

Figure 4.2 CO<sub>2</sub> Emissions Progress and Required Reduction Path

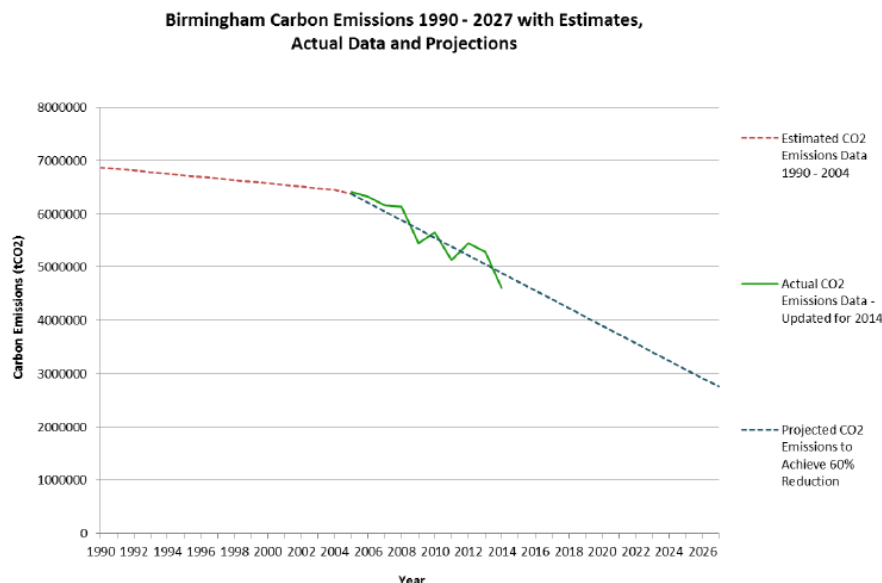


<sup>36</sup> Birmingham City Council website 'Renewable Energy'

<sup>37</sup> Birmingham City Council (2009) Cutting CO<sub>2</sub> for a Smarter Birmingham Strategic Framework

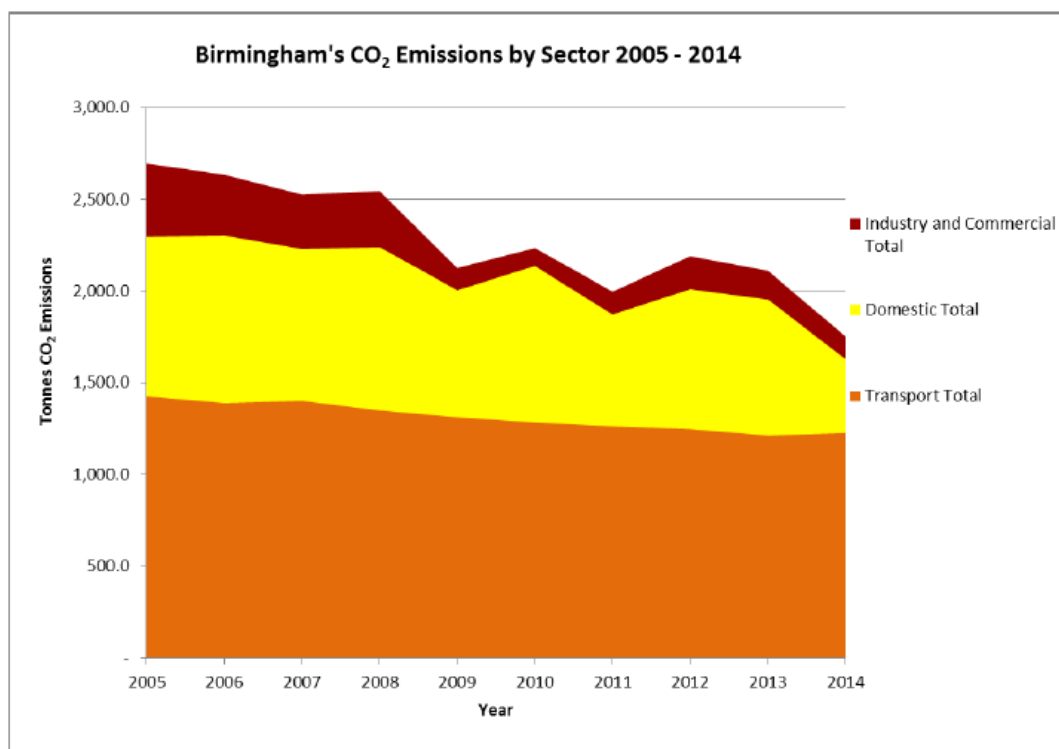
<sup>38</sup> Birmingham's Green Commission (September 2013) Report on Birmingham's Carbon Emissions Progress

<http://greencity.birmingham.gov.uk/wp-content/uploads/2013/11/Birmingham-CO2-Emissions-Progress-September-2013.pdf>



In terms of sectoral emissions (Figure 4.3), the clearest contributions to overall reductions are associated with the industrial and domestic sectors, with transport proving to be more stubborn.

Figure 4.3 Birmingham's CO<sub>2</sub> Emissions by Sector 2005 – 2014



Birmingham's CO<sub>2</sub> Framework suggests that the City has limited scope for large-scale renewable energy projects; however, energy users can support developments elsewhere through their purchasing decisions. The largest renewable energy scheme currently operating in Birmingham is probably the Tyseley Energy from Waste Plant facility which produced a total of over 95,030.50 tonnes of ash between April 2010 and March 2011 and generates 25MWh per annum, from the thermal treatment of waste. A total of 80,241.22 tonnes of



bottom ash that was produced was sent for recycling in Castle Bromwich where metals are removed and recycled with the remaining material used within the construction industry. This is substantially short of the target for renewable energy to account for 15% of energy produced by 2020 in the Climate Change Strategy and Action Plan Consultation 2007. The City has a number of operational 'Combined Heat and Power' (CHP) facilities, such as Birmingham Children's Hospital and Aston University which are part of an award-winning CHP scheme, which are able to generate and supply heat and electricity for local consumption. The connection of Birmingham Children's Hospital to the CHP scheme has allowed for the supply of heat to Lancaster Circus.

Whilst it is acknowledged in the Annual Monitoring Report<sup>1</sup> that the Birmingham City Council currently does not monitor the provision of new renewable energy capacity, it is understood that further consideration is being given by Birmingham City Council to ways of monitoring additional renewable energy capacity installed through new development.

There are 100,000 dwellings in the city which are more than 80 years old according to the Birmingham Sustainability Strategy and Action Plan 2000-2005. As a result, the construction form is intrinsically energy-poor. Recent developments, such as the Birmingham High Performance Centre at the Alexander Stadium, have incorporated innovative, energy-efficient design. Although they are not referred to as 100% sustainable energy systems, CHP can be a more efficient energy system generating and supplying heat and electricity for local consumption.

Heating is by far the largest domestic use of energy in Birmingham. Space heating accounts for 62% of use, while water heating accounts 22%. This is exacerbated by a large number of homes that do not meet Decent Homes standards, including 49,250 City Council-owned homes and an estimated 35,000 private sector dwellings. The Climate Change Framework aims that by 2026 Birmingham will provide an improved quality and choice of housing and 'decent' standard for virtually all housing, with efficient heating systems and insulation in line with the best UK cities.

The Sustainable Community Strategy sets out a vision for Birmingham in 2026 to become the first sustainable global city in modern Britain. The strategy envisages that in 2026 Birmingham will lead on Climate Change with local energy generation from CHP and cooling schemes will reduce CO<sub>2</sub> emissions. If Birmingham is to become the first sustainable global city it needs to dramatically increase deployment in low carbon energy generation technologies. The UK has signed up to the European Renewable Energy Directive, which sets a target of 15% of all energy generated to be sourced from renewable sources by 2020.

## Managing and Reducing Flood Risk

Many of Birmingham's rivers and streams are susceptible to flooding (whether due to climate change or otherwise) and Birmingham City Council is required to consult the Environment Agency on all planning applications within the floodplain zones defined by the Agency.

Since 2011 the Environment Agency has provided advice on 212 approved planning applications including 97 in 2015/16. All of these applications were approved with no outstanding objection from the Environment Agency. In a number of cases an objection was raised to a proposal as initially submitted but, through amendments and discussions during the consideration of the application, issues were resolved and objections removed prior to the applications being approved.

The Level 1 revised Strategic Flood Risk Assessment was published in January 2012 by the City Council which assesses and maps all known sources of flood risk including fluvial, surface water, sewer, groundwater and impounded water bodies, taking into account future climate change predictions, to be used as an evidence base to locate future development, primarily in low flood risk areas. The Level 2 Strategic Flood Risk Assessment (April 2012) assesses possible development locations identified in the Strategic Housing Land Assessment in terms of flood zones and the sequential test. The results of the SFRA should be incorporated into the SA process once they become available.

One factor that can help to manage and adapt to the impact if climate change is the development and enhancement of Green Infrastructure (GI) (also including 'blue infrastructure'). GI is the interconnected network of open spaces and natural areas, such as greenways, waterway and waterbodies, parks, forest preserves and native plant vegetation, that can help naturally manage storm water, reduce flooding risk and improve water quality, helping to reduce the City's 'heat island effect'.

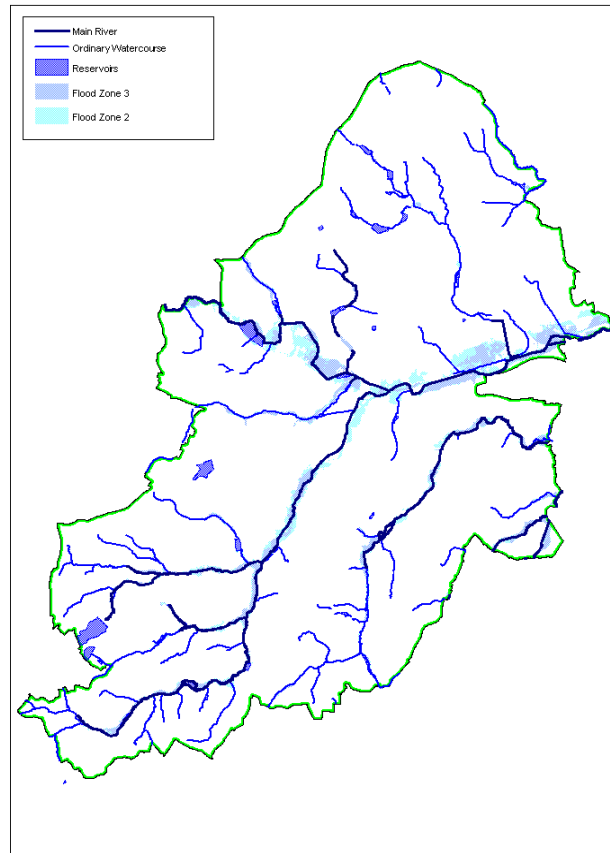
Birmingham is at risk of flooding from Main Rivers, ordinary watercourses, surface water, sewer flooding and groundwater. There is also the potential for canal and reservoir breach and overtopping. It is estimated that there are 11,365 at risk of fluvial flooding and 24,600 properties at risk of surface water flooding.

The Level 1 revised Strategic Flood Risk Assessment (SFRA) was published in January 2012 by Birmingham City Council. The SFRA assesses and maps all known sources of flood risk including fluvial, surface water, sewer, groundwater and impounded water bodies, taking into account future climate change predictions, and these are to be used as an evidence base to locate future development, primarily in low flood risk areas. The Level 2 Strategic Flood Risk Assessment (April 2012) assesses possible development locations identified in the Strategic Housing Land Assessment in terms of flood zones and the sequential test. Emerging strategies at the City-wide level to manage flood risk include the Surface Water Management Plan and the Local Flood Risk Management Strategy.

### Fluvial Flood Risk

Fluvial flooding occurs when water draining from the surrounding land exceeds the capacity of a watercourse. The Environment Agency produced Flood Zones show the areas potentially at risk of flooding from rivers, ignoring the presence of defences. Figure 4.4 shows the flood zones in Birmingham showing 1 in 100 and 1 in 1,000 year risks associated with Birmingham's rivers and their tributaries.

Figure 4.4 Flood Zones across Birmingham



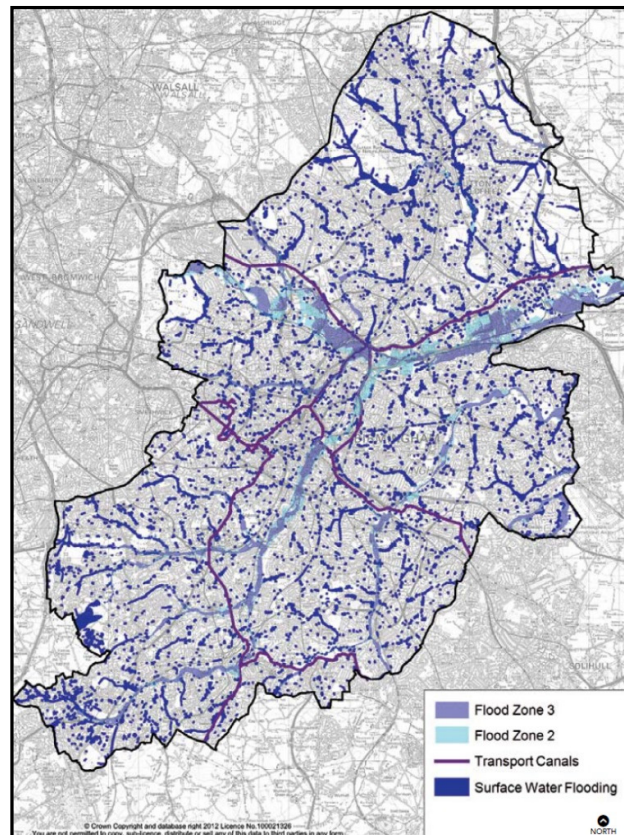
## Surface Water Flooding

Surface water flooding describes flooding from sewers, drains, small watercourses and ditches that occurs during heavy rainfall in urban areas. It includes:

- ▶ Pluvial flooding - flooding as a result of high intensity rainfall when water is ponding or flowing over the ground surface (surface run-off) before it enters the underground drainage network or watercourse, or cannot enter it because the network is full to capacity;
- ▶ Sewer flooding<sup>39</sup> - flooding which occurs when the capacity of underground systems is exceeded, resulting in flooding inside and outside of buildings. Normal discharge of sewers and drains through outfalls may be impeded by high water levels in receiving waters;
- ▶ Flooding from small open-channel and culverted urban watercourses<sup>40</sup> which receive most of their flow from inside the urban area; and
- ▶ Overland flows from the urban/rural fringe entering the built-up area, including overland flows from groundwater springs.

Birmingham City Council has developed a Surface Water Management Plan<sup>41</sup>. The SWMP process is a framework through which key local partners with responsibility for surface water and drainage in their area work together to understand the causes and effects of surface water flooding and agree the most cost-effective way of managing surface water flood risk for the long term. The process of working together as a partnership is designed to encourage the development of innovative solutions and practices. The purpose is to make sustainable urban surface water management decisions that are evidence based, risk based, future proofed and inclusive of stakeholder views and preferences. Figure 4.5 illustrates the areas susceptible to surface water flooding across the City.

Figure 4.5 Areas Susceptible to Surface Water Flooding



Source: Birmingham City Council (May 2013) Green Spaces Living Plan

<sup>39</sup> Consideration of sewer flooding in 'dry weather' resulting from blockage, collapse, or pumping station mechanical failure is excluded from SWMPs as this is for the sole concern of the sewerage undertaker

<sup>40</sup> Interactions with larger rivers and tidal waters can be an important mechanisms controlling surface water flooding

<sup>41</sup> [https://www.birmingham.gov.uk/downloads/file/2561/surface\\_water\\_management\\_plan\\_for\\_birmingham\\_-\\_final\\_report](https://www.birmingham.gov.uk/downloads/file/2561/surface_water_management_plan_for_birmingham_-_final_report)

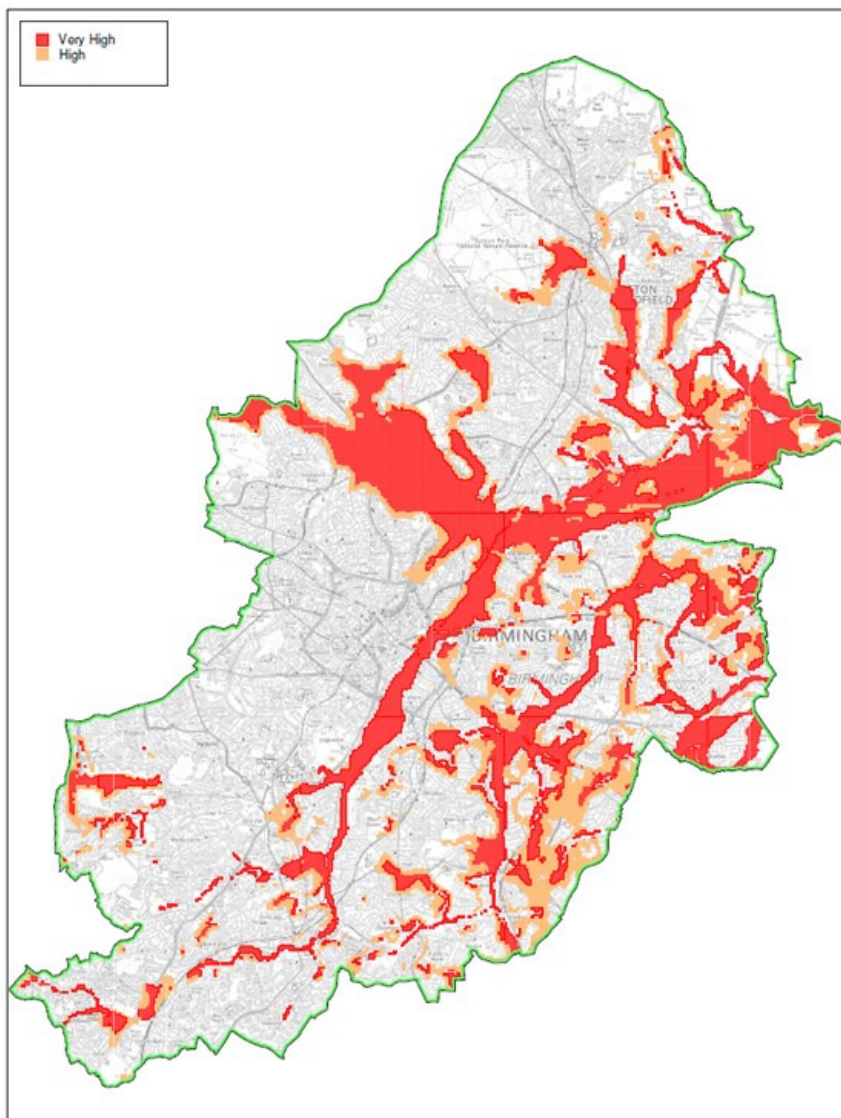
### Groundwater Flood Risk

In response to the need for more information on groundwater flooding, the British Geological Society (BGS) has produced the first national hazard or susceptibility data set of groundwater flooding. The data is based on geological and hydrogeological information and can be used to identify areas where geological conditions could enable groundwater flooding to occur and where groundwater may come close to the ground surface.

Although this is not a risk data set in that it does not provide information about the likelihood of a groundwater flood occurring, it can be used to provide an understanding of groundwater flooding.

Areas susceptible to groundwater flooding are shown Figure 4.6.

