



## **Local Plan Review Assessment Report**

**April 2021**

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## 1. Introduction

1.1 The current local plan for Birmingham comprises of a number of adopted Development Plan Documents prepared by Birmingham City Council as the local planning authority:

- The [Birmingham Development Plan](#) (BDP) adopted in January 2017 sets out the vision, spatial strategy and strategic policies for the development of Birmingham. The BDP contains strategic policies and site allocations which are used to shape development and determine planning applications. This is the lead local plan for Birmingham.
- The [Saved Policies of the Unitary Development Plan \(UDP\) 2005](#). The BDP (adopted January 2017) replaced the policies in the UDP 2005 with the exception of those policies contained within chapter 8 and paragraphs 3.14 to 3.14D of that plan which will continue in force until replaced by the [Development Management in Birmingham DPD](#).
- The [Bordesley Park Area Action Plan](#) adopted in January 2020 provides policies for the transformation and growth of parts of Washwood Heath, Bordesley Green, Bordesley Village and Small Heath to 2031. This AAP has been adopted since the publication of the previous LDS.
- The [Longbridge Area Action Plan](#) adopted in April 2009 provides specific detailed policies for the regeneration and redevelopment of the Longbridge area.
- The [Aston, Newtown and Lozells Area Action Plan](#) adopted in July 2012 provides detailed specific policies for the Aston, Newtown and Lozells areas of the City. Policy ED1 was replaced by the adoption of the BDP in January 2017.

1.2 The BDP is the lead local plan for the city and provides an overall vision and framework for the future development of the city over the plan period of 2011-2031. The BDP contains strategic policies and site allocations for achieving the sustainable growth needed. The strategy for accommodating growth continues to reflect the urban renaissance principles that have been at the heart of planning in Birmingham for many years.

1.3 The BDP sets out the overall levels of growth required in the city over the plan period:

- 51,100 additional homes (including the Langley Sustainable Urban Extension);
- Two Regional Investment Sites of 20 and 25 hectares and a 71 hectare employment site at Peddimore;
- A minimum 5 year reservoir of 96 ha of land for employment use
- About 350,000 sq m of comparison retail development
- A minimum of 745,000 sq m of office development

1.4 Growth is focussed on ten key growth areas which play an important role in providing homes, jobs and supporting facilities. The wider city will see levels of growth reflecting the historic patterns of development and availability of land. The distribution of other growth

opportunities is focussed on the city's extensive network of local centres, the Core Employment Areas, key transport corridors and other opportunity sites.

- 1.5 The BDP was prepared in accordance with relevant legislation was therefore found to be legally compliant. It was also deemed "sound" subject to a number of main modifications when assessed against national planning policy which was in force at the time of the examination (the 2012 National Planning Policy Framework). The Plan was shaped and prepared through consultation with a wide range of people and organisations; is supported by a comprehensive evidence base and was subject to a Sustainability Appraisal and a Strategic Environment Assessment.

## **2. Legislation, policy and guidance relating to plan reviews**

- 2.1 Local planning authorities are required to review local plans every five years, starting from the date of the adoption of the local plan. (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012).
- 2.2 The requirement to review local plans at least every 5 years is also taken reiterated in the 2019 National Planning Policy Framework (NPPF) in paragraphs 31 to 33. This advises that :
- The preparation and review of all policies should be underpinned by relevant and up-to-date evidence;
  - Policies in local plans should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary;
  - Reviews should be completed no later than five years from the adoption date of a plan and take into account changing circumstances affecting the area, or any relevant changes in national policy; and
  - Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future.
- 2.3 It is important to note that a *"plan does not become out-of-date automatically after 5 years"* and the distinction between a review and update. The review is an assessment of whether the plan needs updating. There are three potential outcomes of a review:
- It is decided that no changes are required to the plan and the Council publishes a statement to that effect setting out the reasons for the decision; or
  - It is decided that some changes are required, and work commences on a partial update to the plan; or
  - It is decided that more substantial changes are required, and work commences on a new plan/full update. A local authority can review a plan and determine that it does not need updating. They must publish the reasons for this decision.

### 3. The review method

- 3.1 There is no prescribed method for plan reviews, but the National Planning Practice Guidance (NPPG) provides guidance on the considerations to take into account. This can include information such as (but not exclusively):
- conformity with national planning policy;
  - changes to local circumstances; such as a change in Local Housing Need;
  - Housing Delivery Test performance;
  - whether the authority can demonstrate a 5 year supply of deliverable sites for housing;
  - whether issues have arisen that may impact on the deliverability of key site allocations;
  - appeals performance;
  - success of policies against indicators in the Development Plan as set out in their Authority Monitoring Report;
  - the impact of changes to higher tier plans;
  - plan-making activity by other authorities, such as whether they have identified that they are unable to meet all their housing need;
  - significant economic changes that may impact on viability.; and
  - whether any new social, environmental or economic priorities may have arisen.
- 3.2 The above list of factors has been used as the basis of the review of the plan and each is considered in detail in Table 1 below. The Planning Advisory Service Local Plan Route Mapper and Toolkit – Review and updating local plan policies has been used to demonstrate that the review has been undertaken in robust and objective way.
- 3.3 In gathering evidence to inform a review, the NPPG states that *“Reviews should be proportionate to the issues in hand.”* Evidence from the Authority Monitoring Report, information on planning appeals, a review of relevant Council plans, policies and strategies, the Housing Delivery Test results and technical papers such as the 5-year housing land supply - have been used to inform the review.
- 3.4 The NPPG also advises have due regard to the duty to co-operate when undertaking a review. The Council wrote a letter to all the duty to co-operate bodies seeking views on the review and whether the plan should be updated, and if so, the scope of the update. A summary of the responses is provided in Table 2.

**Table 1: Local Plan Review Assessment**

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
<b>A</b>	<b>PLAN REVIEW FACTORS</b>		
<b>A1.</b>	<p><b>The plan policies still reflect current national planning policy requirements.</b></p> <p><b>PROMPT:</b></p> <p>As set out above in the introductory text, in providing your answer to this statement consider if the policies in your plan still meet the ‘content’ requirements of the current NPPF (completing Part 2 of the toolkit will help you determine the extent to which the policies in your plan accord with relevant key requirements in national policy).</p>	Partly agree	<p><b>Reason (with reference to plan policies, sections and relevant evidence):</b></p> <p>The current development plan documents are broadly in conformity with the National Planning Policy Framework (NPPF), however it is recognised that as the documents were adopted prior to the updated framework, which was published in February 2019, certain aspect of the local plan do not fully reflect the current NPPF. See completed Toolkit Part 2: Local Plan Form and Content Checklist.</p>
<b>A2.</b>	<p><b>There has not been a <u>significant</u> change in local housing need numbers from that specified in your plan (accepting there will be some degree of flux).</b></p> <p><b>PROMPT:</b></p> <p>Look at whether your local housing need figure, using the standard methodology as a starting point, has gone up significantly (with the measure of significance based on a comparison with the housing requirement set out in your adopted local plan).</p> <p>Consider whether your local housing need figure has gone down significantly (with the measure of significance based on a comparison with the housing requirement set out in your adopted local plan). You will need to consider if there is robust evidence to</p>	Disagree	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <p>The Council adopted the BDP on 10 January 2017, prior to the introduction of the standard methodology for calculating Housing Need</p> <p>The Government has recently updated the standard methodology (December 2020) which applies a 35% uplift to the top 20 largest UK cities. This will increase Birmingham’s housing number considerably when compared to the BDP housing requirement.</p> <p>The National Planning Practice Guidance (NPPG) states that “This increase in the number of homes to be delivered in urban areas is expected to be met by the cities and urban centres themselves, rather</p>

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	demonstrate that your current housing requirement is deliverable in terms of market capacity or if it supports, for example, growth strategies such as Housing Deals, new strategic infrastructure investment or formal agreements to meet unmet need from neighbouring authority areas.		<p>than the surrounding areas, unless it would conflict with national policy and legal obligations.”</p> <p>The uplift will significantly increase the minimum local housing need number generated by the standard method against Birmingham’s objectively assessed housing need. Furthermore, when the BDP becomes more than 5 years old the cap is removed and the minimum local housing need number (with the 35% uplift) will be significantly higher than the objectively assessed need.</p> <ul style="list-style-type: none"> <li>• 4,450 Objectively Assessed Housing Need (2013)</li> <li>• 2,555 adopted BDP housing requirement (PG1) (2017)</li> <li>• 3,577 capped standard method (April 2021)</li> <li>• 4,829 capped with 35% uplift (June 2021)</li> <li>• 6,750 uncapped with 35% uplift (Jan 2022)</li> </ul> <p>Due to the increase in the number of dwellings identified in the Council’s SHLAA (the 2018 SHLAA was tested at a Section 78 appeal), there is flexibility in the current supply to meet some of the difference between the adopted BDP requirement and the capped minimum local housing need number (3,577dpa). However, given the significantly increased requirement stipulated as a result of the 35% uplift, there will be a significant gap between the current identified supply and the local housing need number, with the gap further increased when the plan becomes 5 years old and the capping is removed.</p> <p>The content of the Planning White Paper provides further uncertainty around how housing numbers will be calculated, and the City Council</p>

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			will continue to monitor the changes as they emerge and respond to them by factoring them into plan-making.
A3.	<p><b>You have a 5-year supply of housing land</b></p> <p><b>PROMPT:</b></p> <p>Review your 5-year housing land supply in accordance with national guidance including planning practice guidance and the Housing Delivery Test measurement rule book</p>	Agree	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <p>At April 2020 the Council had a 6.28 years housing land supply. This is derived from a 5-Year requirement of 14,963 dwellings (including a 5% buffer) and a supply of 18,801 dwellings.</p> <p>The new standard method for calculating housing need places a 35% uplift on the housing number of the top 20 largest English cities, increasing Birmingham's housing numbers considerably when compared to the BDP housing requirement. In accordance with paragraph 73 of the NPPF, the BDP figure remains as the city's housing requirement until the BDP is 5 years old in January 2022, after which point the local housing need, calculated using the standard method, will be used to determine the housing requirement.</p>
A4.	<p><b>You are meeting housing delivery targets</b></p> <p><b>PROMPT:</b></p> <p>Use the results of your most recent Housing Delivery Test, and if possible, try and forecast the outcome of future Housing Delivery Test findings. Consider whether these have/are likely to trigger the requirement for the development of an action plan or trigger the presumption in favour of sustainable development. Consider the reasons for this and whether you need to review the site allocations that your plan is reliant upon. In doing so you need to make a judgement as to whether updating your local plan will support</p>	Agree	<p>The City has a housing requirement of 51,100 to be provided within Birmingham by 2031. The cumulative requirement for the period 2011/12 to 2019/20 was 19,800 dwellings. A total of 22,694 net new dwellings were completed in this period. The cumulative target to date has therefore been exceeded by 2,894 dwellings.</p> <p>The most recent Housing Delivery Test (HDT) results were published by the Government in January 2021. Birmingham achieved a good result of 152%. As such, only a 5% buffer has been applied when calculating the five-year supply requirement, to ensure flexibility and choice. However,</p>



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	delivery or whether there are other actions needed which are not dependent on changes to the local plan.		we are likely to fail the HDT when the minimum local housing need number applies in 2022/23.
A5.	<p><b>Your plan policies are on track to deliver other plan objectives including any (i) affordable housing targets; and (ii) commercial floorspace/jobs targets over the remaining plan period.</b></p> <p><b>PROMPT:</b></p> <p>Use (or update) your Authority Monitoring Report to assess delivery.</p>	Disagree	<p>i) Affordable housing</p> <p>As set out in the adopted Birmingham Development Plan (BDP), Birmingham's housing 'requirement' or 'target' is 51,100 new dwellings between 2011 to 2031. Of the 51,100 dwellings, 38% (19,400) need to be affordable.</p> <p>From the start of the plan period April 2011/12 to April 2019/20, a total of 4,090 affordable dwellings have been completed. This means that only 54% of the affordable housing target has been met with an under-delivery of 3,434 dwellings. Expressed as a proportion of the total dwellings completed, affordable dwellings comprised 18% of new housing completions between 2011/12 – 2019/20.</p> <p>In the same period the total value of Section 106 clauses containing an affordable housing commuted sum received has been £11,163,561.</p> <p>ii) Employment/ commercial floorspace</p> <p>The BDP sets a requirement for a minimum 5 year reservoir of 96 hectares of B class employment land, about 350,000 sq.m gross comparison retail floorspace by 2026 and a minimum of 745,000 sq.m gross office floorspace between 2013 and 2031.</p> <p>Of the 350,000 sq.m gross comparison retail floorspace, 160,000 is to be delivered in the City Centre, 30,000 in Sutton Coldfield, 20,000 in Perry Barr, 15,000 in Meadway and 25,000 in Selly Oak. The remainder</p>

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			<p>is to be met in smaller centres or in other locations where a sequential justification exists.</p> <p>The vast majority (700,000 sq.m) of the office floorspace is to be met within the City Centre, with a further 20,000 in Sutton Coldfield, 10,000 in Perry Barr, 5,000 in Meadway and 10,000 in Selly Oak.</p> <p>The readily available supply of employment land has fluctuated in recent years, but it has been progressively increasing and now exceeds the 96ha five year reservoir requirement by almost 15ha. Supply is particularly good for Best Quality (+11ha) and Good Quality (+6.46ha) sites but falls short for Other Quality employment land (-2.55ha). The supply of employment land is expected to be hit hard in the next monitoring year due to the government's reclassification of B1 uses to the new E Use Class.</p> <p>At a city-wide level, 52,743 sq.m of comparison retail floorspace has been completed so far and there are 206,832 sq.m in the pipeline, leading to a shortfall of just over 90,000 sq.m. None of the named centres above have yet exceeded their plan target, although Selly Oak is just 906 sq.m short. 48,874 sq.m have been delivered in the City Centre, with a further 32,908 sq.m committed in the pipeline, leaving 78,218 sq.m to be delivered by 2026. The Plan target is therefore very close to being met.</p> <p>For office floorspace, 148,580 sq.m have been delivered so far and there are a further 612,436 in the pipeline, so there is still potential for the plan target to be met. 121,886 sq.m of the office completions have been in the City Centre and there are a further 308,298 sq.m in the committed supply here, leaving 269,816 still to be met. All of the other</p>

