

# Birmingham Local Plan Issues & Options





# 1. Introduction

- 1.1 The emerging Birmingham Local Plan (BLP) will shape how the city will develop over the next 20 years. It will set out the spatial strategy and planning framework to be used to guide development in the city.

## **2. Options for appraisal**

### **Introduction**

#### 2.1 The 'Issues and Options' document













## 4. Housing options: Summary of findings

- 4.1 Table 4.1 presents a visual summary of the options appraisal findings. Below is a summary of the effects for each of the Options. A more complete appraisal is presented in **Appendix B**.
- 4.2 It is important to point out that the options appraised are not mutually exclusive it is likely that a combination of several or all options would be required in order to fulfil the housing growth required. As such this appraisal does not rate the option against each other but rather highlights the potential effects associated with each option.
- 4.3 **Option 1** (Increased housing densities) scores particularly well with likely significant positives for housing, economy and employment, and accessibility and transport as the approach would increase housing provision with less land take and increase growth in more sustainable, well-connected locations; improving accessibility services, employment and transport. Conversely, the option could potentially have significant negative effects on the historic environment due to the concentration of heritage assets in the City Centre and urban centres; making it harder to avoid impacts on the character of such locations.
- 4.4 **Option 2** (More active public sector land assembly) scores relatively well with respect to six of the SA topics as it would help improve housing land supply and address the housing shortfall including for affordable housing. No likely significant effects (either positive or negative) are predicted for this option but as with other options, there are some potentially negative effects on air quality, water quality, the historic environment and biodiversity due to the scale of growth urban areas would

implications due to the reduction of open space which is already underprovided in the City. Mixed effects are also predicted with respect to the natural landscape; negative effects due to the loss of amenity and change to the existing landscape/ townscape character with potential positive effects due to reduced encroachment on areas of high landscape sensitivity and the potential for improved provision of higher quality open/ green space.

4.7 **Option 5** (Utilise some Core Employment Area land for housing) is likely to have



## 5. Appraisal findings: Employment options

### Summary of findings

- 5.1 Table 5.1 presents a visual summary of the options appraisal findings. Below is a summary of the effects for each of the two high level employment options identified at this stage. A more complete appraisal is presented in **Appendix C**.
- 5.2 There is considerable uncertainty involved in predicting the effects of the options at this level of detail. This is because effects could vary widely depending on the actual sites and locations that are involved. The appraisals at this stage should therefore be taken in this context, and as broad indications of the potential merits and drawbacks of each approach.
- 5.3 Option 1 brings potential for the widest range of effects, which is to be expected given that it would involve additional land being identified for employment in Birmingham itself. However, the effects are mixed for many SA topics, as location will be important in determining whether effects are positive or negative. The most beneficial aspect of Option 1 is in terms of economy and employment, as it will deliver needs where they are arising, which is a potential significant positive effect. Provided that jobs are accessible to communities and well located, this ought to bring benefits in terms of health, equality and community development. Effects on environmental factors such as heritage, landscape, biodiversity are uncertain, but could be negative depending on the sites involved. Conversely, they could help reduce pressure on greenfield development. A balance will need to be carefully explored though, as there is also pressure to maximise the use of land for housing in the urban areas.
- 5.4 Addressing the shortfall in employment locally may also lead to increases in employment related traffic, which could affect air quality, and could also mean more growth in areas at risk of flooding.
- 5.5 Meeting the shortfall in land outside of Birmingham has some clear environmental benefits for Birmingham itself, but it is unclear what the knock on effects would be in the wider HMA. However, given that there is limited land supply in the City, and the area is already highly urbanised, a reduced pressure to address all employment needs locally could help to free land for housing and / or reduce the need for additional sites elsewhere.

## **Table 5-1 Summary of findings: Employment Growth Options**

## 6. Appraisal of proposed policy changes

### Introduction

- 6.1 A crucial element of the plan making processes is to establish a suitable strategy for development growth and distribution. The Issues and Options document puts forward a range of policy approaches (including changes to adopted policy approaches) to help guide development. This section presents an appraisal of the preliminary high level policy approaches outlined in the Issues and Options stage of the BLP against the SA Framework. The high level effects have been identified taking into account magnitude, duration, frequency, and likelihood. Combined, these factors have helped to identify the likely significance of effects, whether these are positive or negative. The policies are individually considered





- 6.8 **Purpose built student accommodation:** The change being considered pertains to setting limits on the extent of student accommodation so as to avoid large concentrations in particular areas (e.g. in the City Centre, Selly Oak and Edgbaston).
- 6.9 The HEDNA identified this issue as impacting the provision of a more balanced housing mix. Selly Oak is identified as an area where a need for a higher