Figure 4.6 Areas Susceptible to Groundwater Flooding



Source: Birmingham City Council (May 2011) Preliminary Flood Risk Assessment

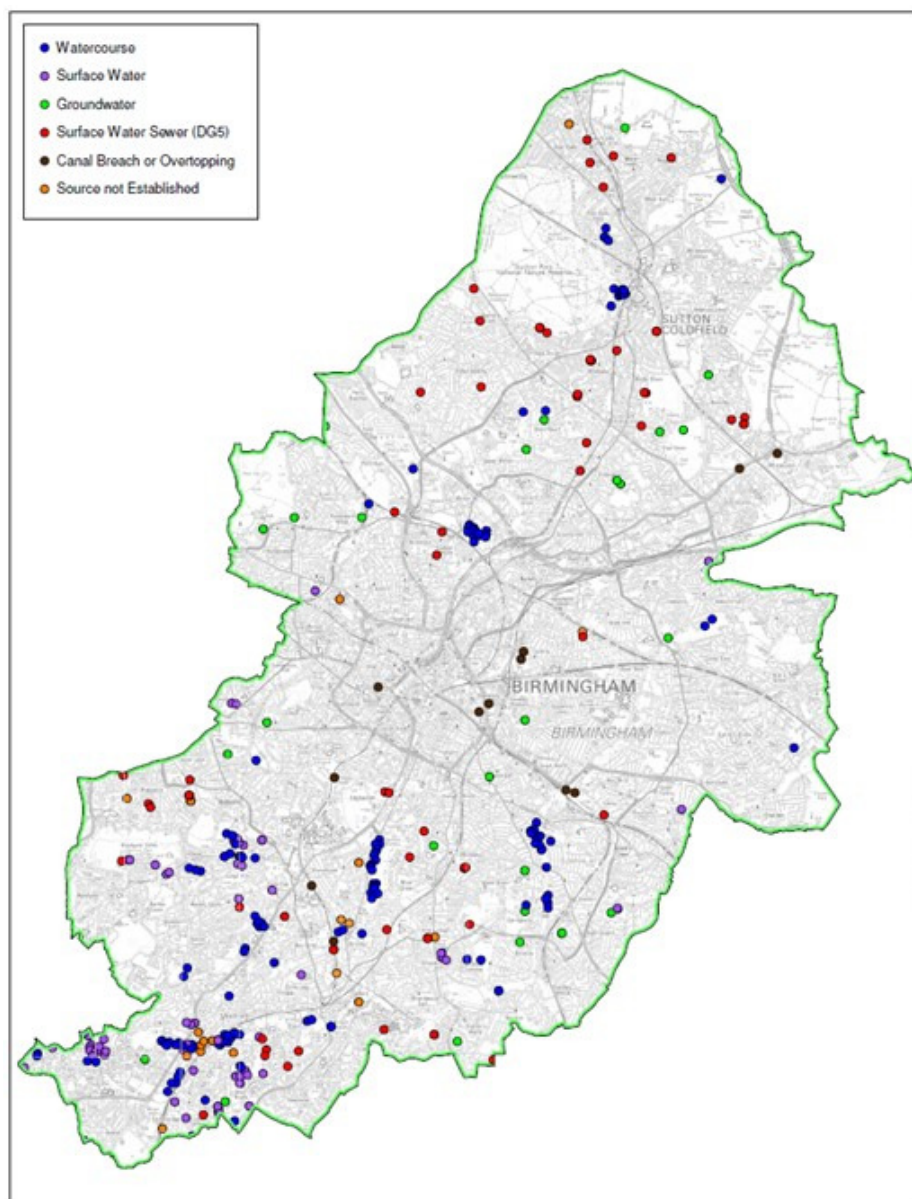


### Historic Flood Risk in Birmingham

A number of datasets have been collated to assess the local historic flood risk in Birmingham; this includes flooding from watercourses, surface water and groundwater. However due to the urbanised nature of the Birmingham catchment there are often significant interactions between sources of flooding and it is not always possible to ascertain the source of the flooding.

Historical flooding records provide a source of data that directly indicates both areas and sources of flooding. Recent years have seen a number of flooding events affecting Birmingham (September 1998, April 1999, June 1999, July 2000, June 2005, June 2007, July 2007, September 2008 and more recently in June 2016 and in May 2018), all historical flooding data has been collected from BCC, Severn Trent Water and British Waterways. The PFRA mapped historic flood locations across the City, shown in Figure 4.7.

Figure 4.7 Historic Flood Locations across Birmingham by Flooding Source



Source: Birmingham City Council (May 2011) Preliminary Flood Risk Assessment

## Influence of the DM DPD on Climate Change and Managing and Reducing Flood Risk

There are opportunities to adopt more sustainable approaches to directly address potential increases extreme weather events which may arise through climate change. Scrutiny of building design could include climate-proofing measures such as passive ventilation and opportunities to enhance energy efficiency which will indirectly assist in mitigating climate change. The extension and enhancement of Green Infrastructure across the City will be important in providing necessary resilience against the likely impacts of climate change. The DM DPD will directly influence where development takes place through guiding development away from flood risk areas, requiring appropriate adaptation measures where this is not possible, and enhancing the City's capacity to mitigate and adapt to the likely effects of climate change.

## Biodiversity and Geodiversity

The City has a number of areas that are protected for their nature conservation value. The City's nature conservation sites include two Sites of Special Scientific Interest (SSSIs): Sutton Park and Edgbaston Pool. Sutton Park is also designated as a National Nature Reserve (NNR). There are 12 Local Nature Reserves (LNRs), over 50 Sites of Importance for Nature Conservation (SINCs) and over 120 Sites of Local Importance for Nature Conservation (SLINCs) covering various ancient woodlands, grasslands, lakes, streams, and other important wildlife habitats or examples of natural landscape. Within the City Centre there are a number of sites of local importance for nature conservation (SLINCs), essentially the canal network and the River Rea. These areas, as well as the linear corridors along main rail and Metro lines, are key wildlife corridors. Together these form the City's green and blue infrastructure network through a series of corridors and stepping stones which, in accordance with the NPPF (para 109) should be protected and enhanced to increase their resilience to current and future pressures. Table 4.4 shows the total area covered by different types of nature conservation sites, Figure 4.8 maps these assets.

Table 4.4 Birmingham's Designated Nature Conservation Sites

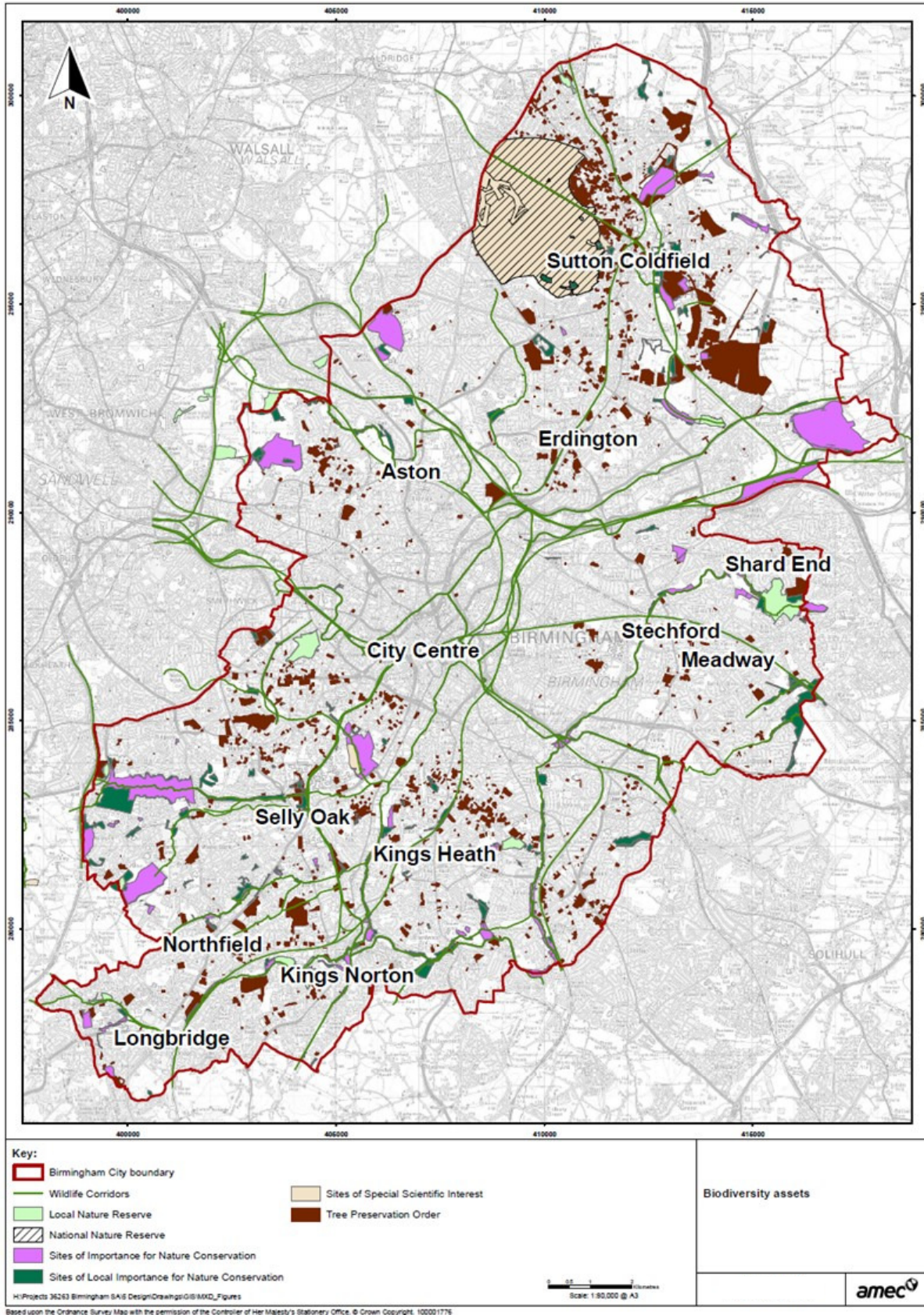
Type of Area	Number of Sites	Total Area (Hectares)	% of City's Area
SSSIs	2	896.59	3.35
NNRs	1	811.73	3.03
LNRs	12	316.73	1.16
SINCs	55	828.03	3.09
SLINCs	121	698.96	2.62

Source: Birmingham City Council, AMR (2013 and 2014)

The 2016-2017 AMR reports only very limited changes to designated sites as a result of planning applications, with one application approved for development within designated sites of national importance (SSSIs or NNRs). Some 43 applications for development were approved for development in or adjacent to SINCs: for these schemes where adverse impacts on sites' nature conservation interests were anticipated, appropriate mitigation and compensation were secured to satisfactorily address these impacts.



Figure 4.8 Birmingham's Biodiversity Assets



Green Infrastructure (GI) refers to the living network of green spaces, water and other environmental features in both urban and rural areas. It is often used in an urban context to cover benefits provided by trees, parks, gardens, road verges, allotments, cemeteries, woodlands, rivers and wetlands<sup>42</sup>. GI can provide a number of benefits including:

- ▶ Safeguarding and enhancing natural and historic assets;
- ▶ Increasing contact between people and nature;
- ▶ Protecting and enhancing landscape character and local distinctiveness;
- ▶ Providing for climate change mitigation and adaptation;
- ▶ Creating a focus for social inclusion, education, training, health and well-being;
- ▶ Increasing property and land values; and
- ▶ Attracting and retaining people ensuring stable populations and labour supply.

The Birmingham and Black Country Nature Improvement Area (NIA) Ecological Strategy provides a landscape-scale framework for action to conserve and enhance biodiversity and geodiversity and to improve ecological networks across the City. The approach set out in the Strategy reflects ecological principles set out in *Making Space for Nature* (Lawton *et al* 2010) and national policy and guidance relating to the natural environment and green infrastructure. The Cannock Chase to Sutton Park Project encompasses an area of approximately 670 square km extending from the edge of Birmingham northwards into Staffordshire. The Project area is characterised by two core areas of semi-natural habitat: Cannock Chase and Sutton Park. These areas support significant amounts of lowland heath habitat along with a range of additional habitats including acidic and neutral grasslands, scrub, woodland and wetlands. The City's ecological networks are a fundamental component of Birmingham's Green Infrastructure and in accordance with paragraphs 91, 150 and 171 of the NPPF should inform policy and its implementation to ensure that development that may affects them is compatible with their purpose and can contribute to their enhancement. The Council's Green Living Spaces Plan recognises the essential role of the green infrastructure network in securing a resilient and healthy city and provides a framework for increasing natural capital and the ability of green infrastructure assets to deliver environmental and socio-economic benefits.

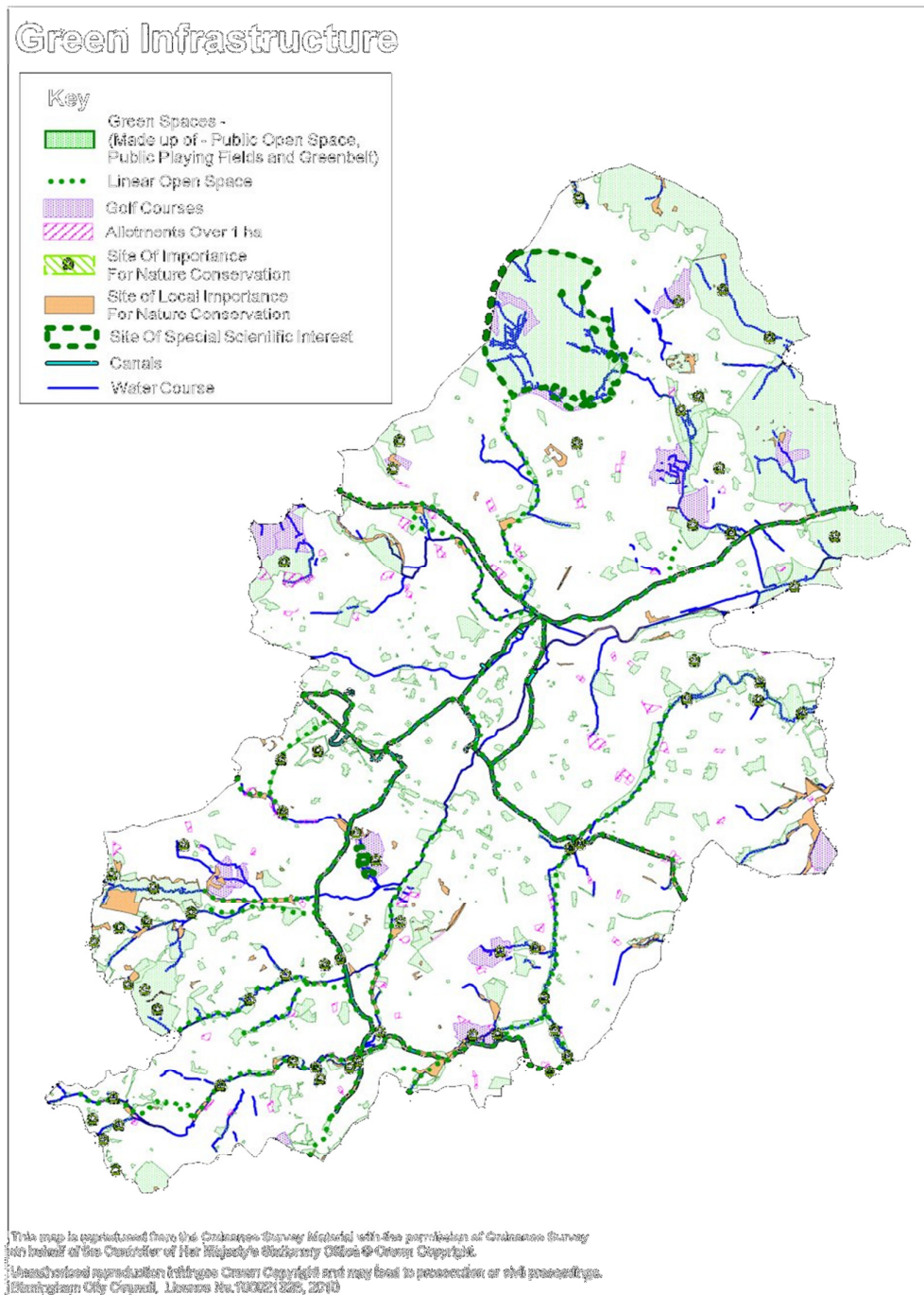
Figure 4.9 illustrates the City's GI network

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<sup>42</sup> Defra (2011) *The Natural Choice: securing the value of nature*.



Figure 4.9 Birmingham's Green Infrastructure Network



Source: <http://consult.birmingham.gov.uk/portal/ps/csd/csdraft?pointId=d2670232e7333>

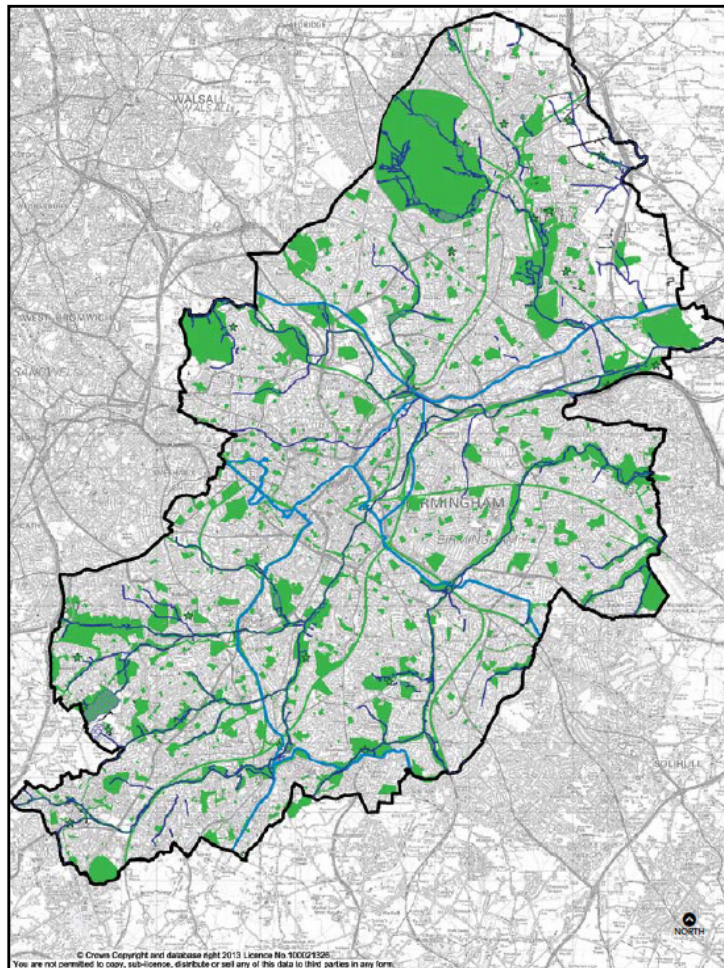
Birmingham is characterised by a large number of well-established parks, many of which were created in the 19th century. The City's greenspace is supplemented by a large linear open space network, which is based primarily on the Rivers Cole and Rea and the City's extensive canal network. The extent of green spaces (excluding areas designated for nature conservation) is shown in Table 4.5 and are mapped in Figure 4.10.

Table 4.5 Green Spaces in Birmingham

Open Space Category	Area (ha)	% of City Council Area
Public Open Space	3,069.77	11.46
Public Playing Fields	296.9	1.11
Private Playing Fields	268.11	1.0
Private Open Space	67.19	0.25
Educational Playing Fields	166.33	0.62
Golf Courses	657.78	2.46
Statutory Common Land	11.25	0.04
Allotments	243.8	0.91
Green Belt	4,154.77	15.52

Source: Birmingham City Council, AMR (2015)

Figure 4.10 Green Spaces in Birmingham

Source: <http://consult.birmingham.gov.uk/portal/ps/csd/csdraft?pointId=d2670232e7333>

## Geodiversity

The term geodiversity incorporates all the variety of rocks, minerals and landforms and the processes which have formed these features throughout geological time. The geology of the West Midlands is dominated by the South Staffordshire Coalfield, the exploitation of which has contributed greatly to the industrial and economic development of the area<sup>43</sup>. Upper Carboniferous Coal Measures underlie the main conurbation of Wolverhampton, Walsall, West Bromwich and Dudley. Surrounding these shales, sandstones and mudstones are Triassic aged rocks which comprise red mudstones and sandstones. These underlie much of Birmingham and form the solid geology up to Sutton Coldfield. Within the main mass of the Coal Measures are a number of isolated outcrops of older Silurian rock. These shallow water limestones and shales contain a wide range of marine fossils and form the famous outcrops at Wren's Nest and Dudley Castle Hill. There are also a number of igneous intrusions into the Coal Measures. Much of the area has been mantled in thick deposits of boulder clay and sands and gravel deposited by ice sheets and meltwaters during the Ice Ages of the last two million years<sup>44</sup>.

The geology underlying the City has a significant influence over the use of SuDS which include a variety of techniques including swales and basins, permeable pavements and ponds and wetlands to mimic natural drainage processes and mitigate the impacts that development has on surface water runoff rates and volumes. The SFRA for Birmingham (2011) notes that the geology beneath Birmingham, is essentially divided into two due to a fault, known as the 'Birmingham Fault', running approximately north-east to south-west and consists of Permian and Triassic sandstones and mudstones. To the west of the fault line the rock strata predominantly consists of red and red-orange sandstones and is indicative of high permeability soils (good to very good drainage), and to the east the rock strata predominately consists of red and red-brown mudstones which are inter-bedded by several silt and sandstone bands and are typically representative of low permeability soils (poor drainage to practically impervious). The SFRA encourages that these characteristics should be considered in the development process where large increases in impermeable area for a site could contribute to a significant and resulting increase in surface water runoff peak flows and volumes. In turn this could contribute to an increase in flood risk elsewhere unless adequate SuDS techniques are implemented as part of a development. Additionally, indirect impacts on the water table and source protection zones need to be taken into account.