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			centres are also still to identify sufficient capacity to meet their plan targets, with the Meadway and Sutton Coldfield having the most significant shortfalls (0 sq.m delivered or committed in Meadway. 114 sq.m completed so far in Sutton Coldfield with the rest of the requirement still to be identified).
A6.	<p><b>There have been no significant changes in economic conditions which could challenge the delivery of the Plan, including the policy requirements within it.</b></p> <p><b>PROMPT:</b></p> <p>A key employer has shut down or relocated out of the area.</p> <p>Up-to-date evidence suggests that jobs growth is likely to be significantly more or less than is currently being planned for.</p> <p>Consider if there is any evidence suggesting that large employment allocations will no longer be required or are no longer likely to be delivered.</p> <p>You will need to consider whether such events impact on assumptions in your adopted local plan which have led to a higher housing requirement than your local housing need assessment indicates.</p> <p>Consider what the consequences could be for your local plan objectives such as the balance of in and out commuting and the resultant impact on proposed transport infrastructure provision</p>	Disagree	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <p>Due to the impact of the Covid-19 pandemic, GDP in the UK, the broadest measure of economic prosperity, fell by 8.9% in the 12 months to November 2020. The decline has been widespread, with a dramatic plunge in output across the services, production and construction industries. The pandemic has taken GDP back to the equivalent position in June 2003.</p> <p>The shockwave triggered by the economic collapse brought about by the pandemic is continuing to be felt, as unemployment begins to rise while businesses across the country struggle to stay afloat. Britain's jobless rate is expected to more than double to the highest level since the 1980s before Christmas 2020.</p> <p>Sectors of the economy more reliant on social interaction – such as hospitality and leisure – have suffered a steeper decline in activity than industries where homeworking and internet sales were able to increase in response. Food and drink sector activities fell by 84.7% as a result of</p>

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	(both capacity and viability), air quality or climate change considerations.		<p>the closure of bars and restaurants in the second quarter, while car sales and retail activity plunged by 63%.</p> <p>The second wave in infections which developed during the last quarter of 2020 and into 2021 has meant further lockdowns and greater restrictions imposed. Although the UK has reached a Brexit deal with the European Union, there still remains uncertainty about its impact and, coupled with continued Covid restrictions, mean that a sustained economic recovery is by no means assured. This may have a subsequent impact on the mortgage market but also the capacity of the development industry to build new homes. Savills research predicts that 171,000 new homes will have been built in 2020 – 68 per cent fewer than the levels seen in 2019.</p> <p>In terms of house prices, the message is more mixed. Some predict a bounce back whilst others expect greater downward pressure on prices in the medium-term. The extent of any impact will be dependent upon the success of Government support measures and the speed at which the UK economy can recover, and consumer confidence can improve.</p> <p>The consequences of the above on local plan objectives are currently unclear. The deliverability of the retail and office floorspace targets set out in the BDP is likely to be affected by the current economic climate as well as likely longer-term changes to working and shopping practices which have been accelerated by the Covid pandemic. As well as this, recent changes to the Use Classes Order mean that the approach to offices and retail development needs to be significantly updated.</p>

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A7.	<p><b>There have been no significant changes affecting viability of planned development.</b></p> <p><b>PROMPT:</b></p> <p>You may wish to look at the Building Cost Information Service (BCIS) All-in Tender Price Index, used for the indexation of Community Infrastructure Levy (CIL), or other relevant indices to get a sense of market changes.</p> <p>Consider evidence from recent planning decisions and appeal decisions to determine whether planning policy requirements, including affordable housing, are generally deliverable.</p> <p>Ongoing consultation and engagement with the development industry may highlight any significant challenges to delivery arising from changes in the economic climate.</p>	Partly agree	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <p>The tender price index is updated annually as part of the CIL process and used as an opportunity to review our planning policies in light of build costs. As S106 agreements are individually negotiated, policy specific requirements may be altered to reflect changes to build costs.</p> <p>A Financial Viability Assessment (FVA) was prepared by BNP Paribas (November 2019) in line with the NPPF. The FVA assessed the requirements set out in the publication version of the 'Development Management in Birmingham: Development Plan Document (October 2019) alongside the policy requirements in the adopted Birmingham Development Plan (January 2017). The study assessed at high level the viability of development typologies representing the types of sites that are expected to come forwards over the plan period and tested the cumulative impact of policy requirements envisaged for specific sites. At the time, the assessment showed that the policies in the DMB and BDP could be viably delivered. It is not yet apparent whether the Covid pandemic will have an impact on viability.</p>

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A8.	<p><b>Key site allocations are delivering, or on course to deliver, in accordance with the local plan policies meaning that the delivery of the spatial strategy is not at risk.</b></p> <p><b>PROMPT:</b></p> <p>Identify which sites are central to the delivery of your spatial strategy. Consider if there is evidence to suggest that lack of progress on these sites (individually or collectively) may prejudice the delivery of housing numbers, key infrastructure or other spatial priorities. Sites may be deemed to be key by virtue of their scale, location or type.</p>	Partly agree	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <p>The housing, retail, office, and employment targets for each of the BDP growth areas are monitored through the AMR. The majority of the growth areas appear to be on track to deliver against their targets. Some, however, have been slow to get started. These include:</p> <p>GA5 Langley Sustainable Urban Extension - the reasons for this are known and the Council is working with the Langley Consortium to progress the site. The delay has not prejudiced the Council's housing delivery performance in the city as evidenced by the result of the HDT. An outline application is expected to be submitted imminently.</p> <p>GA4 Sutton Coldfield Town Centre Growth Area – the BDP allocates 30,000m2 retail and 20,000m2 office in the town centre but only 114m2 of office development has been delivered to date. The centre has suffered from changing consumer habits, and the closures of Marks and Spencer and BHS. A Town Centre Regeneration Partnership was formed 2 years ago and, with funding from GBSLEP, a Town Centre Masterplan has been prepared which was launched in December 2020 for consultation which will replace the existing Sutton Coldfield Regeneration Framework SPD once adopted.</p> <p>GA8 Eastern Triangle Growth Area – the BDP allocates 15,000m2 retail, 5,000m2 office and 1,000 new homes. The housing target is expected to be reached but only 599m2 retail floorspace has been completed and zero completions have been achieved against the office target.</p>

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			GA10 Longbridge Growth Area - the BDP and the Longbridge AAP identifies a 25 hectare Regional Investment Site on part of the former MG Rover Works. This incorporates a Technology Park that has been designed specifically to attract a nucleus of high technology businesses to the Longbridge area. Although 15.5ha of the 25ha have now been developed, phase 1 of Longbridge RIS, known as Longbridge West has yet to come forward. To help bring the site forward, in October 2018, St Modwen secured planning approval for infrastructure works (roads and environmental works) to service the West Works site and create development-ready plots.

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A9.	<p><b>There have been no significant changes to the local environmental or heritage context which have implications for the local plan approach or policies.</b></p> <p><b>PROMPT:</b></p> <p>You may wish to review the indicators or monitoring associated with your Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) / Habitats Regulations Assessment (HRA).</p> <p>Identify if there been any changes in Flood Risk Zones, including as a result of assessing the effects of climate change.</p> <p>Consider whether there have been any changes in air quality which has resulted in the designation of an Air Quality Management Area(s) or which would could result in a likely significant effect on a European designated site which could impact on the ability to deliver housing or employment allocations.</p> <p>Consider whether there have been any changes to Zones of Influence / Impact Risk Zones for European sites and Sites of Special Scientific Interest or new issues in relation to, for example, water quality.</p> <p>Consider whether there have been any new environmental or heritage designations which could impact on the delivery of housing or employment / jobs requirements / targets.</p> <p>Consider any relevant concerns being raised by statutory consultees in your area in relation to the determination of individual planning</p>	Disagree	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <p>The Council declared a climate emergency in June 2019 and has committed to achieving carbon neutral status by 2030. A Route to Zero Task Force has been established and an action plan has been drafted, setting out a series of initiatives, projects and policy changes aimed at achieving zero carbon by various dates including the 2030 ambition. Recognising the continuing challenges of climate change and the importance of reducing carbon emissions, it is considered that planning policies could play a more important role in supporting the move towards net zero carbon.</p> <p>The 2015 National Air Quality plan identified Birmingham as one of five cities being non-compliant with legal NO2 limits beyond 2020 outside London. On 19th December 2017, the Government issued a Ministerial Direction requiring the Council to have a scheme to address air quality in place before the end of 2019. In response, the Council completed the business case for a Clean Air Zone (CAZ) resulting in the determination that a CAZ will be implemented in Birmingham.</p> <p>Whilst Covid-19 has forced delays to the implementation of the Clean Air Zone, the release of the Emergency Birmingham Transport Plan in May 2020 demonstrates the city's commitment to a low carbon, clean air recovery after the pandemic. The Clean Air Zone will now commence in 2021, with a new launch date set for June 2021.</p>



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	<p>applications or planning appeals which may impact upon your plan - either now or in the future.</p>		<p>A new Local Nature Reserve – Popes Lane (extension to Kings Norton LNR) was declared in April 2016, increasing the number of LNRs in the City to 12.</p> <p>A number of further buildings have been added to the statutory and local list.</p>

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A10.	<p><b>There are no new sites that have become available since the finalisation of the adopted local plan which require the spatial strategy to be re-evaluated.</b></p> <p><b>PROMPT:</b></p> <p>Consider if there have been any new sites that have become available, particularly those within public ownership which, if they were to come forward for development, could have an impact on the spatial strategy or could result in loss of employment and would have a significant effect on the quality of place if no new use were found for them.</p> <p>Consider whether any sites which have now become available within your area or neighbouring areas could contribute towards meeting any previously identified unmet needs.</p>	Requires further testing	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <p>The Big City Plan will be replaced by 'Our Future City Plan' (OFCP) and this may require the spatial strategy of the BDP, in particular GA1 City Centre Growth Area, to be re-evaluated. OFCP was launched in January 2021 and proposes a radical new approach for future development in the City Centre using the climate emergency as impetus, setting a new direction towards a green, zero-carbon and people-focussed approach to development as well as repurposing parts of the City Centre.</p> <p>Recent changes to the Use Classes Order and the extension of permitted development rights has undermined some existing BDP policies in relation to urban centres and the protection of (formerly B1 uses) industrial uses.</p>

