

# **Our Future Birmingham City Plan**

## **Birmingham Local Plan Issues and Options**

**October 2022**

# Birmingham Local Plan

Issues and Options

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# 1

## Introduction

**1.1** As the UK's second largest city and the economic heart of the region, Birmingham is a dynamic and exciting place to live, work and play. Our city is attracting record levels of investment and we are building the homes and creating the jobs and opportunities that we need. Hosting the 2022 Commonwealth Games has put Birmingham in the global spotlight. 2022 represents the start of a Golden Decade of Opportunity for Birmingham. Significant regeneration has been delivered as a result of hosting the Commonwealth Games, and HS2, Smithfield, Paradise and the regeneration of Digbeth are all well underway. Local areas across Birmingham are receiving huge, transformative investment, with the Perry Barr masterplan, the Longbridge redevelopment, the East Birmingham Inclusive Growth Strategy, and the Local Centres Strategy, ensuring that opportunity is shared across our city. Our great challenge over the coming decade is ensuring that this opportunity is made

available to every community in our city, lifting our children out of poverty, and giving everyone a stake in Birmingham's growth and success.

**1.2** Birmingham City Council has already made a strong case for Birmingham to be at the very heart of the Government's Levelling Up agenda. We have set out our ambitions to challenge deeply ingrained structural inequalities, addressing poor health, poor educational attainment, low skills and incomes, congestion and air pollution, while bringing forward new homes, employment sites and community facilities.

**1.3** However, like all big cities Birmingham is constantly changing and will need to adapt to many challenges over the next 20 years including the climate emergency, massive housing pressures and a changing economy. Our Future City Plan (OFCP) will set a vision for major change in central Birmingham. Using the climate emergency as impetus, we are setting a new direction, one where we aim for a net zero carbon and climate resilient

future. - In addition to this, we will build inclusive growth principles into the very foundation of all plans to ensure that every citizen in Birmingham benefits from development.

**1.4** The urgent need for action to tackle climate change has been set out through the City Council's ambitious commitment to eliminate carbon emissions through the 'Route to Zero' initiative. Birmingham aims to become a global leader in tackling climate change, meeting the challenges head-on and grasping the opportunities of being at the forefront of a green revolution. As digital technology changes our life and work styles, together with the economic and social uncertainty and change accelerated by the Covid-19 pandemic, the future of our city centre has been brought into question: what needs to be done to stay relevant and thrive; how does it become greener and cleaner; how does it evolve and grow as a destination for living, learning, working, shopping, enterprise, culture and leisure, and how does it

remain attractive to inward investment? Whilst these urgent challenges make the headlines, we know that the growth and investment we have seen in the city doesn't always meet the needs of all of our residents, and endemic deprivation and inequality remains at unacceptable levels in parts of our city, often in those communities closest to areas of intense development. Building new homes is a priority for our communities and there is demand for a range of homes to suit many different needs and aspirations. In a dense urban area, innovative ways need to be found to deliver new, quality homes and neighbourhoods, ensure affordability for all and create healthy, happy and attractive places to live. These challenges require us to take a major shift in direction. We encourage your input to ensure we develop a plan for Birmingham that will create a successful, inclusive, connected and green city.

### **What is the Birmingham Local Plan?**

**1.5** The Birmingham Local Plan will shape how the city will develop over the next 20 years. It will set out a vision, spatial strategy and planning framework that will be used to guide decisions on development proposals and planning applications.

**1.6** It will ensure we deliver the right number and type of homes and jobs in the right places with the right services and infrastructure. It will also be an important tool to help us become a net zero carbon city and create resilient and adaptive environments.

**1.7** This 'Issues and Options' document summarises the key planning issues and invites your views on how these issues should be addressed in the Birmingham Local Plan. Further

rounds of consultation will take place as the plan gets into more detail on specific policies and where development will take place.

### **Why we need a new Plan**

**1.8** All local authorities are required to have an up-to-date Local Plan. Without an up-to-date Plan the city is vulnerable to speculative planning applications and poor or piecemeal development. In the absence of a Plan there is no certainty where development will take place which means we cannot properly plan for the impacts of development.

**1.9** The existing Birmingham Development Plan (2017), Aston, Newtown, Lozells Area Action Plan (2012) and Longbridge Area Action Plan (2009) were all adopted before recent changes were introduced to national planning policy. We need an up-to-date Plan that will guide us through the next 20 years and respond to the new challenges and opportunities the city faces. The new plan will cover the period 2020 – 2042.

### **The Climate Emergency**

**1.10** Birmingham City Council declared a climate emergency in June 2019 with an ambition to work towards zero carbon by 2030. The Council is committed to taking a leading role, playing its part, and working with individuals, communities, businesses, partners, and others across the city and region to act now on the causes and impacts of the climate emergency.

**1.11** The Birmingham Development Plan (BDP) contains existing policies aimed at addressing climate change such as policies on carbon reduction, sustainable construction, low and zero

carbon energy generation, flood risk, green infrastructure, biodiversity, sustainable transport, as well as through its spatial strategy which focuses growth in sustainable locations. However, the BDP was prepared before the declaration of the Climate Emergency and with the aspiration to achieve net zero carbon emissions by 2030, big changes and a rapid response is required.

### **Have your say**

**1.12** We would like you to be involved in creating the Birmingham Local Plan and making choices about how land is used, where future development takes place and how places and buildings are designed. Your views and local knowledge are important. The quickest and easiest way to comment is online at [www.birmingham.gov.uk/birminghamplan](http://www.birmingham.gov.uk/birminghamplan). You can also go to your local library to look at this consultation and get help to respond online.

**1.13** For more information about online and in person events where you can come and talk to us, please see our webpage above. You can also browse our document library here.

**1.14** If you would prefer to submit your response in writing please identify the question or paragraph to which your comments refer. Send these to:

- Email: [planningstrategy@birmingham.gov.uk](mailto:planningstrategy@birmingham.gov.uk)
- Address: Planning Policy Team, Planning and Development, Birmingham City Council, B1 1TU

## What happens next?

**1.15** The development of a new Plan involves several key stages. We are currently at Issues and Options, which is the first stage in the process. The Council will review all the comments received at this stage and publish a summary report. Your comments, along with technical evidence, will help to inform the next stage of the Plan. The timetable shown below may change due to a range of factors such as forthcoming changes to planning legislation and national planning policy.

Stage	Date
Issues and Options consultation (This stage)	October 2022
Preferred Options consultation	October 2023
Publication document consultation	October 2024
Submission of the plan for examination	June 2025
Examination	Autumn 2025
Adoption	Summer 2026

## Forthcoming changes to the planning system

**1.16** The Levelling Up and Regeneration Bill which was introduced in May 2022, and continues its passage through Parliament, sets out a wide range of changes to the planning system. The Government will consult on the detail of these changes over the coming months. It is anticipated that the changes will be implemented from 2024 following the introduction of associated regulations and updated national policy. Therefore, at this point in time, we are working within the current plan making system. The Government are clear that local authorities should not delay or halt plan

making. As such, we consider it is best to proceed with preparing the Birmingham Local Plan and respond to any changes in circumstances or interim arrangements going forward.

## Evidence to inform the Birmingham Local Plan

**1.17** Local Plans need to be supported by a robust evidence base. In this report we refer to existing studies, work that is currently being undertaken, as well as future work we may need to undertake to inform the Plan. We will publish all of our evidence base studies on our website as they are completed.

**1.18** One of the assessments looks at the economic, social and environmental effects of the Plan and possible alternative options. This is called the Sustainability Appraisal (SA) and helps us identify the most appropriate options that will deliver the best outcomes for our area. A SA has been undertaken on this Issues and Options Document and is published alongside this document for consultation.

**1.19** We are also required to consider the impacts of the Plan on significant natural habitats. This process is called the Habitat Regulation Assessment (HRA). Both the SA and HRA derive from European legislation and may be subject to changes in the near future as a result of planning reforms.

## Relationship with other plans

**1.20** The Local Plan must conform with policies set out by national Government in the National Planning Policy Framework (NPPF) unless we have sufficient evidence to demonstrate a different

approach is needed. The Birmingham Local Plan will also be influenced by various Council strategies and plans shown below.



## Our Future City: Central Birmingham Framework

**1.21** Our Future City: Central Birmingham Framework is a non-statutory planning document which will set a vision for the future of Birmingham city centre and inner-city suburbs beyond the ring road. The feedback provided on the first stage Our Future City: Central Birmingham 2040 (January 2021) has been used to feed into the key issues and objectives of this Issues and Options Document. An evidence base is being prepared to inform stage 2 of the Central Birmingham Framework and could be used in turn to inform the Birmingham Local Plan. Consultation on the next stage of the Central Birmingham Framework is due to take place in Spring 2023.

## Working with our neighbours

**1.22** The Council is required to work with other local authorities and bodies in the wider area to deal with issues that run across local authority boundaries. This joint working is critical for Birmingham as we are unlikely to be able to meet

all of our development needs within our boundary. At the same time, we have to consider any unmet development needs from our neighbours. Birmingham will need to continue to work effectively with neighbours to achieve a planned response to the issues, particularly in relation to housing shortfalls.

### National requirements for Local Plans

**1.23** National policy requires that plans promote a sustainable pattern of development that seeks to meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change and adapt to its effects and increase resilience. Plans must include strategic policies which address the priorities for the area. Strategic policies should set an overall strategy for the pattern, scale and quality of development and make sufficient provision for:

- Housing (including affordable housing), employment, retail, leisure and other commercial development;
- Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- Community facilities (such as health, education and cultural infrastructure) and
- Conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation, resilience and adaptation.

**1.24** The NPPF also sets out that Local Plans should be prepared in line with procedural and legal requirements and will be assessed on whether they are considered 'sound'. Plans are considered sound if they are: positively prepared, justified, effective, and consistent with national policy.



# 2

## Challenges and opportunities

### Birmingham today

**2.1** Known in the Victorian era as ‘the city of a thousand trades’ and the birthplace of the Industrial Revolution, today Birmingham continues to be a dynamic force as the UK’s second largest city and the financial, commercial and cultural hub of the region. Its rich history and culture is reflected in its varied neighbourhoods and environments which is home to over 1.1 million people and growing.

**2.2** After a long period of population decline between the 1960s-80s following the collapse of many of its staple industries during that period, the City Council’s commitment to urban renaissance has meant that over the last 30 years, the city has seen a return to growth as new homes, jobs and infrastructure have been delivered. Boosted by transformational development plans, major infrastructure investment, successful industry sectors and strong innovation assets, Birmingham has gone from strength to strength in recent years.

As host of the Commonwealth Games 2022, the city’s international standing and global status is also set to rise.

**2.3** Birmingham’s connectedness is unparalleled and High Speed 2 will cement the city’s excellent transport connections and unlock major development opportunities within and beyond the city. Along with the extension of Metro, re-opening of the Camp Hill Chords, and new cycle lanes, improvement of public transport and active travel is a key priority for Birmingham’s Transport Plan and is essential to delivering a sustainable well-connected city. Connectedness goes beyond physical locations, it recognises the need for Cities to have the right digital infrastructure that enables businesses to work seamlessly with their supply chains and acts to attract new businesses, linking them to world markets from their location in a culturally diverse Birmingham.

**2.4** Over the last 15 years, Birmingham has attracted record levels of investment due to its welcoming and enterprising nature. Our population has grown and with this growth has come new homes, jobs, businesses and opportunities. Our city centre is bigger and better than ever and is set to continue to evolve as several key developments and new plans come forward. Other key major developments in the city will bring holistic regeneration spreading benefits into the surrounding communities.

**Paradise Circus** has already transformed Chamberlain Square and made the city centre better connected. With phase two under construction adding a new hotel and a fourth office building plus plans for a landmark residential tower, this new part of Birmingham, will be a premier destination and one we can take great pride in.

**Langley Sustainable Urban Extension** is the largest development site in the city and will provide around 6,000 homes making a significant

contribution to meeting the city's housing needs. With a focus on family housing and other housing types provided, the site will support a mixed community and be sustained by a comprehensive range of social infrastructure including new schools, shops, healthcare, recreation and leisure facilities.

**Icknield Port Loop** is a mixed use development involving the redevelopment and remediation of 43 acres of land which will deliver 1,150 new homes plus employment and leisure facilities is circled by a kilometre of historic canal and located only 1km from Central Birmingham

**Smithfield**, formerly the site of Birmingham's Wholesale Markets, the 14 hectare site which lies in the heart of the city centre, will provide a new home for the city's historic Bull Ring markets, outstanding new leisure and cultural spaces, including a festival square and landscaped park, integrated public transport, and 3,000 new homes alongside community facilities.

**Perry Barr** is currently benefitting from £700+ million of public sector investment focusing on enhancing infrastructure, providing 2,000 new homes and creating new community spaces. The wider regeneration programme has other long-term opportunities, including further housing to be built over the next 20 years and ongoing infrastructure improvements, which have been captured in the 'Perry Barr: A Vision for Legacy' master plan.

**Curzon Enterprise Zone** is centred on construction of the HS2 railway, the planned Curzon Station will bring a step-change in connectivity for the city and the region, unlocking major cultural, development and investment opportunities.

**Ladywood Estate** is a predominantly 1960s residential neighbourhood spanning 153 acres in Birmingham's city centre. The ambition is to transform the estate into a high-quality residential neighbourhood of exemplar sustainable development and radically improve connectivity into the surrounding area.

**Bordesley Park** and its environs offers a major opportunity for transformational change and the creation of 1,500 jobs for East Birmingham, one of the most deprived areas in Birmingham.

**2.5** While Birmingham has many great strengths, it also faces many serious challenges. Birmingham suffers from high levels of deprivation, with 43% of the population living in the 10% most deprived in England making it rank the 7th most deprived local authority in England. While there are pockets of deprivation in all parts of the city, deprivation is most heavily clustered in the area surrounding the city centre. Around 21.2% of households in Birmingham are in fuel poverty, compared to 13.4% across England.

**2.6** Birmingham has a comparatively high claimant unemployment rate. At 14.7%, Birmingham's claimant unemployment rate is the highest of the core cities, significantly above the core city average of 11.1%<sup>1</sup>. In terms of education

attainment, the gap is closing. In 2019, 62.1% of pupils in Birmingham reached at least the expected standard in Reading, Writing and Maths compared to the national average of 64.9%.

**2.7** Life expectancy for men and women in Birmingham is lower than the national average at 77.2 years for men (England 79.5) and 81.9 years for women (England 83.1). Child obesity is prevalent with more than one in ten 4-5 year olds being obese (11.5%) and a quarter of all 10-11-year olds (25.5%).

**2.8** Air pollution is second only to tobacco smoke in causing premature death (deaths before the age of 75). In the UK it is estimated that each year there are 40,000-50,000 deaths attributable to air pollution; in Birmingham based on current mortality, this equates to almost 900 deaths a year.