## Influence of the DM DPD on Biodiversity and Geodiversity

Policies and proposals pursued in the DM DPD could include a range of direct and indirect impacts, all having the potential to adversely affect biodiversity. Careful scrutiny of development proposals will be required to ensure that direct impacts are avoided where possible and indirect impacts (such as downstream effects) are anticipated and appropriately mitigated. If well managed, development can benefit wildlife and recreational interests, through habitat improvement or creation using the Green and Blue infrastructure multifunctional network as a starting point. This accords with guidance in the NPPF (para 118) which requires the application of the 'avoid, then mitigate and, (as a last resort) compensate for adverse impacts on biodiversity' principle. Given the need to minimise impacts on biodiversity, DM DPD policies and their application should promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets (in accordance with the NPPF para 117). For geodiversity, there is a need to conserve, interpret and manage geological sites and features in the wider environment, and not just designated sites.

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<sup>43</sup> [http://www.naturalengland.org.uk/ourwork/conservation/geodiversity/englands/counties/area\\_ID38.aspx](http://www.naturalengland.org.uk/ourwork/conservation/geodiversity/englands/counties/area_ID38.aspx)

<sup>44</sup> [http://www.naturalengland.org.uk/ourwork/conservation/geodiversity/englands/counties/area\\_ID38.aspx](http://www.naturalengland.org.uk/ourwork/conservation/geodiversity/englands/counties/area_ID38.aspx)

## Population and Human Health

### Housing

Birmingham's 2017 housing strategy states that: *"Every citizen should have the opportunity to live in a safe and warm home within a neighbourhood they are proud of"*. The strategy outlines the importance of tackling fuel poverty to improve health, well-being and financial inclusion. This is highlighted as a cross-cutting issue within the Council's Vision and Priorities statement. The strategy also makes reference to the well-established "Stay Warm Stay Well" (SWSW) programme that delivers practical solutions to vulnerable people affected by fuel poverty. This programme is delivered through a network of third sector partners. The Council has an ambition to extend an offer of affordable warmth works to private sector households within the areas where ECO-funded improvement works are being carried out on Council-owned homes.

The City covers an area of 26,779ha (267.8km<sup>2</sup>), of which 15,200ha is residential. According to the Housing Development Plan<sup>45</sup> Birmingham's residents live in 406,000-410,000 households. The City has about 414,000 self-contained properties. In April 2018, there were about 61,000 Council owned properties and an estimated 37,650 owned by registered social landlords. In addition to this there are also 3,000 shared ownership properties. Since 2001, the City's population has grown after experiencing declines between 1991 and 2001 due to net out-migration. The current population of the City (according to ONS population estimates) is 1,218,100. If recent trends continue the population of Birmingham is projected to grow from 1,101,400 in 2014 to 1,189,600 (+8.0%) in 2024 and to 1,268,100 (+15.1%) in 2034 (sub national population projections)<sup>46</sup>. Substantial growth is expected among pensioners particularly those aged 85 years or more. This age group is expected to increase by almost 25% by 2024. The gains reflect a shift in the overall balance of migration from negative to positive, coupled with greater natural increases. The main reason for this has been the high levels of international immigration in recent years. The growth in the ageing population is reflective of national trends. These statistics have implications for housing provision. Table 4.6 shows that the number of households in the City increased in the period from 2001 to 2011. Despite the above, the rate of increase in households in Birmingham has been less than the national and regional rates.

**Table 4.6** Change in Households in Birmingham, the West Midlands Region and England, 2001 and 2011

Area	2001 Households	2011 Households
Birmingham	390,800	410,700
West Midlands Region	2,153,700	2,294,900
England	20,451,400	22,063,400
Index of Change		
Birmingham		+0.95
West Midlands Region		+0.93
England		+0.92

Source: Census of Population, 2001 and 2011, Office of National Statistics

<sup>45</sup> Source:

<http://www.birmingham.gov.uk/cs/Satellite?c=Page&childpagename=Housing%2FPageLayout&cid=1223092723273&pagename=BCC%2FCommon%2FWrapper%2FWrapper>

<sup>46</sup> Statistics from [https://www.birmingham.gov.uk/info/50065/population\\_and\\_census/1003/population\\_in\\_birmingham/6](https://www.birmingham.gov.uk/info/50065/population_and_census/1003/population_in_birmingham/6) [Accessed April 2018]



If recent trends continue the population of Birmingham is projected to grow from 1,101,400 in 2014 to 1,189,600 (+8.0%) in 2024 and to 1,268,100 (+15.1%) in 2034. Substantial growth is expected among pensioners particularly those aged 85 years or more. This age group is expected to increase by almost 25% by 2024.

Forecast organic population growth equates to just under 40,000 new residents over the next five years. Birmingham is forecast to see growth in the number of households from 422,022 in 2014 to 440,529 – a rise of around 18,500 households. This equates to an average annual increase of approximately 3,680<sup>47</sup> households each year. Longer term forecasts<sup>48</sup> show that the number of households will increase by over 100,000 over the next 20 years.

The average household size in Birmingham is greater than the national average and is greatest in the West Midlands Region according to the 2011 Census with an average household size of 2.6 people. Birmingham has relatively high proportions of households containing one person or with five or more people. Average household size reduced from 2.54 in the period 1991 to 2001, largely as a result of growing numbers of one-person households. However, for the period of 2011 to 2011 the average household size (persons) has increased to 2.56<sup>49</sup>. The City has a relatively low proportion of detached housing, and higher proportions of terraced housing and flats.

According to the 2011 Census, Birmingham was the most densely populated local authority within the West Midlands region with 4,000 people per square kilometre. This is an increase on the 2011 population density of 3,677 people per square kilometre which equates to an increase of 0.9%. The average housing density has decreased from over 74 dwellings in 2009/10 to just over 40.6 dwellings per hectare in 2014/15. This could be attributed to factors such as the reluctance of the development industry to commit to apartment schemes at the present time.

In recent years there have been political concerns over high density suburban development. This has manifested itself in a '*Mature Suburbs: Guidelines to Control Residential Intensification - Supplementary Planning Document*' and away from the City Centre this has led to decreasing densities over the past five years.

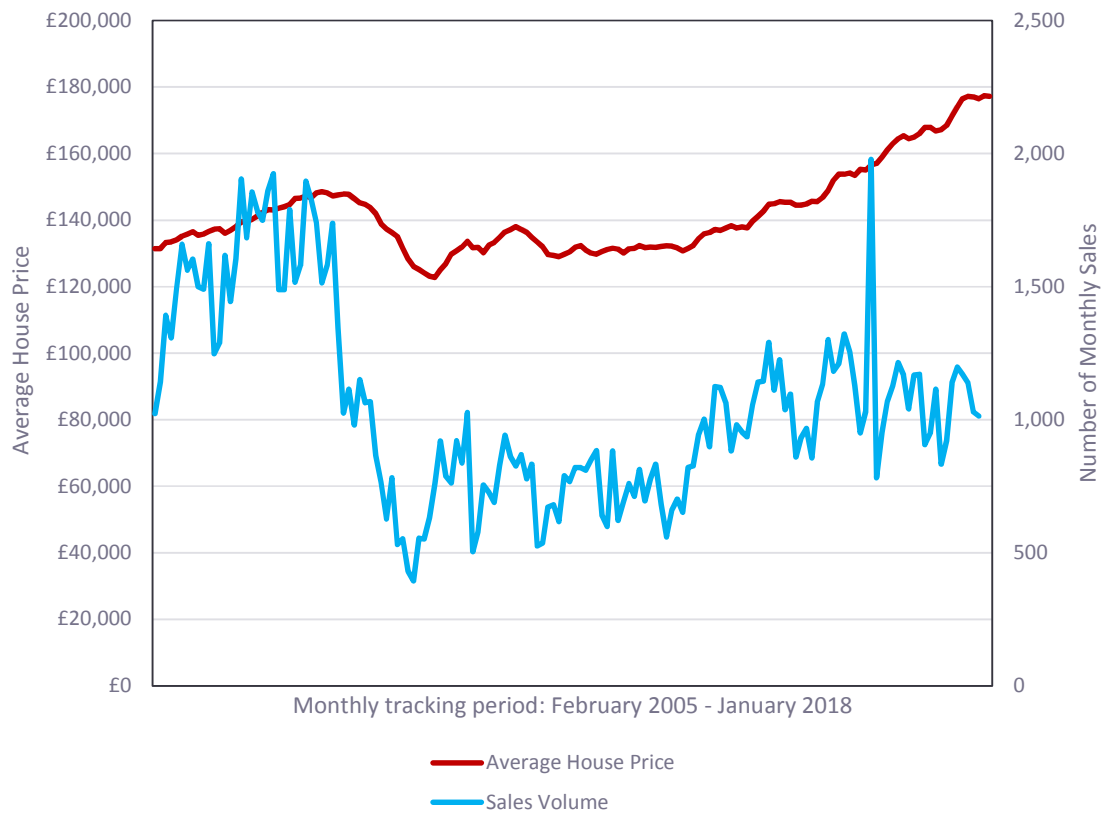
The mean house price in the City is below the regional average, particularly at the cheaper end of the market. Figure 4.11 indicates that house prices in Birmingham peaked in January 2008 and sharply declined through to 2010, and now have recovered strongly to over one third higher in 2018 than 15 years ago at almost £180,000. Over the same period sales volumes initially declined but have recovered to levels of 15 years previously. Overall, the figures suggest that the affordability of housing for poorer families and first-time buyers has declined. 89,000 new homes are needed from 2011 to 2031. Whilst it is not possible to deliver all of this new housing within the city boundary, Birmingham council have ambitious but achievable plans to build at least 51,000 new homes in this period.

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<sup>47</sup> Figures from ONS

<sup>48</sup> ONS 2039 Household Projections

<sup>49</sup> Office for National Statistics 2011 Census: Population and household estimates for England and Wales – supplementary figures Pt 2

Figure 4.11 Average House Prices and Sales Volume in Birmingham 2005-2018<sup>50</sup>

Birmingham has a relatively high proportion of households renting from Birmingham City Council. Statistics from the Housing Strategy Statistical Appendix 2011 show that within Birmingham the number of local authority rented housing is 61,000 and Registered Social Landlord housing is 37,650 which collectively equates to 25.6% of the total housing supply or the local authority.

There is a mismatch between the existing supply of affordable housing and the location of demand. There is continued demand for affordable housing in Birmingham. The most recent City wide Strategic Housing Market Assessment (SHMA)<sup>51</sup> found that approximately 38% of the City's overall housing requirement is for affordable housing. The Birmingham Development Plan will help to address some of this demand.

The Birmingham Housing Plan (2010 Review) identifies that the vast majority of Birmingham's City Council housing meets the Decent Homes standard. In the private sector, Birmingham has a substantial number of older homes that are in need of repair and modernisation. As of April 2018, the new minimum energy efficiency standard (MEES) regulations will come into action. The new standard requires landlords of privately rented domestic (PRS) and non-domestic property in England or Wales to ensure that their properties reach at minimum Energy Performance Certificate (EPC) rating of E before granting a new tenancy to new or existing tenants<sup>52</sup>. If a property does not meet EPC standard E, landlords are obligated to carry out any works under the value of £2,500 to bring the property up to standard. Special exemptions may apply, for example if the building is listed. There are clear links between the condition of housing and human health. For

<sup>50</sup> Land Registry (2018) <http://www.landregistry.gov.uk/public/house-prices-and-sales/search-the-index>

<sup>51</sup> Available at [https://www.birmingham.gov.uk/downloads/download/359/strategic\\_housing\\_market\\_assessment\\_2013](https://www.birmingham.gov.uk/downloads/download/359/strategic_housing_market_assessment_2013) [Accessed April 2018]

<sup>52</sup>

example, research<sup>53</sup> undertaken by Birmingham University showed that there is a clear relationship between excess winter deaths, especially of older people, cold housing and low energy efficiency.

Birmingham has benefitted from 1,944 net dwelling completions and 111 vacant dwellings being returned to use in 2016/17 which totalled over 2,000<sup>54</sup> new dwellings being added to the housing stock. This was lower than the 2015/16 period (3,113) but higher than the four preceding years.

Historically, homeless applications in Birmingham have been twice the national average; although they are declining. There were 19,496 applicants for housing on the Local Authority Housing Register as at 01 April 2013. Increasingly, older and disabled people

Birmingham City Council understands that Trading Standards will be leading on the primary delivery and prosecution process associated with MEES. BCC's Private Rented Services Regulation & Enforcement team have a good working relationship with the people who wish to remain in their own homes. This results in strong demand for property adaptations, and an implication of need for to build homes to 'lifetime' standards. There were 1,899 referrals for assistance from Birmingham City Council in 2011/12. Demand for housing still remains strong albeit that there was a fall from over 28,000 households on the register to just over 20,000 in 2015/16. The overall total as at April 2016 stood at 20,292.

Every year, housing partners across the city ensure that thousands of households who are homeless, or at high risk of homelessness, are provided with shelter and a pathway into settled accommodation. For 2015/16 this included 5,578 households assisted through the statutory homeless system as well an additional 7,824 households whose homelessness was prevented or relieved by Council delivered services or commissioned services delivered by partners. In addition, there are many other agencies active in the city who provide advice and assistance to people in housing crisis.

In 2016 Birmingham undertook a homelessness review<sup>55</sup> which included examining the extent, nature and causes of homelessness in the City. One of the key findings from this review is that there are an estimated 20,000 households in Birmingham each year who are homeless. This study also highlighted that there are more than 20,000 households on the BCC housing register (as at April 2016) so there is significant demand for Council housing.

Birmingham still manages its own stock and, notwithstanding Right to Buy, there remain very significant areas of predominantly local authority housing. These areas are however clustered and there are indeed significant pockets of the City (e.g. Edgbaston and Sutton) where affordable housing is in lesser supply and average houses prices are the highest in the City.

## Economy

Birmingham's economic prosperity was originally built on manufacturing, but changes in the 1970s and 1980s led to a massive decline in this sector. However, highly-skilled, specialist manufacturing remains important to the city. Birmingham has since developed a substantial business and financial services sector through the transformation and growth of the City Centre and has become a major employment centre drawing in workers from across the West Midlands. It is an economic cluster with a particular focus on the banking, finance and insurance and distribution, hotels and restaurants and public service sectors. Birmingham is now a major centre for business conferences.

Despite declines in manufacturing, Birmingham is still a major employment centre drawing in workers from across the West Midlands region. Table 4.7 shows the number of economically active people within

<sup>53</sup> <https://www.birmingham.ac.uk/Documents/college-social-sciences/social-policy/SPSW/Housing/2016/good-housing-better-health-2016.pdf> [Accessed April 2018]

<sup>54</sup> All figures from 2016/17 Authority Monitoring Report [Accessed April 2018]

<sup>55</sup> Birmingham City Council Homelessness Review 2016/17 Available at [https://www.birminghambeheard.org.uk/people-1/birmingham-homelessness-prevention-strategy-2017/supporting\\_documents/Birmingham%20Homelessness%20Review%202016%20FINAL.pdf](https://www.birminghambeheard.org.uk/people-1/birmingham-homelessness-prevention-strategy-2017/supporting_documents/Birmingham%20Homelessness%20Review%202016%20FINAL.pdf) [Accessed April 2018]

Birmingham, and Table 4.8 shows the number of employed residents in Birmingham by Gender and Ethnic Group.

Table 4.7 Economically Active Residents (2017)<sup>56</sup>

	Birmingham (numbers)	Birmingham (%)	West Midlands (%)	Great Britain (%)
<b>All People</b>				
Economically active	500,900	69.4	76.4	78.4
In employment	458,900	63.6	72.4	74.9
Employees	391,500	54.3	62.4	64.0
Self employed	65,900	9.1	9.7	10.6
Unemployed	42,100	8.4	5.4	4.5
<b>Males</b>				
Economically active	275,000	76.9	82.0	83.4
In employment	250,000	69.9	77.5	79.6
Employees	200,900	56.2	63.9	65.2
Self employed	49,100	13.7	13.4	14.1
Unemployed	25,000	9.1	5.5	4.6
<b>Females</b>				
Economically active	225,900	62.1	70.9	73.4
In employment	208,900	57.4	67.2	70.3
Employees	190,600	52.4	60.9	62.7
Self employed	16,800	4.6	6.0	7.2
Unemployed	17,100	7.6	5.2	4.3

Table 4.8 Employed Residents in Birmingham by Gender and Ethnic Group<sup>57</sup>

	2013		2014		2015		2016		2017	
	Number	Rate	Number	Rate	Number	Rate	Number	Rate	Number	Rate
Male	228,100	66.4	236,000	68.2	240,500	68.8	256,000	72.1	250,000	69.9
Female	179,700	51.6	198,500	55.9	194,500	54.3	197,200	54.8	208,900	57.4
White	261,100	67.4	290,600	67.5	306,200	69.1	272,400	73.1	283,400	71.7
Ethnic Minority	145,300	48.1	143,900	53.4	128,700	48.8	180,800	52.8	174,700	54.0

At 63.6%, Birmingham's employment rate is well below both the corresponding regional (72.4%) and national rate (74.9%). The female employment rate for Birmingham (57.4%) is much lower than the male rate (66.9%)

<sup>56</sup> [ONS Annual Population Survey](#)

<sup>57</sup> ONS Annual Population Survey



and both are lower in Birmingham than the national averages; for women there is a 12.9 point difference from the rate for Great Britain.

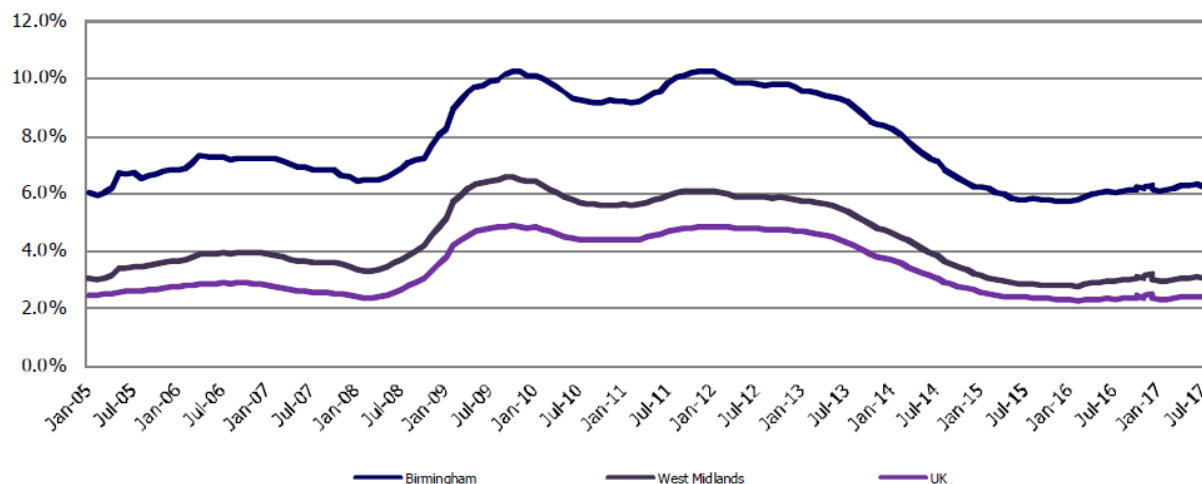
Nearly a third (30.6%) of Birmingham's working age population is economically inactive (neither working nor seeking work). This is 9.0 percentage points higher than the national rate. The female economic inactivity rate in the city is 11.3 percentage points higher than the male rate. Table 4.9 summarises economic inactivity for those aged 16-64 in Birmingham. This shows that the highest proportion of economically inactive residents are full time students (39.6%), which is 12.6 percentage points higher than the national average of 27.0%. The non-white economic inactivity rate is 39%, significantly higher than the white rate of 24%. Both rates are above the GB averages of 30% and 20% respectively.

Table 4.9 Economic Inactivity in Birmingham 2017<sup>2</sup>

	Birmingham (level)	Birmingham (%)	West Midlands (%)	Great Britain (%)
Student	87,400	39.6	28.2	27.0
Looking after family/home	61,500	27.9	26.1	24.4
Temporary sick	4,300	2.0	2.3	2.1
Long-term sick	36,800	16.7	20.9	22.1
Discouraged	!	!	0.3	0.4
Retired	11,300	5.1	11.8	13.2
Other	18,500	8.4	10.5	10.8
<b>Total Economically Inactive</b>	<b>220,600</b>	<b>30.6</b>	<b>23.6</b>	<b>21.6</b>
Male Economic inactivity	82,700	23.1	16.6	18.0
Female Economic inactivity	137,900	37.9	26.6	29.1
White Economic inactivity	93,900	23.7	20.9	20.2
BME Economic inactivity	125,300	38.8	34.8	29.9

Birmingham has seen persistently higher levels of unemployment over the past decade, compared to the West Midlands and the UK, as can be seen from Figure 4.12.