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A11.	<p><b>Key planned infrastructure projects critical to plan delivery are on track and have not stalled / failed and there are no new major infrastructure programmes with implications for the growth / spatial strategy set out in the plan.</b></p> <p><b>PROMPT:</b></p> <p>You may wish to review your Infrastructure Delivery Plan / Infrastructure Funding Statement, along with any periodic updates, the Capital and Investment programmes of your authority or infrastructure delivery partners and any other tool used to monitor and prioritise the need and delivery of infrastructure to support development.</p> <p>Check if there have been any delays in the delivery of critical infrastructure as a result of other processes such as for the Compulsory Purchase of necessary land.</p> <p>Identify whether any funding announcements or decisions have been made which materially impact upon the delivery of key planned infrastructure, and if so, will this impact upon the delivery of the Local Plan.</p>	Partly agree	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <p>The BDP is a growth strategy focused on spatial Growth Areas where significant levels of development, particularly housing growth, will be directed up to 2031. Growth in employment, housing, retail and community uses will also take place outside of the Growth Areas, and the IDP identifies city-wide infrastructure projects that are necessary to support more small-scale growth and the cumulative impacts of development.</p> <p>The levels of growth set out in the BDP will place pressure on existing infrastructure, as well as generating the need for new infrastructure. The majority of the Growth Areas are within the existing built up area where there is already infrastructure in place to support communities and businesses. However, given the scale of development proposed, infrastructure will need to be enhanced to support development, particularly the highway and public transport network. Overall, it is considered that there are no major capacity issues.</p> <p>The BDP confirms Green Belt release to accommodate two Growth Areas; one area for housing and one for employment. These will be on greenfield sites adjacent to the existing urban area in Sutton Coldfield. Consequently, the infrastructure requirements for these areas are likely to be more significant, and the delivery of development is more dependent on the provision of infrastructure to be brought forward thereby making it a critical element in the delivery of these areas.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A12.	<p><b>All policies in the plan are achievable and effective including for the purpose of decision-making.</b></p> <p><b>PROMPT:</b></p> <p>Consider if these are strategic policies or those, such as Development Management policies, which do not necessarily go to the heart of delivering the Plan's strategy.</p> <p>Identify if there has been a significant increase in appeals that have been allowed and /or appeals related to a specific policy area that suggest a policy or policies should be reviewed.</p> <p>Consider whether there has been feedback from Development Management colleagues, members of the planning committee, or applicants that policies cannot be effectively applied and / or understood.</p>	Agree	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <p>The policies in the plan are considered to be achievable and effective. Viability evidence relevant to the BDP was tested through the BDP examination as set out in the Council's CIL Economic Viability Assessment [IMP4] and CIL Revised Viability Assessment [EXAM 27], supplemented by EXAM 148 and EXAM 160.</p> <p>The Development Management in Birmingham Document (DMB), once adopted, will replace the Development Control policies in the saved 2005 Unitary Development Plan. It will give effect to, and support, the strategic policies set out in the Birmingham Development Plan (BDP) adopted in January 2017.</p> <p>The DMB contains 16 policies arranged under themes which mirror the BDP. Each policy is considered to be consistent with national guidance and supports a strategic BDP policy.</p> <p>The DMB was submitted to the Secretary of State in July 2020 for independent examination by the Planning Inspectorate. Examination hearings took place in November 2020 and the Inspector has issued Main Modifications to the DMB which are currently being consulted on. A total of 12 modifications are proposed, none of which alter the main thrust of the policies. The Main Modifications will be subject to consultation from 24 Mar – 5 May 2021. Following the consideration of any representations to the modifications, the Inspector will issue a final report. It is anticipated that the Council will be in a position to adopt the DMB before the end of the year.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
			<p>The polices in the emerging DMB have been subject to a Financial Viability Assessment, which tests the viability of delivering the polices alongside the BDP policy requirements. The study assessed at high level the viability of development typologies representing the types of sites that are expected to come forwards over the plan period and tested the cumulative impact of policy requirements envisaged for specific sites. At the time, the assessment showed that the policies in the DMB and BDP could be viably delivered. It is not yet apparent whether the Covid pandemic will have an impact on viability.</p> <p>Changes to the Use Classes Order which took effect from 1 September 2020 will undermine the effectiveness of the following BDP policies:</p> <p>TP17 Portfolio of employment land and premises - it will not be possible to count research and development or light industrial proposals falling in the new E use class as there will be uncertainty as to whether or not a proposed development will remain in that use or change to the other types of use under class E. Sites in the Best Quality supply are the least likely to be affected as these tend to be sites for larger employment developments falling within the B2 or B8 use classes.</p> <p>TP18 Regional Investment Site and TP19 Core Employment Areas - this will have the effect of diversifying the range of uses that will be found in the Core Employment Areas in the future and will therefore undermine the principle of this designation. There are two Regional Investment Sites (RIS) in the city; at Aston and Longbridge. These are limited to development falling within B1 and B2 uses. With the deletion of the B1 use classes (now part of Class E), the city council will only be able restrict development from B2 uses in these areas.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
			<p>TP20 Protection of Employment Land - with the deletion of use classes B1c and B1b, this policy can now only apply to proposals which involve the loss of B2 and B8 uses.</p> <p>TP21 The Network and Hierarchy of Centres - whilst the town centre first policy would still be applied to new build proposals, under the new class E an office block in an out of centre location can change to a retail shop without consent. At this stage it is not clear to what extent this could affect premises in Birmingham, but it will also be very difficult to monitor all changes as they do not require any form of consent.</p> <p>TP24 Promoting a diversity of uses in centres - this policy seeks to maintain the primary retail function of the City's centres by requiring a minimum of 55%/50% of all ground floor units to be retained in retail (A1) use. The new use class E combines a range of 'High Street' and other commercial uses that were previously in separate use classes. This means that changes of use within the new E Class is not development at all (as opposed to permitted development). This clearly undermines the aims of TP24 as there will be far less control over retail units in primary shopping areas changing to non-retail uses. As noted above, it will be extremely problematic to monitor such changes as no consent or notification to the local authority will be required.</p> <p>In terms of the DMB, the changes to the UCO will affect one policy:</p> <p>DM9 Day nurseries and early years provision -the policy prefers day nurseries to be located in centres. The new E Class would allow former B1 Uses in and outside of centres to be changed to day nurseries and vice versa community uses. This would be contrary to the aims of</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
			<p>ensuring day nurseries uses are sustainably located and maintaining the vitality and diversity of uses in centres.</p> <p>There is no evidence of appeal decisions pointing to policies being ineffective or in need of review.</p> <p>Since January 2017 when the BDP was adopted there have been 12 planning appeals for major development that the City Council has refused. Four of these can be considered as conflicting with strategic BDP policies rather than being refused on more detailed site-specific matters. For three out of these four the council's refusal was upheld. For the fourth that was allowed the Inspector and Secretary of State found that there were no conflicts with the BDP.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A13.	<p><b>There are no recent or forthcoming changes to another authority's development plan or planning context which would have a material impact on your plan / planning context for the area covered by your local plan.</b></p> <p><b>PROMPT:</b></p> <p>In making this assessment you may wish to:</p> <ul style="list-style-type: none"> <li>● Review emerging and adopted neighbouring authority development plans and their planning context.</li> <li>● Review any emerging and adopted higher level strategic plans including, where relevant, mayoral/ combined authority Spatial Development Strategies e.g. The London Plan.</li> <li>● Review any relevant neighbourhood plans</li> <li>● Consider whether any of the matters highlighted in statements A1- A12 for their plan may impact on your plan - discuss this with the relevant authorities.</li> <li>● Consider any key topic areas or requests that have arisen through Duty to Cooperate or strategic planning discussions with your neighbours or stakeholders - particularly relating to meeting future development and /or infrastructure needs.</li> </ul>	Disagree	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <p>Birmingham sits within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). Adoption of the BDP in 2017 confirmed the housing shortfall to be met by other authorities in the HMA. Birmingham has actively led on the Duty to Co-operate arrangements to ensure that progress is being made by other authorities in the HMA on local plan reviews to accommodate Birmingham's unmet housing up to 2031. A GBBCHMA officer working group was established to monitor housing requirements, supply and delivery and to enable adjustments to be made at the HMA level. All HMA authorities are actively involved in this process.</p> <p>The GBBCHMA Officers Working Group maintains a Land Supply Position Statement which sets out housing need and land supply in the HMA and timetables for plan reviews. The latest statement is available <a href="#">here</a></p> <p>Appendix 1 of the document shows the progress that has been made in reviewing local plans along with actual and emerging shortfalls and potential contributions to meeting these.</p> <p>The latest statement suggests that the shortfall to 2031 has fallen to 2,597 dwellings. Most of the additional capacity has come forward in Birmingham where many previously unidentified sites have been granted planning permission. It is considered that the pre 2031 shortfall will continue to fall as local plan reviews progress.</p>



	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
			<p>However, it is now apparent that there will be a HMA shortfall post 2031. The Black Country has evidenced a significant shortfall through its 2019 Urban Capacity Review Update of up to 29,260 between 2019 and 2038, against its Local Housing Need. Whilst this shortfall starts to arise during the term of the position statement and is estimated to be 7,485 up to 2031, the majority (over 20,000 homes), will arise post 2031. This is being considered through the Black Country Plan review and associated Duty to Cooperate discussions with neighbouring local authorities and is subject to revision as more work is undertaken and this will be reported in future statements.</p> <p>The Association of Black Country Authorities has written to local authorities (4 August 2020) providing an update on the strategic housing and employment land needs arising in the Black Country and has formally requested authorities to confirm if their existing or emerging Local Plan is seeking to deliver levels of housing and / or employment land in excess of local needs on non-green belt land and, if so, whether any particular sites are being promoted that, due to their location and accessibility, could reasonably be attributed to meeting part of the housing or employment land needs of the Black Country up to 2039.</p> <p>Local plan reviews (e.g. South Staffordshire, Lichfield and Cannock Chase) are considering levels of growth above local need, up to and beyond 2031. There may also be scope for contributions from local authorities outside the HMA but with a strong functional link to the to it, such as Shropshire and Telford and Wrekin, to help address the shortfall up to and beyond 2031.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A14.	<p><b>There are no local political changes or a revised / new corporate strategy which would require a change to the approach set out in the current plan.</b></p> <p><b>PROMPT:</b></p> <p>In making this assessment you may wish to:</p> <ul style="list-style-type: none"> <li>● Review any manifesto commitments and review the corporate and business plan.</li> <li>● Engage with your senior management team and undertake appropriate engagement with senior politicians in your authority.</li> <li>● Consider other plans or strategies being produced across the Council or by partners which may impact on the appropriateness of your current plan and the strategy that underpins it, for instance, Growth Deals, economic growth plans, local industrial strategies produced by the Local Economic Partnership, housing/ regeneration strategies and so on.</li> </ul>	Disagree	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <p>The Council declared a climate emergency in June 2019 and has committed to achieving carbon neutral status by 2030. A Route to Zero Task Force has been set established and an action plan has been adopted, setting out a series of initiatives, projects and policy changes aimed at achieving zero carbon. Development plan policies will need to support this strategy.</p> <p>The Council is preparing a Transport Plan which aims to reduce car dependency and deliver public transport improvements that will deliver a better environment and inclusive growth. The future vision of the Transport will be secured through the delivery of a series of ‘big moves’.</p> <ul style="list-style-type: none"> <li>● Reallocating road space</li> <li>● Transforming the city centre</li> <li>● Prioritising active travel in local neighbourhoods</li> <li>● Managing demand through parking measures.</li> </ul> <p>Birmingham will host the Commonwealth Games in 2022 and this offers a unique opportunity to boost the profile an economy of the West Midlands region. This accelerated investment in development, housing and transport will deliver a range of benefits both during the games and over the longer term.</p> <p>The city has recently adopted an Economic Recovery Strategy which sets out the City Council’s overall priorities for the recovery from COVID-19, which are:</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
			<ul style="list-style-type: none"> <li>• Creating a more inclusive economy and tackling the inequalities and injustices highlighted by the crisis.</li> <li>• Taking more radical action to achieve zero carbon emissions and a green and sustainable city.</li> <li>• Strengthening our public services and creating new services to address needs</li> <li>• Building the strength and resilience of our communities, based on the positive response to the crisis.</li> </ul> <p>The city's Housing Strategy is currently being reviewed and a Housing and Economic Needs Assessment has been commissioned to inform the review.</p>

	ASSESSING WHETHER OR NOT TO UPDATE YOUR PLAN POLICIES	YES/NO (please indicate below)	
A15.	You AGREE with <u>all</u> of the statements above	No	<p>If <u>no</u> go to question A16.</p> <p>If <u>yes</u>, you have come to the end of the assessment. However, you must be confident that you are able to demonstrate and fully justify that your existing plan policies / planning position clearly meets the requirements in the statements above and that you have evidence to support your position.</p> <p>Based on the answers you have given above please provide clear explanation and justification in section A17 below of why you have concluded that an update is not necessary including references to evidence or data sources that you have referenced above. Remember you are required to publish the decision not to update your local plan policies. In reaching the conclusion that an update is not necessary the explanation and justification for your decision must be clear, intelligible and able to withstand scrutiny.</p>
A16.	You DISAGREE with one or more of the statements above and the issue can be addressed by an update of local plan policies	Yes	If yes, based on the above provide a summary of the key reasons <u>why</u> an update to plan policies is necessary in section A17 below and complete Section B below.
A17.	<p><b><u>Decision:</u></b> Update plan policies</p> <p><b>Reasons for decision on whether or not to update plan policies (clear evidence and justification will be required where a decision not to update has been reached):</b></p> <ul style="list-style-type: none"> <li>The BDP was prepared under the 2012 NPPF. The policies remain broadly in line with the 2019 NPPF, however there are fewer than 15 years remaining of the plan periods. The BDP was adopted in 2017 and much of the supporting evidence is older still.</li> </ul>		

- The Longbridge AAP and Aston, Newtown and Lozells AAP were adopted prior to the 2012 NPPF.
- The BDP was adopted prior to the standard method for calculating housing need being implemented in 2018. In December 2020, the standard method was updated and places a 35% uplift on the housing number of the top 20 largest English cities, including Birmingham. This will increase Birmingham's housing numbers considerably when compared to the BDP housing requirement. In accordance with paragraph 73 of the NPPF, the BDP figure remains as the city's housing requirement until the BDP is 5 years old in January 2022, after which point the local housing need, calculated using the standard method, will be used to determine the housing requirement.
- The BDP designates the AAP boundaries as 'key growth areas' and defers to the AAPs for policy detail. As it is recommended that the BDP is updated in full, which will require the spatial strategy to be redrawn, the AAPs will be superseded by the new local plan.
- Changes to the Use Classes Order which took effect from 1 September 2020 and will undermine the effectiveness of number of BDP policies which seek to protect retail uses in local centres and restrict uses in core employment areas and the Regional Investment Sites. These policies will be to be re-evaluated in conjunction with the impacts of the Covid pandemic as set out above.
- Due to the impact of the Covid-19 pandemic, the economic conditions have abruptly changed. Recovery could take a number of years and therefore challenge the delivery of the existing Plan. The impact of the pandemic on changing working and shopping patterns are likely to continue beyond the pandemic itself meaning that repurposing of some parts of the City Centre and other centres needs to be seriously considered.
- Delivery of affordable housing in recent years has fallen short of the requirement. The reasons for this and action to address them need to be considered.
- Some growth areas (GA5 Langley SUE, GA4 Sutton Coldfield Town Centre, GA8 Eastern Triangle and GA10 Longbridge) have been slow to deliver against plan targets. The reasons for this and actions to address them will need to be considered.
- Economic changes that may impact on viability. The long-term consequences of Covid-19 are still unclear, it is most likely that the deliverability of the retail and office floorspace targets set out in the BDP will be affected.
- The Big City Plan will be replaced by 'Our Future City Plan' (OFCP) and this will require the spatial strategy of the BDP, in particular GA1 City Centre Growth Area, to be re-evaluated. OFCP was launched in January 2021 and proposes a radical new approach for future development in the city centre using the climate emergency as impetus, setting a new direction towards a green, zero-carbon and people-focussed approach to development as well as repurposing parts of the city centre.
- The City Council declared a climate emergency in June 2019 and has committed to achieving carbon neutral status by 2030. A Route to Zero Task Force has been established and an action plan has been adopted, setting out a series of initiatives, projects and policy changes aimed at