## transport





- 6.29 **Portfolio of employment land:** This proposes a policy change to revise the employment land portfolio in order to continue providing an ongoing 5-year supply of readily available employment land with a reduced target of 67 ha as evidenced by the recent HEDNA. The new portfolio will focus on delivering small-medium sized sites. This is likely to have **positive effects** on the economy and employment topic as it will help ensure the council meets future demand for sites.
- 6.30 The HEDNA identified an unmet demand for small/ medium sites and this policy would help address this need. Effects upon other factors would be dependent on the choice of sites.
- 6.31 **Regional Investment Sites:** proposes removing the designation of Regional Investment Sites (term inherited from the revoked West Midlands Regional Spatial Strategy) and maintaining their designation as Core Employment Areas. If deemed appropriate within the Growth Options to continue with the Regional Investment Sites designation, then developments in these locations will need to be restricted to B2 uses only due to the government's changes to the Use Classes Order. This change in designation is unlikely

The HEDNA also reduced the projected office floorspace needs by 30% up to 2042.

- 6.35 This is unlikely to have significant effects (**neutral**) as the changes in Use Classes Order mean offices are in the same class as other commercial uses (retail and food and drink) and the introduction of new Permitted development rights would enable the conversion of class E buildings to residential dwellings without requiring a planning application.
- 6.36 **Urban centres:** This states the council intention to review the centre hierarchy and boundaries seeking to designate new centres and possibly amend some existing centre boundaries.
- 6.37 The policy would also remove the requirement for 50%/55% of uses in centres to be retained for retail use. The approach taken will be informed by the Retail and Leisure Needs Assessment. The proposed policies are potentially **positive** on economy and employment as they will help reduce empty shops in town centres and repurpose empty spaces above shops to various uses including as affordable workspaces promoting local enterprises, offices and homes. This is likely to improve the vitality of centres and attract more footfall producing positive effects on the local economy and employment. There may also be **positive** effects on housing through the conversion of empty premises or above ground floor spaces into residential accommodation. There are potential positive and negative impacts upon the character of the built environment and heritage, but these are uncertainties at this stage.
- 6.38 **Tourism, culture and the night-time economy:** Considers the inclusion of a policy seeking to enable evening and night-time economic activity. This may include protecting public houses, theatres, live music venues and night clubs from change of use. Other measures considered include supporting the night-time economy by better provision of evening/ night-time public transport services. The potential policy measures are likely to have **positive effects** on the local economy and employment as they are likely to improve the vitality of leisure, cultural and social venues, helping to increase visitors through the improved public transport provision. There are potential **minor negative effects** with regards to housing provision, as it prevents changes in use that may otherwise occur.
- 6.39 **Key growth areas - opportunity areas:** Outlines the Council's intention to identify new areas to focus growth. These new opportunity areas will be within existing urban areas, in locations that benefit from good public transport, services and cycling and walking infrastructure. They will be in areas where clusters of development opportunities exist and will be developed through a masterplanning/ area framework approaches. The proposed policy changes include more focussed growth (in size and purpose) in locations where clusters of opportunity sites / infrastructure improvement would bring about wider change in the area. Each growth area is to have a policy setting out key requirements including land, scale, density and site specific requirements. Growth areas identified would be supported by a masterplan SPD. The Council proposes to name such growth areas as 'Strategic Regeneration Areas' or 'Opportunity Areas'. The effects will depend on the eventual policies drafted but generally beneficial effects are likely as the focused regeneration approach is likely to engender multiple benefits including improved design, better housing, employment and infrastructure

provision through





## 7. Next Steps

### Consultation

- 7.1 The Council has prepared an Issues and Options document, with the prime purpose of consulting with stakeholders to invite feedback and suggestions with regards to how the Local Plan Review should progress.
- 7.2 Following the consultation stage, the Council will work on developing the Plan further, and this will draw upon a wide range of evidence, stakeholder feedback and technical studies.
- 7.3 The SA process will continue alongside Plan making activities, with a particular focus on the appraisal of site options and more detailed reasonable alternatives.