Figure 4.12 Unemployment Rates in Birmingham, the West Midlands and the UK, 2005-2017



Source: Birmingham Labour Market Update (January 2018)

Employment growth in the city as a whole is set to be relatively subdued over the period 2010-2025 as the economy recovers from the recession and adjusts to a decline in public sector employment. Indeed, the forecast level of employment in the city in 2025 is only just returning to the levels seen prior to the recession.

The Greater Birmingham & Solihull LEP is a partnership of businesses, local authorities and universities which supports private sector growth and job creation. It was set up to strengthen local economies, encourage economic development and enterprise, and improve skills across the region. The City Deal between the Government and the Partnership was announced in July 2012 which consists of a package of measures that are to be implemented to drive economic growth designed to exploit the area's economic assets and address its challenges<sup>58</sup>. The first phase of the City Deal is to focus on the delivery of a range of economic benefits for the Greater Birmingham and Solihull area. These include:

- ▶ 10,000 additional direct jobs, building on the 40,000 created by the vanguard Enterprise Zone in Birmingham City Centre;
- ▶ Leveraging in over £15bn of private sector investment over 25 years from £1.5bn of public funding;
- ▶ A Single Settlement to cover all economic development funding;
- ▶ A world-class skills system which meets the needs of employers and fulfils the expectations of employees;
- ▶ 3,560 apprenticeships (AGE) grants to be delivered by March 2013;
- ▶ Improvements to employers' perceptions of 'work readiness' year-on-year;
- ▶ In excess of 2,800 additional new homes through the use of public assets;
- ▶ At least 100% capital return on current market value of public assets;
- ▶ An Institute of Translational Medicine to respond to national unmet need, unlock growth potential in the NHS and create a portal for SMEs and international pharmaceutical companies;
- ▶ £35M of largely private sector clinical trial investment and £50M of free drugs;
- ▶ 15,000 homes refurbished delivering savings in domestic energy usage of 26 ktonnes pa of CO<sub>2</sub> and at least 40 public buildings refurbished delivering savings in energy usage of 10 ktonnes pa of CO<sub>2</sub>; and
- ▶ Retrofitting to the properties of 1,500 people on pension or disability premium and 2,250 people in fuel poverty.

The City Deal comprises five elements: GBS Finance; Skills; Public Assets; Life Sciences and Green Deal, each of which includes specific commitments from the LEP and Government. Progress against these will be monitored to ensure they are delivered.

Median gross weekly pay for workers in Birmingham in 2015 was £488.20. This figure is a 1.9% increase on 2014 but it is below the UK figure of £527.70 which saw a 1.8% increase from 2014. However, people who work in the city earn more than the residents (£538.70 compared to £488.20). Workplace earnings in the city are similar to the figure for the UK. The difference between resident and workplace earnings reflects Birmingham's position as the regional capital and the large numbers of people who commute into the city to work. It also highlights that not all Birmingham residents are able to access the better paid jobs in the city.

### Education and Skills

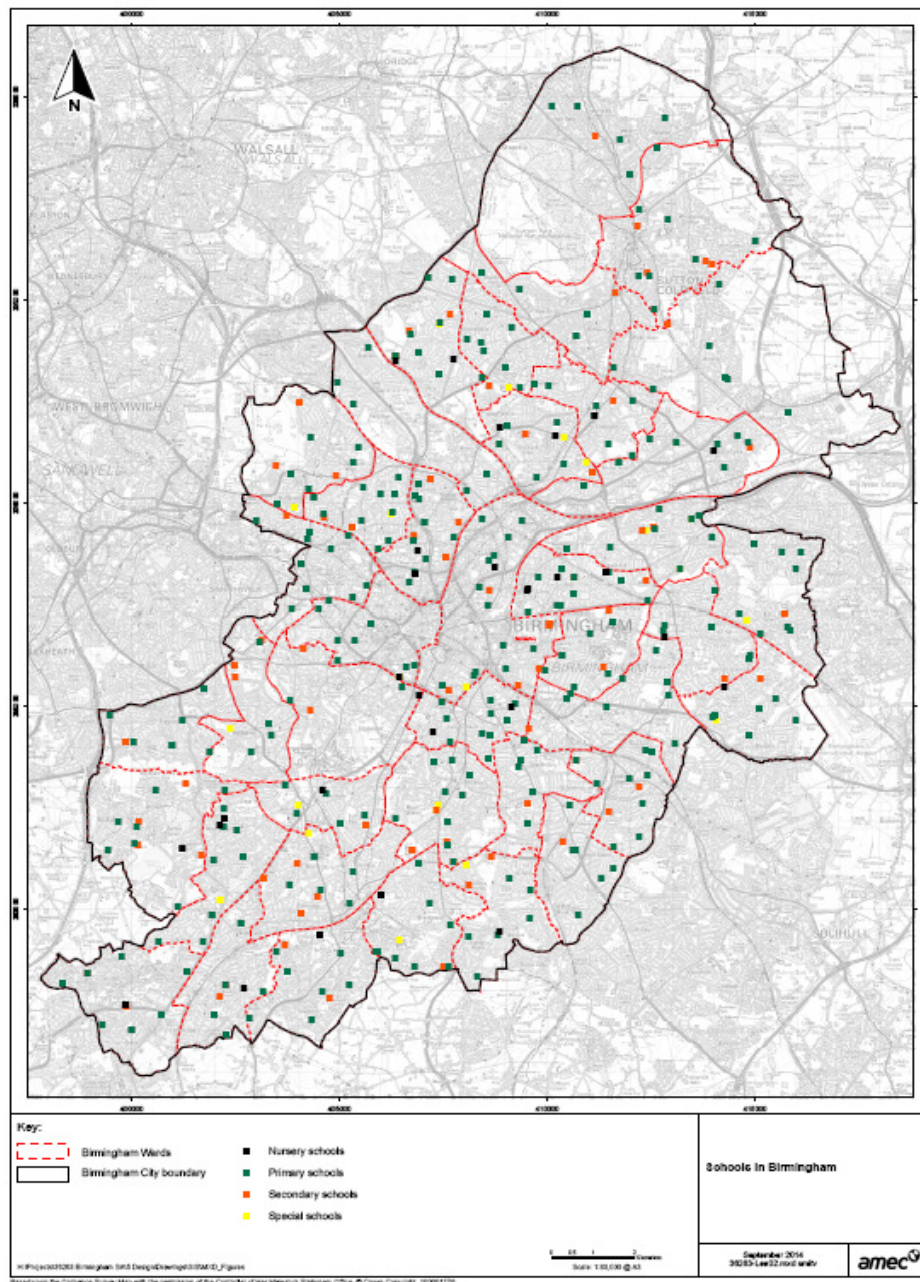
The City has a substantial education sector, from early years and schools through to colleges, universities and adult education. According to the Education Services Delivery and Improvement Plan (2017/18), the City has 445 state-funded schools. In addition, there are five colleges, five universities and a thriving independent school sector. The City Council itself is a major provider of adult and community learning through its Adult Education Service. (Figure 4.13). Birmingham is one of the youngest cities in Europe with around 46% of the population aged under 30. Based on 2014 levels, by 2022 the population aged between 0 to 4 is due to grow by 3.8% to 88,1000 children; the 5 to 9 population is expected to grow by 4.5% to 84,000 but the largest growth rate in Birmingham's children will be the 10 to 14 age group – increasing by 14.6% to 82,600. The demographic makeup of Birmingham's young people has also changed significantly over recent years and is becoming increasingly diverse. For example, according to the 2011 census over

<sup>58</sup> <http://centreofenterprise.com/about-the-lep/key-projects-and-issue/>

60% of the under 18 population is now from a non-white British background, compared to around 44% in 2001. Approximately, 43% of Birmingham's school children have a first language that is other than English. This equated to 38,089 pupils, which is 1.3% more than in 2014.

According to the Annual Population Survey (2017), the City has a substantial education sector (Figure 4.13). The pupils and students of the City's schools and colleges have made major improvement in educational achievement, closing the gap on national averages. The percentage of Birmingham's population achieving NVQ Level 3 or above in 2011 was 43.5%, and this has increased to 50.4% in 2017. However, this remains marginally below the Regional average (50.8%) and significantly below the National average (57.2%). The proportion of the population educated to degree level was 31.4% compared to 31.8% regionally and 38.6% nationally. As a result, nearly half the high-skilled jobs in Birmingham are currently taken by people who live outside of the City.

Figure 4.13 Nursery, Primary and Secondary Education Resources across Birmingham



Birmingham's 2016 GCSE results were very positive. 2016 saw the introduction of a new accountability system for schools with the new measure of Progress 8 – "the progress a pupil makes from the end of Key Stage 2 to Key Stage 4, compared with pupils nationally with similar attainment". The national average performance is therefore zero. A positive score indicates out-performing the national average. Birmingham's provisional result is zero, second best out of core cities.

Birmingham Adult Education Service (BAES) runs a number of adult education courses in the City and these can be undertaken in a variety of locations across the city and cover a wide variety of topics to help improve education and skills levels in the city. The Birmingham Education and Development Plan 2015-2020 includes a vision that by 2013 Birmingham will be:

*'Renowned as an enterprising, innovative and green city that has delivered sustainable growth meeting the needs of its population and strengthening its global competitiveness.'*

To deliver the vision the plan includes a number of objectives including to ensure sufficient school places for young people; that additional places are provided where needed at the right time to meet needs; and to ensure young people participate fully in the school education offer and beyond into further education and training.

Worklessness and long term unemployment is a key issue for Birmingham's residents and can lead to poor economic performance. Table 4.10 shows the total number of residents currently claiming Job Seekers Allowance (JSA). JSA is payable to people who are available for, and actively seeking work. The number of claimants steadily rose to over 50,000 in 2012 but had dropped to 30,685 by 2017. However, the claimant rate of 6.1% was higher than other cities in the UK – Newcastle was the next highest at 5.1%<sup>59</sup>.

Table 4.10 Total JSA Claimants 2007 - 2017<sup>60</sup>

	Birmingham (number)	Birmingham (%)	West Midlands (%)	UK
2007	35,058	7.7	3.9	2.7
2008	35,154	7.7	4.0	2.9
2009	49,011	10.7	6.6	4.8
2010	48,074	10.5	6.2	4.7
2011	49,319	10.8	6.2	4.8
2012	50,123	11.0	6.2	5.0
2013	47,278	10.4	5.8	4.6
2014	41,955	5.9	3.7	3.0
2015	31,605	4.4	2.5	2.1
2016	29,030	4.0	2.2	1.8
2017	30,660	4.2	2.3	1.8
2018	31,405	4.3	2.5	2.0

## Birmingham's Local Centres

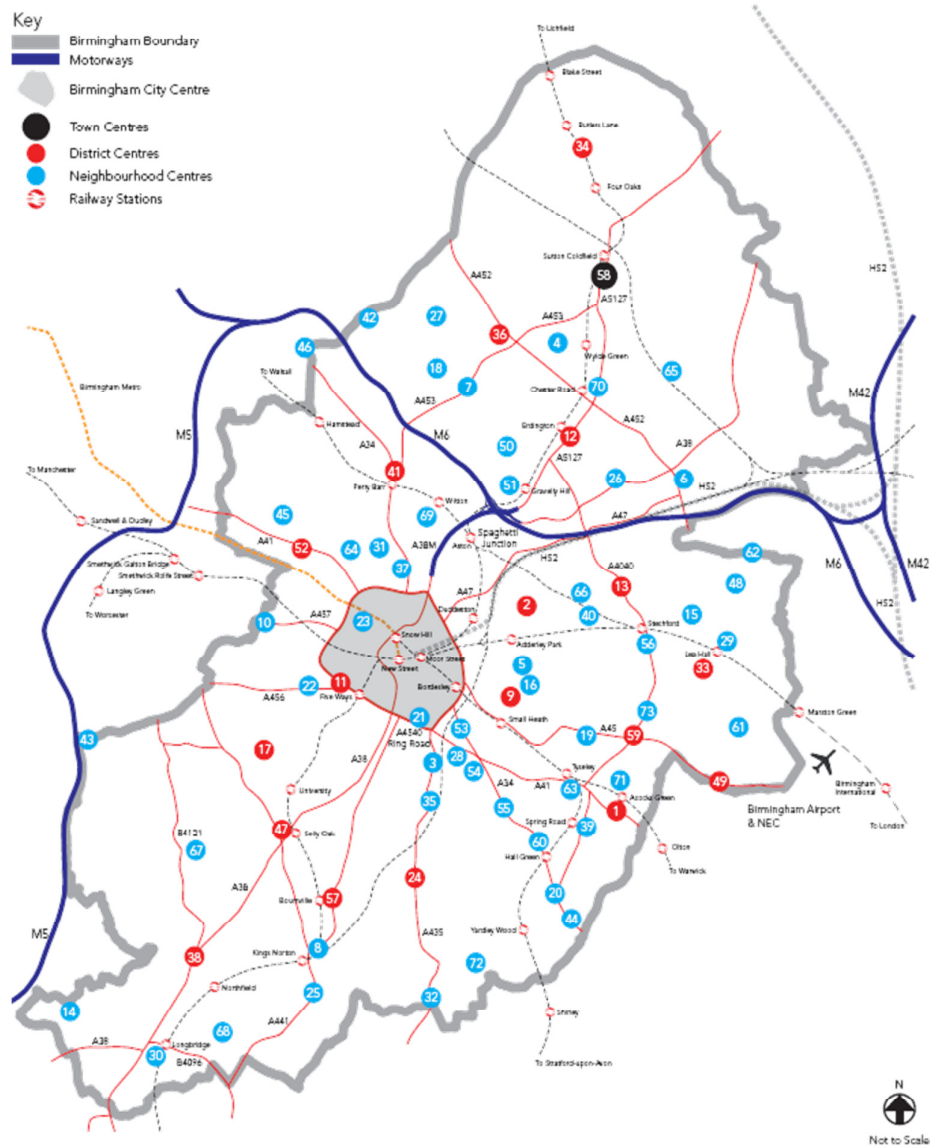
Birmingham's network of 73 local centres provides the focal points for much day-to-day shopping and community activity. Uses of buildings within local centres have been surveyed by Birmingham City Council

<sup>59</sup> Figures from Birmingham Labour Market Update January 2018

<sup>60</sup> ONS claimant count with rates and proportions and Birmingham Labour Market profile 2018.

during 2013 and 2014 in order to help track of changes in use which can affect their vitality and require a policy response. Figure 4.14 below maps the local centres across the City.

Figure 4.14 Birmingham's Local Centres



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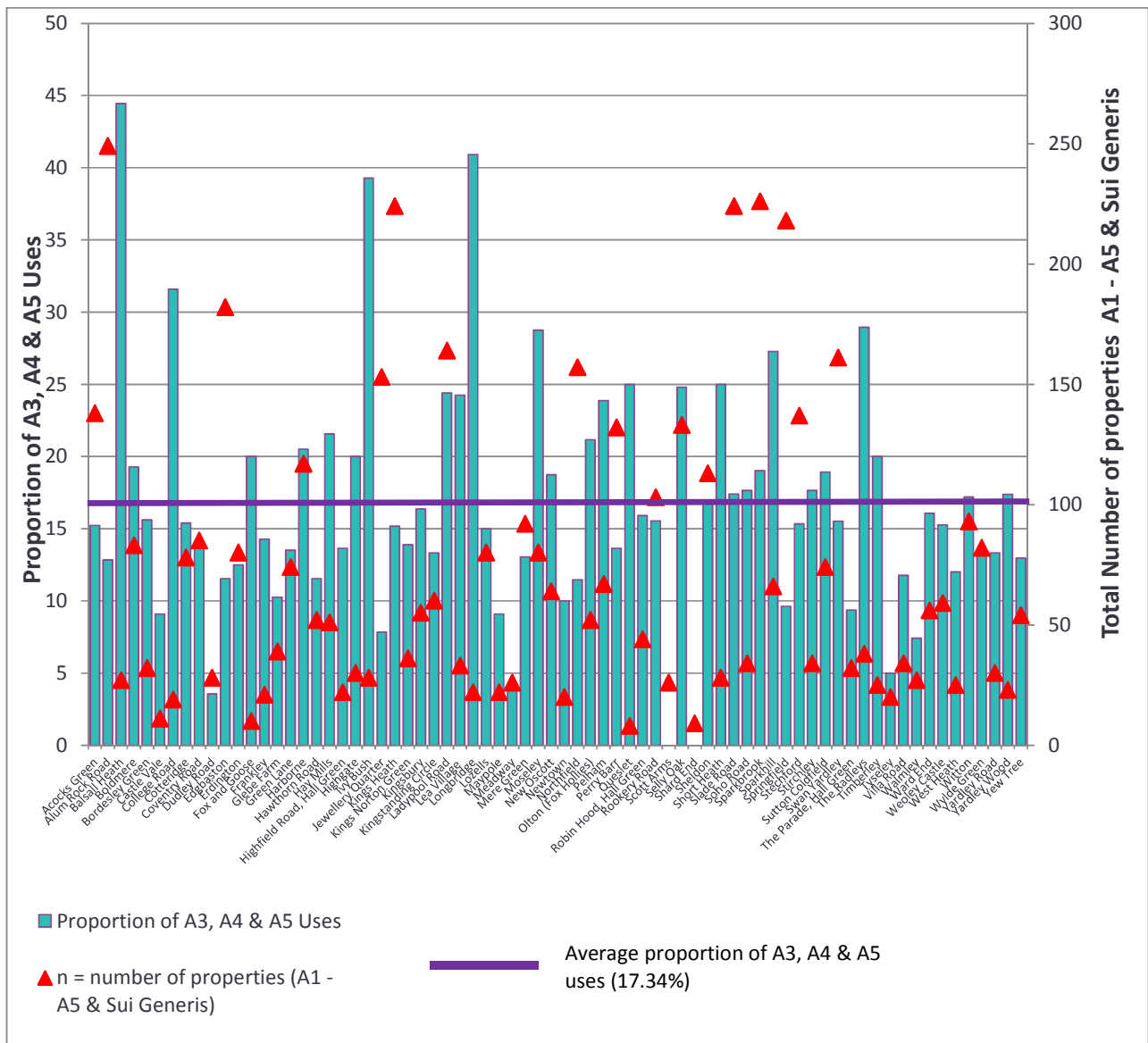
Source: BCC (2012) Shopping and Local Centres SPD

- |                                |                                   |                            |
|--------------------------------|-----------------------------------|----------------------------|
| 1. Acocks Green                | 26. Kingsbury                     | 51. Slade Road             |
| 2. Alum Rock Road              | 27. Kingstanding Circle           | 52. Soho Road              |
| 3. Balsall Heath               | 28. Ladypool Road                 | 53. Sparkbrook             |
| 4. Boldmere                    | 29. Lea Village                   | 54. Sparkhill              |
| 5. Bordesley Green             | 30. Longbridge                    | 55. Springfield            |
| 6. Castle Vale                 | 31. Lozells                       | 56. Stechford              |
| 7. College Road                | 32. Maypole                       | 57. Stirchley              |
| 8. Cotteridge                  | 33. Meadway                       | 58. Sutton Coldfield       |
| 9. Coventry Road               | 34. Mere Green                    | 59. Swan                   |
| 10. Dudley Road                | 35. Moseley                       | 60. The Parade, Hall Green |
| 11. Edgbaston                  | 36. New Oscott                    | 61. The Radleys            |
| 12. Erdington                  | 37. Newtown                       | 62. Timberley              |
| 13. Fox and Goose              | 38. Northfield                    | 63. Tyseley                |
| 14. Frankley                   | 39. Olton Boulevard (Fox Hollies) | 64. Villa Road             |
| 15. Glebe Farm                 | 40. Pelham                        | 65. Walmley                |
| 16. Green Lane                 | 41. Perry Barr                    | 66. Ward End               |
| 17. Harborne                   | 42. Queslett                      | 67. Weoley Castle          |
| 18. Hawthorn Road              | 43. Quinton                       | 68. West Heath             |
| 19. Hay Mills                  | 44. Robin Hood, Hall Green        | 69. Witton                 |
| 20. Highfield Road, Hall Green | 45. Rookery Road                  | 70. Wylde Green            |
| 21. Highgate                   | 46. Scott Arms                    | 71. Yardley Road           |
| 22. Ivy Bush                   | 47. Selly Oak                     | 72. Yardley Wood           |
| 23. Jewellery Quarter          | 48. Shard End                     | 73. Yew Tree               |
| 24. Kings Heath                | 49. Sheldon                       |                            |
| 25. Kings Norton Green         | 50. Short Heath                   |                            |



Analysis of the proportion of three use classes – A3 (restaurants), A4 (pubs and drinking establishments) and A5 (hot food takeaways) – which are likely to be a particular focus for policy, reveals significant variation across centres, and some disproportionately high occurrences above the mean of 17.34% (Figure 4.15). The significance of some of these relatively high proportions of A3/A4/A5 uses in terms of their relationship to issues such as health is unproven. Section 4.6.8 below explores the spatial pattern of health across Birmingham.