## Challenges

**2.9** Birmingham will need to adapt to respond to many challenges and opportunities over the next 20 years to ensure that we can build an inclusive, resilient and connected city.

**Climate change** – is the biggest existential threat that affects us all. In response to the climate crisis, the City Council declared a Climate Emergency in June 2019 and is striving to achieve net zero carbon and build the city's resilience to a changing climate. The Birmingham Local Plan will play a key part in helping us achieve this challenge, but this will affect how we address other priorities that are important to the area. It will influence where we plan for development, how it is designed and how we live.

1 Birmingham City Council, Labour Market Update Q2



**Infrastructure** – we need to ensure the city has the natural and built infrastructure it needs to deliver upon its aspirations and that this infrastructure is resilient to the changing climate and changing demands placed upon it. The city's net zero ambition will result in a significant growth in electricity demand for building heat decarbonisation and transport decarbonisation. The Birmingham Transport Plan aspires to achieve significant shifts in private vehicle use within and across the city to support this net zero ambition. Proposed new legislation for heat network zones to support heat decarbonisation may necessitate priority locations for heat generation and distribution and we need to ensure the opportunities for a growth in renewable energy generation can be supported within the infrastructure investment planned by energy utilities.

**Delivering quality homes and places** – our population is growing and changing. By 2042 we expect there to be around 133,600 more people living in Birmingham (HEDNA). This means more homes will be required including affordable housing and different types and sizes of homes. It will be a significant challenge to accommodate all of our local housing need within our boundary. The way development is planned, designed, developed and maintained has a huge impact on quality of life, appearance and the desirability of places. It will be essential to ensure that the right quality as well as quantity of development is delivered.

**Creating an inclusive economy** – inclusive growth is about ensuring that the benefits of growth are translated into greater opportunity and prosperity for all while planning for the growth and jobs we

need to reflect the changing economy. Covid-19 has accelerated the long-term trends in retail, and we need to support our local centres as well as help them adapt to future trends. We must also ensure that we deliver cleaner and more sustainable growth by transitioning to a low carbon economy.

**Growing the digital economy** – the growth of digital and creative businesses and those that are reliant on ultrafast and low latency digital communications continues at pace, stifled only by 20th century connectivity infrastructure. Regeneration and redevelopment presents great opportunities to ensure that the underpinning of digital infrastructure provides foundations for businesses to thrive.

**Protecting and conserving** – Birmingham's unique heritage assets and treasured natural environments are what make it an attractive place to live. The challenge we face is to ensure we protect these valuable resources for future generations but also to incorporate them into new developments and ensure we all have fair access to open green spaces.

## Opportunities

**2.10** With major shifts in society, economy and the environment also come opportunities to fundamentally transition the way we operate and to build people-centred places.

**Global leader in a Green Future** – as an enterprising and innovative city we have always been at the forefront of significant shifts in the economy, society and environment. The green economy offers exciting opportunities to transition to a cleaner and greener place that can deliver jobs,

homes and places in a sustainable way. Growth in renewable energy heat and power generation and storage will enhance the city's resilience to global energy markets.

**Proud of Brum** – we have a captivating history, a city that continuously adds to our layers of character, diversity, and culture, and a young population full of promise and creativity. In positioning and promoting our city on the world stage we need to shout louder about our heritage, world class arts, dance, music, food and cultural offer, and grasp the chance to build sporting excellence and long-term health benefits beyond the Commonwealth Games.

**Connected and Smart** – located at the centre of the country's rail and motorway networks, and with Birmingham Airport's international connections, we have an opportunity to use our advantageous location to attract inward investment and to build new innovative, smart and digitally connected clusters to support job growth in emerging industries, as well as enabling existing industries to transform.

**Place quality and thriving neighbourhoods** – new development will bring site specific interventions and payments of community infrastructure levy to fund facilities and infrastructure in the city. It will provide an opportunity to regenerate and re-create places that are healthier, greener, cleaner, safer and more connected.

**Build a stronger economy** – with our youthful population, diverse economic base, sectoral strengths in a range of areas and five universities, we have the opportunity to maximise the productive

potential of our people, businesses and places, creating new jobs and thereby raising living standards and quality of life.

**Creating a sustainable future** – Sustainable development is defined at many levels. At the international level the UN Sustainable Development Goals set out the overall principles. For planning, sustainable development is a combination of environmental, economic and social objectives. We need to follow these in drawing up the Birmingham Local Plan and making decisions on planning applications. The NPPF requires us to consider what the international Sustainable Development would look like for Birmingham and use this to shape the plan.

## SUSTAINABLE DEVELOPMENT GOALS



### What does sustainable development mean for the Birmingham Local Plan?

- Utilising brownfield land and re-using existing buildings and sites. We already prioritise brownfield land and will continue to ensure that as much development as possible is provided on brownfield land.

- Locating development in places where schools, jobs, and services are accessible by foot and cycle or creating new neighbourhoods where walkability is central to its design
- Ensuring good access to open space
- In built resilience to climate change
- Supporting the creation of effective public transport systems
- Ensuring easy access to a range of job opportunities by walking, cycling or public transport
- Developing near public transport hubs where higher densities use less land and support public transport use
- Contributing to the delivery of essential transport, digital and social infrastructure
- Providing affordable homes where it meets people's needs and ensuring a range of housing types
- Focussing development on land not at risk of flooding
- Designing places where people can lead safe and healthy lives as part of a community
- Avoiding the loss of best agricultural land
- Ensuring we have a well-connected, well managed and resilient Nature Recovery Network
- Avoiding development in areas of landscape quality

## Have your Say

### Challenges and Opportunities

1. Do you agree with the challenges and opportunities identified?
2. Are there any other challenges or opportunities which are important?

# 3

## Vision and Objectives

### Vision

**3.1** In response to the challenges and opportunities facing the city, we have developed a draft vision and series of objectives for the Birmingham Local Plan to achieve. We would like you to help us shape the vision and objectives as these will guide the direction of the Plan.

**3.2** At the heart of this vision is for Birmingham to be a world class net zero city built on a vibrant inclusive economy and a resilient, green and beautiful environment where people and business can thrive and reach their full potential.



## Vision

By 2042, Birmingham will be:

- **A net zero carbon city** that has delivered sustainable development and showcases the best environmental quality, resource efficiency and adaptability.
- **A resilient city** that has prepared for the local impact that climate change will present and has maximised the local capacity for energy generation and storage.
- **A city of growth for all** based on diversity and equality, where everyone can reach their full potential and where new housing, jobs and infrastructure meets the needs of our people, raising quality of life and increased prosperity.
- **A city of thriving neighbourhoods** with an integrated collection of vibrant, distinct and successful neighbourhoods offering a wide choice of high quality and affordable housing supported by services and facilities which enable residents to meet their daily needs by walking and cycling.
- **A city of nature** with more wildlife, trees and a rich multifunctional, connected green infrastructure network that can be enjoyed by everyone.
- **A healthy city** with cleaner air and water and wide range of open spaces and recreation facilities to support active healthy lifestyles.
- **A city of layers** rich in history, the arts, industry, culture, technology, and sports which make Birmingham like no other place, and a city that we can be proud of, own and celebrate. A city known for its people-centred design, enduring places and high quality environment.
- **A connected city** with a sustainable, green, inclusive, go-anywhere transport system where walking, cycling and public transport are the first and natural choice of travel.
- **A city of knowledge and innovation** world class for its jobs, education and research, where residents are highly skilled, businesses are successful, and we capture the full potential of technology and data to create a smart and sustainable city.
- **An inclusive city** characterised by diversity and equality and where everyone can reach their full potential regardless of where they live.

## Objectives

**3.3** We have drafted a set of objectives for the Birmingham Local Plan which will help us achieve this vision. The objectives will form the framework for the Plan, and our policies and sites should all contribute to achieving them.

### Objective 1: A net zero carbon city

- To ensure all new development achieves net-zero carbon emissions and is as energy efficient as possible

- To have a positive and bold strategy to renewable energy
- To make the most efficient use of our natural resources and minimise energy use
- To minimise waste and promote a circular economy

### Objective 2: A resilient city

- To ensure development is designed to create resilient, adaptive and liveable environments that supports nature and human health and well-being

- To manage flood risk and encourage the use of sustainable drainage systems
- To reduce the impacts of urban overheating
- To make building and places greener

### Objective 3: A city of growth for all

- To develop and grow the city in fair and inclusive way, meeting the needs of all of Birmingham's citizens

- To support business growth, job creation, and inward investment by providing a range of employment and economic growth opportunities
- To meet the housing needs of the city while protecting the things that are important to existing communities
- To provide essential infrastructure to support development in a co-ordinated and timely manner

#### **Objective 4: A city of knowledge and innovation**

- To build on Birmingham’s competitive economic advantages and retain and attract the best talent
- To capture the potential of our innovation assets such as our universities and strengths in next generation transport, sustainable construction and medical sciences to drive economic growth
- To promote low carbon industries and a green economy
- To improve the education and skills of Birmingham’s residents, increasing life prospects and prosperity

#### **Objective 5: A city of thriving neighbourhoods**

- To provide for a significant increase in high-quality new homes and affordable housing in a range of, sizes, types and tenures to meet the city’s housing needs
- To create safe, attractive and sustainable neighbourhoods where there is good access to services and facilities within walking and cycling distance
- To support our network of urban centres as they adapt to changing trends and demands,

- encouraging investment and a wider range of activities to increase footfall and spend
- To continue to enhance the City Centre to make it greener, more attractive and resilient as well as spreading the success of the City Centre to surrounding areas beyond the ring road through the emerging Central Area Framework

#### **Objective 6: A city of layers**

- To raise the standard of design and place quality across the city creating enduring places popular with those who live here and visit
- To create safe, accessible and distinctive places which enhance local identity and pride of place
- To protect and enhance the city’s rich heritage and its cultural offer, integrating new development with respect
- To make the city an international destination for tourists

#### **Objective 7: A healthy city**

- To ensure development contributes to reducing health inequalities and maximising health and well-being
- To improve access to health and social care facilities, high quality open spaces, and sports and recreation facilities to support healthy lifestyles
- To radically improve our air and water quality

#### **Objective 8: A city of nature**

- To protect and enhance our varied natural environments and promote a connected green and blue infrastructure network
- To deliver net gains in biodiversity and improve access to nature
- To expand the Birmingham Urban Forest and green the city

#### **Objective 9: A connected city**

- To facilitate a step change in how people travel with the delivery of an integrated and sustainable transport network which prioritises walking, cycling and public transport
- To maximise on Birmingham’s position as one of the best-connected places in the UK – locally, nationally and internationally - using the catalyst of High Speed Rail (HS2) to drive growth and investment
- To create a framework for a smart and digitally connected city
- To establish a digital ecosystem that brings together data, future proof connectivity and emerging technologies to the forefront.

#### **Objective 10: An inclusive city**

- To ensure physical, social and digital infrastructure meets the needs of all existing and future citizens
- To provide local economic opportunities through skill development and job creation

## Have your Say

### Vision and Objectives

3. Do you agree with the proposed vision?
4. Are these right objectives for the Birmingham Local Plan to achieve?
5. What is most important to you?  
E.g. 1 – Net zero carbon city,  
2 – A connected city etc.
6. Is there anything missing from the vision and objectives?



# 4

## Homes and Neighbourhoods

### Why do we need new homes?

**4.1** Birmingham is a growing city and based on the Government's standard methodology, we need to build 7,136 new homes every year. The Birmingham Development Plan (2017) was unable to identify enough land to meet all of Birmingham's housing need, whilst the city has delivered more homes than the plan set out, there has still been a need to work with neighbouring authorities within the Housing Market Area (HMA) to deliver the shortfall. This Plan will also be capacity led, despite creative approaches used to identify sites which may be suitable for development, and proposed changes to policy approaches, including increased density, particularly within the city centre, we will continue to be reliant on working with other local authorities within the Housing Market Area to deliver our required housing growth.

**4.2** Over the next 20 years Birmingham's population is expected to grow by around 133,600 people resulting in increased pressures on services,

jobs and infrastructure. To meet the needs of our growing population, we need to significantly increase the delivery of new housing, especially affordable housing for which there is a pressing need. This means not only ensuring a strong housing land supply but also ensuring the right type, size and tenure of housing is provided. Birmingham has a good track record of delivering housing growth, but the housing challenge remains the biggest the Birmingham Local Plan will need to address going forward.

**4.3** The pressure on the existing housing stock is reflected in high levels of homelessness and overcrowding in the city as households are unable to access suitable housing. Birmingham has a young population which means affordability presents a particular challenge for a large proportion of our residents.

At the same time, we have an ageing population which presents issues around the type of housing required and high levels of under-occupancy in

parts of the city. As affordability has worsened and house prices have outstripped growth in wages more people will require housing support. It is clear that we need to deliver a major step change in the provision of new high-quality affordable housing.

**4.4** The private rented sector makes up 18% of the tenure market in Birmingham. The evidence tells us that most of the privately rented accommodation in Birmingham is occupied by people in their 20-30s, often economically active and with young children. It is likely that these households are not able to afford to purchase property and therefore remain stuck in the rental market without the means to access the capital needed for home ownership. Only 55% of households in Birmingham are owner occupiers, significantly lower than the national average at 63% (Census 2011). The growth of HMO accommodation and Exempt Accommodation means the city has seen a significant loss in privately rented family homes.

**4.5** Access to good quality housing is one of the most important factors affecting quality of life and we want to ensure that every citizen is able to find, access and sustain housing that meets their needs. The new homes we build will need to be resilient to a changing climate, including hotter temperatures and increased surface water flooding.

### What are the benefits of new homes?

**4.6** New housing development can:

- Create more choice in the housing market and can help first time buyers onto the property ladder or older people wishing to downsize
- Improve the environment and neighbourhood, especially where sites have been vacant for a long time
- Deliver new facilities e.g. open space, transport improvements, school
- Add to the supply of affordable housing
- Support struggling services e.g. shops, community facilities
- Create construction jobs
- Provide opportunities to enhance biodiversity
- Bring about the wider social and economic regeneration of an area

### How many homes do we need?

**4.7** National government has set a standard method for calculating how many homes are needed in a local authority area. This currently gives Birmingham a local housing need of **7,136 dwellings per annum** (dpa) (as at March 2022).

This includes an additional 35% for the top 20 largest cities in the UK which includes Birmingham. The government expects the standard method to be used as the starting point for Local Plans and only in exceptional circumstances can a different approach be taken.