	<p>achieving a zero-carbon city. Recognising the continuing challenges of climate change and the importance of reducing carbon emissions, the plan will need to play a more important role in supporting the move towards net zero carbon.</p> <ul style="list-style-type: none"> <li>Plan- making activities of other authorities which have identified that they are unable to meet their housing and employment needs. The Black Country has evidenced a significant shortfall through its 2019 Urban Capacity Review Update of up to 29,260 between 2019 and 2038, against LHN and has made formal request to confirm if our existing or emerging Local Plan is seeking to deliver levels of housing and / or employment land in excess of local needs on non-green belt land and, if so, whether any sites could reasonably be attributed to meeting part of the housing or employment land needs of the Black Country up to 2039.</li> </ul>		
	<b>B. POLICY UPDATE FACTORS</b>	<b>YES/NO (please indicate below)</b>	<b>Provide details explaining your answer in the context of your plan / local authority area</b>
<b>B1</b>	<b>Your policies update is likely to lead to a material change in the housing requirement which in turn has implications for other plan requirements / the overall evidence base.</b>	<b>Neither</b>	The housing requirement is likely to be driven by land supply and be informed by evidence e.g. capacity study, viability assessment etc. The changes to the housing methodology itself and the resultant minimum local housing need number generated by the method will necessitate a re-think of the overall strategy and policies of the plan to meet the much higher number.
<b>B2</b>	<b>The growth strategy and / or spatial distribution of growth set out in the current plan is not fit for purpose and your policies update is likely to involve a change to this.</b>	<b>Neither</b>	<p>The spatial strategy remains generally sound and provides a realistic and achievable framework against existing targets and expectations. Higher housing need numbers will necessitate a revisit of the strategy. Evidence shows new residential and employment development are being delivered as broadly predicted. However, certain allocations as described in Section A8 have been slow to deliver and the effectiveness of certain thematic policies have been undermined by changes to the UCO.</p> <p>There is potential that spatial policy GA1 will need to be updated to reflect the 'Our Future City Plan' (revision of the Big City Plan).</p>

			<p>Chapter 8: Environment and Sustainability. Some of the policies in this chapter will need to be updated in the context of the Council's climate emergency declaration and ambition to achieve net zero, and national policy changes regarding environmental net gain.</p> <p>Chapter 7: Economy and network of centres. Some of the policies in this chapter will need to be re-evaluated and updated in the context of the changes to the Use Classes Order.</p> <p>GA10 Longbridge allocates a 25ha Regional Investment Site (RIS). Due to the slow delivery of the RIS, concerns around low demand and impact of changes to the UCO, the evidence for the allocation should be re-evaluated.</p> <p>TP21 The network and hierarchy of centres sets out the comparison retail and office floorspace requirements for 2012-2026. With 5 years remaining to 2026, and major changes in the retail and office sector, compounded by Covid-19, the strategy for Sutton Coldfield Town Centre, Perry Barr and Meadway should be re-assessed.</p>
<b>B3</b>	<b>Your policies update is likely to affect more than a single strategic site or one or more strategic policies that will have consequential impacts on other policies of the plan.</b>	<b>YES</b>	<p>The significantly higher housing need number generated by the standard method will necessitate a revisit of the overall spatial strategy with the review of existing sites and potentially the addition of new sites. The review has also identified that more than one of the Growth Area policies may need updating in the near future (GA1 City Centre, GA4 Sutton Coldfield Town Centre, GA8 Eastern Triangle and GA10 Longbridge (not an exhaustive list) to reflect the changes in the market for retail and employment development needs. This may have consequential impact on other strategic policies such as TP19 core employment areas, TP18 Regional Investment Sites and TP21 Network and diversity of centres.</p>

	<b>You have answered yes to one or more questions above.</b>	<b>YES</b>	<b>You are likely to need to undertake a full update of your spatial strategy and strategic policies (and potentially non-strategic policies). Use your responses above to complete Section B4.</b>
	<b>You have said no to <u>all</u> questions (B1 to B3) above</b>	<b>NO</b>	<b>If you are confident that the update can be undertaken without impacting on your spatial strategy and other elements of the Plan, you are likely to only need to undertake a partial update of policies. Complete Section B4 to indicate the specific parts / policies of the plan that are likely to require updating based on the answers you have given above.</b>
<b>B4</b>	<p><b>Decision:</b> Full Update of Plan Policies</p> <p><b>Reasons for scope of review:</b></p> <p>The PPG provides a useful (but not exhaustive) list of the factors to be considered when determining whether a plan or its policies should be updated. The review has been carried taking these factors into account.</p> <p>A full update to the plan is considered to be the most appropriate response to the issues raised in this review.</p> <p>The most significant change since the BDP was adopted is the introduction of the standard method for calculating housing need and the 35% urban centres uplift to the minimum local housing need number. In accordance with paragraph 73 of the NPPF, the BDP figure remains as the city's housing requirement until the BDP is 5 years old in January 2022, after which point the local housing need, calculated using the standard method, will be used to determine the housing requirement. It is therefore critical for the city to respond to this through a plan update. Since the housing number (6,750 dpa uncapped with 35% uplift) is significantly higher than the current BDP housing requirement, it will necessitate a thorough review of the city's capacity to accommodate as much development as possible as the NPPG states that <i>"This increase in the number of homes to be delivered in urban areas is expected to be met by the cities and urban centres themselves, rather than the surrounding areas, unless it would conflict with national policy and legal obligations."</i></p> <p>Furthermore, the Government consulted on its Planning for the Future White Paper in August 2020, which set out radical proposals for the reform of the planning system. Government has yet to publish its response to the consultation, but they have indicated that a new Bill will be brought forward in winter 2021 to pave the way for future changes. The White Paper contained radical proposals to reform the planning system including local plans</p>		



zoning into two or three categories; a single statutory sustainable development test; a binding housing need number; development management policies set out at national scale and restricted in local plans; and front-loading consultation.

The AMR monitors the effectiveness of the current policies and shows that performance against the majority of the monitoring indicators is good. Against the latest Government's Housing Delivery Test, Birmingham achieved 152%. However, only 54% of the city's affordable housing requirement has been met between 2011/12-2019/20.

A number of the Growth Areas (GA5 Langleigh SUE, GA4 Sutton Coldfield Town Centre, GA8 Eastern Triangle and GA10 Longbridge) have been slow to deliver against policy targets. Once again, the reasons for this needs to be evaluated and updated evidence (in particular retail, office and industrial) is required to understand if the policies remain deliverable and relevant. Some of these policies will impact other dependent policies, which may require additional modifications. Equally, and as a result of the plan making process, other policies may be subject to an update to reflect latest evidence and /or stakeholder engagement and community consultation.

The environmental context has changed with the Council's Climate Emergency Declaration and ambition to achieve net zero carbon status by 2030. The development plan strategy will need to support this.

Finally, the national planning context has changed due to amendments to the Use Classes Order, which undermines several BDP policies which specify or restrict certain uses. Further major changes to the planning system are currently proposed through the Government's Planning for the Future White Paper. If carried forward, could mean that the local plan will need to be completely updated to align with a new national planning framework.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
	<i>General Requirements</i>		
1.	Include any relevant material that is set out in a government policy statement(s) for the area for example a national policy statement(s) for major infrastructure and written ministerial statements.	NPPF Para 5, 6	<p>National Planning Policy for Waste (Oct 2014) (NPPF para 4): Planning for waste in Birmingham is addressed in Section 7 below.</p> <p>National Planning Policy for Traveller Sites (Aug 2015) (NPPF para 4): see assessment Section 15 below.</p> <p>Sustainable Drainage Systems: Written Statement (Dec 2014) (NPPF para 6): Addressed in response to NPPF para 165 below.</p> <p>Parking Policy: Written Statement (Mar 2015) (NPPF para 6): Addressed in response to NPPF para 106 below.</p> <p>Planning for Schools Development Policy (Aug 2011): Addressed in response to NPPF para 94 below</p>
2.	Contribute to the achievement of sustainable development.	NPPF Para 8, 9, 16	The Birmingham Development Plan (BDP) supports the delivery of sustainable development which encompasses environmental, social and economic objectives (p 18-20). This is reflected in the strategy of the BDP which seeks to ensure that the development of new homes is matched by the provision of opportunities for employment, accessible local services and a high-quality environment and located in the most sustainable places (Spatial Growth Area policies GA1-GA10). This is also reflected in the range of city-wide thematic policies which have been

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>developed to help achieve the overall vision, particularly PG3 Place making.</p> <ul style="list-style-type: none"> <li>• Chapter 3: The vision, objectives and strategy</li> <li>• Chapter 4: Planning for growth</li> <li>• Chapter 5: Spatial delivery of growth</li> <li>• Chapters 6 – 9: Thematic policies</li> </ul> <p>The Longbridge AAP supports sustainable development through the principles of the plan which are adopted in the spatial strategy.</p> <ul style="list-style-type: none"> <li>• Theme 1: Sustainable development</li> <li>• Objective 1 and Objective 2.</li> <li>• Sustainability strategy</li> <li>• Land use strategy</li> <li>• Movement strategy</li> </ul> <p>The Aston, Newtown and Lozells AAP has sustainable development as a core objective and transformational theme in the AAP</p> <ul style="list-style-type: none"> <li>• Objective 1: sustainable development and quality places</li> <li>• Integrated and sustainable transport</li> </ul> <p>The Bordesley Park AAP will play a significant role in delivering growth and sustainable development.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<ul style="list-style-type: none"> <li>• Principle 1: To promote growth in the AAP area, with a presumption in favour of sustainable development</li> <li>• Principle 4: Sustainability – to demonstrate best practice in sustainable development</li> </ul> <p>The saved Development Control policies of the Unitary Development Plan 2005 will soon be replaced by the Development Management in Birmingham DPD. Main modifications are currently being consulted on. It is anticipated that the DPD is adopted by the end of 2021.</p>
3.	Apply the presumption in favour of sustainable development.	NPPF Para 11	The presumption in favour of development is applied in decision-taking.
4.	Provide a positive vision for the future; a framework for addressing housing needs and other economic, social and environmental priorities.	NPPF Para 15	<p>The Local Plan has a clear positive vision for the future and a framework for addressing housing and economic needs. In the BDP this vision is expressed on p18. The objectives (p18-20) of the Plan address the well understood economic, social and environmental challenges (p14-15) facing the city.</p> <ul style="list-style-type: none"> <li>• Chapter 3: The vision, objectives and strategy</li> <li>• Policy PG1: Overall levels of growth</li> </ul> <p>In the Longbridge AAP this is addressed in:</p> <ul style="list-style-type: none"> <li>• Section B: Vision, Themes and Objectives</li> <li>• Land Use strategy</li> <li>• Section C: Site Plans and proposals</li> </ul>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>In the Aston, Newtown and Lozells AAP this is addressed in:</p> <ul style="list-style-type: none"> <li>• The Vision (p12)</li> <li>• The policies covering a number of themes and site allocations</li> </ul> <p>In the Bordesley AAP this is covered in:</p> <ul style="list-style-type: none"> <li>• Development vision and principles (p12)</li> <li>• Key opportunities for change (p24)</li> <li>• Neighbourhoods (p48)</li> </ul> <p>The Council declaration of a climate emergency in June 2019 and Route to Zero strategy will mean that this vision needs to be reflected extensively as part of a new vision for the future.</p>
5.	<p>Plans should be:</p> <p>Aspirational and deliverable</p> <p>Contain clear and unambiguous policies</p> <p>Accessible through the use of digital tools</p> <p>Serve a clear purpose avoiding duplication</p>	NPPF Para 16	<p>Overall the plans are ambitious and deliverable. They contain clear and unambiguous policies. Each plan and their supporting evidence base can be accessed digitally.</p> <p>Care has been taken to ensure the plans are viable both in terms of individual policies and when taken as a whole.</p> <p>Preparation and presentation of the Local Plan has been achieved through using digital tools and content, made available on the Council's website. Consultation and engagement in plan preparation have been facilitated by the Council's website, social media accounts and email. The Local Plan's Policies Map is presented digitally as a GIS based interactive map.</p>

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			The policies in the Local Plan are fully consistent with the NPPF and duplication of NPPF content has been avoided wherever possible - for example, Green Belt policy does not repeat the detailed policy of the NPPF. Policies are justified in that they add to or aid the implementation of national policies within the local context and are locally distinctive and as such do not repeat or reformulate national policy.
6.	<i>Plan Content</i>		
7.	Include strategic policies to address priorities for the development and use of land. They should set out an overall strategy for the pattern, scale and quality of development.	NPPF Para 17, 20	<p>The BDP contains the strategic policies which addresses the priorities for the development and use of land in the city. It sets out the overall levels of growth (PG1) that are required and contains a spatial strategy to accommodate growth (GA1-GA10). Thematic policies are set to ensure high quality sustainable development.</p> <ul style="list-style-type: none"> <li>• Chapter 3: The vision, objectives and strategy</li> <li>• Chapter 4: Planning for growth (Policies PG1-PG3)</li> <li>• Chapter 5: Spatial delivery of growth (Policies GA1 – GA10)</li> <li>• Chapter 6 – 9 : Thematic policies: <ul style="list-style-type: none"> <li>- Environment and sustainability</li> <li>- Economy and network of centres</li> <li>- Homes and neighbourhoods</li> <li>- Connectivity</li> </ul> </li> </ul>
8.	Outline which policies are ‘strategic’ policies	NPPF Para 21	The BDP was prepared and adopted in January 2017, before the revised NPPF of February 2019. While containing strategic policies, it does not

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			make explicit which policies are strategic. This is also the case for the adopted AAPs and Balsall Heath Neighbourhood Development Plan.
9.	Strategic policies should look ahead over a minimum 15-year period <u>from adoption</u> .	NPPF Para 22	The BDP period is 2011-2031. The Plan was adopted in January 2017, so there are fewer than 15 years remaining of the plan period. An update to the strategic policies would require an extension to the end date of the plan to ensure that the policies cover the minimum timeframe set out in the NPPF.
10.	Indicate broad locations for development on a key diagram, and land use designations and allocations on a policies map.	NPPF Para 23	An interactive policies map which shows land use designations and allocations is available <a href="http://www.planvu.co.uk/bcc/index.php">http://www.planvu.co.uk/bcc/index.php</a>
11.	Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period.	NPPF Para 23	Birmingham cannot meet its objectively assessed need for housing (89,000 dwellings) and the adoption of the BDP confirmed the city housing requirement (51,100 dwellings) and the shortfall (37,900 dwellings) to be provided by other local authorities in the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) through the duty to co-operate.  BDP Policy PG1: Overall levels of growth
12.	Include non-strategic policies to set out more detailed policies for specific areas.	NPPF Para 18, 28	The BDP contains non-strategic policies (GA1-GA10) which sets out more detailed policies for specific areas growth areas. The Longbridge Area Action Plan, Aston, Newtown and Lozells Area Action Plan and Bordesley