Figure 4.15 Proportion of Use Classes A3, A4 and A5 by centre and total units



## Culture/Sport/Recreation

Birmingham is internationally known for sports and exhibitions, with well-known venues including the National Indoor Arena and the National Exhibition Centre. Developments in arts, sports and leisure have played a key part in the City's renaissance over the past twenty years. Birmingham has many strengths including world-class performance, arts, sports and exhibition facilities, and internationally recognised companies of cultural excellence. Many of these facilities are located in the City Centre, including the

International Convention Centre; Birmingham Symphony Hall, home of Birmingham Symphony Orchestra, the National Indoor Arena, a major concert and sporting venue; Birmingham Hippodrome; Birmingham Royal Ballet and Birmingham Museum & Art Gallery. These are complemented by smaller venues such as the IKON Gallery, Jam House and Electric Cinema.

The proportion of leisure development that has taken place in centres has varied considerably year on year, and there appears to be no clear trend or pattern. This is probably in part due to the fact that there are various types of leisure development and some (e.g. sports facilities associated with playing fields or pitches), would not necessarily be expected to be located in centres. The relatively high proportion of out-of-centre leisure development overall since 1991 (61%) is skewed by a small number of very large developments, such as 'Star City' (Nechells), Birmingham Great Park and Longbridge which were committed before the current national planning policy guidance came into effect. There has also been a significant amount of leisure development based around existing sports facilities in out-of-centre locations. During 2010/11 88% was built out-of-centre including an indoor sports arena at the Tenby building, Great King Street (Aston). Also out-of-centre, but under construction, included the erection of a 5,000 seat stand at the Alexander Stadium in Perry Barr. Birmingham will host the 2020 Commonwealth Games which will prompt a significant amount of construction activity.

Investment in new hotels continues e.g. the Radisson and Etap. Other recent leisure developments in the City Centre include Millennium Point and the Five Ways Leisure complex. A significant amount of leisure development that has taken place in Birmingham since 1991 has been tourism related, for example, the National Sea Life Centre and Millennium Point. The number of overseas visitors to the City has increased from 520,000 in 2000, to 713,000 in 2012 and 1,110,000 in 2015<sup>61</sup>. Birmingham is now the fourth most popular destination in the UK among overseas residents after London, Edinburgh and Manchester. Birmingham welcomed the highest number of visitors on record in 2016, with tourist numbers reaching 39 million, and tourism revenue hitting an all-time high of £6.5 billion.

Culture and leisure facilities both attract people to Birmingham and serve local residents. According to the Community Strategy, surveys show that 45% of Birmingham residents had been to the theatre or a concert in the city in the last year, while 36% had visited a museum or gallery.

## Community Involvement

Community involvement can be measured by a number of indicators, including election turnout. Table 4.11 shows the election turnout in Birmingham for the 2017 General Election by constituency. It can be seen that the turnout varies between some of the different constituencies.

Table 4.11 General Election Turnout in Birmingham for the 2017 General Election

Constituency	% Turnout
Sutton Coldfield	70.06
Hall Green	69.63
Selly Oak	66.05
Edgbaston	64.21
Perry Barr	63.28
Northfield	61.53
Hodge Hill	61.50
Yardley	61.46

<sup>61</sup> Source: <http://birminghamtoolkit.com/files/downloads/VisitorEconomyHeadlines2016withupdatedSTEAMfigures.pdf>

Constituency	% Turnout
Ladywood	59.21
Erdington	57.37

Source:

[https://www.birmingham.gov.uk/info/20097/elections\\_and\\_voting/1273/parliamentary\\_general\\_election\\_results\\_june\\_2017/5](https://www.birmingham.gov.uk/info/20097/elections_and_voting/1273/parliamentary_general_election_results_june_2017/5)

Erdington constituency had the lowest turnout, which was the third lowest turnout in the UK. Conversely, Sutton Coldfield had the highest turnout, but this was only the 217<sup>th</sup> highest turnout in the UK.

One important aspect of community involvement is the extent to which people feel involved in the development of their local area. As part of the Government's Big Society, new legislation has been introduced to encourage local people to have more say in how their area looks. Neighbourhood Planning is a process by which communities can come together and prepare land use plans that will guide the type of developments they would wish to see in their area.

The Sustainable Community Strategy indicates that in 2006, 40% of people agreed that they can influence decisions that affect their local area, an improvement of 22% from 2004. Furthermore, the Birmingham Community Strategy (Strategic Assessment Update November 2006) found over half those asked felt that people together can influence decisions in their constituency (most apparent in areas of Ladywood and Sparkbrook), compared to just over a quarter who felt that people collectively had little or no influence (most apparent in Perry Barr and Selly Oak).

## Equality

Birmingham's residents are from a range of national, ethnic and religious backgrounds, as Birmingham is one of the most ethnically diverse cities in Europe. Table 4.12 summarises the proportion of the main ethnic groups present. Almost 10% are Pakistani, with the next largest groups being Indian and Black Caribbean. Between 1991 and 2001, the Black and Minority Ethnic (BME) population increased, particularly the Pakistani and Bangladeshi groups. BME groups are mainly concentrated in the inner parts of the City. BME groups vary in terms of housing, the labour market, health and age structure. Most established BME groups are growing through natural change and immigration. Since 2001 the city has attracted migrants from a widening range of countries, including Eastern Europe, Africa and the Middle East.

Table 4.12 Largest Ethnic Groups in Birmingham and England, 2010

Ethnic Group	% of Population Birmingham	% of Population England
White British	63.3	82.8
Pakistani	9.7	1.9
Indian	5.8	2.7
Black Caribbean	4.0	1.2
White Irish	2.1	1.1
White Other	2.6	3.6
Mixed Groups	3.2	1.8
Bangladeshi	2.5	0.7
All other groups	6.8	4.1

Source: Experimental Estimates, National Statistics, Crown Copyright 2010



Birmingham has a fairly youthful population. Approximately 46% of residents are younger than 30, compared with the national (England) average of 38%<sup>62</sup>.

Inequalities are reflected in statistics relating to people without a car. Birmingham has a relatively high percentage of households without a car, 38%, compared to the English average of 27%. The percentages without a car are high in the inner parts of the city and in some more peripheral areas. About two thirds of those in social-rented housing live in households without a car, as do nearly half of unemployed people and those not working because of long term sickness or disability. Percentages are particularly high among households containing lone pensioners and lone parents. Percentages are also high among Black, Bangladeshi and White Irish households.

Work undertaken for the West Midlands Local Transport Plan showed that there is generally good accessibility in most places at most times for the 33.7% (2001) of households without a car, due to the extensive bus network. However, two particular problems were identified with access for unemployed people to attend job interviews and with access to major NHS hospitals by public transport.

Further detail on equality has been covered in the section on Economy and Equality.

## Health

Information on health for Birmingham can be found in the NHS Health Profile for the area 2017<sup>63</sup>, which gives a snapshot of health in Birmingham. According to the NHS, life expectancy in Birmingham for males is 77.1 years which is 'significantly worse' when compared to an average across England of 79.5 years. Furthermore, life expectancy for females is 81.9 years compared to an average across England of 83.1 years.

Adults in Birmingham are less likely than average to follow healthy eating guidelines, but the proportion of obese adults is not vastly different to the England average. A survey undertaken by Sport England<sup>64</sup> reveals that there is a low rate of participation in sport and other physical activity in Birmingham compared with other local authorities within the West Midlands. The 2017 health profile reflects this trend with the percentage of physically active adults lower (51.1%) than the national average (57%).

Teenage pregnancy rates are 'significantly worse' for Birmingham (47.4 per 1,000) than the England average (38.1 per 1,000). Binge drinking is lower than the England average; however, hospital stays for alcohol-related harm were 'significantly worse' in Birmingham for 2017 with 6,786 per 100,000 rate of admission episodes for alcohol attributable conditions compared to the national average of 1,163<sup>65</sup>. Rates of sexually transmitted infections are better than the England average. The incidence of malignant melanoma is lower than average (2017). Estimated levels of adult 'healthy eating' and obesity are worse than the England average.

People in routine and manual occupations have poorer health than those in more highly-skilled jobs, and these people are also more likely to smoke. The infant death rate is greater than the England average in this group. Birmingham has a higher than average number of people working in lower grade jobs such as process plant and machine operatives than in the rest of the West Midlands and England.

Local health priorities for Birmingham include childhood obesity, statutory homelessness and reducing the numbers of vulnerable children and adults

<sup>62</sup> Source: Mid Year Population Estimates, ONS

<sup>63</sup> Available at <http://fingertipsreports.phe.org.uk/health-profiles/2017/e08000025.pdf> [Accessed April 2018]

<sup>64</sup> [http://www.sportengland.org/research/active\\_people\\_survey/active\\_people\\_survey\\_2/regional\\_results.aspx](http://www.sportengland.org/research/active_people_survey/active_people_survey_2/regional_results.aspx)

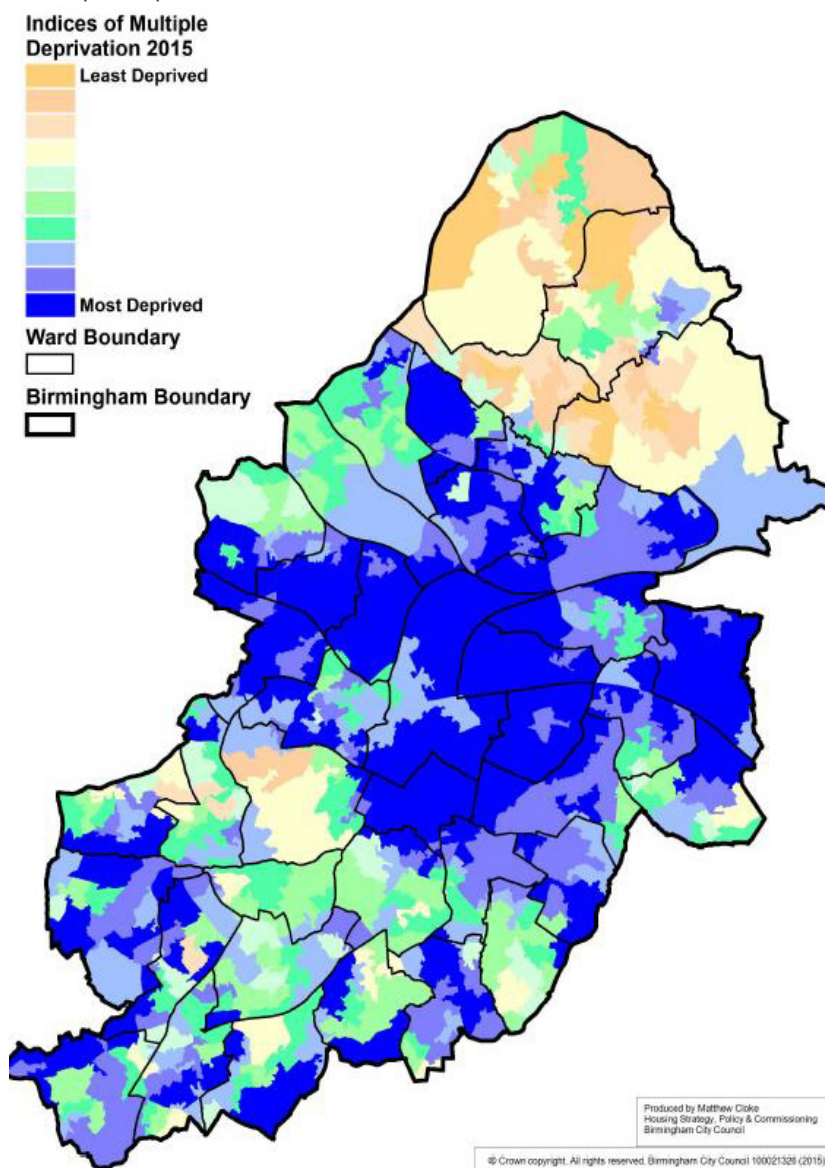
<sup>65</sup> Public Health Organisations (2017) Hospital stays for alcohol related harm from 2017 Birmingham Health Profile

## Poverty

According to the Index of Deprivation, in 2015 about 40% of Birmingham's residents lived in areas that were in the most deprived 10% in England. Concentrations are very high in wards to the east, north and west of the City Centre and also in the Tyburn and Kingstanding Wards to the north of the M6 motorway (Figure 4.16). In 2014 (the most recent figures available) the proportion of child living in poor households in Birmingham was 32.9%, compared to 20.3% for England and 20% for the UK.<sup>66</sup>

In Birmingham there are over 100,000 children living in poverty, the equivalent of 37% of all children in the city (after housing costs). Nearly half of Birmingham's children live in the 10% most deprived areas in the country – with nearly 8,000 living in the 1% most deprived areas. Birmingham Ladywood Constituency has the third highest level of child poverty in the UK among parliamentary constituencies with 47% of children living in poverty after housing costs<sup>47</sup>.

Figure 4.16 Index of Multiple Deprivation 2015

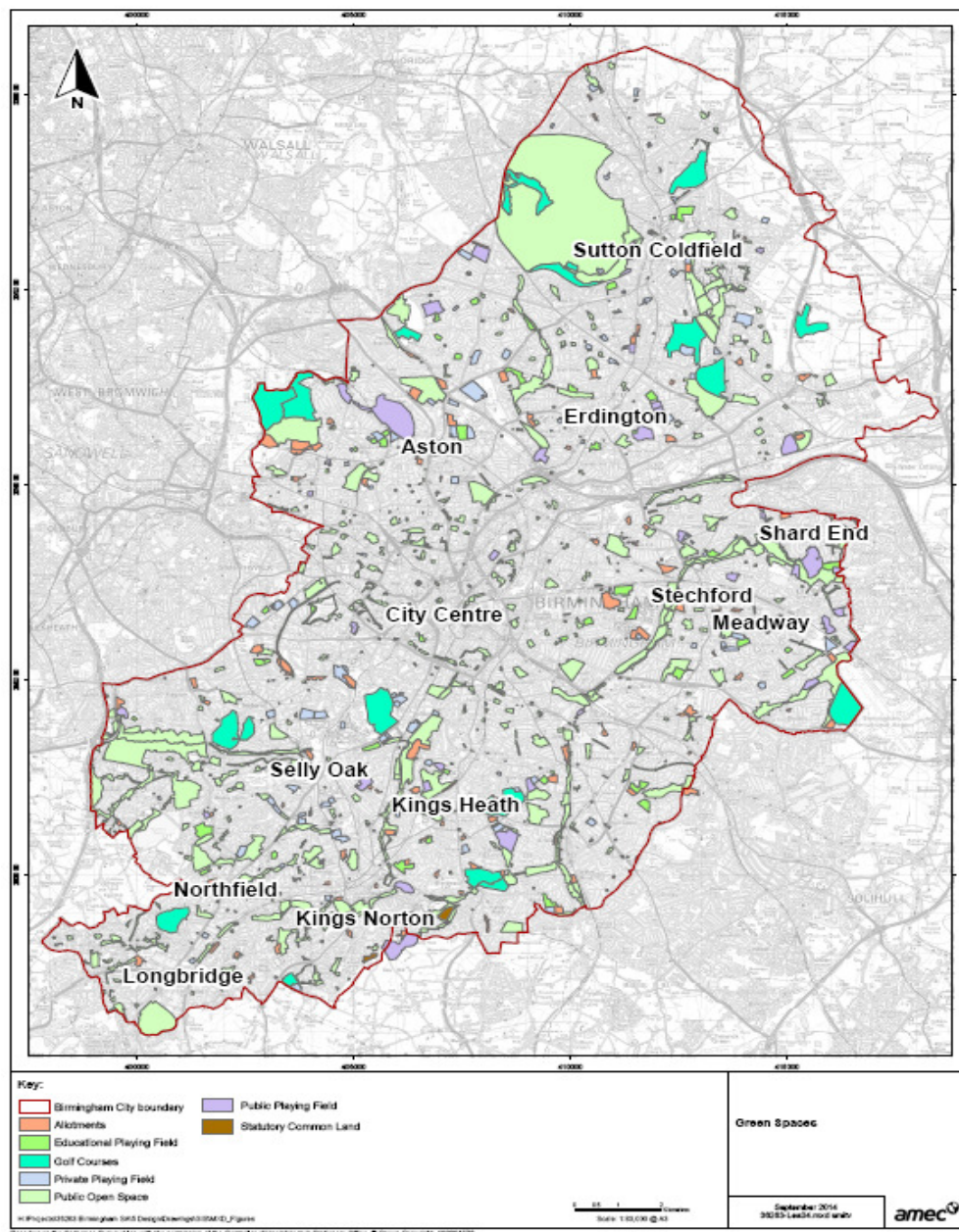


<sup>66</sup> <https://www.gov.uk/government/statistics/personal-tax-credits-children-in-low-income-families-local-measure-2014-snapshot-as-at-31-august-2014-30-september-2016>

Data from the Public Health Profile<sup>67</sup> for Birmingham from 2017 shows that over 50% of residents live in neighbourhoods classed as some of the most deprived (based on IMD classifications) compared to the average for England of 20%. In consequence, less than 10% of residents in Birmingham live in neighbourhoods classed as the least deprived.

As noted above, well planned GI can give access to high quality green spaces that will provide opportunities for better health and well-being. Figure 4.17 illustrates the distribution of green spaces, by type, across the City. Further information on health in Birmingham can be found in the Department of Health Birmingham Health Profile 2017<sup>68</sup>.

Figure 4.17 Green Spaces Across Birmingham



<sup>67</sup> Available from <http://fingertipsreports.phe.org.uk/health-profiles/2017/e08000025.pdf> [Accessed April 2017]

<sup>68</sup> Department of Health Birmingham Health Profile 2017 <http://fingertipsreports.phe.org.uk/health-profiles/2017/e08000025.pdf>

## Crime

Burglary crime in Birmingham was declining between 2011 and 2015, however the most recent data from 2016 indicates that crime is on the rise. The total Birmingham crime rate for 2014-2016 is 205 crimes per 1000 people. This is notably much lower than other cities of a similar size: the crime rate in Manchester – the next largest UK city after Birmingham – is 87% higher, at 384 crimes per 1000 people. Antisocial is the most reported crime in Birmingham, followed by violent crime, which is 40% higher than the national average. Crime and safety remain a concern of local people, however Birmingham City Council's Performance Plan<sup>69</sup> feedback indicates that 95% of Birmingham residents surveyed say they feel safe during the day. The Birmingham Community Safety Partnership's 2012 annual report reveals that the city is making good progress to reducing serious violence among 10-19 year olds, with a 19.3% reduction.

More recent figures show that Burglary crime whilst fluctuating has increased with 7,625 victims of Burglary reported for the 12 months ending 30<sup>th</sup> September 2017. Robbery has also increased with 3,647 incidents for the 12 months ending 30<sup>th</sup> September, compared with 3165 for the equivalent period in 2016. Shoplifting offences fell slightly, whilst violent offences have been steadily increasing, alongside possession of weapons offences. This is also reflected in the total crimes recorded in Birmingham which has been steadily increasing and stood at 96,992<sup>70</sup> for the 12 months ending 30<sup>th</sup> September 2017. In the month of February 2018, West Mercia police had recorded 10 street crimes in Birmingham and this included 3 violent offences, 1 incident of shoplifting and 2 other thefts.

Vehicle crime is a notably bigger problem in Birmingham than other cities. Although making up just 10% of total crime recorded in Birmingham in 2016 the city had the fourth highest amount of vehicle crime over the period in the country with 22 recorded incidents per 1,000 people which was 145%<sup>71</sup> higher than the national average.

Figures from the Birmingham Community Safety Partnership in 2005 showed that there are certain areas in Birmingham which have higher burglary rates than elsewhere in Birmingham, notably Erdington Ward, Lozells in Perry Barr, Bournbrook Student Area in Selly Oak, Frankley and Rubery in Northfield, and Brandwood and Billesley Ward Boundary in Hall Green. The number of robberies and muggings in Birmingham tends to fluctuate (as demonstrated by the more up to date statistics provided above), but there were higher rates in the following four areas than in other areas in Birmingham: Nechells Parkway in Ladywood District, Soho Road Lozells and Aston in Ladywood and Perry Barr Districts; the city centre; Coventry Road on the Ladywood, Bordesley Green and Yardley Border. Noise

Levels of noise pollution are problems in certain parts of the city according to the Sustainable Community Strategy<sup>72</sup>. Surveys have shown that one in eight residents are concerned about noise, and the Council receives over 3,000 complaints about noise a year. Traffic is one of the principal sources of this noise. Birmingham has pioneered 'noise mapping' to help manage the problem.