**4.8** As a sensitivity the Housing and Economic Needs Assessment (HEDNA) has explored housing need if the more recent 2018-based household projections were relied upon. This scenario resulted in an annual requirement of 6,140 new homes to be delivered in the city<sup>2</sup>. However, the assumptions that underpin this scenario would diverge from the Planning Practice Guidance and would also result in higher needs for other local authorities within the Greater Birmingham and Black Country Housing Market Area. For this reason, the City Council did not pursue this scenario and are continuing to follow the government's standard method.

**4.9** Applying the standard method to the plan period (2020 – 2042) gives a total housing figure of **149,286 dwellings for the plan period (prior to taking completions into account)**. This takes into account the housing requirement of 6,566 dwellings between April 2020 and March 2022 based on the adopted BDP and LHN and 7,136 dpa from April 2022 to March 2042 based on the standard method. When completions between 2020/21 – 2021/22 of 6,624 dwellings are taken into account, the figure is 142,662 dwellings.

**4.10** Delivering these many homes will be a huge challenge given that our current annual rate of housebuilding is 3,347 homes (average over the

last 5 years). We will need to explore the scale of housing growth that can be realistically achieved and consider where and how we can accommodate new homes. While the housing need figure is 7,136 dpa, the eventual housing requirement will be determined through the Birmingham Local Plan.

**4.11** The formula for the standard method means that this number will also vary annually in line with population changes and affordability ratios. The Office of Budgetary Responsibility (OBR) published its annual Economic and Fiscal Outlook in March 2022. The analysis shows that the housing affordability ratio is inflated due to pandemic factors, which saw a higher than normal increase in house prices and a reduction in average workplace incomes. This has worsened affordability leading to an increase in the housing need. The OBR report suggests that affordability ratios may return to their 2017 / 2018 levels in future thereby returning to pre-pandemic levels. (<https://obr.uk/efo/economic-and-fiscal-outlook-march-2022/> ). Furthermore, there may also be updates to the standard method itself during the preparation of this Plan. If this is the case, the local housing need will be reviewed accordingly.

### Existing sources of housing supply

**4.12** Based on the government's standard method, we need to deliver 149,286 new dwellings over the plan period. There will be existing sources of new housing which we can take into account and will be common to all proposed approaches.

2 At a very late stage in the production of the HEDNA, ONS published affordability ratios for 2021. This would increase the 6,140 figure to 6,459 dpa



**4.13** These include housing sites under construction, existing planning permissions yet to be started, and site allocations not completed ('committed sites') and other opportunity sites (including suitable Call for Sites submissions). The majority of these will be on previously developed ('brownfield') land. The Langley Sustainable Urban Extension, allocated within the existing Birmingham Development Plan, will deliver around 6,000 new homes.

### Maximising the use of land in the urban area

**4.14** The use of brownfield land is a priority for the government and has been a key part of Birmingham's development strategy for many years. Whilst many large brownfield sites have been redeveloped through the continued regeneration of the city, further opportunities have been identified through work undertaken to search for sites which have not come forward through the traditional Call for Sites process, this includes land in public and private ownership, as well as areas where multiple land parcels will need to be assembled to bring forward deliverable sites. Many of the sites require a change to the existing land use. We have written to all the landowners of the land parcels identified as suitable through our digital land search and where landowners have confirmed availability of their land for development, these have been included in the HELAA as 'other opportunity sites'. Work will continue to identify further sites appropriate for inclusion in the HELAA. Therefore, the supply figure could increase by the time we consult on Preferred Options, reducing any housing

shortfall. It should be noted that should even if all of the sites come forward there would still be a significant housing shortfall.

### Current assessment of available land

**4.15** Based on the latest HELAA, we estimate the potential capacity from the sources mentioned to amount to a total of 70,198 dwellings (identified sites and windfalls) taking into account completions between 2020/21 and 2021/22. This leaves a shortfall of around 78,415 dwellings to be found through the preparation of this Plan. It should be noted that this figure will be refined as the plan progresses.

Category	Dwellings
Under Construction	15,737
Detailed Planning Permission (Not Started)	12,132
Outline Planning Permission	5,602
Permitted Development (office, retail, agricultural to residential)	433
Permission in Principle	18
Allocation in Adopted Plan	9,604
Other Opportunity (including call for sites submissions)	11,044
<b>Sub Total – identified Sites</b>	<b>54,570</b>
Lapse rate 12% (applied to outline consents and other opportunities)	-1,998
<b>Sub Total – Identified Sites – lapse rate</b>	<b>52,572</b>

Category	Dwellings
Windfall allowance (unidentified sites x 19 years – no windfalls in year 1)	11,675
Completions 2020/21 – 2021/22	6,624
<b>Total Capacity</b>	<b>70,871</b>

Summary of housing need/ supply	No. of dwellings
Housing need 2020 – 2042	149,286
Housing supply	70,871
Shortfall	78,415

**4.16** The HELAA is not a policy document, it is simply a database of available land from which we select the most suitable and deliverable sites to meet future development needs. The HELAA will continue to be updated throughout the plan-making process and is available to view on the Evidence Base page at [www.birmingham.gov.uk/downloads/download/5184/evidence\\_base\\_for\\_the\\_new\\_birmingham\\_plan](http://www.birmingham.gov.uk/downloads/download/5184/evidence_base_for_the_new_birmingham_plan).

### Options for housing growth

**4.17** Maximising the use of brownfield land will continue to be a key part of Birmingham's strategy for growth so it is not listed below as an option because it will be common to all approaches taken. Brownfield land alone however will not deliver the number of homes we need. The broad options identified by the Council below could help to increase the supply of land for housing. At this stage

of the process, it is about the overall strategy, not specific sites, therefore housing numbers are not identified against the different options. The options are not mutually exclusive; meaning it's not a case of choosing one or another but deciding which combination of options would best help deliver the number of homes we need. It should also be noted that even if all the all of the options were adopted there would still be a significant housing shortfall. The options are:

Option 1 – Increase housing densities

Option 2 – More active public sector land assembly

Option 3 – Further comprehensive housing regeneration

Option 4 – Utilise poor quality under-used open space for housing

Option 5 – Utilise some employment land for housing

Option 6 – Release Green Belt for housing

## Option 1

### Increase housing densities

**4.18** This option would seek to maximise densities on housing sites within the city and make better use of the land. A simple definition of density is the number of residential units per hectare. The more units within a given space, the higher the density. Our current policy (TP30) in the BDP requires new housing to be provided at a minimum of:

- 100 dwellings per hectare in the City Centre

- 50 dwellings per hectare in areas well served by public transport
- 40 dwellings per hectare elsewhere

**4.19** The policy acknowledges that there may be occasions where lower densities would be appropriate, for instance in conservation areas, mature suburbs or to enable the provision of larger housing.

**4.20** We have analysed the density of sites that have been granted planning permission and sites that have been built in the last 3 years. The assessment revealed that the density for dwellings in suburban locations is broadly in line with Policy TP30 at 40 dwellings per hectare. We do not think there is much potential to vary this figure due to the prevailing character of suburban areas and the need for larger homes.

**4.21** The average density achieved in and around urban centres is 70 dwellings per hectare, which is higher than the policy target of 50 dwellings per hectare for 'areas well served by public transport' in Policy TP30. We therefore consider it reasonable to increase the density target to 70 dwellings per hectare in and around centres. 'Around' is defined as a 400 metre buffer from the boundary of an identified local centre.

**4.22** Densities being granted consent and delivered in the city centre average at 400 dwelling per hectare which is considerably higher than the current 100 dwellings per hectare target. There will be variation across the city centre but acknowledging the density optimising approach set out in national policy which seeks to maximise the use of land, it is suggested that this is an

appropriate average density to achieve within and around the city centre (a 400m buffer has also been applied to the city centre).

**4.23** The new density assumptions and net developable area calculations have been used to inform the HELAA and have been applied to 'Other Opportunity' sites which do not have anything else to inform their capacity (e.g. expired consent, pre-apps). The new density assumptions have yielded an additional estimated 1,300 dwellings compared to the lower BDP density assumptions.

### Density assumptions

Area	Average Net Density (dwellings per hectare)
In and around Urban Centres	70

**4.24** Examples of different densities are shown in a topic paper available to view on the Local Plan evidence page

Option 1 Increase housing densities	
Opportunities	Challenges
More people would live within easy reach of employment and leisure opportunities.	The range of housing provided may be more limited. Less scope to meet demand for family housing.

**Option 1 Increase housing densities**

Potentially lower carbon emissions and air pollution due to shorter travelling distances from new homes to jobs and facilities.	Residents might have less access to open space and private outdoor space than people living in less dense areas; this could be detrimental to physical and mental health, unless adequate provision is made.
Could result in lower car dependency if supported by investment in cycling, walking and public transport infrastructure.	Potential issues related to urban heat island effect.
Likely to meet the housing needs of younger people moving to the city to study or work.	
Maximises opportunities for development to utilise district heat networks.	Possible adverse impacts on biodiversity or nature conservation sites but this will depend on site specifics
Would maximise the capacity of sites and boost housing supply.	

**Option 2  
More active public sector land assembly**

**4.25** To meet the city’s housing needs will require a proactive approach to land assembly. Larger sites deliver more housing and provide wider regeneration benefits but there are few of these within the city. Large schemes often span across land ownership boundaries, and one of the first steps in making them happen is to acquire the property interests from the various owners. This could also be applied to smaller schemes which would typically result in higher densities.

**4.26** Assembling land does not necessarily mean the use of compulsory purchase powers but national policy encourages local authorities to use CPO power where necessary and the proposed changes to the planning system attempts to make the process faster.

**Option 2 More active public sector land assembly**

Opportunities	Challenges
Where the Council is a major landowner, we could take a proactive role using our land and general land assembly powers to shape new development.	Will require effective partnerships between the public and private sector and stakeholder buy in.
Would boost housing supply.	Can be a complex, lengthy and expensive process.

**Option 2 More active public sector land assembly**

Would allow under-utilised land to be repurposed such as underperforming shopping centres.	The co-ordination of infrastructure is challenging on large complex sites often involving collaboration and equalisation agreements to ensure that infrastructure costs are shared.
Would help to remove or relocate non-conforming industrial sites from residential areas.	Limited resources to assemble land.
Would help to secure more comprehensive development and better development outcomes.	

**Option 3  
Further comprehensive housing regeneration**

**4.27** The city has a long tradition of supporting regeneration and the renewal of existing housing estates to deliver better homes, enhanced neighbourhoods and improve quality of life. Recent examples include the Lyndhurst Estate, Newtown, the Meadway and Kings Norton which have been regenerated to provide new housing and enhanced community facilities and open space. However, there are still some large residential estates which do not provide the quality of accommodation or environment that ensure a high quality of life for

residents. This option would look to identify further housing regeneration areas where the Council would take a proactive approach to work with delivery partners and local residents to deliver comprehensive change and improvement.

Option 3 Further comprehensive housing regeneration	
Opportunities	Challenges
Regeneration would result in better homes and improvements to the local environment and amenities.	Will require effective partnerships between the public and private sector and local resident buy in.
Would have a positive local economic impact.	Can be a complex, lengthy, contentious, disruptive and expensive process
Would improve other area outcomes such as crime, health and well-being.	The cost of demolition, compensation and construction could result in a reduced number of homes for social rent and increased rental and service charges for tenants.
Would raise property values.	Carbon emissions released from demolition and disposal.
Diversification of the housing mix.	

### Option 4

#### Utilise poor under-used open space for housing

**4.28** As the city’s population grows the demand for open space will also increase and there will be both a need to provide more open space in some areas and improve what already exists. Open space is an important asset and is vital to environmental quality, biodiversity, health and well-being and climate resilience. In many parts of the city there is already a shortage of good quality open space, so opportunities to utilise open space for housing are limited. The Council also aspires to increase the amount of open space in the city as set out in the City of Nature Plan.

**4.29** This option would explore the potential to develop or partially develop open space where it is of limited value, underused or no longer serves its purpose. This could also provide the opportunity for improvements to the quality of open space.

#### Option 4 Utilise poor under-used open space for housing

Opportunities	Challenges
Sites would be in accessible locations.	There is already an under-provision of open space.

#### Option 4 Utilise poor under-used open space for housing

Would reduce the housing shortfall and number of dwellings to be provided by neighbouring authorities.	Some open space may be valuable for biodiversity.
Provision of enhanced open space integrated into housing developments.	Could impact on the amenity and health and wellbeing of residents.

### Option 5

#### Utilise some employment land for housing

**4.30** A significant amount of the city’s employment land lies within established employment locations which have been designated as Core Employment Areas. These are protected for industrial uses to ensure that the city has a sufficient supply of land to support jobs and the needs of businesses. There is also a significant amount of employment land that falls outside of the Core Employment Areas.

**4.31** Whilst the employment land supply section of this document has identified that most of these Core Employment Areas will need to be retained, there may be opportunities to repurpose poorer quality and underused employment land for housing development.

### Option 5 Utilise some employment land for housing

Opportunities	Challenges
Potentially lower carbon emissions and air pollution due to shorter travelling distances from new homes to jobs and facilities.	Businesses may need to be relocated so this will be a challenge in terms of viability and deliverability.
Would support on-going regeneration and investment in the urban area.	Employment land is more likely to require land remediation and demolition.
Opportunity to give a new role to areas no longer required for employment.	Could impact on the Council's ability to maintain an adequate employment land supply.
Would boost the supply of housing land.	
	Some employment land may be in less accessible locations so investment in walking, cycling and public transport infrastructure may be required.

### Option 6

#### Release green belt for housing

**4.32** Birmingham's Green Belt covers about 15% of the city's land area. The majority of this is in the north of the city; there are smaller areas where the city boundary meets Sandwell to the west and Bromsgrove to the south. There are also a number of 'green wedges' along river valleys, such as the Cole Valley and Woodgate Valley.

**4.33** The Green Belt was reviewed around 5 years ago through the Birmingham Development Plan and through that process 274 hectares was released for the development of 6,000 homes at Langley, Sutton Coldfield along with a 71 hectare employment site at Peddimore. An outline planning application has been submitted for the Langley SUE in December 2021.

**4.34** We do not want to see further release of Green Belt but the city's housing need is now much greater and the ability of neighbouring authorities to accommodate any Birmingham housing shortfall will be challenged by the need to deal with any of their own housing shortfall.

**4.35** All reasonable alternatives must be explored before considering altering the Green Belt. The government says that changes to the Green Belt should only be done in exceptional circumstances and through Local Plans. The starting point is looking at whether we can maintain the current Green Belt and still build the homes needed. Much of Birmingham's Green Belt is constrained by nature designations and flood risk. The only significant areas of Green Belt remaining are in the north east of Birmingham in Sutton Coldfield. The BDP 2017 confirmed that the Green Belt (Areas A and B) in the Sutton Coldfield area were of higher landscape value and more sensitive to development with

regard to landscape and visual effects. The Council also considers that there are limits to the number of new homes that can be built and sold in a similar location, particularly given that Langley SUE has not yet started on site. If all alternative options are exhausted (including asking our neighbouring authorities for help) and there is still a shortfall in the number of homes we need to deliver, we will need to undertake a Green Belt review.