### Developing reasonable alternatives

- 7.4 The focus in the interim SA Report has been on the appraisal of high-level options and policy approaches. Whilst options appraisals are helpful to help refine plan-making and stimulate debate, they should not be confused with 'reasonable alternatives' in the context of the SEA Regulations. The Regulations state that alternatives to the 'Draft Plan' should be considered (rather than every element of the plan individually), and this will be the focus of SA work at the next stages of Plan making.
- 7.5 The appraisal of options (including individual site options) should therefore be viewed as steps towards identifying reasonable alternatives.
- 7.6 Following consultation on the Issues and Options Document (and this interim SA Report), the Council will work towards developing a spatial strategy, and exploring changes to plan approaches / policies in further detail. At some point it should be possible to identify a draft plan approach and any reasonable alternatives with regards to key issues such as housing and employment growth.
- 7.7 Ideally, this will take the form of a series of 'alternative key diagrams', illustrating different combinations of growth locations / sites that could be explored to meet the plan objectives. The reasonable alternatives will explore distribution of growth as well as the overall quantum (with the two intrinsically linked).
- 7.8 Consultation on this interim SA Report alongside the Issues and Options document provides an opportunity for stakeholders to provide input in relation to several key elements of the SA process:

The appraisal fM











## **SA Topics**





SA Topics	SA Objectives	Guide questions	Potential monitoring indicators	Topic in the SEA Directive
<p><b>7. Air quality</b></p>	<p>7b) Increase use of public transport, cycling and walking as a proportion of total travel and ensure development is primarily focused in the major urban areas, making efficient use of existing physical transport infrastructure</p>	<p>Does it reduce road traffic congestion, pollution and accidents?</p> <p>Will it encourage walking and cycling?</p> <p>Does it help to reduce travel by private car?</p> <p>Will it improve access to or encourage the use of the canal network for sustainable travel?</p>	<p>Net additional dwellings in the City Centre (AMR).</p> <p>Percentage of new residential development within 30 mins public transport time of a GP, hospital, primary and secondary school, employment and a major shopping centre (AMR).</p> <p>Percentage of trips by public transport into Birmingham City Centre (AMR).</p> <p>Percentage of completed retail, office and leisure development in town centres (AMR).</p> <p>Number of people killed or seriously injured in road accidents in Birmingham.</p> <p>Number of children killed or seriously injured in road accidents in Birmingham.</p>	<p>Material Assets</p> <p>Population</p> <p>Air quality</p>

SA Topics	SA Objectives	Guide questions	Potential monitoring indicators	Topic in the SEA Directive
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<p><b>8. Water quality</b></p>	<p>8a) Minimise water pollution levels and create good quality water.</p>
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SA Topics	SA Objectives	Guide questions	Potential monitoring indicators	Topic in the SEA Directive
<p><b>9. Land and soil</b></p>	<p>9a) Minimise soil pollution levels and create good quality soil.</p>	<p>Will it maintain and enhance soil quality?</p> <p>Will it encourage the efficient use of land?</p> <p>Will it minimise the loss of soils to development?</p> <p>Will it encourage the use of previously developed land and/or the reuse of existing buildings?</p> <p>Will it prevent land contamination and facilitate remediation of contaminated sites?</p>	<p>Area of contaminated land.</p> <p>Percentage of development recorded on greenfield / brownfield land</p>	

<b>SA Topics</b>	<b>SA Objectives</b>	<b>Guide questions</b>	<b>Potential monitoring indicators</b>	<b>Topic in the SEA Directive</b>
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**9. Land and soil**

9c) Encourage the efficient use of previously developed land and buildings and encourage

SA Topics	SA Objectives	Guide questions	Potential monitoring indicators	Topic in the SEA Directive
<p><b>10. Achieving zero carbon living</b></p>	<p>10a) Minimise Birmingham’s contribution to the cause of climate change by reducing emissions of greenhouse gases from transport, domestic commercial and industrial sources.</p>	<p>Will it contribute to Council’s decarbonisation agenda?</p> <p>Will it reduce emissions of greenhouse gases by reducing energy consumption?</p> <p>Will it increase the proportion of energy needs being met by renewable sources?</p> <p>Does it help reduce dependence on fossil fuels?</p> <p>Will it reduce reliance on carbon hungry materials e.g. bedding plants in parks?</p>	<p>Carbon dioxide emissions and Greenhouse gas emissions.</p>	<p>Climatic factors</p> <p>Population</p> <p>Flora</p> <p>Fauna</p> <p>Human Health</p> <p>Biodiversity</p> <p>Landscape</p> <p>Water</p> <p>Material assets</p> <p>Air Quality</p>

<b>SA Topics</b>	<b>SA Objectives</b>	<b>Guide questions</b>	<b>Potential monitoring indicators</b>	<b>Topic in the SEA Directive</b>
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**10. Achieving zero carbon living**

10b) Promote and ensure high standards of sustainable









<b>SA Topics</b>	<b>SA Objectives</b>	<b>Guide questions</b>	<b>Potential monitoring indicators</b>	<b>Topic in the SEA Directive</b>
			landscape character and visual assessments with appro	