## Influence of the DM DPD on Population and Human Health

The influence of the DM DPD on population and human health could make a significant difference in respect of certain measures such as changes in the use of buildings in local centres. Here, for example, changes to hot food takeaways could be carefully monitored in order to gauge their potential impact on the character of the locality, health indicators and vulnerable groups such as children. Individual approaches to specific

<sup>69</sup> Source: <http://www.birmingham.gov.uk/cs/Satellite?c=Page&childpagename=Policy-and-Delivery%2FPageLayout&cid=1223092613434&pagename=BCC%2FCommon%2FWrapper%2FWrapper>

<sup>70</sup> All crime statistics from <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/datasets/recordedcrimedatatacommunitysafetypartnershiplocalauthoritylevel> [Accessed April 2018]

<sup>71</sup> <https://www.verisure.co.uk/advice-and-help/crime-statistics/birmingham-crime-statistics>

<sup>72</sup> [https://www.birmingham.gov.uk/downloads/file/1543/strat1\\_sustainable\\_community\\_strategy\\_birmingham\\_2026\\_2008pdf](https://www.birmingham.gov.uk/downloads/file/1543/strat1_sustainable_community_strategy_birmingham_2026_2008pdf)



service centres may be required to take account of special circumstances including their size, economic health and proximity to specific receptors such as schools. More widely, the role of Green Infrastructure in promoting health and well-being needs to be recognised and planned for.

## Water & Air Quality

### The State of Birmingham's Rivers

The BCC SPD on sustainable management of rivers and floodplains<sup>73</sup> summarises the key issues relating to the state of the City's rivers:

- ▶ Parts of the river system are in a poor ecological state;
- ▶ Parts of the river system are inaccessible over much of their length and are of poor amenity value to the local community;
- ▶ Fly tipping of domestic and commercial waste;
- ▶ Beneath Birmingham, groundwater is rising, bringing with it contaminants that have previously remained in the ground;
- ▶ Wildlife habitats in the rivers and at the banksides have been badly damaged;
- ▶ During storms pollution flushes into the river, causing a loss of oxygen and killing fish; and
- ▶ There are increasing development pressures on bank-side locations.

Across the Humber River Basin<sup>74</sup> as a whole, despite recent progress, a range of challenges still remain, which will need to be addressed to secure the predicted outcomes. They include:

- ▶ Physical modifications - affecting 42% of water bodies;
- ▶ Pollution from waste water – affecting 38% of water bodies;
- ▶ Pollution from towns, cities and transport - affecting 16% of water bodies;
- ▶ Changes to the natural flow and level of water - affecting 6% of water bodies;
- ▶ Negative effects of invasive non-native species - affecting <1% of water bodies;
- ▶ Pollution from rural areas - affecting 32% of water bodies; and
- ▶ Pollution from abandoned mines - affecting 4% of water bodies.

### Reservoirs and Canals

Birmingham has 22 reservoirs as defined under the Reservoir Act 1975 of which 11 large raised reservoirs are the responsibility of Birmingham City Council. The remaining reservoirs are the responsibility of a variety of organisations including Environment Agency (3), Severn Trent Water (5), British Waterways (1) and private companies (2). Of these, two reservoirs are used for drinking water supply and one, a canal feed reservoir at Edgbaston.

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<sup>73</sup>[https://www.birmingham.gov.uk/downloads/file/1166/sustainable\\_management\\_of\\_urban\\_rivers\\_and\\_floodplains\\_supplementary\\_planning\\_document](https://www.birmingham.gov.uk/downloads/file/1166/sustainable_management_of_urban_rivers_and_floodplains_supplementary_planning_document)

<sup>74</sup> Environment Agency (2016) Humber River Basin Management Plan

Birmingham has an extensive network of canals, the exact length depends on where you draw the city boundaries, but the whole Birmingham Canal Navigations system extends for approximately 160 miles in total. It is one of the most intricate canal networks in the world. These waterways converge in the city centre at Gas Street Basin. The canals within Birmingham include:

- ▶ Birmingham & Fazeley Canal;
- ▶ Birmingham Canal Main Line;
- ▶ Birmingham Canal Old Main Line;
- ▶ Grand Union Canal;
- ▶ Tame Valley Canal;
- ▶ Worcester and Birmingham Canal; and
- ▶ Stratford-upon-Avon Canal.

## Air

The whole of Birmingham was declared as an Air Quality Management Area (AQMA) in 2003. The main pollutant is nitrogen dioxide, the primary sources of which are transport and industrial combustion processes.

The transportation sector is a major contributor to the emissions of nitrogen oxides across the city, but there has been a slight decrease in the traffic contribution over the last few years according to the Air Quality Action Plan. The City's principal road network is illustrated in Figure 4.18 and shows the distinct presence of motorways to the north of the City and their influence, along with the City Centre, on NO<sub>2</sub> concentrations (Figure 4.19). The overall number of morning rush hour car trips into Birmingham City Centre has declined by around one third over the period 1999 – 2011 (AMR, 2013), replaced by an increase in rail trips by one third (18,987 to 27,674) and a doubling of tram trips (998 to 1,687).

Figure 4.18 Birmingham's Transportation Network

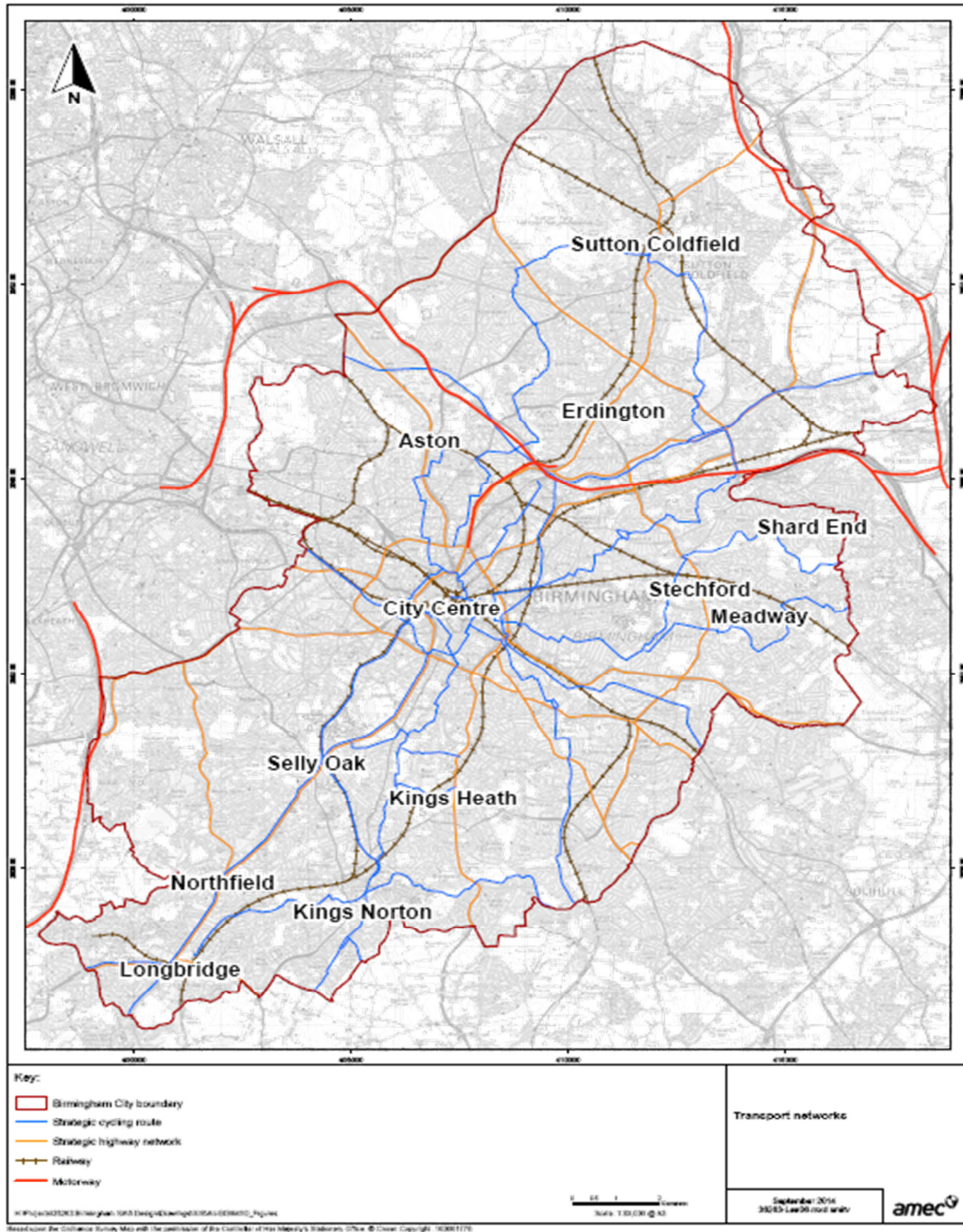
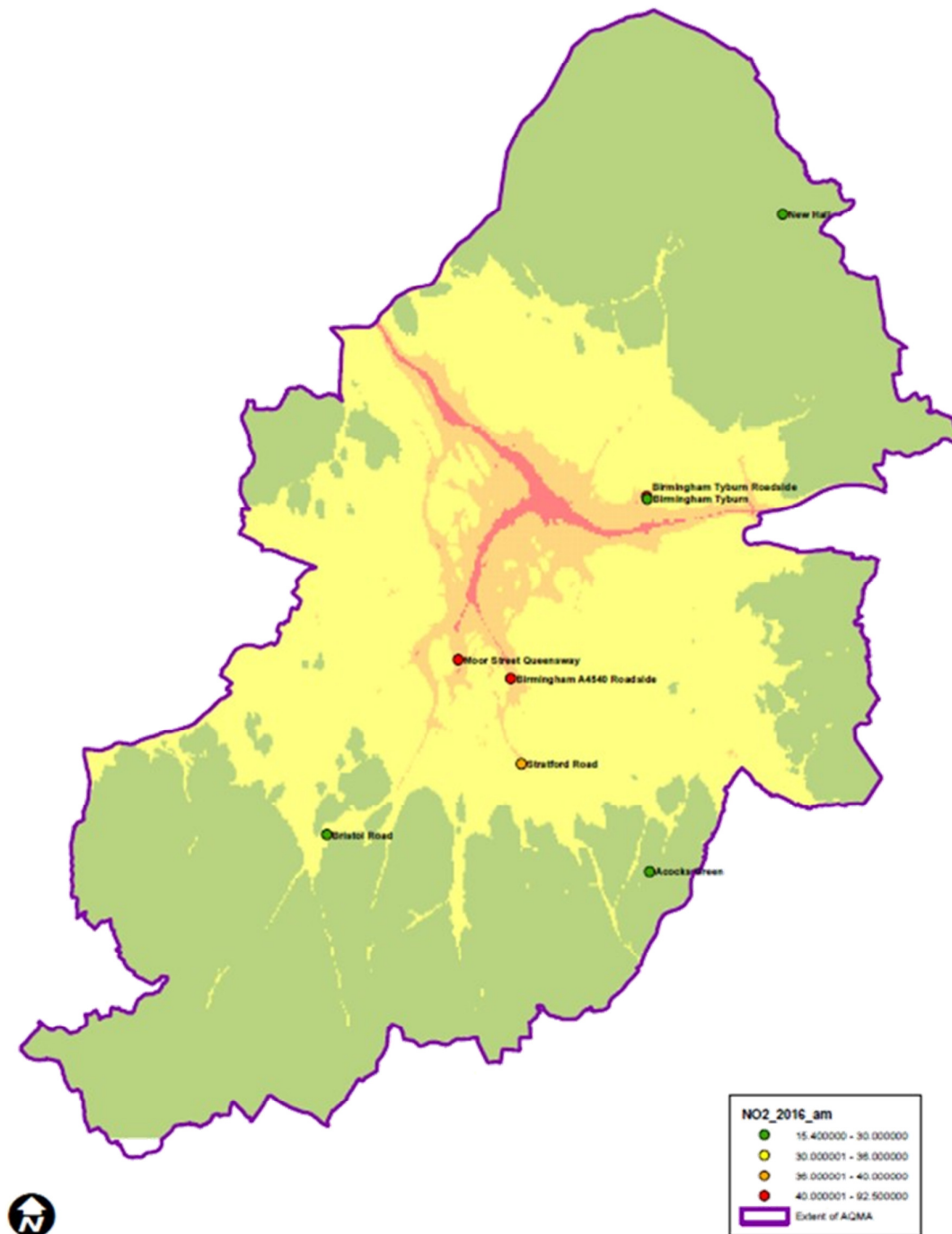


Figure 4.19 Modelled N02 Concentrations across Birmingham 2016<sup>75</sup>

### Influence of the DM DPD on Water and Air Quality

The influence of the DM DPD on water and air quality is likely to be both direct and indirect, short and longer term, and potentially cumulative reflecting the impact of multiple developments over a long timescale. Through the application of the supporting criteria to the policies and appropriate conditions, negative effects should be avoided and where appropriate mitigated. However, monitoring of developments will be required to determine net effects. A specific issue relates to the increased volume of waste water and sewage effluent

<sup>75</sup> Birmingham City Council (2017) 2016 Air Quality Annual Status Report (ASR)



associated with City's growth proposals will need to be treated to a high enough standard to ensure that there is no detriment in the quality of the watercourses receiving this discharge. Given the dispersed nature of the proposed development, it is likely that there will be a requirement for widespread upgrading of the sewerage pipe network throughout the City. Policy will need to ensure that the sewerage system has adequate capacity to manage any additional flows.

## Cultural Heritage

### Built and Historic Environment

Birmingham has a wide variety of distinctive historic townscapes, buildings and landscapes. The extent of the City's historic resource is summarised in Table 4.13 and mapped in Figure 4.20.

Table 4.13 Birmingham's Historic Built Environment

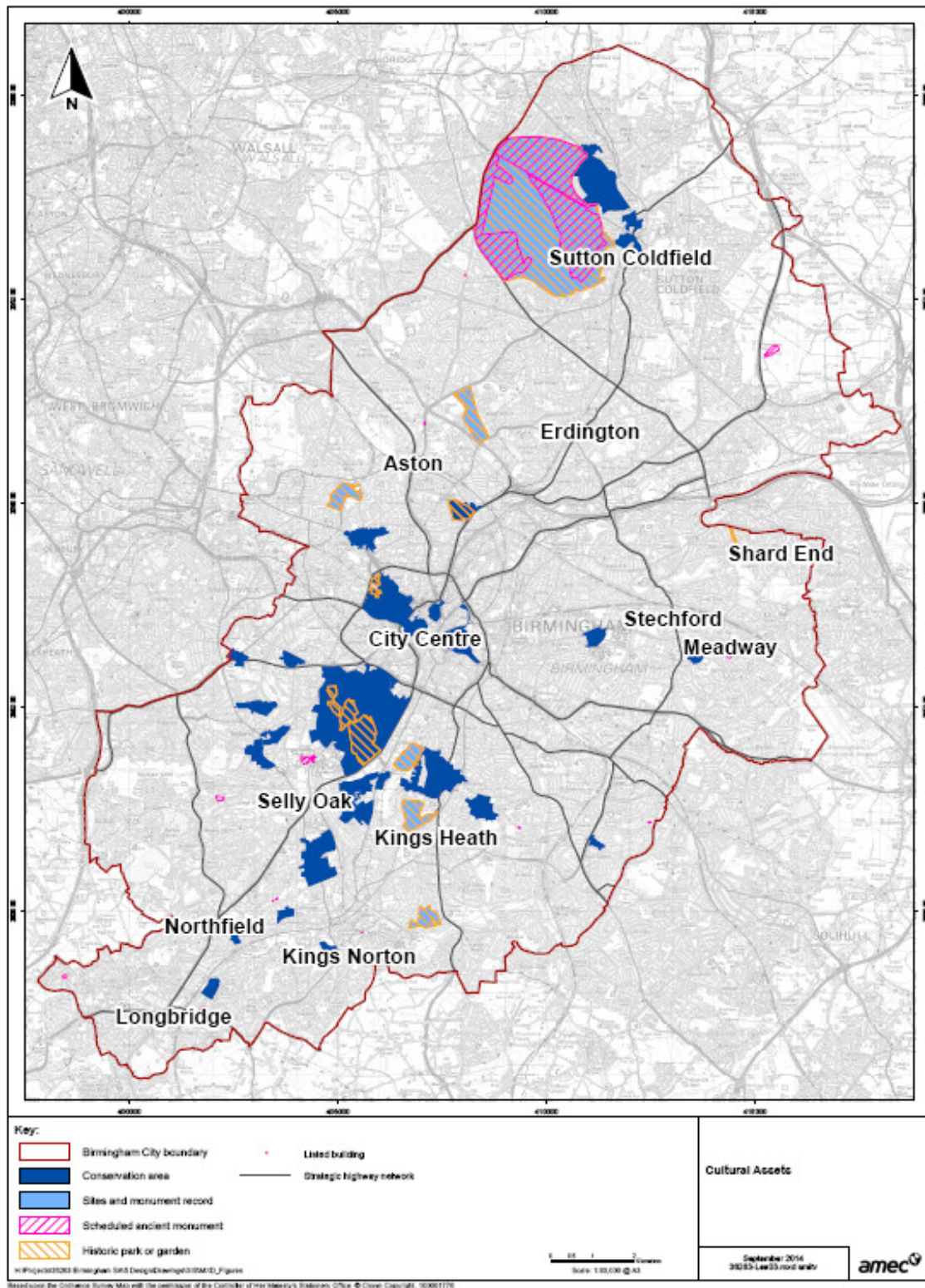
Heritage Asset	Number	Area (Hectares)
Scheduled Ancient Monuments	14	528.72
Statutorily Listed Buildings	1,486	369.98
Locally Listed Buildings	444	176.06
Conservation Areas	30	1,223.22
Registered Parks and Gardens	14	1,183.44
		Length (Kilometres)
Canals	-	57.4

Source: Birmingham City Council, AMR (2015)

There are currently 30 Conservation Areas in Birmingham, which account for 4% of the land area of the City including five within the City Centre. Some Conservation Areas, such as the Jewellery Quarter and Bourneville, are unique and are nationally recognised. Birmingham also has nearly 1,500 statutorily listed buildings and 14 registered parks and gardens of special historic interest. The City Council applied to the United Nations Educational, Scientific and Cultural Organisation for 'World Heritage Site' status in 2011 for the Jewellery Quarter. The City's Listed Buildings range in date from mediaeval churches and houses to important examples of twentieth century architecture. Birmingham also has an extensive network of historic canals, reflecting its key role during the Industrial Revolution in the eighteenth and nineteenth centuries.

The City's archaeological resource is surprisingly varied for such a major urban area. Some remains are recognised as being of national importance, and are protected by scheduling. Known remains range in date from prehistoric earthworks to nineteenth and twentieth century industrial buildings and structures. The Historic Environment Record maintained by the City Council includes details of all known archaeological remains within the City. These now total almost 5,525 records which has increased from 5,445 from 2012. Historic Landscape Characterisation of the City commenced in 2011 with 4,141 polygons captured. Environmental improvements by the City Council during the late 1980s and early 1990s, such as the development of the ICC and Centenary Square, Victoria Square and the pedestrianisation of New Street, have improved the overall quality of the environment within the City Centre. There have been notable successes in relation to improving the quality of design and the environment, particularly in the city centre. This was recognised by the award to the city of the RTPI Silver Jubilee Cup in 2004. Birmingham also won the European City of the Future Award at the European Property Awards in Munich in 2005.

Figure 4.20 Birmingham's Heritage Assets



There are a number of challenges and opportunities facing Birmingham's historic environment including the condition of its designated and non-designated heritage assets, the continuing programme of townscape and public realm improvements, pressure on the skyline and its cultural identity and distinctiveness.

There are 26 entries on Historic England's 'at risk' register for Birmingham<sup>76</sup> and these include a number of churches, the Grand Hotel on Colmore Row, the public baths in Moseley, the Red Lion pub on Soho Road, several conservation areas, former school of art on Moseley road, and Perrott's Folly. The condition of these historic assets on the register varies, for example Icknield Street School is classed as category A i.e. at immediate risk of further rapid deterioration, as are the public baths on Moseley Road, the Red Lion pub on Soho pub is category C so in slow decay but not in any immediate risk of rapid deterioration and Austin Village Conservation Area is in very bad condition and is deteriorating significantly. Some of these are in the process of being repaired or have plans in place for repair whilst others are at risk, for example the vacant British Rail goods office.

Birmingham's Heritage Strategy<sup>77</sup> 2014-19 has four key aims:

- ▶ Preservation – including ensuring heritage is properly considered in the planning process, supporting the Heritage Champion and improving the sustainability of heritage programmes and projects;
- ▶ Prioritisation – including working with the Heritage Strategy Group to bring forward projects, including in local districts, to co-ordinate bidding for funds and planning for major anniversaries and city events;
- ▶ People – including participation, engagement volunteering, celebrating local heritage and identity and supporting Districts to engage with heritage in neighbourhoods; and
- ▶ Promotion – including building a better story around our heritage and improving our marketing of heritage assets.