### Option 6 Release green belt for housing

Opportunities	Challenges
Would boost the supply of housing and maximise provision of affordable housing.	Potentially higher carbon emissions and air pollution due to more new homes having increased travelling distances to jobs and facilities.
Would facilitate a wider range of new homes and deliver more suburban family housing.	Additional infrastructure investment will be required in some locations such as schools.
Lower risk of people wanting larger family homes moving out of Birmingham.	Likely to concentrate delivery later in the plan period due to infrastructure provision and phasing.
Would provide a wider range of sites and could ensure more consistent delivery in the face of changes in the housing market.	Loss of Green Belt land.

## Option 6 Release green belt for housing

Would have greater opportunity to promote rail travel for inter urban trips.	Impacts on the wider transport network may need to be mitigated in some locations.
May help to protect more urban greenspaces.	

## Have Your Say

### Options for Housing Growth

7. Are there any additional housing growth options that we should consider?
8. What is your preferred option or combination of options?
9. Do you think the proposed densities are appropriate? Should we build to even higher densities?
10. Are there any additional sites you think are suitable and available for housing development? If so, please submit a Call for Sites Form at ([bcc-call-for-sites.nw.r.appspot.com](http://bcc-call-for-sites.nw.r.appspot.com))

### What type of homes do we need?

**4.36** In bringing forward new housing schemes the type, size and tenure of homes will be just as important as the overall numbers that are built. The NPPF requires local planning authorities to assess

the size, type and tenure of housing needed for different groups in the community and reflect these in planning policies. A Housing and Economic Development Needs Assessment (HEDNA) has been undertaken which provides updated evidence on the overall need for housing, and type and mix of housing needed.

### Affordable housing

**4.37** There is a significant need for affordable housing estimated at 2,997 dwellings per annum (excluding households already in accommodation). This includes social and affordable rented housing<sup>3</sup>.

**4.38** In deciding what types of affordable housing to provide, including the split between rented and home ownership products, the Council will need to look at the levels of need and whether it would be viable to meet the need. While the evidence suggests that affordable housing delivery should be maximised, the amount of affordable housing provided will be limited by financial viability and other priorities such as the provision of open space, transport improvements, and education contributions.

**4.39** The Council's current affordable housing policy (TP31 in the BDP) seeks 35% affordable homes as a developer contribution on residential developments of 15 dwellings or more.

### Proposed policy changes

- Given the significant need for affordable housing in the city, it is proposed that the Council tests the 35% figure to see if a higher contribution is viable,

particularly as viability may be improved with inclusion of First Homes.

- There will be a need for both social and affordable rented housing but a rigid policy for the split between the two is not considered appropriate. The specific tenures to be provided would be determined on a site by site basis. This gives flexibility but less certainty over the types of affordable homes that will be provided.
- The Council will need to consider the NPPF requirement for 10% of housing to be affordable home ownership and the role that First Homes will play in the overall affordable mix.
- The HEDNA suggests changes should be made to our existing housing size and tenure mix requirements. The Council will be led by this evidence and propose to update the policies on the type, size and tenure of new housing.

### Family housing

**4.40** The loss of family housing is frequent concern raised by residents through planning applications involving the conversion of family houses to Houses in Multiple Occupation (HMO) or specialist housing. This can be problematic as the city has a relatively high level of families and this is expected to grow.

### Proposed policy changes

- While the Council has introduced a city-wide HMO Article 4 Direction and more stringent policy on HMO development, a policy to prevent the loss of family housing (Use Class C3) would help to retain economically active families in the city and

<sup>3</sup> Under-delivery of affordable housing should not be seen as cumulative. See para 7.86 of the HEDNA.

ensure the housing needs of families can be met, sustaining mixed and balanced communities.

## Housing for older people

**4.41** The older person population (65+) is projected to increase by 32% in the future and an ageing population means that the number of people with disabilities is likely to increase substantially. This would suggest there is a clear need to increase the supply of accessible and adaptable dwellings and wheelchair user dwellings as well as providing specific provision of older persons housing (e.g. sheltered housing, extra-care).

**4.42** Currently there is no policy which sets a specific percentage or threshold requirement for residential development to provide specialist housing for older people within the BDP. Policy DM10 in the Development Management in Birmingham requires housing development of 15 or more dwellings to provide 30% as accessible and adaptable dwellings in accordance with Building Regulation Part M4(2) but there is currently no provision for housing to support wheelchair users.

### *Proposed policy changes*

- The Council will consider whether to have a policy which requires new residential development to provide a specific percentage of homes for older people. This would provide more certainty of provision but would need to be viability tested.
- The Council could also explore allocating sites or parcels within larger sites for specialist housing.

This would provide greater certainty of meeting specialist housing needs.

- To help meet the housing needs of wheelchair users, we could consider having a policy which requires residential development of a certain threshold to provide a percentage (e.g. 10-15%) of wheelchair accessible homes.

## Purpose built student accommodation

**4.43** Birmingham is home to five main universities, which bring many positive benefits to the city through research and innovation, the production of skilled workers and supporting jobs. The supply of good quality accommodation in the right location is important to not only students but also the neighbourhoods within which they are located.

**4.44** The existing policy (TP33) for purpose built student accommodation in the BDP supports on campus provision and sets out criteria for off campus provision. This includes demonstrating a need for the development and being very well located to the university it seeks to serve.

**4.45** The majority of purpose built student accommodation is currently located in the city centre and the Selly Oak and Edgbaston area. Local residents in Selly Oak have expressed concerns about the impact of high densities of students on their local area and have asked the Council to explore a policy which would spread student accommodation more evenly across the area surrounding each university. Another policy option that has been suggested by local residents is setting a limit on the density of students permitted to live in an area. This would be difficult to implement as

students live in a variety of accommodation, have the freedom to move and change accommodation and there is no complete data on where all students live.

### *Proposed policy changes*

- Review existing BDP policy TP33 and consider alternative policy approaches.

## Built to rent

**4.46** 'Build to rent' is a growing sector in the housing market, comprising large purpose-built developments for private rent. This type of housing is associated with long term institutional funding/investment and is expanding particularly in major urban areas.

**4.47** The government is promoting build to rent as a means of improving the supply, choice and quality of private rented accommodation. The Council accepts that build to rent can add to the choice of good quality rented accommodation and secure longer-term tenancies.

### *Proposed policy change*

- Currently the Council has no policy for build to rent. It could be beneficial to have a policy which defines the city's expectations for such housing to ensure the delivery of high quality schemes.

## Large scale shared accommodation

**4.48** Large scale shared accommodation, commonly known as co-living, is a relatively new form of accommodation where residents rent a room within a purpose-built (or converted) development which has shared amenities and facilities. This type of accommodation can provide an alternative to

traditional flat or house shares and includes additional services and facilities, such as room cleaning, on site gyms, communal workspaces and a concierge service. Co-living is currently undefined in the Use Classes Order which means that they would typically be a “Sui Generis” Use as they are non-self-contained housing. There is currently no specific national or local planning policy for co-living. However, the Council has produced a Supplementary Planning Document to provide guidance to developers.

#### *Proposed policy change*

- A new policy would help to define the city’s expectations for co-living and ensure schemes are located in the right place and deliver high quality accommodation.

### **Gypsies, travellers and travelling show people**

**4.49** A study into the requirements of gypsies and travellers was produced in 2014 and updated in 2019. The HEDNA has taken the 2019 study and extrapolated the need. 30 pitches will be required to 2042.

**4.50** Two sites were allocated at Hubert Street/ Aston Brook Street East and Rupert Street/ Proctor Street in the BDP to provide a sufficient 5 year supply of permanent and transit sites. However, given the pressing need for the Council to provide transit sites to assist with an increasing prevalence of unauthorised encampments across the city, the two allocated sites have been identified as transit sites.

**4.51** Transit provision in the city is currently under review but it is likely that the City Council will also need to identify and allocate a further site or sites for permanent provision for gypsies and travellers which will need to be delivered during the new Birmingham Local Plan period to meet any shortfalls.

**4.52** It is also likely that an additional site will need to be identified and allocated for travelling show people. This will be for accommodation and storage of fairground equipment particularly during the winter months.

#### *Proposed policy change*

- If there is a need, the Council are required to allocate sites to provide at least 5 years supply of sites against the need assessed by the latest gypsy and travellers assessment.

### **Healthy neighbourhoods**

**4.53** National policy says that local plans should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles. The health and wellbeing of residents a key priority for the City Council and is embedded in the Council Plan, Health and Wellbeing Strategy, the BDP, BTP and other documents.

**4.54** Poor health is linked to a number of environmental, social, and cultural factors and high levels of deprivation. Although planning is not the only solution, it plays a vital role in promoting health and wellbeing, such as encouraging active travel,

promoting sustainable transport, creating access to high quality open space and the design of safe places.

**4.55** The 15 or 20 minute neighbourhood concept can enable residents to access all of their needs within a 15 or 20 minute walk or bike ride from their home. It can reduce car use and encourage active travel helping to address the climate emergency, imbalances in access to services and facilities and improve the health and well-being of all residents.

**4.56** Meeting Birmingham’s future housing needs will generate additional demand and increase pressure on existing facilities. Healthcare infrastructure planning is necessarily an on-going process and Birmingham will continue to work closely with healthcare partners and the development industry to assess and meet existing and new healthcare infrastructure needs.

**4.57** A Health Impact Assessment (HIA) can be a useful tool in assessing development proposals where there are expected to be significant impacts on health and wellbeing. They can be used to identify measures to help reduce adverse impacts and maximise the positive impacts of a development proposal. Detailed guidance would need to be prepared on HIA to assist with the implementation of any HIA policy requirement.

#### *Proposed policy change*

- The Council will consider introducing a requirement for development proposals of a certain threshold to be subject to Health Impact Assessment (HIA). HIA can help to enhance the benefits and minimise the risks to health of a development. We would need to determine the



appropriate type and scale of development that HIA requirement would be applied to.

## Have your Say

### Homes and neighbourhoods

11. What type, size and tenure of homes do you think will be needed in the future?
12. How do you think we can increase the supply of affordable housing?
13. Should we have a policy with a simple split of affordable rent and affordable homeownership or a policy with a more detailed tenure split?
14. How do you think we can prevent the loss of family housing to other forms of housing?
15. Should we have a policy which requires a percentage of older persons housing on residential developments?
16. Should we allocate sites specifically for older persons housing? Where should they be?
17. What should the policy be on purpose built student accommodation?
18. Where should new gypsy and traveller sites be located?
19. What type and scale of development should Health Impact Assessments apply to?



# 5

## Climate change

### Introduction

**5.1** Today we are facing a crisis that requires urgent action. The City Council declared a Climate Emergency in June 2019 and aspires to be net zero carbon by 2030. The latest Action Plan was endorsed by Full Council in January 2021, setting out priority actions and a dedicated team to facilitate this net zero ambition was established in January 2022. The net zero ambition exists to limit global warming to 1.5°C above pre-industrial levels. In May 2021, the UK's Met Office announced, "There is more than a 40% chance that the annual average global temperature in at least one of the next five years will temporarily reach 1.5°C above pre-industrial levels."<sup>4</sup>. We are already vulnerable to climate impacts and this will increase. This declaration underlines the critical need to adapt the

way the way we plan, live, work, and move around in order to reduce carbon emissions and build our resilience to a changing climate.

**5.2** Climate change is the long-term shift in average weather patterns across the world, which human activity has contributed to through the release of carbon dioxide and other greenhouse gases into the air, leading to global warming. The impacts of global warming include an increase in extreme weather events such as flooding, heatwaves, droughts, and rising ocean levels - posing risks to people, nature, infrastructure and our economy.

**5.3** There are various planning measures which can help to support net zero and build climate resilience including reducing the need to travel through place making, supporting new and well-connected sustainable transport systems, integrating and enhancing natural capital and

biodiversity through implementation of nature-based solutions, minimising demand for energy through design integrating renewable energy generation and supporting infrastructure and connection to decarbonised heat networks

**5.4** Similarly, it will be necessary to ensure developments are designed and futureproofed against the impact of climate change. Climate resilience measures include mitigating surface water flood risk, through Sustainable Drainage Systems and increased natural infrastructure, mitigating risk of overheating through building design and material selection, minimising the urban heat island effect through green infrastructure and increased planting and water efficiency through rainwater collection and reuse, and planning for water infrastructure. Planning therefore has a significant role to play in ensuring sustainable patterns of development and sustainable design.

4 [www.metoffice.gov.uk/about-us/press-office/news/weatherand-climate/2021/chance-of-temporarily-reaching-1.5-c-in-nextfive-years-is-increasing](http://www.metoffice.gov.uk/about-us/press-office/news/weatherand-climate/2021/chance-of-temporarily-reaching-1.5-c-in-nextfive-years-is-increasing)

## Energy efficiency and zero carbon development

**5.5** A large proportion of carbon emissions generated in the city come from buildings, and particularly the use of fossil fuels for heating. Improving the energy efficiency of buildings and minimising energy demand is the first priority. The remaining energy demand should be supplied from renewable energy sources or low carbon energy sources that will support a transition to renewable or net zero in the future. The significant gap between designed energy demand and operational (actual) energy demand also needs to be reduced.

**5.6** The rising cost of energy emphasises the importance of moving towards net zero and the strong case for increasing non-fossil fuel energy generation and energy cost resilience across the city. The planning system can support this by requiring local generation of heat and electricity and supporting opportunities for excess heat or electricity generation to be shared with others. Central government is currently piloting the introduction of mandated heat network zones in areas where heat networks present the most cost-effective decarbonisation solution. There are emerging opportunities for carbon reduction via aggregation of over-generation of renewable electricity (known as sleeving) which may present additional opportunity for carbon and energy cost reduction.

**5.7** 100% self-sufficiency from renewable sources of heat and electricity or heat networks may not be available in every circumstance and therefore a role remains for alternative options to reduce residual

carbon emissions, including aggregation of excess renewable electricity generation in other locations (sleeving) and local carbon offsetting.

**5.8** Nationally, the government will introduce the 'Future Homes Standard' which will change the Building Regulations so that by 2025 new homes will be expected to reduce carbon emissions by 75-80%, compared with current levels. This would be achieved through very high fabric standards and low carbon heating systems such as ground or air source heat pumps in place of heating from gas. The Government suggested that the move towards a de-carbonised electricity grid would mean that homes built to the Future Homes Standard would become net zero carbon over time, with no need for further retrofit. However, this does not account for building local resilience to imported energy (through onsite renewable energy investment), local opportunities for decarbonised heat supply through heat networks, or the potential for developments with capacity to over-generate renewable energy to share with other sites. The city is keen to maximise these opportunities to maintain long term affordable, cost-effective energy supply.