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>Area Action Plan which are referred to in the BDP also set out more detailed policies.</p> <ul style="list-style-type: none"> <li>• Chapter 5: The spatial delivery of growth</li> <li>• Adopted Area Action Plans</li> </ul> <p>The Development Management in Birmingham DPD, once adopted, will replace the saved Development Control policies in the Unitary Development Plan 2005.</p>
13.	Set out contributions expected from development and demonstrate that expected contributions will not undermine the deliverability of the Plan.	NPPF Para 34, 57	<p>The Plan is viable both in terms of individual policies and when taken as a whole. This is evidenced through the CIL Economic Viability Assessment and a Financial Viability Assessment (FVA) prepared by BNP Paribas (November 2019) in line with the NPPF. The FVA assessed the requirements set out in the publication version of the 'Development Management in Birmingham DPD (October 2019) alongside the policy requirements in the adopted Birmingham Development Plan (January 2017). The study assessed at high level the viability of development typologies representing the types of sites that are expected to come forwards over the plan period and tested the cumulative impact of policy requirements envisaged for specific sites. At the time, the assessment showed that the policies in the DMB and BDP could be viably delivered.</p>



	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
	<i>Housing</i>		
14.	Be informed by a local housing need assessment, conducted using the standard method in national planning guidance as a starting point.	NPPF Para 60	The BDP was informed by a Strategic Housing Market Needs Assessment (2013) and pre-dated the introduction of the standard method for calculating housing need.
15.	Identify the size, type and tenure of housing needed for different groups.	NPPF Para 61	<p>The BDP identifies size, type and tenure of housing needed (p13 shows summary of SHMA housing mix), but not for all the different groups specified in NPPF para 61. Need has been assessed for those requiring affordable housing and travellers. Specific need has not been assessed for older, people, students, people with disabilities, service families, families with children, people who rent their homes and wishing to build their own homes. An up to date Housing Needs Assessment is therefore required.</p> <ul style="list-style-type: none"> <li>• TP30: The type, size and density of new housing</li> <li>• TP31: Affordable housing</li> <li>• TP34: Provision for gypsies, travellers and travelling showpeople</li> </ul>
16.	Where a need for affordable housing is identified, specify the type of affordable housing required.	NPPF Para 62	<p>The BDP identifies the type of affordable housing needed but this is simply split by tenure as shared ownership, affordable rent, and social rent. The planning definition of affordable housing has since changed to include a wider variety of affordable products, which is not reflected in the BDP. An up to date Housing Needs Assessment is therefore required.</p> <ul style="list-style-type: none"> <li>• TP31: Affordable housing</li> </ul>

	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
17.	Expect at least 10% of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups	NPPF Para 64	The Plan does not contain a policy which expects at least 10% of homes to be available for affordable home ownership. Government has also signalled introduction of First Homes (sold at 30% below market value) as a new tenure. Government has indicated that it will make planning policy changes through the NPPF and guidance to ensure that clear expectations are set for a minimum of 25% of all affordable housing units to be secured through developer contributions under section 106 should be First Homes.
18.	Set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.	NPPF Para 65	The BDP does not set out a housing requirement for designated neighbourhood areas because the BDP predated the 2019 NPPF.
19.	Identify a supply of specific, deliverable sites for years one to five of the plan period, and specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.	NPPF Para 67	The BDP identifies a five years supply of specific deliverable sites for years one to five of the plan period. <a href="#">See SHLAA 2014</a> . A 5 year housing land supply has been maintained since the Plan was adopted evidenced through subsequent revisions to the SHLAA. See latest <a href="#">5 year supply statement</a> .
20.	Identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare; unless it can be demonstrated that there are strong reasons why the 10% target cannot be achieved.	NPPF Para 68	The <a href="#">2020 SHLAA</a> contains at least 10% of sites under one hectare.

	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
21.	Support the development of entry level exception sites, suitable for first time buyers, unless the need for such homes is already being met within the authority's area.	NPPF Para 71	The BDP does not specifically mention support for entry level exception sites for first time buyers.
22.	Include a trajectory illustrating the expected rate of housing delivery over the plan period and requiring a buffer of 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan.	NPPF Para 73	BDP Policy TP29: Housing trajectory sets out the housing required to be delivered in accordance with the indicative average annual rates.
23.	Be responsive to local circumstances and support rural housing developments that reflect local needs.	NPPF Para 77	Proposals for new development in rural areas will be supported where in accordance with BDP Policy TP10 Green Belt.
24.	Identify opportunities for villages to grow and thrive, especially where this will support local services.	NPPF Para 78	Proposals for new development in rural areas will be supported where in accordance with BDP Policy TP10 Green Belt.
25.	Avoid the development of isolated homes in the countryside unless specific circumstances are consistent with those set out in the NPPF.	NPPF Para 79	Proposals for new development in rural areas will be assessed in accordance with BDP Policy TP10 Green Belt.
<i>Economy</i>			
26.	Create conditions in which businesses can invest, expand and adapt.	NPPF Para 80	One of the key objectives of the Plan is to create a prosperous, successful and enterprising economy with benefits felt by all. The Local Plan as a whole provides for a wide range of opportunities for economic development and job creating activity. Key components of this are a supply of good quality available employment land and premises and a vibrant network of local centres. Through the policies listed below, the

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>Plan seeks to ensure that an adequate supply of employment land is maintained throughout the plan period to enable long-term balanced growth to be sustained and for the economic base to diversify and grow.</p> <p>Birmingham Development Plan</p> <ul style="list-style-type: none"> <li>• Chapter 3: The vision, objectives and strategy</li> <li>• Chapter 4: Planning for growth</li> <li>• Chapter 5: Spatial strategy for growth</li> <li>• Chapter 7: Economy and network of centres</li> <li>• TP17: Portfolio of employment land and premises</li> <li>• TP18: Regional Investment Sites</li> <li>• TP19: Core Employment Areas</li> <li>• TP20: Protection of employment land</li> <li>• TP21: The network and hierarchy of centres</li> <li>• TP22: Convenience retail provision</li> <li>• TP23: Small shops and independent retailing</li> <li>• TP24: Promoting a diversity of uses within centres</li> <li>• TP25: Tourism and cultural facilities</li> <li>• TP26: Local employment</li> <li>• Employment Land Review 2012</li> <li>• Employment Land and Office Targets 2012</li> <li>• Retail Needs Assessment 2013</li> <li>• Employment Land Study for the Economic Zones and Key Sectors 2012</li> </ul> <p>Longbridge Area Action Plan</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<ul style="list-style-type: none"> <li>• Economic Transformation Theme and Objectives (p12-13)</li> <li>• Site Plans and proposals – Land Use Strategy (p20-28)</li> </ul> <p>Aston Newtown and Lozells Area Action Plan</p> <ul style="list-style-type: none"> <li>• A successful economy (p29 – 35)</li> <li>• Thriving local centres (p36-39)</li> </ul> <p>Bordesley Park Area Action Plan</p> <ul style="list-style-type: none"> <li>• Principle: Growth</li> <li>• Key Opportunities for Change – The Wheels Site and Environs, Coventry Road, Alum Rock Road, Adderley Park</li> </ul>
27.	Set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.	NPPF Para 81	<p>The Plan has a clear vision and strategy to create an enterprising, innovative and green city that has delivered sustainable growth meeting the needs of its population and strengthening its global competitiveness. The BDP predates the West Midlands Local Industrial Strategy but the city collaborates with the West Midlands Combined Authority and Greater Birmingham and Solihull Local Enterprise Partnership on various projects and strategies in relation to economic development and regeneration</p> <ul style="list-style-type: none"> <li>• Chapter 3: The vision, objectives and strategy</li> <li>• Chapter 4: Planning for growth</li> <li>• Chapter 5: Spatial strategy for growth</li> <li>• Chapter 7: Economy and network of centres</li> </ul>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>Longbridge Area Action Plan</p> <ul style="list-style-type: none"> <li>• Vision, themes and objectives (p8-9)</li> <li>• Economic Transformation Theme and Objectives (p12-13)</li> <li>• Site Plans and proposals – Land Use Strategy (p20-28)</li> </ul> <p>Aston Newtown and Lozells Area Action Plan</p> <ul style="list-style-type: none"> <li>• Vision (p12)</li> <li>• A successful economy (p29 – 35)</li> <li>• Thriving local centres (p36-39)</li> </ul> <p>Bordesley Park Area Action Plan</p> <ul style="list-style-type: none"> <li>• Development vision and principles (p12)</li> <li>• Principle: Growth</li> <li>• Key Opportunities for Change – The Wheels Site and Environs, Coventry Road, Alum Rock Road, Adderley Park</li> </ul>
28.	Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period.	NPPF Para 81	<p>The maintenance of the industrial sector and the provision of sufficient land and premises to enable the economic base to diversify and grow are critical to the prosperity of the city.</p> <p>BDP Policy TP17 Portfolio of employment land and premises requires the city to maintain a provision of ‘readily available’ employment land and maintain a 5-year minimum reservoir of 96ha consisting of different categories of sites.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>BDP Policy TP18 Within the portfolio there is a requirement for Regional Investment Sites (RIS) which are intended to support the diversification and modernisation of the City's economy. Regional Investment Sites are large high-quality sites attractive to national and international investors in the order of 25 to 50 ha. Two Regional Investment Sites are currently being developed at Longbridge and at East Aston.</p> <p>BDP Policy GA6 Peddimore sets out the policy criteria for the delivery of 71 ha of high-quality employment land to meet the shortfall identified in the Employment Land Review (2013) for Best Quality employment land.</p> <p>BDP Policy TP19 identifies Core Employment Areas which have been allocated to help retain land in employment use and will be the focus of economic regeneration activities and development opportunities.</p> <p>Longbridge Area Action Plan</p> <ul style="list-style-type: none"> <li>• Site Plans and proposals – Land Use Strategy (p20-28)</li> </ul> <p>Aston Newtown and Lozells Area Action Plan</p> <ul style="list-style-type: none"> <li>• A successful economy (p29 – 35)</li> <li>• Thriving local centres (p36-39)</li> </ul> <p>Bordesley Park Area Action Plan</p> <ul style="list-style-type: none"> <li>• Key Opportunities for Change – The Wheels Site and Environs, Coventry Road, Alum Rock Road, Adderley Park</li> </ul>

	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
29.	Seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment.	NPPF Para 81	<p>Achieving this requirement requires a holistic approach across different topic areas of the BDP including overall strategy, housing, employment, infrastructure and environment policies. A number of policies in the Plan are aimed at providing adequate infrastructure and creating good environments.</p> <p>The Plan's overall aim as set out in BDP Policy PG1 state that "Over the Plan period significant levels of housing, employment, office and retail development will be planned for and provided along with supporting infrastructure and environmental enhancements."</p> <p>The Infrastructure Delivery Plan highlights where potential investment is required strategic infrastructure to address barriers to development.</p> <p>Relevant sections in the BDP:</p> <ul style="list-style-type: none"> <li>• Chapter 3: The vision, objectives and strategy</li> <li>• Chapter 4: Planning for growth</li> <li>• Chapter 5: Spatial strategy for growth</li> <li>• Chapter 6 Environment and sustainability</li> <li>• Chapter 7: Economy and network of centres</li> <li>• Chapter 8: Homes and neighbourhoods</li> </ul>
30.	Be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.	NPPF Para 81	<p>The BDP makes provision for a portfolio of 'readily available' employment land within a hierarchy of sites. This support the provision of a range of employment sites to meet predicted demand but also allows flexibility for the City's economy to maximise the potential of any new and flexible work practices and respond to growth sectors. The</p>



	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>minimum reservoirs of and to be maintained allows for choice, flexibility and churn. The portfolio of land set out in Policy TP17 is intended to meet the needs of all types and sizes of businesses and will ensure that desirable employment development is not lost due to a lack of site availability by ensuring that supply leads demand. The portfolio consists of a wide range of sites from large strategic sites such as Regional Investment Sites (Policy TP18) to smaller Good Quality sites suitable for local businesses.</p> <p>The Core Employment Areas (TP19) provide the City's main employment opportunities and include the Regional Investment Sites and other high quality areas such as The Hub, Witton and Bromford. Outside of the core employment areas other land in employment use will continue to be protected and the provision of accommodation for small and medium enterprises (SMEs) will be supported.</p> <ul style="list-style-type: none"> <li>• TP17: Portfolio of employment land and premises</li> <li>• TP18: Regional Investment Sites</li> <li>• TP19: Core Employment Areas</li> <li>• TP20: Protection of employment land</li> </ul>
31.	Recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.	NPPF Para 82	The evidence base below highlights a number of key growth sectors, such as advanced manufacturing, which are vital to the future of Birmingham's economy. Six Economic Zones have been created to provide the clustering of economic activity within high quality business environments. The Economic Zones are an Advanced Manufacturing

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>Hub at the East Aston Regional Investment Site, ITEC Park at the Longbridge Regional Investment Site, Life Sciences Campus around the Queen Elizabeth Hospital and Birmingham University Campus, Environmental District at Tyseley, Food Hub at the former IMI site at Witton and The City Centre Enterprise Zone (EZ).</p> <p>The Core Employment Areas (TP19) provide the City's main employment opportunities and include the Regional Investment Sites and other high-quality areas such as The Hub, Witton and Bromford. The allocated Regional Investment Sites have specific locational requirements which are set out in BDP Policy TP18.</p> <ul style="list-style-type: none"> <li>• Employment Land Review 2012</li> <li>• Employment Land and Office Targets 2012</li> <li>• Retail Needs Assessment 2013</li> <li>• Employment Land Study for the Economic Zones and Key Sectors 2012</li> </ul>
32.	Enable the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings.	NPPF Para 83	Proposals for new development in rural areas, including those which support the rural economy, will be supported where in accordance with BDP Policy TP10 Green Belt.
33.	Enable the development and diversification of agricultural and other land-based rural businesses.	NPPF Para 83	Proposals for new development in rural areas, including those which support the rural economy, will be supported where in accordance with BDP Policy TP10 Green Belt.