The strategy notes that given reductions in funding available that partnership working will be important going forward for Birmingham's historic environment. The strategy also notes Community Infrastructure Levy (CIL) will be important for providing funding for the historic environment and also the Heritage Lottery Fund (HLF). HLF has identified a number of priority areas in the city which have received less funding than other parts of the region. These are:

- ▶ Perry Barr;
- ▶ Oscott;
- ▶ Handsworth Wood;
- ▶ Lozells & East Handsworth;
- ▶ Aston;
- ▶ Soho;
- ▶ Ladywood; and
- ▶ Nechells.

There is a continuing programme of townscape and public realm improvements in Birmingham which presents opportunities for historic environment improvements. One of the big City Centre development

<sup>76</sup> <https://historicengland.org.uk/advice/heritage-at-risk/search-register/results?q=birmingham&searchtype=har&page=2> [Accessed July 2018]

<sup>77</sup> Birmingham Heritage Strategy 2014-2019 Available at [https://www.birmingham.gov.uk/downloads/file/2008/exam\\_30\\_birmingham\\_heritage\\_strategy\\_2014-2019](https://www.birmingham.gov.uk/downloads/file/2008/exam_30_birmingham_heritage_strategy_2014-2019) [Accessed July 2018]

schemes currently ongoing is the paradise area between the museum and art gallery and the library. Paradise is to be transformed into a vibrant mixed use development of commercial, civic, retail, leisure and hotel space, providing major improvements to pedestrian access and greatly enhanced public realm befitting this exemplary historic setting. There are also masterplans for developments in other parts of the City Centre including around Snowhill.

In 2017 Historic England published an updated edition of Streets for all which is a practical guide for anyone involved in planning and implementing highways and public realm works in sensitive historic locations. A supplementary document was then published in the context of the West Midlands<sup>78</sup>. This document explains how historic character adds value to the region's contemporary public realm and summarises some of the priorities and opportunities for further improvements to the West Midlands' streetscapes.

This supplementary document notes that through support by the Greater Birmingham and Solihull Local Economic Partnership, Birmingham is now in the top three spenders on public realm nationally. This level of spending has helped to deliver a number of public realm improvements across the City.

## Natural Landscape

Although much of Birmingham is built up, there is a significant amount of open land within the City (Table 4.14).

Table 4.14 The Natural Environment and Open Space

Open Space Category	Area (ha)	% of City Council Area
Sites of Special Scientific Interest	896.59	3.35
National Nature Reserves	811.73	3.03
Local Nature Reserves	316.73	1.16
Sites of Importance for Nature Conservation	828.03	3.09
Sites of Local Importance for Nature Conservation	698.98	2.62
Public Open Space	3,069.77	11.46
Public Playing Fields	296.9	1.11
Private Playing Fields	268.11	1.0
Private Open Space	67.19	0.25
Educational Playing Fields	166.33	0.62
Golf Courses	657.78	2.46
Statutory Common Land	11.25	0.04
Allotments	243.8	0.91
Green Belt	4,154.77	15.52

Source: Birmingham City Council, AMR (2015)

Landscape character is a key contributor to regional and local identity, influencing sense of place, shaping the settings of people's lives and providing a critical stimulus to their engagement with the natural environment. The National Character Areas (NCAs) provide a description of landscape character across

<sup>78</sup> <https://content.historicengland.org.uk/images-books/publications/streets-for-all-west-midlands/heag149h-sfa-west-midlands.pdf/>

England<sup>79</sup>. These are used by Natural England to provide a context for monitoring landscape change through the Countryside Quality Counts (CQC) project<sup>80</sup>. Birmingham falls within two NCAs, Arden to the south and Cannock Chase and Cank Wood to the north. The part of the City which lies within Arden is almost entirely urbanised. The wider landscape to the south is characterised by a farmed woodland landscape of rolling landform with narrow meandering river valleys.

The National Character Area description relevant to Birmingham states:

*"Birmingham has a clearly-defined concentric pattern of development. Much of the landscape is dominated by 19<sup>th</sup> and 20<sup>th</sup> century housing, the former in characteristic red brick. Canals, parks, golf courses and the river corridor form the main open spaces, with a substantial parkland area around the University at Edgbaston and some low-density garden suburbs like Bourneville. Enclosed within the urban area are fragments of older landscapes like Castle Bromwich Park<sup>81</sup>."*

The change in landscape character in the period 1998-2003 is described in the CQC assessment as:

*"...development pressure continues to be evident throughout the area, with evidence of expansion around many major settlements such as Nuneaton, Coventry, Bromsgrove and Redditch, and expansion of major roads such as the M6 toll<sup>82</sup>."*

The northern part of the city lies within the Cannock Chase and Cank Wood NCA. Relevant extracts from the JCA are set out below:

*"Cannock Chase and Cank Wood is a landscape dominated by its history as a former forest and chase and by the presence at its centre of the South Staffordshire Coalfield. It forms an area of higher ground, with the towns and large villages of the Black Country rising out of the lowlands of Shropshire and Staffordshire to the west. In the south it merges with Birmingham and Arden. 9% of the area is woodland, 45% is urban and 9% lies within Cannock Chase AONB. Part of the area lies within the Forest of Mercia (Community Forest) and the Black Country Urban Forest. To the north of Birmingham and west of West Bromwich there are many more areas of open land, primarily in agricultural use, but with a large historic park at Sutton Park and with fragments of heathland, such as Barr Beacon. There are medium-sized fields, generally with good quality hedgerows, patches of ancient enclosure fields and areas of semi-natural vegetation including acid grassland, pools, fens and fragments of ancient woodland. Narrow, hedged lanes are often present and there is a real feeling of countryside despite the nearness of the built-up area<sup>82</sup>."*

The change in landscape character is characterised in the CQC assessment as:

*"High rate of change to urban (JCA ranked 11th nationally); 46% of JCA is within greenbelt. Marked expansion of fringe into peri-urban around Cannock, Lichfield, Burntwood and Norton Canes. Also development of M6 Toll has had major impact. Character of the area continues to be transformed."*

Approximately 15% of Birmingham's land area is designated as Green Belt which lies within the Cannock Chase and Cank Wood JCA. This includes all the open countryside within the City's boundary, as well as other areas extending into the City, for example along river valleys. There are also areas of open space within the built-up areas of the City, such as parks and playing fields, nature reserves and allotments.

## Influence of the DM DPD on Cultural Heritage

Development Management policies potentially have a significant influence over cultural heritage assets, emphasising the importance of clear policy, application of suitable conditions and monitoring of impacts to mitigate potential negative impacts.

<sup>79</sup> <http://publications.naturalengland.org.uk/category/587130>

<sup>80</sup> <http://www.countryside.gov.uk/LAR/Landscape/CC/cqc.asp>

<sup>81</sup> Source: [http://www.naturalengland.org.uk/Images/jca097-arden\\_tcm2-21191\\_tcm6-5424.pdf](http://www.naturalengland.org.uk/Images/jca097-arden_tcm2-21191_tcm6-5424.pdf)

<sup>82</sup> Source: <http://www.farmsteadstoolkit.co.uk/downloads/jca/JCA%2067.pdf>



## Appendix C

# Consultation Responses on the Scoping Report update (August 2018) and the Council's Response

Ref	Consultee	Consultee Response Summary	Response/ Action
1	Natural England	<p><b>General Comments</b></p> <p>We understand that due to the delayed adoption of the Birmingham Development Plan (adopted January 2017), work on this DPD has been put on hold and re-started this year. We also understand that Natural England provided comments on the 2014 SA Scoping Report in correspondence to you dated 22 January 2015.</p> <p>Specifically, we support and welcome the updating of this report in respect of the main changes (as acknowledged by your authority):</p> <ul style="list-style-type: none"> <li>- Updates to the evidence base (where required);</li> <li>- Updated DPD objectives (which are now the same as the BDP objectives); and</li> <li>- Updated review of policies and programmes.</li> </ul>	<p>Comments are noted. No action taken.</p> <p>Comments are noted. No action taken.</p>
	Natural England	<p><b>Scope of the Proposed Assessment</b></p> <p>We welcome the reference to the need for a Habitat Regulations Assessment and confirm that a HRA will be required to ascertain if any likely significant effects on any European site as a result of the Plan's implementation (either on its own or 'in combination' with other plans or projects) will occur and, if so, whether these effects will result in any adverse effects on the site's integrity.</p> <p>Where the possibility of significant effects cannot be excluded, a more detailed Appropriate Assessment (AA) is carried out to determine whether those effects would adversely affect the integrity of European sites.</p> <p>We welcome the comprehensive list of Plans, Programmes and Strategies relevant to the SA/SEA of the DM DPD at Table 3.1. Natural England has not reviewed the plans listed. However, we advise that the following types of plans relating to the natural environment should be considered where applicable to your plan area:</p> <ul style="list-style-type: none"> <li>• Green Infrastructure Strategies</li> <li>• Biodiversity Plans</li> <li>• Rights of Way Improvement Plans</li> <li>• Shoreline Management Plans</li> <li>• Coastal Access Plans</li> <li>• River Basin Management Plans</li> <li>• AONB and National Park Management Plans</li> <li>• Relevant Landscape Plans and Strategies.</li> </ul>	<p>Comments are noted. No action taken.</p> <p>Comments are noted. No action taken.</p> <p>Comments are noted. No action taken. The plans and programmes listed are considered to be comprehensive.</p>
	Natural England	<p><b>Main Issues Identified</b></p> <p>We welcome and generally agree with the key sustainability issues for Birmingham as detailed at Table 4.1.</p> <p><u>Proposed Objectives and Guide Questions</u></p> <p>NE notes that that only one guide question relates to biodiversity – i.e. 'Will development protect and where possible enhance the City's cultural and natural heritage?' – In this regard, we recommend the strengthening of the need for restoration or enhancement of biodiversity in line with National Planning Policy Framework.</p> <p><u>Table 6.3 – Compatibility between the Sustainability Objectives and the Draft DM DPD Objectives</u></p> <p>NE advises that effective and inventive application of Policy ENV4 ('To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage') can also lever in positive benefits towards 'education' and 'sustainable connectivity' Plan Objectives via adoption of a multi-functional green infrastructure</p>	<p>Comments are noted. No action taken.</p> <p>This comment has been actioned accordingly.</p> <p>Positive benefits on these objectives have now been noted via positive scores in this table.</p>

Ref	Consultee	Consultee Response Summary	Response/ Action
		approach.	
	Natural England	<p><b>Objectives Covering the Breadth of Issues Appropriate for Assessing the Effects</b></p> <p>Generally, yes. We welcome in particular the positive correlations made between effective green infrastructure and human health.</p> <p>Ecological connectivity: There is a risk that in some situations, development on land of limited biodiversity value in its own right can lead to the creation of islands of biodiversity, permanently severed from other areas. We thus suggest adding 'Ensure current ecological networks are not compromised, and future improvements in habitat connectivity are not prejudiced'.</p>	<p>Comments are noted. No action taken.</p> <p>Objective ENV4 amended to:  <i>"To encourage high quality development which protects and enhances Birmingham's cultural and natural heritage, including resilient ecological networks able to meet the demands of current and future pressures."</i></p>
2	Environment Agency	<p><b>Evidence Base</b></p> <p>The updated scoping report incorporates our previous comments from 2015. The most up to date evidence base should be used going forward for this assessment.</p> <p>The Birmingham Level 1 &amp; Level 2 SFRA's were completed in 2012 and these should be updated to take into account the most accurate flood risk information and the updated climate change allowances (published in February 2016).</p>	<p>Comments are noted. No action taken.</p> <p>Comments are noted. No action taken – the Council will consider updates to the SFRA's as part of the evidence base work in support of this DPD.</p>
	Environment Agency	<p><b>Aims and Objectives</b></p> <p>Section 1.3 'Aims and Objectives' does not include any reference to flood risk. The second to last bullet point states to 'enhance Birmingham's natural environment' but there should be a wording to ensure flood risk is not increased and reduced at every possibility.</p>	<p>For continuity, the Aims and Objectives are drawn from the Birmingham Plan. These will be reviewed as part of future plan review.</p>
	Environment Agency	<p><b>Flood Risk Baseline</b></p> <p>In this section 'Managing and Reducing Flood Risk', the figures used relate to 2012/13 and 2013/14. We consider this section should refer to the most up to date data available which is most likely to be more representative.</p> <p>We assume the 'Historic Flood Risk' section on page 41 includes all flooding events to have occurred in Birmingham? We consider this should be updated with the most recent flooding events as it currently it goes up September 2008 and there have been a number of flooding events since then.</p>	<p>More recent data has now been included in this section.</p> <p>Reference to more recent flooding events has been added in this section.</p>
	Environment Agency	<p><b>Groundwater and Contaminated Land</b></p> <p>From a Ground Water and Contaminated Land perspective there are no additional detailed comments to make on the updated Scoping Report. However we would re-iterate our comments made in 2014 regarding land contamination issues.</p> <p>Land contamination can be a significant source of water pollution in the environment. In the worst cases pollution plumes can extend many kilometres and can also cause pollution that impacts on boreholes used for Public Water Supply or impact the quality of ecology in linked surface waters.</p> <p>The plan should seek to protect water quality through the various regulatory and advisory mechanisms with respect to land contamination. The aim should strongly encourage voluntary remediation or remediation of land contamination through the planning regime.</p> <p>The plan should encourages the use of sustainable and effective remedial measures to prevent or address water pollution from sites affected by contamination and so provide a better environment and amenity value. This includes the sustainable recycling of water and soils where appropriate. However, these operations must not result in an unacceptable release to groundwater and must where necessary have appropriate permits and controls.</p>	<p>Comments are noted. No action taken.</p> <p>Comments are noted. No action taken.</p> <p>Comments are noted. No action taken.</p> <p>Comments are noted. No action taken.</p>

Ref	Consultee	Consultee Response Summary	Response/ Action
		<p>Sustainable remediation should seek to manage unacceptable risks to human health and the environment (including groundwater), while optimising the environmental, economic and social impacts. Sustainable remediation appraisal requires consideration of a wide range of environmental, social and economic factors, including, for example, climate change impacts such as greenhouse gas emission from the remedial works or the site itself, worker safety and cost.</p> <p>The concept that a site should be 'suitable for use' should underlie the approach to remediation of historic contamination. This means suitable for the environment as a whole, not just for use by people. Protecting surface water and groundwater may mean carrying out work over and above that required to make the land suitable for the proposed development and to protect human health.</p> <p>We would also strongly recommend that strategies promote risk based assessment methodology and good practice promoted through use of the framework, tools and supplementary guidance set out in Model procedures for the management of land contamination (Contaminated land report 11) (Environment Agency and Defra 2004).</p> <p>Management of Contaminated Land by application of the well-established principles and practices outlined above will help both the Local Authorities and the Environment Agency deliver its obligations to reduce diffuse urban pollution required by virtue of the Water Framework Directive.</p>	<p>Comments are noted. No action taken.</p> <p>Comments are noted. No action taken.</p> <p>Comments are noted. No action taken.</p> <p>Comments are noted. No action taken.</p>
3	Historic England	<p><b>Executive Summary</b></p> <p>In the Executive Summary can you please change reference from English Heritage to Historic England.</p>	This change has been actioned accordingly.
	Historic England	<p><b>Section 3 Plans and Programmes Review</b></p> <p>You may wish to add: The Government's Heritage Statement, 2017. <a href="https://www.gov.uk/government/publications/the-heritage-statement-2017">https://www.gov.uk/government/publications/the-heritage-statement-2017</a></p> <p>Protecting the past – informing the present. Birmingham's' Heritage Strategy 2014-2019 <a href="https://www.birmingham.gov.uk/downloads/file/2008/exam_30_birmingham_heritage_strategy_2014-2019">https://www.birmingham.gov.uk/downloads/file/2008/exam_30_birmingham_heritage_strategy_2014-2019</a></p>	These have been added to the plans and programmes review accordingly.
	Historic England	<p><b>Section 4 Key Sustainability Issues</b></p> <p>At present the Report sets out what the City's designated heritage assets area with a brief commentary but doesn't really set out the challenges and opportunities (the issues) facing Birmingham's historic environment such as the condition of its designated and non-designated heritage assets; the continuing programme of townscape and public realm improvements; the pressure on its skyline and its cultural identity and distinctiveness. Where do the risks lie? Birmingham's Heritage strategy (see above) may be a useful source.</p>	The historic environment section of the baseline has been updated accordingly.





## Appendix D

# Consultation Responses on the Scoping Report (2014) and the Council's Response

### Consultee: English Heritage

"It appears an appropriately focussed proposal, proportionate and streamlined to the role of the Plan and as such I have no concerns. However, you may wish to apply the same or similar indicators as those that will monitor the HE policy in the B'ham Plan and in particular re the city's heritage assets formerly 'at risk'.

For information, EH has prepared specific guidance for the preparation of SA in relation to historic environment. It may be worth referring this to AMEC to consider and apply during work on the SA and the environmental report."

### Consultee: Environment Agency

Comment	Response
<p><u>Executive Summary</u></p> <p>We support the inclusion of environmental issues identified as Key Sustainability Issues for the city of Birmingham (pages vi-ix).</p>	Noted
<p>We note the issue of water resources is raised in Theme 1; Resource Use, however recommend that another key theme relating to water sustainability is the timely provision of foul drainage infrastructure to support the proposed level of growth. The city's transmission infrastructure is currently undersized to accommodate the increase in loading that will go hand in hand with the level of development proposed and the SA should ensure this is addressed through the DM DPD.</p>	Reference to foul drainage added to Theme 1
<p>We welcome the consideration of both climate change adaption and mitigation (Themes 2, 9 and 10). We question however whether Theme 10 should be relabeled as Flood Risk as this is the only issue identified in relation to the management of climate change. We question whether there are other climate change related issues that should be incorporated under this heading relating to health, wellbeing, biodiversity and infrastructure provision (see section 4.4.1: Climate Change page 23). The issue of flood risk could be separated out under its own heading as it is an issue in its own right as the issues are not wholly resulting from the impacts of climate change.</p>	<p>Flood risk separated out under Theme 10</p> <p>Links made to other climate change issues.</p>
<p>Theme 8: The efficient use of land should be linked with the issue of flood risk (theme 10) as the flood risk sequential test outlined within national policy steers development to areas at lowest risk of flooding. This can sometimes conflict with the preference for brownfield redevelopment sites. We support the reuse of brownfield land as this can enable the remediation of underlying ground contamination caused by previous land uses, improving ground water quality. This therefore links with Theme 16: water quality and vice versa.</p>	Link made
<p>Theme 16 refers to the chemical and biological quality of rivers and waterways, and observes that Birmingham suffers from low quality against these measures. Water quality in the city is largely influenced by the efficiency of the foul drainage infrastructure – this links to our comments in relation to Theme 1.</p>	Comment added
<p>We note that the 28 sustainability issues identified for this plan are to be addressed by 18 standard objectives which are taken from the Development Plan SA/SEA. It should be ensured that all issues raised within this report are reflected within the proposed objectives – it appears that Issue 1: Resources Uses (water) has not been included within the objectives. We recommend it is added in under ENV5 or ENV6.</p>	Added to ENV6