**5.9** The Government's commitment to strengthening Building Regulations will be a big step on the pathway to net zero carbon. However, they will not be ambitious enough to meet Birmingham's ambition to be net zero by 2030; new development will need to go further than the requirements set out in the current and future Building Regulations.

### *Proposed policy changes*

- If we are to achieve net zero carbon by 2030, all new development will have to be zero carbon.

This means setting high energy efficiency standards to reduce the demand for energy and incorporating renewable energy to provide cost-effective and resilient energy supply, and / or connection to a heat network where required.

- Where residual carbon emissions remain, alternative options for achieving net zero carbon will be explored. The priority will be to ensure residual carbon emissions are realised within the city boundary or projects that directly contribute to City net zero.
- Policies will need to deal with all of the carbon associated with new buildings including the energy needed to power them (operational energy) and that needed to construct and decommission them (embodied energy). This is known as whole life carbon. Only operational carbon is covered in Building Regulations.
- New development would be expected to get as close as possible to zero-carbon onsite, before relying on alternative options to make up any residual emissions reductions. Such alternatives may have the potential to support carbon reduction in existing buildings through demand reduction measures and by installing renewable technologies. Alternative options must be for projects which go over and above those that would happen anyway.
- Evidence around alternative options will be developed to progress any policy requirements. This includes assessing the impact on the viability of development posed by the additional cost of higher local standards alongside other priorities for contributions and requirements from new development.

## Sustainable design and construction

**5.10** At the same time as reducing carbon emissions, we must recognise that our climate is already changing as a result of past emissions. Extreme weather events including flooding and heat waves are becoming more frequent, and as such we need to ensure that all new developments are adaptable to this changing climate, in ways which do not energy use and associated carbon emissions.

**5.11** Overheating, particularly in new residential buildings is becoming an increasing problem with potentially serious consequences to health and life. The urban heat island effect is caused by extensive built-up areas absorbing and retaining heat during the day and night, leading to those areas being several degrees warmer than their surroundings. With higher temperatures across the country, the likelihood of heat being trapped in this way is very likely to increase. The use of green roofs and / or walls plus increased provision of natural infrastructure as part of developments can provide some mitigation by shading roof surfaces and through the mechanism of evapotranspiration. Building in resilience to future impacts will also be important.

**5.12** The Severn Trent Water has been identified as an area of 'serious water stress'. It is therefore essential that water resources are managed efficiently within the region. Current Building Regulations require that water consumption in new homes does not exceed 125 litres per person per day. Currently the Council does not have a specific policy on water consumption for new homes.

## Proposed policy changes

- The Council will develop policy to require development to minimise internal heat gain and the impacts of urban heat islands. This would help to reduce health risks associated with retained heat in indoor air quality which could have serious effects on the very young or the elderly, or those with respiratory diseases.
- Requiring new development to meet higher water efficiency standards than specified in the Building Regulations would help to conserve water and lower water consumption helping to address issues of water stress in the city. Such a policy would need to be justified including financial viability evidence.
- With surface water flooding risk set to increase as a result of climate change, a strengthening of natural environment measures to reduce flooding risk is needed.
- The Council's current policy (TP3) requires new non-residential development of a certain threshold to aim to meet BREEAM standard Excellent unless it can be demonstrated that the cost of achieving this would make the proposed development unviable. It is proposed that this policy is retained but options explored to include requiring minor non-residential development to meet a BREEAM standard. This would mean applying the standard to a larger number of developments and could improve the environmental credentials of smaller development. This would also need to be assessed to see if it would be financially viable.

## Low and zero carbon energy infrastructure

**5.13** All new developments should aim to generate, at building or development level, all operational heat and power demands. There may also be opportunities for over generation and shared energy benefit within communities or developments. There may also be certain locations within the city that offer greater potential for the installation of low and zero carbon technologies (LZCs) such as solar panels coupled with electricity storage, and heat networks. The Council will undertake studies to identify such opportunities, which could lead to the identification of 'Energy Zones' including proposed Heat Network Zones being considered by central government.

**5.14** Heat networks are key to providing a decarbonised source of heating and cooling to existing buildings and new development. Connection of new development to heat networks supports the expansion of the network and connection of a wider number of existing buildings. There are 3 heat networks in the city centre at Broad Street, Aston University Campus and Birmingham Children's Hospital. Their development in combination with energy efficiency could help to deliver affordable, secure and zero carbon heat across the city.

**5.15** The main heat decarbonisation policies in the government's Net Zero Strategy are the switch to heat pumps and hydrogen. With a growing demand for electricity to support the switch to heat pumps coupled with electrification of the transport sector, it is increasingly important that spatial planning is aligned with energy infrastructure planning and investment. The Council will seek to

proactively engage local utility infrastructure providers in the development of the Plan and investment infrastructure to support the city's net zero ambitions.

#### *Proposed policy changes*

- The Council has been working with BEIS on Heat Network Zoning. This could result in the identification of 'Energy Zones' where greater carbon reductions are expected to be achieved.
- The Council could seek to ensure that new housing and employment schemes are provided with the infrastructure to link into decarbonised heat networks where they do not currently exist or are still in the process of being delivered. This would help to future-proof development and prevent the need to retrofit in the future.

#### **Flood risk and water management**

**5.16** Parts of Birmingham are at risk of flooding from rivers, watercourses, surface water, sewer flooding and groundwater as well as potential for canal and reservoir breach and overtopping. The risk of flooding is likely to increase with climate change. Measures to minimise the risk of flooding and mitigate its effects are therefore required.

**5.17** The risk of flooding can be avoided by directing development away from the highest risk areas and where development is necessary in such areas, they should be made safe for its lifetime and not increase flood risk elsewhere. The Council is in the process of updating its Strategic Flood Risk Assessment to provide a detailed assessment of the extent and nature of flood risk across the plan

area. We will take account of this assessment and update policy where necessary in consultation with the Environment Agency.

**5.18** Current BDP policy (TP6) seeks to ensure that developments are planned to avoid vulnerability to flooding and manage risks with suitable adaptation measures. New developments are required to incorporate Sustainable Drainage Systems where feasible. It is proposed that policy is updated to provide clearer expectations to developers when developing sites vulnerable to flooding and in terms of sustainable drainage.

#### **Sustainable waste management**

**5.19** There is a need to reduce the waste the city produces from its homes and businesses and carefully and sustainably manage what is left. How the city deals with waste will be important to planning for sustainable growth and tackling climate change

**5.20** The 'waste hierarchy' (3Rs) – Reduce, Reuse, Recycle summarises the overall national approach to waste management. This gives priority to preventing waste in the first place, then re-using it, then recycling it. Last of all, is disposal (e.g. landfill). Local plans are required to set policies on waste management and promote a circular economy where materials are retained in use at their highest value for as long as possible and are then reused or recycled, leaving a minimum of residual waste.

**5.21** With the need to accommodate further growth, it is important that adequate waste and recycling facilities which adopt the 3Rs principles are provided. The Council has commissioned a

Total Waste Study which will explore a range of issues including predicted waste arisings from all sources and future capacity requirements. The results of the study will be used to update the waste policies.

#### *Proposed policy changes*

- The Council will explore how we can strengthen policy to ensure that the principles on waste management and resource efficiency are addressed by new development, including construction waste.
- This could include applying the circular economy principles to the design of buildings for adaptation, reconstruction and deconstruction, extending the useful life of buildings and allowing for the salvage of building components and materials for reuse or recycling. Taking such an approach reduces the need to extract raw materials and the manufacture of new building components, reducing carbon emissions and assisting with the achievement of net zero carbon.
- Policies which require major development to provide infrastructure for facilitating recycling and composting on site and a strategy for sustainable disposal of waste can also help to reduce the amount of landfill.

### **Have your Say**

#### *Climate Change*

20. Do you feel we have missed any policy opportunities to help the city achieve net zero?

21. How should we encourage all developers to deliver net zero carbon development?
22. How can we ensure that the principles on waste management and resource efficiency are addressed by new development?
23. Should we introduce higher water efficiency standards?
24. Do you agree with introducing a policy to prevent overheating of new buildings?
25. Should the Plan include policy to ensure that rivers within the city provide multi-functional benefits in relation to flood risk, ecology biodiversity and support health and wellbeing?
26. Should the Plan include policy to ensure a catchment-based approach to flood risk management from all sources and deliver climate resilience?



# 6

## The built and natural environment

### Introduction

**6.1** Birmingham City Council is on a journey to improve the environment our citizens live in. The City of Nature Plan is a 25-year delivery plan which was approved by the City Council in February 2022. The Plan sets out the Council's ambition to create a greener, healthier, fairer and more involved city. It highlights the issue of 'environmental justice' - inequalities across the city in accessing green space and seeks to address this through a framework which resets how we should look at green spaces. It also includes an action plan for tackling the top 5 wards most affected by 'environmental injustice' in the city.

**6.2** As well as its natural environment, Birmingham has a varied and unique built environment. The has rich historic environs which contributes to its local distinctiveness and gives it a unique sense of place. The existing BDP seeks to ensure that development responds sympathetically to its surroundings, protecting what

is treasured and valued, whilst enhancing the environmental quality of the area through good design.

**6.3** Good design makes places enjoyable, safe and sustainable. It can create a sense of belonging, reduce opportunities for crime, improve accessibility and enhance biodiversity.

### Green infrastructure

**6.4** Green infrastructure is a network of multi-functional green and blue space and other green and blue features. This can include open spaces, playing fields, parks, woodlands, street trees, allotments, green roofs and blue spaces such as rivers, streams, lakes, pools and canals. Green infrastructure has a critically important role to play in mitigating the impacts of extreme weather events, particularly heat waves and reducing flood risk. In addition, green infrastructure helps support biodiversity, enhances the quality of the city's environment and improves health and well-being.

**6.5** An Urban Forest Masterplan has been produced by the City Council which outlines how Birmingham's Urban Forest (which comprises all trees and associated vegetation along streets, in parks and woodland, in private gardens, and elsewhere) will be developed and proactively manage and grow the city's tree canopy.

### *Proposed policy changes*

- Current policy (TP8) promotes the protection and enhancement of the existing green infrastructure network. A more proactive approach to expanding the green infrastructure network including Birmingham's Urban Forest could be taken using the Local Nature Recovery Strategy and Urban Forest Master Plan to help increase the number of trees and canopy cover and identify locations for the improvement or restoration of existing wildlife habitats or the creation of new habitats.

## Biodiversity Net Gain

**6.6** The varied natural environments in the city support a diverse range of biodiversity. Biodiversity means the variety of all living species, including plants and animals. In recent years biodiversity has been much affected by climate change. Increases in average temperatures and changing weather patterns have impacted on all living things. The city's green infrastructure has a critical role to play in helping species survive.

**6.7** The Environment Act 2021 introduces a mandatory requirement for most new development to achieve a 10% net gain in biodiversity on or near the development site. This means that habitats for wildlife must be left in a measurably better state than before the development took place. The mandatory requirement for Biodiversity Net Gain is expected to be introduced in Winter 2023.

**6.8** Birmingham is highly urbanised, and the majority of development occurs on brownfield sites with very limited existing biodiversity. As such there is a case for seeking to achieve a higher net gain percentage.

**6.9** Local Nature Recovery Strategies (LNRS) introduced by government through the Environment Act 2021 will map the most valuable existing habitat for wildlife and opportunities for creating or improving habitat. They will also set out priorities for nature recovery. The Council will be able to use the LNRS to guide the delivery of Biodiversity Net Gain where it cannot be achieved on a development site. In such cases, developers have the option to contribute to off-site nature recovery projects

instead, either at a local or regional scale. These could include, for example, woodland creation and flood plain restoration.

### *Proposed policy changes*

- Given that the majority of development sites will be on brownfield land with limited biodiversity value, the Council will explore a higher % of Biodiversity Net Gain e.g. 20%. A key challenge in securing higher net gains through development will be the effect on viability.

## Urban greening

**6.10** Urban greening is about making streets, buildings and other public spaces green. This can include roofs and walls covered in plants, street trees and small pocket parks. Urban greening can help to improve air and noise pollution, soak up rainwater that may cause flooding, reduce urban heating effects, create habitats for local wildlife, offset carbon emissions in the local area, improve physical and mental health and make places look more attractive. As the city grows and the population increases, having a greener environment will help the city stay healthy and liveable, as well as less grey; showing the changing of seasons.

**6.11** Current BDP policy (TP8) encourages development to integrate green infrastructure as part of the design process to encourage urban greening.

### *Proposed policy change*

- The Council proposes to strengthen the policy on urban greening to ensure major development proposals include urban greening as part of their design. We will also consider whether to develop

an Urban Greening Factor to identify the appropriate amount of urban greening required in new developments. A number of cities such as London have successfully adopted a 'green space factor' to encourage more and better urban greening.

## Open space and playing pitches

**6.12** Open space encompasses a wide range of spaces, not just traditional parks and gardens, but allotments, playgrounds and natural and semi-natural green spaces. All are important in providing recreational, health and other benefits for Birmingham residents and those who work in or visit the city.

**6.13** An Open Space Assessment has been prepared which assesses the quality, quantity and accessibility of publicly accessible open spaces in Birmingham and identifies surpluses and deficiencies. The Open Space Assessment is published as evidence alongside the issues and options consultation. The Open Space Assessment proposes new standards for provision of public open space in the city.

**6.14** Playing Pitch Assessment and Strategy is currently being prepared. This focuses on outdoor sport and will analyse the current and future demand for outdoor sports facilities looking at quantity, quality and availability in relation to supply and demand. The Council intends to produce a Physical Activity Strategy and Built Indoor Sport Facilities Strategy in the future. These reports will be used to inform policies in the Birmingham Local Plan on provision of playing pitches.



### Proposed policy changes

- The new open space standard would see an increase in the requirement for open space from 2ha per 1,000 persons under current BDP Policy TP9 to 2.35ha per 1,000 persons. The new standard would be split into separate standards for allotments, parks and recreation grounds, play space, and accessible nature/informal green space. This contrasts with the current approach which sets an undifferentiated standard for all open space without identifying particular types of open space. More details of the proposed standard is set out in the Open Space Assessment.

### Minimising environmental pollution

**6.15** Air quality and the impacts of noise and light pollution are key considerations which can arise as a result of new development proposals. Policies relating to air, noise and light pollution have been recently adopted through the Development Management in Birmingham DPD. This provides up to date policies on ground conditions and pollution which are consistent with national policy so the Birmingham Local Plan will not cover these policy areas.

### Historic environment

**6.16** Birmingham's character is shaped by its historic development, which is represented by a rich and varied environment consisting of archaeological remains, canals, historic buildings, townscapes and landscapes. High levels of development will be expected in the future and this could place increased pressure on heritage assets

and their wider settings. However, it also presents potential opportunities to reinforce and reveal the historic environment through incorporating it rather than isolating or losing it.