	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
34.	Enable sustainable rural tourism and leisure developments which respect the character of the countryside.	NPPF Para 83	Proposals for new development in rural areas, including those which support the rural economy, will be supported where in accordance with BDP Policy TP10 Green Belt.
35.	Enable the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.	NPPF Para 83	<p>The BDP contains a suite of policies which seek to enable the retention and development of accessible local services and community facilities. They key ones are listed above.</p> <ul style="list-style-type: none"> <li>• TP9: Open space, playing fields and allotments</li> <li>• TP11: Sports facilities</li> <li>• TP12: Historic environment</li> <li>• TP21: The network and hierarchy of centres</li> <li>• TP22: Convenience retail provision</li> <li>• TP23: Small shops and independent retailing</li> <li>• TP24: Promoting a diversity of uses within centres</li> <li>• TP25: Tourism and cultural facilities</li> </ul>
36.	Recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.	NPPF Para 84	Proposals for new development in rural areas will be supported where in accordance with BDP Policy TP10 Green Belt.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
37.	<i>Town centres</i>		
38.	Define a network and hierarchy of town centres and promote their long-term vitality and viability.	NPPF Para 85	Policy TP21 in the BDP defines a network and hierarchy of centres in the city to guide appropriate development and their growth, management and adaptation.
39.	Define the extent of town centres and primary shopping areas and make clear the range of uses permitted in such locations.	NPPF Para 85	<p>The extent of the centres and primary shopping areas are identified in the Shopping and Local Centres SPD.</p> <p>BDP Policy TP21 and TP24 make clear the range of uses permitted in centres within the hierarchy.</p> <p>A diversity of uses is encouraged within the centres while maintaining a minimum % of retail and limiting hot food takeaways to no more than 10%.</p> <ul style="list-style-type: none"> <li>• TP21: The network and hierarchy of centres</li> <li>• TP24: Promoting a diversity of uses within centres</li> <li>• Retail Needs Assessment 2013</li> <li>• Shopping and Local Centres SPD 2012</li> </ul> <p>These policies are reflected in the AAPs.</p>
40.	Retain and enhance existing markets and, where appropriate, re-introduce or create new ones.	NPPF Para 85	BDP Policy TP23 'Small shops and independent retailing' supports proposals for other forms of retailing such as markets that encourage smaller and independent retailers.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
41.	Allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead.	NPPF Para 85	<p>The policies below specify a range of uses suitable in the centres which are located in the growth areas. Within the District Growth Points of the City Centre, Sutton Coldfield Selly Oak, Perry Barr and Meadway, TP21 specify the of comparison retail floorspace and office floor space requirements.</p> <ul style="list-style-type: none"> <li>GA1: City Centre</li> <li>GA2: Greater Icknield</li> <li>GA3: Aston, Newtown and Lozells</li> <li>GA4: Sutton Coldfield Town Centre</li> <li>GA7: Bordesley Park</li> <li>GA8: Eastern Triangle</li> <li>GA9: Selly Oak and South Edgbaston</li> <li>GA10: Longbridge</li> <li>TP21: The network and hierarchy of centres</li> </ul> <p>Longbridge Area Action Plan</p> <ul style="list-style-type: none"> <li>Theme 4: A new heart for Longbridge</li> <li>Proposal LC1 -LC4 a new mixed-use local centre</li> </ul> <p>Aston Newtown and Lozells Area Action Plan</p> <ul style="list-style-type: none"> <li>Thriving local centres (p36-39)</li> </ul> <p>Bordesley Park Area Action Plan</p> <ul style="list-style-type: none"> <li>Key Opportunities for change <ul style="list-style-type: none"> <li>- Alum Rock Road</li> </ul> </li> </ul>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			- Coventry Road
42.	Where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre.	NPPF Para 85	BDP Policy TP21 'The network and hierarchy of centres' includes the local interpretation of the sequential approach and impact assessment. This is to ensure that any development, new planned centres or the expansion of existing centres will not result in a significant adverse impact on existing centres.  Longbridge Area Action Plan <ul style="list-style-type: none"> <li>• Theme 4: A new heart for Longbridge</li> <li>• Proposal LC1 -LC4 a new mixed-use local centre</li> </ul>
	Recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.	NPPF Para 85	BDP Policy TP21 states that residential development will also be supported in centres having regard to the provisions of policy TP24. This is reflected in the AAPs.  Changes to Permitted Development Rights will also make it easier to change uses within centres to residential.
43.	<i>Healthy and safe communities</i>		
44.	Achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible, and enable and support healthy lifestyles.	NPPF Para 91	The policies below require new development to create safe environments that design out crime and carefully considered site layouts, designing buildings and open spaces that promote positive social interaction and natural surveillance (PG3). New housing is expected to contribute to making sustainable places, characterised by access to facilities, safe and multifunctional spaces and reducing

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>dependence on cars (TP27). TP37 specifically address health by seeking to improve air quality, promote health care facilities in centres, safe residential environments, helping to tackle obesity by encouraging physical activity through the provision of open space and playing fields, sports facilities and creating and enhancing environments conducive to cycling and walking (TP38). Major developments are required to meet the accessibility standards set out in TP45 to ensure for example access to an appropriate level of public transport provision. PG3: Place making</p> <ul style="list-style-type: none"> <li>• TP27: Sustainable neighbourhoods</li> <li>• TP37: Health</li> <li>• TP38: A sustainable transport network</li> <li>• TP45: Accessibility standards for new development</li> </ul> <p>These policies are reflected in the AAPs.</p>
45.	Plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments.	NPPF Para 92	<p>The Plan contains a range of policies which positively plan for the provision of shared and community facilities such as open space (TP9), local shops (TP21, TP22 and TP23), cultural facilities (TP24) and other local services which contribute to sustainable communities (TP27 and TP28).</p> <ul style="list-style-type: none"> <li>• Chapter 3: The vision, objectives and strategy</li> <li>• Chapter 4: Planning for growth</li> <li>• Chapter 5: Spatial strategy for growth</li> <li>• Chapter 6: Environment and sustainability</li> <li>• Chapter 7: Economy and network of centres</li> </ul>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<ul style="list-style-type: none"> <li>Chapter 8: Homes and neighbourhoods</li> <li>Chapter 9: Connectivity</li> </ul> <p>Aston, Newtown and Lozells Area Action Plan</p> <ul style="list-style-type: none"> <li>Vision, transformational themes and objectives</li> <li>A successful economy policies</li> <li>Thriving local centres policies</li> <li>Environment, open space and sport policies</li> <li>Excellent education facilities policies</li> </ul> <p>Longbridge Area Action Plan</p> <ul style="list-style-type: none"> <li>Vision, themes and objectives</li> <li>Sustainability strategy</li> <li>Land use strategy</li> <li>Environment, open space and landscape strategy</li> </ul> <p>Bordesley Area Action Plan</p> <ul style="list-style-type: none"> <li>Vision and principles</li> <li>Key Opportunities for change</li> <li>Neighbourhoods</li> </ul>
46.	Take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.	NPPF Para 92	The policies contained in the local plans take account of local strategies to improve health, social and cultural well-being. For example, Birmingham Connected, which is the Council's long-term transport strategy for the city aims to improve air quality and encourage active



	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>travel. This is reflected in the Plan's policies on walking, cycling and public transport. The Council has a duty to work in partnership to deliver the priorities outlined in the Health and Wellbeing Strategy, and the Public Health Outcomes Framework. This is reflected in BDP Policy TP37: Health and throughout the plan</p> <ul style="list-style-type: none"> <li>• Chapter 3: The vision, objectives and strategy</li> <li>• Chapter 5: Spatial strategy for growth</li> <li>• Chapter 8: Homes and neighbourhoods</li> <li>• Chapter 9: Connectivity</li> <li>• Birmingham Connected</li> <li>• Health and Wellbeing Strategy</li> </ul> <p>Aston, Newtown and Lozells Area Action Plan</p> <ul style="list-style-type: none"> <li>• Vision, transformational themes and objectives</li> <li>• Thriving local centres policies</li> <li>• Environment, open space and sport policies</li> </ul> <p>Longbridge Area Action Plan</p> <ul style="list-style-type: none"> <li>• Vision, themes and objectives</li> <li>• Land use strategy - Local centre proposals</li> <li>• Environment, open space and landscape strategy</li> </ul> <p>Bordesley Area Action Plan</p> <ul style="list-style-type: none"> <li>• Vision and principles</li> </ul>

	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
47.	Guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs.	NPPF Para 92	<p>The Plan includes a number of policies which guard against the loss of valued facilities and services including shops, sports facilities, open space, employment land and cultural facilities.</p> <p>Recent changes to the Use Classes Order and introduction of new Permitted Development rights mean that some of these policies will be undermined</p> <ul style="list-style-type: none"> <li>• TP7 Green infrastructure network</li> <li>• TP9: Open space, playing fields and allotments</li> <li>• TP11: Sports facilities</li> <li>• TP17: Portfolio of employment land and premises</li> <li>• TP18: Regional Investment Sites</li> <li>• TP19: Core Employment Areas</li> <li>• TP20: Protection of employment land</li> <li>• TP21: The network and hierarchy of centres</li> <li>• TP24: Promoting a diversity of uses within centres</li> <li>• TP25 Tourism and cultural facilities</li> <li>• TP35: The existing housing stock</li> </ul>
48.	Ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community.	NPPF Para 92	<p>The local plan policies guard against the loss of and encourages the development of services and facilities within appropriate locations.</p> <p>Other policies indirectly support this aim by locating development where it can support the financial viability of existing shops, facilities and services by increasing their customer base. Employment land policies ensure that there is sufficient supply of employment land to</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>meet a wide range of employment needs which facilitate business development and modernisation.</p> <ul style="list-style-type: none"> <li>GA1-GA10 Growth area policies</li> <li>TP7 Green infrastructure network</li> <li>TP9: Open space, playing fields and allotments</li> <li>TP11: Sports facilities</li> <li>TP17: Portfolio of employment land and premises</li> <li>TP18: Regional Investment Sites</li> <li>TP19: Core Employment Areas</li> <li>TP20: Protection of employment land</li> <li>TP21: The network and hierarchy of centres</li> <li>TP24: Promoting a diversity of uses within centres</li> <li>TP25 Tourism and cultural facilities</li> <li>TP35: The existing housing stock</li> </ul>
49.	Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.	NPPF Para 92	<p>The local plans adopt an integrated approach to the location of development, taking into consideration infrastructure, accessibility by public transport, environmental and physical constraints. Development is directed the most sustainable locations and focuses on locations which currently play an important role in providing homes, jobs and supporting facilities. This includes the key growth areas (GA1-GA10), the network of centres across the city (TP21), Core employment areas (TP19) and key transport corridors.</p> <ul style="list-style-type: none"> <li>Chapter 3: The vision, objectives and strategy</li> <li>Chapter 5: Spatial strategy for growth</li> </ul>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<ul style="list-style-type: none"> <li>• Longbridge Area Action Plan</li> <li>• Aston Newtown and Lozells Area Action Plan</li> <li>• Bordesley Park Area Action Plan</li> </ul>
50.	Consider the social, economic and environmental benefits of estate regeneration.	NPPF Para 93	<p>The city has a long tradition of supporting regeneration and the renewal of existing housing estates to deliver an improved environmental quality and housing offer. A large proportion of the city's housing offer is contained within existing large residential estates. The City Council will continue to support the regeneration and renewal of housing estates/areas. The initial housing regeneration priorities are set out in BDP Policy TP32.</p> <ul style="list-style-type: none"> <li>• TP32: Housing regeneration</li> <li>• Birmingham Housing Strategy 2017</li> <li>• Aston Newtown and Lozells Area Action Plan</li> </ul>
51.	Promote public safety and take into account wider security and defence requirements.	NPPF Para 95	BDP policy PG3 requires all new development to "Create safe environments that design out crime... designing buildings and open spaces that promote positive social interaction and natural surveillance." The emerging Birmingham Design Guide, which will replace existing design guidance, will set out detailed guidance in relation to designing out the potential for crime, the creation of safe places and anti-terror measures.
52.	Provide open space, sports and recreational facilities which meets the needs of the local area.	NPPF Para 95	Given Birmingham's built up character and with an increasing population and pressure for development, opportunities to create new

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>areas of open space are limited within the existing urban area. The main emphasis is on quality and accessibility; ensuring that people have access to good facilities and sufficient recreational space. Therefore, accessibility and quality will inform the assessment of how much public open space provision is required. BDP Policy TP9 sets out a minimum standard of open space per 1,000 population and accessibility to open space. New residential development will be required to provide new open space broadly in line with the standard. Further detail on the implementation of these requirements is provided in the Public Open Space in New Residential Development SPD. Likewise playing fields will be protected and will only be considered for development where they are either shown to be surplus for playing field use, taking account of the minimum standard. Birmingham has a wide range of sports facilities which provide for a variety of recreational sporting needs. The City Council is endeavouring (with its key partners) to increase the levels of participation and formal sport and informal physical activity within its various assets across the City.</p> <ul style="list-style-type: none"> <li>• TP9: Open space, playing fields and allotments</li> <li>• TP11 Sports facilities</li> <li>• Green Living Spaces Plan 2013</li> <li>• Playing Pitch Strategy and Action Plan 2017</li> </ul>
53.	Protect and enhance public rights of way and access.	NPPF Para 98	Birmingham's Rights of Way Improvement Plan (ROWIP) and the definitive map of routes support Birmingham's commitment to