Comment	Response
We draw your attention towards Sustainability Objectives 16, 17 and 18 on Page x, which appear to be duplicates of Objectives 1, 2 and 3.	Corrected
<p><u>Plans, Programmes and Strategies</u></p> <p>Table 3.1 lists the <i>Severn Trent Water Resources Management Plan (2010)</i> under the Regional heading. This is updated every 5 years and as such this is not the current version. The SA should refer to the 2014 plan found at <a href="http://www.severntrent.com/future/plans-and-strategy/water-resources-management-plan">http://www.severntrent.com/future/plans-and-strategy/water-resources-management-plan</a> as referenced on page 15 of the report.</p>	Reference added
The SA should also consider the findings of the Environment Agency publication <i>Tame, Anker and Mease abstraction licensing strategy (February 2013)</i> which can be found at <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/291402/LIT_3306_bc78df.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/291402/LIT_3306_bc78df.pdf</a> . This relates the availability of water for ground and surface water for abstraction purposes. Information from this strategy should be summarised alongside other water resources issues on page 15.	Reference added
<p>The Environment Agency now has in draft the <i>Humber Flood Risk Management Plan</i> which sets out proposals for managing the risk of flooding at a catchment and river basin district scale. These proposals will help inform decisions about where investment and action are targeted in future to best protect people and places from the risk of flooding. For more information about this please see the link at the end of this letter that directs you towards this consultation document.</p> <p>Birmingham City Council also have a number of other water-based evidence documents that should be considered. These include:</p> <ul style="list-style-type: none"> <li>• <i>Surface Water Management Plan for Birmingham (2013 emerging draft)</i></li> <li>• <i>Local Flood Risk Management Strategy for Birmingham (2014 outline version). Preliminary Flood Risk Assessment (2011)</i></li> </ul>	References added
<p><u>Appendix A</u> reviews the relevant plans and programmes in more detail. Under the Objectives and Targets identified for the Water Framework Directive (WFD) (page A1) it states that all waterbodies are to reach 'Good Ecological Status' by 2015. This is currently correct, however this will change when the next round of River Basin Management Plan (RBMP) is published in December 2015, therefore this will need to be kept up to date. The next statement: 'Exactly what constitutes 'Good Ecological Status' has not yet been defined.' is incorrect. The following definition is taken from the Humber RBMP (relevant to Birmingham) and should be reflected within the SA:</p> <p><i>Good ecological status applies to natural water bodies, and is defined as a slight variation from undisturbed natural conditions.</i></p> <p><i>Some water bodies are designated as 'artificial' or 'heavily modified'. This is because they may have been created or modified for a particular use such as water supply, flood protection, navigation or urban infrastructure. By definition, artificial and heavily modified water bodies are not able to achieve natural conditions. Instead the classification and objectives for these water bodies, and the biology they represent, are measured against 'ecological potential' rather than status. For an artificial or heavily modified water body to achieve good ecological potential, its chemistry must be good. In addition, any modifications to the structural or physical nature of the water body that harm biology must only be those essential for its valid use. All other such modifications must have been altered or managed to reduce or remove their adverse impact, so that there is the potential for biology to be as close as possible to that of a similar natural water body.</i></p>	Noted
The objectives of the Trent Catchment Flood Management Plan (CFMP) are very broad and high level and should be summarised in terms relevant to the local distinctiveness of Birmingham as a city. The CFMP considers Birmingham alongside the Black Country, and forms Policy Unit 10. Based on the level of proposed growth, and flooding characteristics of the area, Policy Option 5 has been applied which identifies that Birmingham is to "take further action to reduce flood risk". This very specific aim should be reflected within the SA's issues and objectives, particularly ENV5 i.e. the policies should ensure they do not just	ENV5 amended

Comment	Response
'manage' flood risk but 'reduce' flood risk.	
The Humber RBMP (local delivery vehicle for WFD), although listed in Table 3.1 under the Regional subgroup does not appear to be included in Appendix A. This should be rectified with locally-specific objectives summarised and reflected within the SA. Consideration should also be given to the draft plan currently out for consultation.	Amended
We recommend that Birmingham City Council undertake a Water Cycle Study to pull together all the available information on water resource availability and water quality to inform detailed development management policies on development requirements and their impact on the water environment. This should be undertaken in liaison with Severn Trent Water and the Environment Agency with a focus on how development within the city will support objectives set out within the Humber River Basin Management Plan (already referenced within the report).	Noted
<p><u>Key Sustainability Issues for Birmingham</u></p> <p>Section 4.4.2 refers to information on planning application consultations and overrulings on flood risk issues from 2011/12. Information is currently available for 2013-14 which is likely to be more representative than the information currently included in this report. Environment Agency records show we responded to 64 consultations in 2013-14, which comprised as follows:</p> <ul style="list-style-type: none"> <li>• Full 35</li> <li>• Outline 8</li> <li>• Change of Use 5</li> <li>• Conditions 11</li> <li>• Reserved Matters 2</li> <li>• Variations 3</li> </ul> <p>Please find attached a dataset for this period detailing applications which we objected to on flood risk grounds. This information should be correlated with Birmingham's records of decisions made to ascertain if there were any overrulings during the period (we are not notified of all planning decisions). This may already be undertaken as part of the annual monitoring process.</p>	Equivalent 2013-14 data not yet available for Birmingham
Section 4.7.1 provides background information to the current state of water and air quality within the city. The Humber RBMP indicates that there are twenty-three surface water bodies which fall within or cross the Birmingham boundary comprising of two lakes, eight canals and thirteen rivers. In the baseline year of 2009 only three out of these twenty-three water bodies achieved the required 'Good Ecological Status' or 'Good Ecological Potential'. We draw your attention towards the WFD Evidence Pack provided by the Environment Agency to support the development of your Development Plan. The Humber RBMP is currently being revised with the new version being published in December 2015. The draft 2015 RBMP is now available as part of the formal consultation process, and any changes to the current plan should be considered within this report. The consultation on the 2015 plan is open until the end of March 2015 (please see details at end of letter).	Noted
The increased volume of waste water and sewage effluent produced by the proposed additional 50,000 dwellings will need to be treated to a high enough standard to ensure that there is no detriment in the quality of the watercourses receiving this discharge. Information currently available indicates that Minworth sewage treatment works should have the capacity to manage this additional capacity however given the dispersed nature of the proposed development, it is likely that there will be a requirement for widespread upgrading of the sewerage pipe network throughout the City. Section 4.7.4 should therefore include a reference to the required upgrading of foul drainage pipework and transmission infrastructure. Cumulative impact is key to this, making it hard to assess which sites and when will trigger the current drainage system to become overloaded and for water quality to become detrimentally impacted by development. It is likely therefore that a blanket policy is required to cover all developments and ensure the sewerage system has adequate capacity to manage any additional flows.	Text updated
<u>Sustainability Objectives and the SA Framework</u>	ENV5 amended

Comment	Response
Table 6.2 shows the proposed objectives, guide questions and indicators. As discussed above, in line with the emerging Birmingham Development Plan and the CFMP evidence base, ENV5 should be amended to reflect the need to REDUCE flood risk not just manage it. A guide question should be added to table 6.2 to ask 'Will development help reduce flood risk?'	
We support the inclusion of ENV6 which aims to reduce pollution and ENV1 which will encourage the remediation of brownfield contaminated land. These objectives should help ensure the DM DPD is in line with Humber RBMP's requirements in improving the water quality of the city's rivers, canals and groundwater. The Environment Agency can provide information on water quality objections to planning applications which could be used as a potential indicator to ENV6 (as per flood risk in ENV5).	Noted
<u>Development of Environment Agency publications as part of the evidence base</u> Environment Agency strategies including the draft River Basin Management Plans (RBMPs) and draft Flood Risk Management Plans (FRMPs) are undergoing public consultation at present. The updated plans are due to be published in December 2015 and they will guide us in directing considerable investment and action from 2016 to 2021 and beyond, which will provide benefits to society and the environment. The catchment of interest to Birmingham city is the Humber.	Noted

### Consultee: Natural England

Comment	Response
<b>Question 1 - Scope of the proposed SA</b> Natural England is generally supportive of the scope of the proposed SA.  We are also supportive of the series of objectives provided at 1.3 to confirm and clarify the Development Management DPD. We particularly welcome the recognised need for development to make a positive contribution to (1) ...health and well being, and (2) environmental considerations.	Noted
We support the proposed SEA Topic Areas as proposed at Table 4.1.	Noted
Paragraph 2.2.1 Habitat Regulation's Assessment (HRA) – we recognise the acknowledgement that a HRA will be required and concur with the need for this.	Noted
<b>Question 2 - Do we agree with the main issues identified?</b> We generally agree with the 28 sustainability themes (and related issues) identified as being particularly important affecting the city (page vi and Table 4.15). Specific comments in relation to the 28 Sustainability Themes (ST) and the related issues are provided below:	Noted
- We would argue that ST6 'Reducing the need to Travel' may be provided for via the provision of new / enhanced footways / cycleways and, by this, this ST may also potentially related to the improvement of health and well-being.	Reference included
- Natural England would also like to see a mention of the benefits of multi-functional green infrastructure (GI) (and blue infrastructure) as a potential consideration in the efficient use of land (ST8).	Reference included
- ST9 and ST10 (Reducing and Managing Climate Change) - relate to the important need for the city to tackle climate change. There are many ways that the natural landscape and GI can be utilised for this purpose.	Reference included
- ST13 (Natural Landscape) – Natural England understands that a large proportion of the open land and green belt land discussed here is being considered for development via the Birmingham Plan. The SA / DM DPD, therefore, surely needs to recognise this here in order to be able to provide a truly reflective account. In this way, should Figure 4.9, Table 4.5 and the statistics provided within paragraph 4.8.2 (Natural Landscape) also be	BDP not yet approved

Comment	Response
updated to reflect the reduction in green belt and public open space area's proposed?	
- ST14 (Biodiversity and Geodiversity) – Incorrect reference to Biodiversity Enhancement Areas (BEAs). This work / project has now ceased. Reference here should instead be made to The Cannock Chase to Sutton Park Project. Reference should also be made here to the Nature Improvement Area (NIA) designation. (see notes re: NIA below).	BEA reference removed NIA reference included
- ST25 (Health) – we support the reference to natural landscape and recreation.	Noted
ST28 (Culture/Sport/Recreation) – we support the reference to health and natural landscape.	Noted
Section 4: Key Sustainability Issues for Birmingham <i>Managing and Adapting to Climate Change</i>  - Paragraph 4.4.2 – Natural England welcomes the reference made here in respect of the value of GI to helping to mitigate and adapt to climate change. We also recommend a reference to the value of blue infrastructure (e.g. rivers, canals, SuDS) for this purpose.	Reference included
- Paragraph 4.4.4 (Influence of DM DPD on Managing Climate Change) – potential inclusion of need for maximisation of GI as part of development proposals, as appropriate, to help mitigate and adapt to climate change.	Reference included
<i>Biodiversity and Geodiversity</i>  - Section 4.5–acknowledge the importance of urban ecological sites and corridors as stepping stones for habitats/species and, in accordance with paragraph 109 of the NPPF, also acknowledge the need to establish improved coherent ecological networks that are more resilient to current and future pressures. We would also recommend inclusion of reference to multi-functional GI (and blue infrastructure) for this purpose.	Reference included
- Acknowledge also the need for the council to ensure net gains are made (to conserve and enhance biodiversity) where possible, from development proposals by applying the 'avoid, then mitigate and, (as a last resort) compensate for adverse impacts on biodiversity' principle (NPPF para 118). By this, when determining planning applications opportunities to incorporate biodiversity in and around developments should also be encouraged.	Reference included
- Also, given the need to minimise impacts on biodiversity and geodiversity, the SA must ensure the DM DPD policies promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets (NPPF 117).	Reference included
- Page 34 – we support the reference made to the work of the West Midlands Biodiversity Partnership (WMBP) and in particular, The Cannock Chase to Sutton Park Project. References made to the 'BEA', however, are incorrect as this designation / project has now ceased.	BEA reference removed
- Page 34 - This section should also acknowledge the Nature Improvement Area (NIA) designation. NIAs are fundamental to the step-change needed to establish a coherent and resilient ecological network. Where NIAs are in place (in accordance with para's 117 and 157 of the NPPF), Natural England wishes to see Local Plans: identify them on proposals maps; and include policies to ensure that any development affect them is compatible with their purpose and makes a positive contribute to their enhancement (using CIL/S106 agreements/conditions as appropriate).	Reference included
- Page 34 (GI) – neglects to include a reference to climate change mitigation and adaptation benefits.	Reference included
- Page 38 (Geodiversity) – we support the inclusion of geodiversity within the SA. However, we recommend the SA makes an explicit reference to geological conservation and the need to conserve, interpret and manage geological sites and features in the wider environment not just in relation to designated sites	Reference made
- Paragraph 4.5.2 (Biodiversity and Geodiversity) – comments supported.	Noted
<i>Population and Human Health</i>	Reference

Comment	Response
- Paragraph 4.6.11 – Recommend inclusion of reference to GI benefits upon human health and well-being.	included
Section 5: Issues and Problems Relevant to the DM DPD	Noted
- Table 5.1 – Generally support.	
- We particularly welcome the reference to the need for continued monitoring of developments on periphery of designated sites to determine potential indirect and cumulative impacts. We would, also, recommend the inclusion of a reference to the need for monitoring of effects upon designated sites which may result from other environmental pathways outside those developments on the immediate periphery.	Noted and reference included
- We also welcome the reference to the importance of greenspace and reductions in motor transport that can have positive impacts upon populations and health.	Noted
- Climate Change – include reference to GI and its benefits.	Reference included
<b>Question 3: Do the objectives cover the breadth of issues appropriate for assessing the effects?</b>	Noted
Generally, yes. Ensure incorporation of the above.	

# Appendix E

## Regulation 18 Consultation Responses

### Purpose and Aims of the DPD

6 respondents all supported the purpose and aims of the DPD.

### The Objectives

7 respondents supported the Objectives, with one suggesting an additional objective “Ensure that development responds to local character and history”. This was not taken forward as it is already met by the BDP Objective “To protect and enhance the City’s heritage and historic environments” and Policy TP12.

### Policy List

2 respondents – no comment/support.

### Policies DM01/05/08/09/10/16/19/20/22/24

No substantive comments.

### Policy DM02

2 respondents. One requested that reference be made to the need to design out crime etc. This is referred to in what is now Policy DM24 – Design.

### Policy DM03

3 respondents. Main issues raised were that

- reference be made to the need to design out crime etc.
- that the policy should be sufficiently flexible to ensure that high quality niche offerings are not unduly restricted by broad blanket policies, and
- effect on existing residential or business buildings.

These have been addressed in Policy DM03 and in what is now Policy DM24 – Design.

### Policy DM04

Highways England is supportive of the principle of the introduction of an Air Quality policy.

### Policy DM06

3 respondents, all supportive, 2 of which offered advice which has been taken into account in the policy.

### Policy DM07

The Environment Agency welcomed the inclusion of this policy and offered advice which has been taken into account in the policy.



**Policy DM11**

2 respondents, both supportive. One suggested that the policy should be sufficiently flexible to ensure that high quality niche offerings are not unduly restricted by broad blanket policies. This has been taken into account in the policy.

**Policy DM12**

4 respondents, all supportive. One requested that reference be made to the need to design out crime etc., and one registered support requesting the introduction of an Article 4 Direction removing permitted development rights for the change of use to a House in Multiple Occupation (HMO) (Class 4) from a dwelling (Class 3) in parts of Ladywood Ward.

Policies DM12/13 have been drafted to address HMOs. The need to design out crime etc. is referred to in what is now Policy DM24 – Design. An Article 4 Direction area is made under different legislation to the DM DPD, and must be a separate process. However, the request is noted.

**Policy DM13**

4 responses similar to DM12 above. The recent use of Article 4 Directions within Selly Park and surrounding areas is welcomed, albeit with concern about the exclusion of Bournbrook. The wider application of this to surrounding areas would be encouraged.

Bournbrook was excluded from the Article 4 Direction area, as it would be ineffective due to the already high concentration of HMOs.

**Policy DM14**

2 respondents, both supportive. One noting that proposals should take into account standards of residential amenity, not have an adverse impact on the character of an area, and accommodate parking on site. These considerations have been taken into account in this policy, and new policies DM25 and DM26.

**Policy DM15**

One request that reference be made to the need to design out crime etc., and one registered support requesting the introduction of an Article 4 Direction removing permitted development rights for the change of use to a House in Multiple Occupation (HMO) (Class 4) from a dwelling (Class 3) in parts of Ladywood Ward.

See DM12 above.

**Policy DM17**

3 respondents, all supportive.

**Policy DM18**

2 responses. The Mobile Operators Association (MOA) suggested a complete policy. Draft Policy DM18 uses different wording which achieves the same aims.

**Policy DM21**

7 respondents, generally supportive and offering constructive comment, particularly in relation to highway considerations. The comments have been taken into account in the policy.

### Policy DM23

6 responses. Main issues raised were:

- The Environment Agency recommend that the policy includes consideration of how developments will interact with rivers and streams that flow through their boundaries, and should be drafted in consultation with the Lead Local Flood Authority.
- It should provide detailed design guidance for shop fronts.
- The PCCWM welcome the reference that there is a need to consider crime and disorder, and would encourage reference being made to the requirement for proposals to meet 'Secured by Design' principles when considering specific design elements such as shop fronts, housing, tall buildings, hard and soft landscaping etc. Also request that reference be made to the need to design out crime, and to introduce, where appropriate, additional measures and infrastructure – such as CCTV and/or lighting.
- Shop fronts will be of particular interest to Calthorpe Estates given the proposals identified in the Edgbaston Planning Framework. The unique nature of the historic buildings within the heart of the estate requires policies to be sufficiently flexible to respond to the special needs of operations recognised as being at the forefront of UK retailing.

The comments have been taken into account in the policy.

### Enforcement

2 respondents, both supportive.

### Policy List

3 respondents, generally supportive. Main issues raised were:

- Council for British Archaeology, West Midlands welcomes the retention of the Archaeology Strategy SPG and the Regeneration through Conservation SPG, and expects the Archaeology Strategy SPG, like the Regeneration through Conservation SPG, to be absorbed within, and superseded by, the Historic Environment SPD when that is produced.
  - Both SPGs are due to be retained until a replacement Historic Environment SPD is produced.
- Moseley Regeneration Group expressed concern about the proposal to revoke the area of restraint for Moseley / Sparkbrook, but have not provided a more detailed response.
  - Draft Policies DM12-16 incorporate the elements of the various AOR policies. This approach will enable what is effectively old policy material of limited effect to be replaced by up-to-date policies in a statutory development plan.
- Primesight note that it is unclear why a different approach has been taken to that of the Large Format Banners SPD, which on the face of it performs a comparable role.
  - The Location of Advertisement Hoardings SPG is regarded as being out-of-date, as it does not address more recent developments such as digital media. Some of the content should be included in the DPD policy. The Large Format Banners SPD relates to adverts on buildings under construction or being redeveloped, and contains detailed criteria to address the issue of potential harm to visual amenity. It is considered to be relevant and up-to-date.

The recommendations and proposed Development Plan Policy outcomes in Appendix 1 of the Regulation 18 Consultation Document remain unchanged, except for the division of proposed Policy DM15 into two policies (DM15/16, and consequent renumbering of the remaining policies), and the addition of new Policy DM26.

### Alternative Options

19 responses. Main issues raised were:

- North Warwickshire Borough Council: Possible strategic issues relating to policies DM04/06/09/10/11/07 and Implementation arising from the cumulative impact of development to the east of Birmingham. This is the only response identifying any potential issues under the Duty to Co-operate - an ongoing dialogue will be required.
- Stafford Borough Council, The Coal Authority, Historic England, Lichfield District Council, Sandwell MBC, Natural England, Severn Trent Water, and Castle Bromwich Parish Council raise no comments or strategic issues.
- The Environment Agency recommend that consideration is given to an additional policy entitled 'Environmental Protection – Water' in order to build upon policies contained within draft BDP Policy TP6. BDP Policy TP6 (as modified) provides city-wide strategic policy on flood risk and the water environment, including foul drainage. Consequently, an additional policy as suggested is not considered necessary. However, Policy DM07 has been drafted to include the issue of foul drainage.
- Frankley Parish Council repeat their comments in response to the Birmingham Development Plan relating to the Green Belt in Birmingham and its neighbouring boundaries, that brownfield across Greater Birmingham and Solihull LEP and the Black Country Authorities should be utilised prior to Green Belt.
- Selly Park Property Owners' Association have become dismayed at the concentration of student development now taking place in Selly Oak and especially Bournbrook, and would welcome the opportunity to be invited to comment upon future draft policies and to become formally involved with any consultation processes should this be appropriate.
- Health & Safety Executive provided detailed technical advice in respect of hazardous substances and installations. Text has been included in the DPD to address this.
- Council for British Archaeology, West Midlands suggest that the Development Management DPD contains cross-references to BDP policies and a table, similar to Table 3 in the Appendix of the consultation document, which lists topics that are not included in the Development Management DPD because they are covered by BDP policies. BDP Examination Document EXAM2D is included as an Appendix 2 to the Evidence Base document, with appropriate reference in the DPD.
- Tyler Parkes on behalf of the Police and Crime Commissioner for West Midlands (PCCWM) submitted a lengthy response seeking
  - a) an additional policy for Listed Buildings and Conservation Areas seeking the use of alternative materials and/or artifacts which are less likely to be vulnerable to repeat theft.
  - b) An additional policy for maintenance following completion of development
  - c) An additional policy for ATMs

These have not been taken forward.

- Calthorpe Estates are fully supportive of encouraging well-designed and coordinated development, the DPD should ensure that there is sufficient flexibility within the policies to ensure that developers are not overly restricted in what they are able to do.
- Alvechurch Parish Council note that there is no transport policy to consider cross boundary transport integration. Cross boundary transport integration is a strategic planning consideration which is addressed in the BDP.
- BCC Transportation suggest the addition of a transport policy to address detailed considerations in respect of planning applications, planning conditions, car parks, the Parking Guidelines SPD and potential Travel Plans SPD. This has been taken up as new Policy DM26.



**wood.**