**6.17** Current policy (TP12) seeks to value, protect, and enhance the historic environment and manage new development in ways which will make a positive contribution to its character.

### Placemaking and design quality

**6.18** Good design makes places enjoyable, safe and sustainable. It can create a sense of belonging, excitement, beauty, and reduce opportunities for crime, improve accessibility and enhance biodiversity. Essentially, good design can improve quality of life.

**6.19** The existing BDP policy (PG3) requires all new development to achieve high quality design. To facilitate the delivery of this policy, the Council has produced the Birmingham Design Guide SPD which was adopted in September 2022.

**6.20** We are aware of potential forthcoming requirements for all Local Authorities to produce a Design Code for their whole area. Should this requirement be introduced, we intend to prepare a Design Code to sit alongside the Local Plan, as a separate document and we will publish a timetable for doing so.

### Tall buildings

**6.21** In the right locations tall buildings can make important contributions toward delivering new homes, economic growth and regeneration. Tall buildings will be particularly important to the delivery of a growth strategy which seeks to optimise the

use of land. At the same time, it is also important to ensure that new development respects the existing historic character of the city and key landmarks and views that help to make Birmingham distinctive.

### Proposed policy change

- The Council are considering whether to introduce a tall buildings policy which will indicate the most appropriate locations for them and ensure that they are well designed including greening of tall buildings.

## Have Your Say

### The Built and Natural Environment

27. How should the city's green infrastructure network be improved and expanded?
28. Should we explore a higher than 10% Biodiversity Net Gain for all major developments?
29. Should the new Local Plan seek to identify/allocate sites to provide off-site Biodiversity Net Gain?
30. Should the Council introduce an Urban Greening Factor policy?
31. Do you agree with the proposed new standards for open space?
32. How can we ensure that residents have good access to quality open space?

33. How can the Birmingham Local Plan achieve high quality design in all developments?
34. Are there any specific issues that the Birmingham Local Plan needs to address regarding the environment?



# 7

## Economy and centres

### Introduction

**7.1** A strong inclusive economy that is environmentally responsible and benefits local residents is a key part of achieving sustainable development. The Birmingham Local Plan will have an important role to play in providing opportunities for economic development and job creating activity.

**7.2** The current local plan supports local economic development, seeks to protect existing employment land and maintain the vitality of our urban centres. While these policies are still relevant, the Covid-19 pandemic has re-emphasised the continuing need to strengthen and diversify Birmingham's economy. The current local plan also needs updating in the light of recent legislation introduced by the Government to allow more changes of use without the need for planning permission.

### Employment land need

**7.3** The Birmingham Local Plan will need to set out the amount of employment space that is required over the period to 2042. To help us understand what is needed a Housing and Economic Development Needs Assessment (HEDNA) has been undertaken which assesses the future requirements for both economic development and housing.

**7.4** The HEDNA identifies a need for 295.6 ha of employment land over the plan period. Ensuring that an adequate supply of employment land is maintained throughout the plan period will be essential in enabling long-term balanced growth to be sustained and is therefore a key challenge.

**7.5** The HEDNA also highlights a number of key growth sectors, such as construction, transport and storage, food and accommodation, information and communication, financial, professional and business

services, education, health and residential and social services which are vital to the future of Birmingham's economy.

### Current assessment of available land

**7.6** Based on the latest HELAA, we estimate the potential capacity from the sources listed in the table adjacent to amount to a total of 221.96 hectares. This leaves a shortfall of 73.64 hectares to be found through the preparation of this Plan. It should be noted that this figure will be refined as the plan progresses.

Category	Hectares
Under Construction	17.5
Detailed Planning Permission (Not Started)	24.20
Outline Planning Permission	73.33
Allocation in Adopted Plan	29.54

Category	Hectares
Other Opportunity (including call for sites submissions)	34.49
Land at Washwood Heath (to be released following HS2 construction)	24
<b>Sub Total – identified Sites</b>	<b>203.06</b>
Completions 2020/21 – 2021/22	18.9
<b>Total Capacity</b>	<b>221.96</b>

Employment land need/ supply	Hectares
Employment land need 2020 – 2042	295.6
Employment land supply	221.96
Shortfall	73.64

**7.7** The HELAA is not a policy document, it is simply a database of available land from which we select the most suitable and deliverable sites to meet future development needs. The HELAA will continue to be updated throughout the plan-making process and is available to view on [www.birmingham.gov.uk/downloads/download/5184/evidence\\_base\\_for\\_the\\_new\\_birmingham\\_plan](http://www.birmingham.gov.uk/downloads/download/5184/evidence_base_for_the_new_birmingham_plan).

### Approaches to increasing employment land supply

**7.8** The City Council will continue to investigate and identify further sources of land supply to address this shortfall. For example, a review of the existing Core Employment Areas has been undertaken as part of the HEDNA and this has identified some potential opportunities for future industrial development. The City Council has also identified further development opportunities through the urban capacity work that as yet has had no confirmation from landowners about the potential for development. Discussions will also continue with authorities in the wider Housing Market Area to determine whether any employment land proposed in their forthcoming plans can meet any of the need arising from Birmingham. In particular, evidence prepared for the Black Country Plan has identified 53 hectares of potential development land at the West Midlands Strategic Rail Freight Interchange in South Staffordshire that can cater for a share of Birmingham’s B8 warehousing needs<sup>5</sup>.

### Portfolio of employment land

**7.9** Ensuring that an adequate supply of employment land is maintained throughout the plan period will be essential in enabling long-term balanced growth to be sustained.

**7.10** The current portfolio of employment land in the city is set by policy TP17 of the BDP. This requires the maintenance of an ongoing reservoir

of employment land within different categories that is readily available for development over a 5 year rolling period.

**7.11** The HEDNA has found that there is a significant unmet need for small to medium sized sites to meet the needs of SMEs operating or wishing to set up within the city. It has also found that with the allocation and outline approval of Peddimore, the allocation of the Former Wheels site and the future release of the large 24 hectare site at Washwood Heath following the construction of HS2, there should be sufficient land to meet the need for larger scale, strategic sites over the next plan period.

**7.12** The new portfolio of employment land recommended by the HEDNA is therefore to continue to require an ongoing 5 year reservoir of readily available employment land, but that this should be refocused on supporting the delivery of small to medium sized sites to cater for locally generated needs. The resulting recommended portfolio of employment land for the new plan is as follows.

Site Size:	Minimum supply over 5 years:
10+ hectares	22.4 hectares
2.4 to 10 hectares	22.4 hectares
1 to 2.4 hectares	11.2 hectares
Less than 1 hectare	11.2 hectares

<sup>5</sup> West Midlands Strategic Rail Freight Interchange, Employment Issues Response Paper - Whose need will the SFRI serve? (Stantec; prepared on behalf of the Black Country Local Planning Authorities, February 2021)

Site Size:	Minimum supply over 5 years:
Total Reservoir:	67 hectares

**7.13** The above portfolio reflects the government’s reclassification of B1 uses to the new E use class, so it will now only cater for B2 (general industrial) and B8 (storage and distribution) uses.

**7.14** The HEDNA also recommends moving away from the categorisation of employment land as ‘Best Quality’, ‘Good Quality’ and ‘Other Quality’ and instead relying simply on the site size categories listed above.

#### *Proposed policy changes*

- The Council proposes to revise the employment land portfolio so that it continues to have a requirement for an ongoing 5-year reservoir of readily available employment land but is reduced from the current BDP target of 96 hectares to 67 hectares. This new reservoir reflects the up to date needs identified in the HEDNA and the narrower definition of employment uses in the Use Classes Order which now only comprises of B2 and B8 uses. The new portfolio will have a greater focus on supporting the delivery of small-medium sized sites compared with the existing portfolio if policy TP17 of the BDP.
- The Council also propose to re-categorise the definition of ‘readily available’ employment land that is counted in the 5 year deliverable supply to those that are allocated or have planning

permission for employment development, as this more closely reflects the PPG<sup>6</sup>.

### **Regional Investment Sites**

**7.15** There are two Regional Investment Sites in the city at Aston and Longbridge. These are locations that meet strategic development needs and are limited to the former B1 uses and extant B2 uses. B8 warehousing is discouraged unless it is ancillary to the main B1/B2 use. Over the BDP plan period since 2011, the successful delivery of development in both of these areas has seen the remaining supply of land in this category progressively reduce from 45 hectares when originally allocated, to 27 hectares in 2021. The Regional Investment Site designation originates from the West Midlands Regional Spatial Strategy which was revoked by the government in 2010.

**7.16** Given the changes to the Use Classes Order, the reducing supply of land in the Regional Investment Sites and because the designation of these areas originated from the revoked West Midlands Regional Spatial Strategy, it may now be an appropriate time to reconsider the Regional Investment Sites designation and simply rely on their designation as Core Employment Areas over the next plan period.

**7.17** If the Regional Investment Sites designation continues, then it may be appropriate for the new plan to restrict the proposed uses to B2 class only, with some complementary uses continuing to be

allowed. The other criteria of policy TP18 relating to transport, IT, location and education and training are considered to remain appropriate.

#### *Proposed policy changes*

- The Council proposes to remove the designation of Regional Investment Sites but maintain their designation as Core Employment Areas. If it is deemed appropriate within the Growth Options to continue with the Regional Investment Sites designation, then developments in these locations will need to be restricted to B2 uses only due to the government’s changes to the Use Classes Order. All other policy criteria will remain but may require amendment, for example to reflect the reduced land supply in these locations. This will ensure that the Aston and Longbridge sites will continue to be focused on delivering high quality advanced manufacturing developments and will not become diluted by the introduction of other uses. The benefits to the local population of education and training opportunities will also continue to be maximised.

### **Core Employment Areas**

**7.18** Much of the city’s employment land supply lies within the established employment locations which have been identified as Core Employment Areas in the BDP. These areas are the focus of the city’s main industrial activity. The BDP currently requires Core Employment Areas to be retained in B1b (Research and Development), B1c (Light Industrial), B2 (General Industrial) and B8 (Warehousing and Distribution) uses.

6 Planning Practice Guidance, Paragraph: 014 Reference ID: 3-014-20190722

**7.19** The HEDNA has reviewed the Core Employment Areas and found that most are continuing to function as intended under policy TP19 of the BDP, i.e. that they are predominantly in a B class use and have good levels of occupancy and economic activity. There is a big variation in the quality of the Core Employment Areas, with some areas containing modern premises in a high quality and attractive local environment, whilst other areas contain older buildings which are in poor condition or near derelict, and often set within degraded and uncared for local environments. Despite the very poor quality of some of the Core Employment Areas most generally remain in high occupancy, which reflects the unmet localised demand for modern employment premises that is a key finding of the HEDNA.

**7.20** It is clear therefore that there is an overall need to retain the Core Employment Area designation but amend and refocus them so that they are more able to deliver better and more modern premises or, where appropriate, contribute to meeting housing need.. There is also a continuing need to improve the quality, attractiveness and accessibility of many of the Core Employment Areas.

**7.21** The government's changes to the use classes order have seen B1b and B1c uses become part of the new E use class. As E class encompasses a wide range of other uses that are more appropriate for centres, such as retail, offices and restaurants, it is not considered that E class uses will be appropriate for Core Employment Areas in the future. The City Council is therefore proposing that the future policy for Core Employment Areas

will focus on retaining them for B2 (General Industrial) and B8 (Warehousing and Distribution) uses only, but that there will continue be scope for other uses that are appropriate for industrial areas, such as waste management and builders' merchants. In reflection of these changes the City Council is considering whether it may be more appropriate to rename the Core Employment Areas as *Core Industrial Areas* in the new plan.

**7.22** Some Core Employment Areas which contain high concentrations of Use Class E may no longer be appropriate for designation. This is because the City Council has little control over many changes of use within or from class E. For example, Core Employment Areas that contain large numbers of office, light industry or research and development uses can now change to retail, leisure or food and drink uses without the need for a planning application. There is also a national permitted development right to allow class E uses to change to residential use. As a result, the Core Employment Area designation will have little effect in such cases.

**7.23** Taking these changes in to account, the HEDNA has reviewed the 63 existing Core Employment Areas in the city and found that the majority should be retained as they are, some should be retained but with amended boundaries to reflect the current distribution of uses and where further development opportunities exist, and that some should be de-designated due to them no longer being predominantly in an employment use.

#### *Proposed policy changes*

- The Council proposes to refocus the Core Employment Areas for B2 (General Industrial)

and B8 (Warehousing and Distribution) uses only but retain some scope for other Sui Generis uses of an industrial nature. Given the new focus, we propose renaming the designation to 'Core Industrial Areas'. This will provide greater clarity of the types of uses that would be considered as acceptable within these locations.

- It is proposed that the Core Employment (or Industrial) Areas policy in the new Birmingham Local Plan will include more specific criteria to establish what will constitute an exceptional justification non-employment uses in a Core Employment Area. This will be supported by a new Loss of Industrial Land to Alternative Uses SPD that will be prepared in parallel to the new plan.

#### **Protection of employment land**

**7.24** There are also existing employment land and premises that fall outside of the Core Employment Areas. Policy TP20 of the BDP currently provides protection for such land and says that development for other uses is only considered appropriate where it is a non-conforming use (which the Loss of Industrial Land to Alternative Uses SPD defines as less than 1 acre/ 0.4 hectares and in a predominantly residential area) or has been unsuccessfully marketed for a new employment use for at least two years.

**7.25** The high housing needs that city faces has seen increasing pressure on existing employment sites outside the Core Employment Areas to be redeveloped for housing. Given the city's very high housing needs, there may be room for greater flexibility in the criteria for the loss of employment

uses outside the Core Employment Areas in the future but this will need to be considered further in the context of the shortfall of employment land identified earlier on in this section.

### *Proposed policy changes*

- The Council is considering making the non-conforming employment use requirement more flexible. This could mean amending or removing the size requirement so that larger industrial sites, or any size of industrial site could be considered as non-conforming if it is in a predominantly residential area.
- Another option could be broadening the definition of the surrounding uses, so that non-conforming sites are not restricted to predominantly residential areas. For example, this could also include sites in predominantly commercial areas. Another broader approach could be to consider any isolated industrial site that does not adjoin another industrial use as being non-conforming.
- The requirement to demonstrate active marketing ensures that sites which are capable of providing a valued contribution to the city's economy and to local employment are not lost. The City Council therefore considers that this requirement should continue in some form, but there may be potential to increase the flexibility for the evidence required. For example, the required marketing period could be reduced to one year instead of two years.
- The criterion also makes provision for viability evidence to be submitted where it is argued that redevelopment for employment purposes would be commercially unviable. A further option to consider is that the requirement for a viability assessment could entirely replace the requirement

for active marketing to be submitted. This would also continue to provide a safeguard to ensure that valued employment sites are not lost to other forms of development.