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>preserving walking routes across the City and improving their level of maintenance.</p> <ul style="list-style-type: none"> <li>TP39: Walking</li> </ul>
54.	<i>Transport</i>		
55.	Should actively manage patterns of growth in support of objectives in Para 102. Significant development should be focused on locations which are/can be made sustainable. Opportunities to maximise sustainable transport solutions will vary between urban and rural areas - this should be taken into account in plan-making.	NPPF Para 103	<p>The overall strategy of the Plan seeks to direct development to the most sustainable locations in the city and focuses significant development into a number of locations which currently play an important role in providing homes, jobs and supporting facilities. This includes the key growth areas (GA1-GA10), the network of centres across the city (TP21), Core employment areas (TP19) and key transport corridors. The Plan clearly recognises and emphasises the importance of an efficient, comprehensive and sustainable transport system is an essential element in supporting the City's economic competitiveness, meeting the targets for reducing CO2 emissions and enabling the delivery of sustainable development. The policies in the connectivity chapter seek to develop and enhance the city's transport network so that is sustainable, high quality, and integrated.</p> <ul style="list-style-type: none"> <li>Chapter 3: The vision, objectives and strategy</li> <li>Chapter 5: Spatial strategy for growth</li> <li>Chapter 9: Connectivity</li> </ul> <p>Longbridge Area Action Plan</p> <ul style="list-style-type: none"> <li>Sustainability strategy</li> </ul>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<ul style="list-style-type: none"> <li>• Movement strategy</li> </ul> <p>Aston Newtown and Lozells Area Action Plan</p> <ul style="list-style-type: none"> <li>• Sustainable development and quality places</li> <li>• Integrated and sustainable transport</li> </ul> <p>Bordesley Park Area Action Plan</p> <ul style="list-style-type: none"> <li>• Sustainability principles</li> <li>• Connectivity principles</li> </ul>
56.	Support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities.	NPPF Para 104	<p>The key growth areas are focussed in the most sustainable locations in the city and support the delivery of a mix of uses set out in the growth area policies. This includes housing, employment, shopping and leisure.</p> <ul style="list-style-type: none"> <li>• BDP Chapter 3: The vision, objectives and strategy</li> <li>• BDP Chapter 5: Spatial strategy for growth</li> <li>• TP21: The network and hierarchy of centres</li> <li>• TP24 Promoting a diversity of uses within centres</li> <li>• TP27 Sustainable neighbourhoods</li> <li>• TP45 Accessibility standards for new development</li> </ul> <p>The AAPs support an appropriate mix of uses across the area and development sites are in sustainable locations.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
57.	Identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development.	NPPF Para 104	<p>The Plan recognises that high quality connections by road, rail, bus, walking, cycling or digital, are all vital to the City's future economic prosperity and social inclusiveness. Achieving this will require a road user hierarchy that favours sustainable modes of transport. TP39 and TP40 promotes the provision of safe and pleasant walking and cycling environments throughout Birmingham. TP41 demonstrates the Council's commitment to improving public transport for example by ensuring that road space is managed efficiently to support public transport through initiatives such as bus priority measures and infrastructure. TP41 also sets out the key bus, rail and rapid transit proposals/ corridors that will be supported and safeguarded. TP44 sets out the Highway Improvement Lines that will be protected for highway and public transport schemes from other development. The Council will continue to protect land within the designated HS2 Safeguarding Area.</p> <ul style="list-style-type: none"> <li>• BDP Chapter 9: Connectivity</li> <li>• Bordesley Park Area Action Plan</li> </ul>
58.	Provide for high quality walking and cycling networks and supporting facilities such as cycle parking (drawing on Local Cycling and Walking Infrastructure Plans).	NPPF Para 104	<p>The transport strategy for Birmingham places pedestrians at the top of the road user hierarchy with the commitment to encouraging walking as a safe, attractive and convenient means of getting around the city. The City Council is continuing to improve public realm environments, improve walking routes through the provision of dropped kerbs and pedestrian crossing facilities, and develop way finding facilities through a variety of media and community safety initiatives with a view to ensuring that walking is a safe option for as many people as possible.</p>



	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>Policy TP39 promotes the provision of safe and pleasant walking environments throughout Birmingham. Cycling contributes towards reducing carbon emissions and improving air quality. As a form of active travel it can assist with the adoption of healthier lifestyles and managing the use of the City's transport network more efficiently. TP40 sets out that cycling will be encouraged through a comprehensive city-wide programme of cycling infrastructure improvements (both routes and trip end facilities) supported by a programme of cycling promotion, accessible cycling opportunities, training and travel behavioural change initiatives.</p> <ul style="list-style-type: none"> <li>• TP38: A sustainable transport network</li> <li>• TP39: Walking</li> <li>• TP40: Cycling</li> <li>• Walking and Cycling Strategy and Infrastructure Plan 2020</li> </ul> <p>Longbridge Area Action Plan</p> <ul style="list-style-type: none"> <li>• Movement strategy</li> </ul> <p>Aston Newtown and Lozells Area Action Plan</p> <ul style="list-style-type: none"> <li>• Integrated and sustainable transport</li> </ul> <p>Bordesley Park Area Action Plan</p> <ul style="list-style-type: none"> <li>• Connectivity principles</li> </ul>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
59.	Provide for any large-scale transport facilities that need to be located in the area and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy.	NPPF Para 104	<p>The Plan provides for the integration of the HS2 station in the city centre. The Birmingham Curzon HS2 Masterplan has been prepared for the area around the proposed HS2 station and this demonstrates how the benefits of this significant investment can be maximised. The HS2 rail line is also proposed to run through part of the area and the City Council is working with HS2 Ltd to minimise and mitigate the impact of the rail line on local residents and businesses both during its construction and future operation. Land within the HS2 Safeguarding Area at Washwood Heath will also become available for employment use in the event that it is not required for HS2 purposes. The Council will continue to protect land within the designated HS2 Safeguarding Area. HS2 provides further opportunities to enhance local and regional rail services by releasing network capacity.</p> <ul style="list-style-type: none"> <li>• Chapter 3: The vision, objectives and strategy</li> <li>• Chapter 5: Spatial strategy for growth</li> <li>• TP38: A sustainable transport network</li> <li>• TP39: Walking</li> <li>• TP40: Cycling</li> <li>• TP41: Public transport</li> </ul>
60.	Recognise the importance of maintaining a national network of general aviation airfields.	NPPF Para 104	<p>There are no aviation fields in Birmingham. Birmingham Airport is located in the boundary of Solihull Metropolitan Borough Council. The Plan seeks to improve rapid transit routes to Birmingham Airport and NEC via East Birmingham.</p> <ul style="list-style-type: none"> <li>• GA8: Eastern Triangle</li> </ul>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<ul style="list-style-type: none"> <li>TP41: Public transport</li> </ul>
61.	Provide adequate overnight lorry parking facilities, taking into account any local shortages.	NPPF Para 107	<p>While the Plan does not specifically allocate sites for overnight lorry parking facilities, taking account of any local shortages, BDP policy TP42 says that “Consideration will be given to providing long stay lorry parking in areas where there are significant logistical movements.”</p> <ul style="list-style-type: none"> <li>T42: Freight</li> </ul>
62.	In assessing sites that may be allocated for development in plans, it should be ensured that: appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; safe and suitable access to the site can be achieved for all users; and any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.	NPPF Para 108	<p>In assessing allocations for development, opportunities have been taken to promote sustainable transport e.g. GA5 Langley SUE connectivity requirements, GA Eastern Triangle improvements to Lea Hall rail station, GA3 Aston, Newtown and Lozells improved pedestrian linkages to Perry Barr rail station and public transport interchange. The Plan has been subject to sustainability appraisal. Sites have been assessed against criteria including access to public transport (train and high frequency bus network) and proximity to the core cycle network. Other criteria have considered walk distances to key services and facilities (town/district/neighbourhood centres, primary and secondary schools, GPs etc.). Sites have also been assessed in terms of their impact on the Strategic Road Network.</p> <ul style="list-style-type: none"> <li>Chapter 3: The vision, objectives and strategy</li> <li>Chapter 5: Spatial strategy for growth</li> <li>TP38: A sustainable transport network</li> <li>TP39: Walking</li> </ul>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<ul style="list-style-type: none"> <li>TP40: Cycling</li> <li>TP41: Public transport</li> </ul> <p>Longbridge Area Action Plan</p> <ul style="list-style-type: none"> <li>Movement strategy</li> </ul> <p>Aston Newtown and Lozells Area Action Plan</p> <ul style="list-style-type: none"> <li>Integrated and sustainable transport</li> </ul> <p>Bordesley Park Area Action Plan</p> <ul style="list-style-type: none"> <li>Connectivity principles</li> </ul>
63.	Development should only be prevented 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.	NPPF Para 109	Policy DM14 'Transport safety and access' in the emerging Development Management applies this principle.
64.	<i>Communications</i>		
65.	Support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections, setting out how high-quality digital infrastructure is expected to be delivered and upgraded over time.	NPPF Para 112	<p>The BDP supports the expansion of digital technologies and requires proposals for new commercial and residential developments to include appropriate infrastructure, wired and wireless to provide high speed ubiquitous internet access.</p> <p>TP46: Digital Communications</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
66.	<i>Making effective use of land</i>		
67.	Promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.	NPPF Para 117	<p>The overall strategy of the Plan seeks to make the best use of land in meeting the need for homes and other uses. The majority of the allocations and growth areas are on brownfield sites. BDP policy TP30 sets target densities for new development to ensure that the most efficient use of the land is made. Land is a scarce resource, so it is important that it is used efficiently when new residential schemes are proposed. Appropriate densities will vary across the City, with higher densities in the City Centre to lower density housing in the suburbs. Higher densities should be accompanied by high quality design and ensuring the impact on its surroundings is fully considered. BDP Policy PG3 also requires all new development make best use of existing buildings and efficient use of land in support of the overall development strategy.</p> <ul style="list-style-type: none"> <li>• Chapter 3: The vision, objectives and strategy</li> <li>• Chapter 5: Spatial strategy for growth</li> <li>• PG3: Place making</li> <li>• TP30: The type, size and density of new housing</li> </ul>
68.	Set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.	NPPF Para 117	<p>The BDP sets out a clear strategy for meeting as much need as possible within the city. The Plan's overall strategy is predominantly brownfield led with 8 out of 10 of the key growth areas being located in the urban area on brownfield land.</p> <ul style="list-style-type: none"> <li>• Chapter 3: The vision, objectives and strategy</li> </ul>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<ul style="list-style-type: none"> <li>Chapter 5: Spatial strategy for growth</li> <li>PG3: Place making</li> </ul>
69.	Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains.	NPPF Para 118	<p>The Local Plan seeks to encourage benefits from urban and rural land through taking opportunities to enhance green infrastructure and biodiversity value (TP7 and TP8). PG3 supports development which takes opportunities to make sustainable design integral to development, such as green infrastructure, sustainable drainage and energy generating features. While TP7 seeks to maintain and expand the GI network and take advantage of new opportunities such as green and brown roofs, there is no explicit policy requirement to achieve net environmental gains.</p> <ul style="list-style-type: none"> <li>Chapter 3: The vision, objectives and strategy</li> <li>Chapter 5: Spatial strategy for growth</li> <li>Chapter 6: Environment and sustainability</li> <li>PG3: Place making</li> </ul>
70.	Recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production.	NPPF Para 118	<p>The Plan recognises that green infrastructure has a critically important role to play in mitigating the impacts of extreme weather events, particularly extended heat waves, and reducing flood risk. In addition, green infrastructure helps support biodiversity and makes an important contribution to the quality of the City's environment, its quality of life and human wellbeing and its economic status and performance.</p> <ul style="list-style-type: none"> <li>TP7: Green Infrastructure network</li> </ul>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
71.	Give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.	NPPF Para 118	<p>Regeneration of previously developed land is integral to the city's growth strategy for the creation of housing and jobs. While the Council supports development opportunities that bring areas of land affected by contamination or instability back into beneficial use, the potential for any risks associated with these issues should be appropriately considered to make development safe. Proposed policy DM3 requires that Proposals for new development will need to ensure that risks associated with land contamination and instability are fully investigated and addressed by appropriate measures to minimise or mitigate any harmful effects to human health and the environment within the development and the surrounding area and/ or groundwater.</p> <ul style="list-style-type: none"> <li>• Chapter 3: The vision, objectives and strategy</li> <li>• Chapter 5: Spatial strategy for growth</li> <li>• Chapter 6: Environment and sustainability</li> <li>• PG3: Place making</li> <li>• DM3: Land affected by contamination, instability and hazardous substances (emerging Development Management in Birmingham DPD)</li> </ul>
72.	Promote and support the development of under-utilised land and buildings.	NPPF Para 118	The Plan supports the development of under-utilised land and buildings through a number of policies. Measures to improve the operational and functional efficiency and the quality and attractiveness of the core employment areas will be supported. The employment land policies seek to protect employment land but also provides flexibility for land that has become obsolete and can no longer make a contribution towards the portfolio of employment land. TP35 seeks to prevent the