### **Offices**

**7.26** The Coronavirus pandemic has seen an increase in homeworking for workers who are normally office based, and it is unlikely that full time office-based work will see a return for many companies and employees, with hybrid working (i.e. partly in the office and partly at home or another remote location) likely becoming the normal working pattern. In reflection of this, the HEDNA has determined that a 30% discount on the projected future office development needs is appropriate. The resulting need for office floorspace over the plan period up to 2042 is 469,000 sq.m.

**7.27** The government's changes to the Use Classes Order means that offices fall within the same use class as other commercial uses such as retail and food and drink. Changes within class E do not require a planning application and permitted development rights mean that such uses can be converted to residential use. As a result, the City Council now has little control over how office floorspace can be used.

### *Proposed policy change*

- Given the above, the City Council does not propose to include a detailed policy to guide future decisions on office developments in the new plan. It may instead be appropriate to have a broader policy setting out the criteria and geographic locations for development under Use Class E.

### **Other employment policies**

**7.28** The NPPF states that planning policies should also allow for new and flexible working practices, for example live-work accommodation. The BDP doesn't currently have a policy relating to newer ways of working. The City Council would therefore welcome your comments and suggestions as to whether the new Birmingham Local Plan should contain such a policy and what the scope of any new policy should be.

**7.29** Recent development proposals such as 193 Camp Hill (2021/10845/PA) and land at Key Hill in the Jewellery Quarter (2021/06272/PA) have also seen increased discussions about the provision of affordable workspace, particularly within the city centre. This is employment floorspace that is provided within development schemes at a reduced rate for eligible occupiers and is funded through developer contributions via Section 106 agreements. The City Council welcomes your views on whether the new plan should contain a policy relating to the provision of affordable workspace within relevant development schemes.

### **The city centre / Central Birmingham**

**7.30** Over the last 30 years, the city centre has undergone major transformation, attracting unprecedented levels of investment and development into the city, providing jobs, homes, enhanced public transport infrastructure and environmental improvements. Exciting future developments such as Smithfield, HS2 and the completion of Paradise will ensure we continue to be one of the largest growing city economies in the UK.

**7.31** For the last 30 years, the regeneration and growth of the city centre has been focussed within the area defined by the Middle Ring Road. The central civic, cultural and economic core of the city has expanded with many exemplar developments, with surrounding quarters evolving and developing their own identities leading to great opportunity.

**7.32** In defining the city centre by the ring road, this has however often resulted in physical and perceived barriers between areas, with the city centre considered separate from the surrounding inner city.

**7.33** 'Our Future City Plan – Central Birmingham Framework 2040' will provide a new vision for the central area of the city. This will incorporate the entire Central Birmingham area, from the city core to the inner city suburbs beyond the ring road to promote and link opportunities and investment into surrounding communities.

### **Urban centres**

**7.34** Birmingham contains a large and diverse network of centres which meet day-to-day shopping needs but also act as focal points for local communities and provide important sources of local employment. In addition to the centres identified in the existing hierarchy of centres, there are also many smaller shopping parades.

**7.35** Changes that were already occurring in the retail sector have been accelerated by the Covid-19 pandemic; changing shopping habits, use of space and consumer demand. While some centres have met this challenge by finding a new focus and flourishing, others will need to evolve to remain attractive, viable and vibrant places.

**7.36** Recent changes to the Use Classes Order means that there is more flexibility for businesses to change from one use to another. This means that a shop can become a restaurant or a gym for example without needing planning permission. On the one hand this provides flexibility to allow vacant retail units to be occupied but on the other hand, it removes the Council's ability to maintain the retail function of centres.

**7.37** As the city looks to the future, we will need to reimagine the role of our urban centres as places which offer more than just somewhere to shop. New working patterns with more people working at home for most of the week could drive new footfall into local centres as demand grows for smaller scale affordable workspace, leisure, social experience and personalised services.

**7.38** The digital infrastructure of local centres will become more important with more businesses offering customers seamless online and physical services, building on the trend of click and collect. This type of retail service delivery means that bricks and mortar shops are becoming multi-use spaces, and there is generally less need for retail space and more demand for urban warehousing and delivery lockers.

**7.39** The City Council will prepare a Retail and Leisure Needs Assessment which will assess future retail and leisure needs in terms of floorspace, type and location. A health check and boundary review of the centres will also be undertaken. The evidence gathered will be used to update the centre hierarchy and boundaries and inform the focus or locations for future retail and leisure growth.

**7.40** Recent evidence places Birmingham in the top 20% of local authorities with the highest prevalence of obesity in adults, and just outside the top 20% for children. (Birmingham Health Profile 2019). Evidence shows links between greater exposure to takeaway food outlets and the likelihood of being overweight and obese. The Council considers there is continuing need to ensure our local centres promote healthy living and to restrict the concentration of hot food takeaways. However, we would like to know if there should be more flexibility to allow for the changing needs of our centres but still ensure healthy environments.

**7.41** Empty space above shop units represents a significant waste of floorspace and an untapped resource. Non-retail uses such as offices and homes on the upper floors of buildings within existing centres could be given more policy support provided that they do not have a negative impact upon the operation of the existing ground floor business or the amenities of potential future occupants.

### *Proposed policy changes*

- The Council will review the centre hierarchy and centre boundaries, looking at potential for new local centre designations and amending centre boundaries where appropriate.
- Given the flexibilities allowed by the new Use Class E, we can no longer have a policy requirement for 50%/ 55% of uses in centres to be retained in retail use (former Class A1). We will need to refocus our centres as places to work, rest, and socialise. This could include promoting local enterprise (providing affordable workspace), enhancements to the public realm and digital



connectivity, enabling street markets and pop-up events. We also need to manage the impacts of the growth in online shopping on local centres (increased deliveries and click and collect).

- The Retail and Leisure Needs Assessment will be used to inform new policies in relation to the quantitative and qualitative requirements for local centres.
- The Council will consider how more policy support can be given promoting the use of empty space above shops.

### **Tourism, culture and the night-time economy**

**7.42** Birmingham is a top visitor destination in the UK attracting millions of people a year to experience the wide range of cultural, leisure and recreational activities it has to offer. The Creatively Birmingham statement of intent sets out our shared ambition, as partners, invested in the creative future of our city, to grow and develop Birmingham's diverse creative, cultural and arts sector over the next decade. The Creatively Birmingham Strategy will be developed over the next six months and will deliver an inclusive, accessible, sustainable and economically vibrant arts, culture and creative sector that is alive in every community across Birmingham.

**7.43** Tourism has an important economic role and Birmingham's continued success as a destination for tourists will depend upon the city having a diverse mix of facilities that are attractive to a range of audiences. Protecting and enhancing the diverse leisure, recreation, arts and cultural facilities in the city where they meet local and wider needs will be important to Birmingham's economy.

**7.44** A vibrant and mixed evening and night time economy can introduce new activity and help valued cultural, recreational and social assets like pubs and music venues to be retained, but it can also have negative impacts on local residents and the local environment needs to be carefully managed.

#### *Proposed policy change*

- We would like to take a proactive approach to enabling and managing the evening and night-time economy. This could include considering whether to have a policy that seeks to protect public houses, theatres, live music venues and night clubs from change of use.
- We are also considering whether to have a policy which identifies where the clustering of night-time economy uses would be encouraged and not encouraged to help promote intensification and diversification of leisure and cultural uses while protecting local amenity and character. Clustering of night-time economy uses would support provision of public transport, in particular evening services and timetables.

### **Have Your Say**

#### *Economy and Centres*

35. Do you agree with the proposed removal of the Regional Investment Sites designation?
36. Do you agree that the Core Employment Areas should be refocused on B2 and B8 uses only, including renaming them as Core Industrial Areas?
37. How do you think the shortfall in the supply of employment land should be addressed?

38. Are there any additional sites you think are suitable and available for employment development? If so, please submit a Call for Sites Form at [\\_ \(bcc-call-for-sites.nw.r.appspot.com\)](http://bcc-call-for-sites.nw.r.appspot.com)
39. Do you think we should allow more flexibility for employment land outside of the Core Employment Areas to change to other uses?
40. What are your views on the proposed approach to offices? Should we instead have a broader policy approach to cover commercial developments under use class E?
41. Do you think there should be a policy to support the delivery of affordable workspace and other new ways of working? If so, what should this policy be?
42. Do you have any other suggestions or comments about the economy and employment land?
43. What would you like to see more of in your local high street/ centre?
44. Do you think we should have a policy which seeks to protect public houses, theatres, live music venues and night clubs from change of use?
45. Do you think we should have a policy which says where night-time uses should be located and where they should not be?

46. What type of leisure and cultural activities would you like to see more of in the night-time economy?

47. How can the night-time economy be better managed (e.g. noise, transport, safety etc)?



# 8

## Connectivity

### A sustainable transport network

**8.1** The City Council is committed to delivering an efficient, fair, green, sustainable and healthy transport system. The Birmingham Transport Plan (BTP) outlines how the city's transport system needs to be transformed to meet the challenges of the future focusing on the key areas of intervention: reallocating road space, transforming the city centre, prioritising active travel in local neighbourhoods and managing demand through parking measures. The key objectives of the BTP, which we propose will be embedded in the Birmingham Local Plan are:

- a sustainable, green, inclusive, go-anywhere network
- safe and healthy environments - walking and cycling will be the first choice for people making short journeys

- a fully integrated, high quality public transport system will be the go-to choice for longer trips
- a smart, innovative, carbon neutral and low emission network will support sustainable and inclusive economic growth, tackle climate change and promote the health and well-being of Birmingham's citizens.

### Reducing car use and dominance

**8.2** Reducing car use will reduce congestion delays, carbon emissions and improve air quality. The average Birmingham driver spent 80 hours sat in traffic in 2019, costing £624 per driver, and £325 million for the city as whole (INRIX, 2020).

**8.3** By focusing development on locations which are sustainable or can be made sustainable, the need to travel can be reduced and/ or the use of sustainable modes of transport can be increased. This can help to reduce congestion and emissions and improve air quality and public health. We would expect development to be located and designed to

be accessible by the whole community and reduce reliance on the private car. Increasing density of development close to public transport links such as rail and bus routes can also help people to move around the city in a sustainable way.

**8.4** With competition for road space so high, reallocating road space away from private cars in favour of public transport and active travel networks, such as cycle and bus priority lanes, may be necessary.

**8.5** Managing demand through parking measures will also be used as a way to reduce car travel through availability, pricing and restrictions. Where development potential exists, land currently occupied by car parking will be put to more productive use.

## Safe and healthy environments

**8.6** The BTP puts pedestrians first with the commitment to create safer and healthy environments to make walking, cycling and active travel the natural choice for short journeys.

**8.7** As a way of prioritising active travel in local neighbourhoods, Birmingham is looking to introduce a 20mph standard for all residential streets and local centres in Birmingham, while retaining a 30mph speed limit on strategic and distributor roads. Walking infrastructure and street pedestrianisations will also be introduced, as well as wayfinding to ensure connectivity with public transport hubs. This includes Places for People and School Streets schemes which are being developed to reduce the amount of traffic in residential neighbourhoods and improve the quality of the pedestrian environment, making it safer for people to walk and cycle, and children to play.

**8.8** Cycle schemes and canal towpath improvements will be introduced including new cycle routes along main commuter corridors and cycle hire schemes incorporating electric vehicles. A Kerbside Management Strategy will be compiled to ensure that kerbside space in our city is managed for the benefit of all our residents and our environment. The Birmingham Local Plan will ensure that we deliver homes and jobs in the right places close to services and infrastructure. This will reduce journey lengths and enhance the convenience and attractiveness of walking and cycling.

**8.9** 15-20 minute neighbourhoods / Healthy Living Zones will be key in reducing travel times and increasing access for residents to day-to day

services and facilities. But provision of safe walking and cycling infrastructure and access to frequent, reliable, affordable public transport is fundamental to making the 15-minute model work. Active travel corridors can also provide opportunities for delivering green infrastructure.

**8.10** New development will continue to be expected to incorporate high quality pedestrian routes including to and from bus stops, train stations and Metro stops, providing pedestrian crossing facilities where appropriate and ensuring footway surfaces are well maintained.

**8.11** Development will also expect to continue to support the city-wide programme of cycling infrastructure improvements and opportunities such as improving cycle security, increasing access to bicycle hire opportunities, support for travel behaviour initiatives and ensuring that new development incorporates appropriately designed facilities which will promote cycling as an attractive, convenient and safe travel method.

## Public transport

**8.12** There is a continuing need to improve public transport so that there is an attractive and realistic alternative to the car. Active travel and public transport need to be complemented by road space reallocation that supports a fundamental change in the way that people and goods move around the city and leads to the reduction of car kilometres travelled. Road space will be reallocated to make active travel and public transport more attractive than private car use, whilst not restricting those who still need to use a car or a taxi, such as people with a Blue Badge. Buses are the most accessible mode

of travel in the city and can adapt quickly to changing demands, facilitating immediate shift from private cars to public transport and delivering rapid decarbonisation without major infrastructure changes. There is good bus coverage in Birmingham, but journey times can be unpredictable and provision unequal across the city and different times of the day. Several important bus investment programmes are taking shape including the introduction of Sprint rapid transit buses and the development of cross-city bus routes. These will reduce the need to change buses in Birmingham city centre, increasing connectivity across the different neighbourhoods of the city and connectivity with areas beyond the city's administrative boundaries. This work is also complemented by prioritising buses at junctions across the region and the introduction of zero and low emissions buses.

**8.13** In terms of rail, the city's network is limited in size and in need of enhancement, particularly as levels of commuting are rising and journey lengths increasing. HS2 provides opportunities to enhance the local and regional rail services by releasing network capacity. This will be used by new local services and stations, which will be enabled by delivery of the Midlands Rail Hub which will also improve regional connectivity between Birmingham, Worcestershire and Herefordshire and between Birmingham, Leicester, Nottingham and the East Midlands. More imminently, work is underway to re-introduce passenger services on the Camp Hill rail line and open new stations in Moseley Village, Kings Heath and Pineapple Road.

**8.14** Light rail provides a fast and reliable travel mode which can encourage more sustainable travel patterns, improve access to key employment locations and complement the city's existing bus and heavy rail public transport networks. As such, it is a key component of the City Council's Birmingham Transport Plan. The Midland Metro network is planned to triple in size over the coming years, connecting more people to employment, leisure and education opportunities this includes a new tram route running from the city centre through East Birmingham to Solihull and the Airport, providing a new direct and reliable connection to both HS2 stations and to Birmingham City Centre. Sprint buses will deliver high frequency services on main commuter routes with predictable journey times. The first phase of Sprint has recently been delivered on the A34 Walsall Road and A45 Coventry Road corridors. Once complete, the Sprint rapid bus transit route created along the A45 Coventry Road will have a dedicated lane, providing a fast and reliable service through East Birmingham with connections to Solihull and Birmingham Airport.

## Freight

**8.15** Efficient freight movement is essential to ensuring business and individuals receive the goods they need at the time and location they need them. Improvements for freight could include the introduction of consolidation and micro-consolidation centres that will serve specific areas of the city, and replacement of delivery journeys with electric vehicles, including electric cargo bikes that can serve the last part of delivery journeys. The Council will continue to work with businesses and the logistics industry to explore

sustainable freight solutions for Birmingham. The introduction of the city centre segments, which 'divides' the city centre into seven segments, will encourage sustainable freight movements. Each segment can only be accessed from the A4540 Ring Road, while movement between segments is only possible for public transport, pedestrians, and cyclists. All other vehicles cannot cross the segment boundaries due to physical measures such as bus gates and road closures, and so would need to go back to the A4540 Ring Road to move between segments. Whilst access is restricted to private cars, servicing and loading will be maintained for local businesses.

## Digital connectivity

**8.16** High quality digital connectivity and mobile networks will become increasingly important to our working, learning, leisure and community activity. It can also contribute towards reducing the need to travel. Improving digital connectivity is a national and a local priority. The Government has set a target of achieving 5G coverage for the majority of the population by 2027 and full fibre connectivity across the whole country by 2033.

**8.17** Access to high-speed broadband across Birmingham remains inconsistent. Currently full fibre coverage in Birmingham is 48% compared to 11.5% across England. Many urban cities and regions are developing plans to accelerate full fibre deployments in order to increase their competitive advantage. Given the importance of internet access to residents and businesses, the Council are considering whether to require all new developments to make provision for ultrafast broadband and full fibre connectivity. For

non-residential development, viability will need to be considered. Adopting this approach will prevent the need for fibre retrofitting programmes in the future, which have significant cost implications and cause considerable disruption through road works.

**8.18** Birmingham aspires to be one of the most connected digital cities in the world, an instrumented city enabled through the deployment of sensors and actuators to capture real time data. The infrastructure for the provision of Internet of Things sensors should be considered by developers in order for city operations to gain valuable insights into environmental and climate conditions, better planning, greater utilisation of the use of space and places as well as early warning monitoring systems for other inclement conditions

**8.19** The adaptive use of properties/buildings continues to evolve with homes becoming offices. There is a need to ensure that all new developments are supplemented by a digital specification to accompany the physical building plans to ensure that the development is futureproofed and capable of supporting intergenerational living. The digital specification should facilitate emerging technologies such as the Internet of Things, the establishment of local smart energy grids, electrical charging points as well as enhanced digital connectivity infrastructure

**8.20** The use of virtual 3D modelling technologies is becoming more and more prevalent. The Council aims to develop digital twins, virtual representations of the city which can be used for modelling new concepts and ideas, and testing, trialling and validating technologies. The adaptable virtual models will enable planners and developers to

design optimal developments in the right locations to meet city and commercial needs. Birmingham proposes that all development plans are accompanied by virtual models in a format and data standards that enable federated network of digital twins. Together these platforms can be developed into a comprehensive digital twin for Birmingham. This hugely ambitious aspiration would not only see Birmingham leading the way in terms of city data sharing nationally, delivering benefits for its citizens and city organisations, while also providing a platform to attract high profile businesses requiring data to drive their innovation agendas.

## Have your Say

### Connectivity

48. What else can be done to encourage people to walk and cycle more and use their car less?
49. How can public transport be improved so that more people will use it?
50. Should new development be required make provision for future proof digital infrastructure?
51. Should all developments be required to meet an accredited standard for digital connectivity?



# 9

## Locations for growth

### Background

**9.1** Historically, Birmingham has seen new development accommodated through the regeneration, redevelopment and renewal of its urban area with periodic expansion. The city is extensively built up and tightly constrained Green Belt. Other constraints, such as open space and ecological designations will also affect where new development can go.

**9.2** National policy encourages local plans to make the best use of land in meeting the need for homes and other uses, while safeguarding and improving the environment. The development of previously developed or 'brownfield' land and under-utilised land and buildings is encouraged. However, large scale regeneration will often involve 'land assembly' (combining land under different ownerships to create a larger more comprehensive redevelopment) and land decontamination (many brownfield sites have previously been used for industrial purposes).

**9.3** This chapter reviews the current spatial strategy (how much development is built and where it is located) and set out in the BDP and proposes principles to underpin the strategy of the new Birmingham Local Plan. This chapter also suggests potential broad locations for growth. At this stage specific sites are not identified.

### Key growth areas – opportunity areas

**9.4** The current BDP strategy for growth focuses on ten key growth areas within the city but also distributes growth in the network of centres, transport corridors, housing regeneration areas, Core Employment Areas, and other opportunity sites.

**9.5** Some of these key growth areas will continue to be important locations for growth over the new plan period, such as Langley Sustainable Urban Extension and Peddimore employment site. Some will have mostly achieved their objectives and need to be refocussed such as Longbridge and Selly

Oak. There will also be new opportunities identified through the local plan process and the Council's existing and emerging area frameworks such as 'Our Future City Central Birmingham Framework' which will need to be taken into account.

**9.6** The opportunity areas will be informed by the evidence base including sustainability appraisal, site availability assessments, and the area frameworks. However, it is also important to establish the key principles to guide their selection. We would like to hear your views on whether the following key principles are appropriate. The opportunity areas will be:

1. Focussed on existing urban areas
2. Locations which are (or will be) well served by public transport, cycling and walking infrastructure and other services and amenities

3. Where clusters of development opportunities exist
4. Built on emerging or recently adopted masterplanning/ area frameworks

#### *Proposed policy change*

- The Council considers that the growth areas need be more focussed both in size and purpose.
- We propose they contain clusters of development opportunity sites and or/ infrastructure improvements, the delivery of which would bring about wider change in the area.
- Each growth area would have a policy which would set out the key requirements e.g. land use, scale of growth (floorspace for commercial / leisure/ industrial/ mixed uses, the number homes), housing density and other area specific requirements.
- Each growth area would be supported by a masterplan SPD to facilitate a co-ordinated and comprehensive approach to the regeneration of the area.
- We propose that key growth areas are renamed to 'Strategic Regeneration Areas' or 'Opportunity Areas'.

#### **Potential opportunity areas**

**9.7** The Council propose to carry forward some growth areas from the current BDP into the new plan because they have not been completed. Other growth areas in the BDP need to be refocussed as they have been largely achieved but remain as important locations for further growth. Finally, new

opportunity areas have been Identified through the Council's work on emerging or existing area frameworks.

- Langley Sustainable Urban Extension
- Peddimore
- Sutton Coldfield Town Centre
- Bordesley
- Longbridge
- Selly Oak
- City Centre
- Knowledge Quarter and Nechells
- Hockley, St. George's, Gun Quarter
- Highgate and Balsall Heath
- Edgbaston
- Digbeth and Bordesley
- Ladywood
- Perry Barr
- Smethwick - Birmingham Corridor
- Tyseley Energy Enterprise Park (Centre of Excellence for Decarbonisation of Heat).

## **Have Your Say**

### **Locations for Growth**

52. Do you agree with the principles for identifying opportunity areas? Is there anything missing?
53. What are your views on the proposed approach to the opportunity areas?
54. Have we identified the correct opportunity areas? Is there anything missing?



# Appendix 1 - Call for sites

The Council issued a Call for sites in Summer 2021, providing the opportunity for landowners, developers and communities to let us know about potential sites or broad locations for development that they wish the Council to consider through the Housing Land and Availability Assessment (HELAA). All Call for sites submissions have been assessed in accordance with the HELAA methodology.

The HELAA assesses a site's suitability, availability and viability for development. The HELAA is not a policy document and does not allocate sites for development, it is simply a database of available land from which we select the most suitable and deliverable sites to meet future development needs. Not all the sites that have been suggested will be suitable for development. A HELAA report documenting all the sites assessed and the results of the assessment has been published alongside this consultation document. This can be viewed at [www.birmingham.gov.uk/birminghamplan](http://www.birmingham.gov.uk/birminghamplan)

While the initial Call for sites has taken place, we would welcome any additional site suggestions during this consultation period. Please use the link here ([bcc-call-for-sites.nw.r.appspot.com](http://bcc-call-for-sites.nw.r.appspot.com)) to submit a site to us for consideration.

## Appendix 2 - What happens to the existing Local Plan documents?

The current local plan for Birmingham comprises:

- The Birmingham Development Plan (adopted January 2017) sets out the strategic planning policies, housing and employment targets and allocations of land for development in the city.
- The Development Management in Birmingham Development Plan Document (adopted December 2021) provides detailed development management policies on a range of topics used to inform decisions on planning applications.
- The Bordesley Area Action Plan (adopted January 2020) sets a vision and development strategy for the regeneration of the area.
- The Longbridge Area Action Plan (adopted April 2009) was prepared to secure the comprehensive redevelopment of the area following the closure of the MG Rover plant in 2005.
- The Aston, Newtown and Lozells Area Action Plan (adopted in July 2012) includes a development strategy and policies for the area to inform planning decisions.

The new the Birmingham Local Plan, once adopted, will supersede the existing BDP and Longbridge Area Action Plan (2009) and Aston, Newtown and Lozells Area Action Plan (2012). The existing BDP includes a number of sites which are allocated but have not yet been developed; these allocations will be reviewed and rolled forward in the new plan where appropriate.

The recently adopted Bordesley Area Action Plan (2020) and Development Management in Birmingham Plan (2021) will not form part of the new Birmingham Local Plan but will be reviewed five years or earlier from their adoption date.

## Appendix 3 - Neighbourhood plans

Neighbourhood plans are local area plans that have been or are being produced by Birmingham communities. They contain local area initiatives and policies and are used alongside the local plan. A neighbourhood plan should support the delivery of strategic policies set out in the local plan.

The made and emerging neighbourhood plans in Birmingham are:

- Balsall Heath Neighbourhood Development Plan (made October 2015)
- The Beeches, Booths and Barr (3Bs) Neighbourhood Plan (made October 2021)
- Jewellery Quarter Neighbourhood Development Plan (in development)

There is no requirement to review or update a neighbourhood plan. However, policies in a neighbourhood plan may become out of date, for example if they conflict with policies in a local plan

# Appendix 4 - List of consultation questions

## Challenges and opportunities

1. Do you agree with the challenges and opportunities identified?
2. Are there any other challenges and opportunities which are important?

## Vision and objectives

3. Do you agree with the proposed vision?
4. Are these right objectives for the Birmingham Local Plan to achieve?
5. What is most important to you? E.g. 1 – Net zero carbon city, 2 – A connected city etc.
6. Is there anything missing from the vision and objectives?

## Options for housing growth

7. Are there any additional housing growth options that we should consider for housing growth?
8. What is your preferred option or combination of options?
9. Do you think the proposed densities are appropriate? Should we build to even higher densities?
10. Are there any additional sites you think are suitable and available for housing development? If so, please submit a Call for Sites Form at ([bcc-call-for-sites.nw.r.appspot.com](http://bcc-call-for-sites.nw.r.appspot.com))

## Homes and neighbourhoods

11. What type, size and tenure of homes do you think will be needed in the future?
12. How do you think we can increase the supply of affordable housing?
13. Should we have a policy with a simple split of affordable rent and affordable home ownership or a policy with a more detailed tenure split?
14. How do you think we can prevent the loss of family housing?
15. Should we have a policy which requires a percentage of older persons housing on residential developments?
16. Should we allocate sites specifically for older persons housing? Where should they be?
17. What should the policy be on purpose built student accommodation?
18. Where should new gypsy and traveller sites be located?
19. What type and scale of development should Health Impact Assessments apply to?

## Climate change

20. Do you feel we have missed any policy opportunities to help the City achieve net zero?
21. How should we encourage all developers to deliver net zero carbon development?
22. How can we ensure that the principles on waste management and resource efficiency are addressed by new development?

23. Should we introduce higher water efficiency standards?
24. Do you agree with the policy proposal to prevent overheating of new buildings?
25. Should the Plan include policy to ensure that rivers within the city provide multi-functional benefits in relation to flood risk, ecology biodiversity and support health and wellbeing?
26. Should the Plan include policy to ensure a catchment-based approach to flood risk management from all sources and deliver climate resilience?

## The built and natural environment

27. How should the city's green infrastructure network be improved and expanded?
28. Should we explore a higher than 10% biodiversity net gain for all major developments?
29. Should the new Local Plan seek to identify/allocate sites to provide off-site biodiversity net gain?
30. Should the Council introduce an Urban Greening Factor policy?
31. Do you agree with the proposed new standards for open space?
32. How can we ensure that residents have good access to quality open space?

- 33. How can the Birmingham Local Plan encourage high quality design in all developments?
- 34. Are there any other specific issues that the Birmingham Local Plan needs to address regarding the environment?
- 43. What would you like to see more of in your local high street/ centre?
- 44. Do you think we should have a policy which seeks to protect public houses, theatres, live music venues and night clubs from change of use?

### **Economy and centres**

- 35. Do you agree with the proposed removal of the Regional Investment Sites designation?
- 36. Do you agree that the Core Employment Areas should be refocused on B2 and B8 uses only, including renaming them as Core Industrial Areas?
- 37. How do you think the shortfall in the supply of employment land should be addressed?
- 38. Are there any additional sites you think are suitable and available for employment development? If so, please submit a Call for Sites Form at
- 39. Do you think we should allow more flexibility for employment land outside of the Core Employment Areas to change to other uses?
- 40. What are your views on the proposed approach to offices? Should we instead have a broader policy approach to cover commercial developments under use class E?
- 41. Do you think there should be a policy to support the delivery of affordable workspace and other new ways of working? If so, what should this policy be?
- 42. Do you have any other suggestions or comments about the economy and employment land?
- 45. Do you think we should have a policy which says where night-time uses should be located and where they should not be?
- 46. What type of leisure and cultural activities would you like to see more of in the night-time economy?
- 47. How can the night-time economy be better managed (e.g. noise, transport, safety etc)?

### **Connectivity**

- 48. What else can be done to encourage people to walk and cycle more and use their car less?
- 49. How can public transport be improved so that more people will use it?
- 50. Should new development be required make provision for future proof digital infrastructure?
- 51. Should all developments be required to meet an accredited standard for digital connectivity?

### **Locations for growth**

- 52. Do you agree with the principle of allocating Opportunity Areas?
- 53. What are your views on the proposed approach to the Opportunity Areas?
- 54. Have we identified the correct Opportunity Areas? Are there anything missing?

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