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>loss of 'decent' housing to other uses, to maximise use of the existing stock by reducing vacancies and to improve the existing stock where it has fallen into a substandard condition or where it has the potential to become substandard. The City Council's Empty Homes Strategy sets targets for bringing empty private sector homes back into use.</p> <ul style="list-style-type: none"> <li>• TP19: Core employment areas</li> <li>• TP20: Protection of employment land</li> <li>• TP21: The network and hierarchy of centres</li> <li>• TP35: The existing housing stock</li> <li>• Empty homes Strategy 2020-2025</li> </ul>
73.	Support opportunities to use the airspace above existing residential and commercial premises for new homes.	NPPF Para 118	<p>There is no specific policy in the Plan which supports the use of airspace above existing residential and commercial premises. However, changes to permitted development rights have been brought in which allows:</p> <ul style="list-style-type: none"> <li>- existing purpose-built detached blocks of flats, of 3 storeys or more, to extend upwards to create new self-contained homes.</li> <li>- the demolition and redevelopment of freestanding blocks of flats and certain commercial buildings for residential purposes.</li> <li>- enlargement of a dwellinghouse by the construction of additional storeys</li> </ul>
74.	Reflect changes in the demand for land.	NPPF Para 120	<p>The overall strategy of the Plan seeks to meet the various demands for land; and is considered sufficiently flexible to reflect changes in demand. The policies are monitored through the Authority Monitoring Report.</p>



	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
75.	Support development that makes efficient use of land, taking into account the need for different types of housing and other forms of development, local market conditions, the availability and capacity of infrastructure and services, the character and setting of the area, and the importance of securing well-designed, attractive and healthy places.	NPPF Para 122	<p>The Plan seeks to make the most efficient use of land by maximising densities and directing development on brownfield land. The Plan takes account of the different types of housing need and local market conditions and the character and setting of sites through BDP Policy TP30. The importance of good design and healthy places is emphasised in PG3 and TP37.</p> <ul style="list-style-type: none"> <li>• Chapter 3: The vision, objectives and strategy</li> <li>• Chapter 4: Planning for growth</li> <li>• Chapter 5: Spatial strategy for growth</li> <li>• Chapter 8: Homes and neighbourhoods</li> <li>• Strategic Housing Market Assessment 2013</li> </ul>
76.	Avoid homes being built at low densities where there is an existing or anticipated shortage of identified housing needs, and where appropriate include the use of minimum density standards.	NPPF Para 123	<p>The overall strategy of the Plan seeks to make the best use of land in meeting the need for homes and other uses. The majority of the allocations and growth areas are on brownfield sites. BDP Policy TP30 sets target densities for new development to ensure that the most efficient use of the land is made. Land is a scarce resource, so it is important that it is used efficiently when new residential schemes are proposed. Appropriate densities will vary across the City, with higher densities in the City Centre to lower density housing in the suburbs. Higher densities should be accompanied by high quality design and ensuring the impact on its surroundings is fully considered. PG3 also requires all new development make best use of existing buildings and efficient use of land in support of the overall development strategy.</p> <ul style="list-style-type: none"> <li>• Chapter 3: The vision, objectives and strategy</li> </ul>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<ul style="list-style-type: none"> <li>Chapter 5: Spatial strategy for growth</li> <li>PG3: Place making</li> <li>Policy TP30: The type, size and density of new housing</li> </ul>
77.	<i>Design</i>		
78.	Set out a clear design vision and provide maximum clarity about design expectations.	NPPF Para 125 & 126	<p>BDP Policy PG3 requires all new development to demonstrate high design quality, contributing to a strong sense of place. This is supplemented by design guidance SPD and masterplans for specific areas of change.</p> <ul style="list-style-type: none"> <li>Chapter 3: The vision, objectives and strategy</li> <li>Chapter 5: Spatial strategy for growth</li> <li>PG3: Place making</li> <li>Birmingham Design Guide</li> </ul>
79.	Ensure that developments will function well and add to the overall quality of the area, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, including the surrounding built environment and landscape setting, establish or maintain a strong sense of place, optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development, and create places that are safe, accessible and inclusive.	NPPF Para 127	<p>BDP Policy PG3 requires all new development to demonstrate high design quality, contributing to a strong sense of place. This is supplemented by design guidance SPD and masterplans for specific areas of change.</p> <ul style="list-style-type: none"> <li>Chapter 3: The vision, objectives and strategy</li> <li>Chapter 5: Spatial strategy for growth</li> <li>PG3: Place making</li> <li>Birmingham Design Guide</li> </ul>

## Appendix 2: Summary of responses from Duty to Co-operate Bodies

Local Authority / Duty to Cooperate Body	Date of Response	General Comments on BDP Review	Specific Issues Raised
East Staffordshire District Council	03/03/21	East Staffordshire do not consider there to be any significant or cross boundary issues relevant to assessing whether the BDP should be updated.	East Staffordshire have an adopted Local Plan (2015), covering the period 2012 – 2031. Due to consider whether the Local Plan needs reviewing in the autumn 2021. If at that point, we decide to review the Local Plan, we will be in touch to discuss any potential arising DtC issues then.
Natural England	17/03/21	Natural England would be very interested and willing to give you all the support you need in order to get the right balance for people and nature across the city	Include suitable design that includes: biodiversity (plus ecological networks, protected species,) geodiversity, green infrastructure (including greenspace), sustainable drainage, climate change adaptation, carbon neutrality, sustainable transport links, soils and air quality options.
Coventry City Council	22/03/21	Coventry City Council notes the matters raised in the letter and confirms that it is willing to engage in strategic matters under the Duty to Co-operate as progress on the plan evolves.	
Highways England	22/03/21	It is noted that the Birmingham Local Plan review now coincides with the Black Country Local Plan. Therefore, a key aspect will be working collaboratively with yourselves, and other key stakeholders to understand the impact of proposals coming forward through the Local Plan review. Particularly, what impact these proposals will have upon the safe and	M6, M5, and M42 motorways create a hub at the centre of the motorway network which are of national importance for the movement of freight, goods and people. We would welcome early engagement on the development of the transport evidence base and to agree the modelling methodology, parameters and scenarios being undertaken.

		efficient operation of the SRN and transport networks within Birmingham and the wider West Midlands Conurbation.	
Stafford Borough Council	22/03/21	Stafford Borough Council wish to continue engaging effectively with Birmingham City Council through the Duty to Co-operate process in relation to strategic planning matters and wider implications.	Stafford Borough Council completed a consultation period on the New Local Plan 2020-2040 Issues & Options stage in April 2020 and is currently preparing for the Preferred Options stage.
Environment Agency	24/03/21	Environment Agency strongly agrees that the BDP should be updated to take account of improved understanding of flood risk, flood risk mitigation measures as well as improving community health and wellbeing through improved biodiversity.	The review should take a holistic approach looking at the policy's regarding flood risk and look to strengthen all policies which encourage mitigation against flood risk. High level principles for a catchment-based approach to achieving water quality objectives need to be incorporated into the plan in line with the Water Framework Directive. The plan should seek to protect water quality through the various regulatory and advisory mechanisms with respect to land contamination.
Stratford On Avon	24/03/21	SDC is aware of the housing situation and we are being proactive in seeking to accommodate a proportion of the unmet needs arising from the Greater Birmingham and Black Country HMA through our emerging Site Allocations Plan.	Being a large rural area, the District lacks major infrastructure to support significant increases in population. If the District were to significantly contribute to Birmingham's housing shortfalls, we would expect that Birmingham would also assist in the provision of necessary infrastructure within the District to help facilitate such housing provision.

			Government planning policy appears to be to maximise growth within existing urban areas through densification.
Canals and Rivers Trust	26/03/21	The Trust consider that there are areas of the BDP which could benefit from amended or additional textual changes to increase the robustness of the policies and extend the reach and success of its intended outcomes.	BDP lacks detail to support our responses. This stems from the BDP being a high-level document, with the intention for other documents to come forward and address the details, as set out at para 1.9 of the BDP. The Trust would welcome additional policy detail instead of or in addition to a review of the BDP itself which provides a sufficiently appropriate strategic framework for decision making which broadly reflects national policy and legislation.
Lichfield District Council	26/03/21	LDC is of the view you have identified the appropriate issues to consider at this time.	LDC understands that in respect of the 35% uplift point, the government indicates this should be met within the city authority boundary rather than in neighbouring authorities in relation to consideration of this issue.
Worcestershire County Council	26/03/21	If Birmingham and neighbouring authorities are unable to meet their housing and employment land needs within their own boundaries, there is the potential for a range of impacts on neighbouring authorities, including the county and districts of Worcestershire. We look forward to constructive engagement over the impacts on infrastructure – including, but not limited to, transport and education - that could arise from such growth.	It will also be important to fully understand how Birmingham will maximise its own contribution to mineral requirements and waste management capacity, and the scale of any cross-boundary implications/requirements for minerals and waste, not just housing/employment land.

Historic England	28/03/21	A review could be used to identify heritage led development and regeneration opportunities which would conserve and enhance the city's rich cultural heritage and help communities create a sense of place.	Any Plan review identifies opportunities for potential reuse of existing building stock to help achieve the carbon neutral goal A Plan review would assist in establishing a balance between city centre living and associated opportunities for retail and services, in addition to ways forward for spaces to be repurposed, whilst conserving and enhancing the historic environment.
Redditch Borough Council	29/03/21	Redditch Local Plan No.4 was adopted in 2017 and is required to be reviewed by 2022 to ensure it is still fit for purpose. Further cross boundary issues may arise following any HEDNA report and throughout the plan review process.	The Council notes the new Standard Methodology will subject Birmingham to a 35% uplift on its housing number. We also note that the uplift is expected to be met by the cities and urban centres themselves. In considering how need is met, brownfield and other underutilised urban sites should be prioritised to ensure homes are built in the right places.
Bromsgrove District Council	15/04/21	As part of the plan review process, the identified issues represent a reasonable starting point for progression. Bromsgrove District Council has no additional strategic or cross boundary issues to raise and will welcome the opportunity to engage as the Birmingham Plan Review progresses.	
Association of Black Country Authorities	19/04/21	The Black Country consider that a review of the BDP is essential and should be undertaken as soon as possible with a regulation 18 consultation in 2021 and progress to a timetable which aims for adoption by 2026.	Needs to be evidenced by a full review of all employment land, open space and public-owned land; a refresh of the green belt review undertaken for the 2017 BDP; a review of centres in light of Covid-19 and the impact of

			the changes to the Use Classes Order and PD rights; cross boundary issues.
South Staffordshire District Council	19/04/21	<p>The BDP now needs to be updated and will need to:</p> <p>Clarify the intended scope of any local plan review including the intended plan period and strategic approach to housing needs</p> <p>Provide a clear timescale for the plan's preparation, specifying at what stage the City Council anticipates it will be able to robustly demonstrate the maximum housing supply that could be realised over the reviewed plan period (including through further Green Belt land release within Birmingham's local authority area if necessary).</p> <p>Commit to preparing a thorough evidence base demonstrating how all sustainable brownfield and underutilised land within the city has been maximised, including densification, before any housing needs are exported.</p>	<p>As a significant change in unmet housing needs arising from the Birmingham City Council area is likely, an appropriate cross boundary evidence base must be prepared to ensure this can be addressed in a demonstrably sustainable manner. This is especially important as the Planning Practice Guidance indicates that authorities which agree to take additional housing from other areas may in turn require investment in infrastructure provision to support this. be required. A Statement of Common Ground is required between Birmingham and the Black Country and surrounding districts with regard to the distribution of any exported housing and to support the South Staffs Local Plan Review.</p>

## 4. Conclusions

4.1 The findings of the review indicate that the requires a full update due to a number of significant changes to national planning legislation, policy and guidance, as well as changes in local circumstances and priorities. The key drivers are:

- The BDP was adopted prior to the standard method for calculating housing need being implemented in 2018. In December 2020, the standard method was updated and places a 35% uplift on the housing number of the top 20 largest English cities, including Birmingham. This will increase Birmingham's housing numbers considerably when compared to the BDP housing requirement. As In accordance with paragraph 73 of the NPPF, the BDP figure remains as the city's housing requirement until the BDP is 5 years old in January 2022, after which point the local housing need, calculated using the standard method, will be used to determine the housing requirement;
- Recent changes to the Use Classes Order and the extension of permitted development rights has undermined some existing BDP policies in relation to urban centres and the protection of (formerly B1 uses) industrial uses;
- The City Council declared a climate emergency in June 2019 and has committed to achieving carbon neutral status by 2030. A Route to Zero Task Force has been established and an action plan has been drafted, setting out a series of initiatives, projects and policy changes aimed at achieving a zero-carbon city. Recognising the continuing challenges of climate change and the importance of reducing carbon emissions, the new Plan will need to play an important role in supporting the move towards net zero carbon;
- The Big City Plan will be replaced by 'Our Future City Plan' (OFCP) and this will require the spatial strategy of the BDP, in particular GA1 City Centre Growth Area, to be re-evaluated. OFCP was launched in January 2021 and proposes a radical new approach for future development in the city centre using the climate emergency as impetus, setting a new direction towards a green, zero-carbon and people-focussed approach to development as well as repurposing parts of the city centre;
- The performance of some BDP policies, for example affordable housing, the Longbridge Regional Investment Site, retail growth – have under-delivered against targets and will require a re-evaluation of approach;
- Plan- making activities of other authorities which have identified that they are unable to meet their housing and employment needs;
- Other changes to national planning policy such the definition of affordable housing, climate change mitigation and biodiversity enhancement have been introduced since the BDP was adopted.
- Economic changes that may impact on viability. The long-term consequences of Covid-19 are still unclear, it is most likely that the deliverability of the retail and office floorspace targets set out in the BDP will be affected.



- The Longbridge AAP and Aston, Newtown and Lozells AAP were adopted prior to the 2012 NPPF. The BDP designates the AAP boundaries as 'key growth areas' and defers to the AAPs for policy detail. As it is recommended that the BDP is updated in full, which will require the spatial strategy to be redrawn, the AAPs will be superseded by the new local plan.