## **APPENDIX B – Appraisal of Housing Options**

### **Option 1 Increased Housing Densities**

7.10 This option seeks to maximise housing densities (dwellings per hectare of land) on sites allocated for residential development within the City Centre. The adopted BDP (policy TP30) specifies densities ranging from 40 to 100 dwellings per hectare (dph) depending on location with the highest density (100 dph) proposed for City Centre sites, 50 dph in areas well served by public transport and 40 dph elsewhere. Following analyses of recent planning permissions and sites completed within the last 3 years the Council concluded that average densities in and around urban centres is around 70 dph which is substantially higher than the density specified in TP30 for 'areas well served by public transport'. The analyses also showed that densities (for developments granted consent / completed) in the City Centre average 400 dph; four times the target specified in TP30. Birmingham contains a large network of centres ranging from the City Centre that holds a national position as a retail destination to local centres which meet immediate day-to-day needs. More than 70 other (local) centres are identified in the Birmingham Development Plan. These centres are varied in

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7.18 It is also likely to improve footfall with positive knock on effects on businesses









effects are predicted on the historic environment (these could be positive and / or negative).

**7.46 Natural landscape:**



potentially increase density (and therefore reduce the shortfall), and would take place in urban areas, helping reduce pressure on greenfield sites. Therefore, minor **positive effects** are predicted at this stage.

7.58 **Achieving zero carbon living:** Under this approach the Council can positively influence the regenerated estates by promoting more energy efficient design and active travel /public transport infrastructure.

7.59 The option presents opportunities to incorporate low carbon or more efficient di











- 7.93 **Water quality:** As with other options discussed the additional growth proposed can potentially adversely impact the quality of water bodies through surface water runoff and treated wastewater effluent. There may be opportunities to implement SuDS as part of new development, but this remains uncertain at this stage.
- 7.94 Given that much of the land involved is already likely to be previously developed, the potential for pollution and flooding issues are considered to be low, thus **neutral effects** are predicted.
- 7.95 **Land and soil:** This approach has potentially **positive effects** on land and soil as it will likely enhance housing provision in existing industrial/ commercial non-agricultural areas, improving land supply and reducing the need to utilise high quality agricultural land elsewhere.
- 7.96 **Achieving zero carbon living:** As discussed under the other options the scale of growth proposed is likely to create more vehicular traffic leading to increased congestion and emissions. Employment areas may not be within walking/ cycling distance from community services such as schools, shops and GP surgeries which may increase reliance on cars for such journeys. The effects would be largely dependent on the location of sites identified and site specific policies. There may be scope for new development to provide these community services locally, but this is uncertain at this stage. Conversely, the location of sites under this option are generally sustainably located with respect to roads/ railway transport and employment in accessible locations which would reduce the need to travel to work. However, the overall scale of growth proposed will inevitably lead to increased vehicular traffic and congestion with associated increases in emissions. Therefore, residual **negative effects** remain at this stage.
- 7.97 **Flooding:** This approach is not expected to produce significant effects therefore **neutral** effects are predicted. However, some employment uses are considered suitable in areas at risk of flooding, whilst residential development would not be. As such, a change of use in this respect could be negative.
- 7.98 **Historic environment:** effects would be dictated by the location and size of sites utilised through this approach. If sites are located in less constrained areas (away from heritage assets/ conservation areas) adverse effects would be less likely to occur. Employment land is less likely to contain heritage assets therefore the provision of housing here can potentially reduce pressure on other locations in more constrained locations (e.g. conservation areas).
- 7.99 However, given the scale of growth proposed and numerous heritage assets within the City, it is unlikely that development in heritage constrained locations can be entirely avoided. **Neutral effects** are predicted in relation to development within CEAs.
- 7.100 **Natural landscape:** Existing employment land is generally within less sensitive landscape areas therefore the introduction of residential development into such locations is unlikely to adversely impact the landscape. There may **be positive effects** as the approach can help reduce encroachment on areas of high landscape sensitivity.
- 7.101 **Biodiversity and geodiversity:** Employment land is generally less environmentally constrained, therefore this approach is unlikely to lead to adverse effects and would potentially help reduce development pressure on

other more constrained areas. Therefore, this option could have some **positive effects** overall.

**7.102 Accessibility and transport:** This option is likely to engender some positive effects on accessibility as the sites would be in accessible locations benefitting from the city's extensive public transport links (Bus, Metro, Sprint Rapid Transit and HS2).

7.103 However, this is offset by the potential lack of walking/ cycling infrastructure within the employment locations and the lack of community services such as healthcare and education within employment areas. Therefore, **neutral effects** are predicted overall at this stage.

### **Option 6 Release Green Belt for housing**

7.104 This option proposes Green Belt release for new residential development. The majority of Green Belt land is concentrated within the north and north east of Birmingham but there are smaller Green Belt areas (green wedges) to the east, west and south west along the city's boundary. The Green Belt covers around 15% of the total area of Birmingham. The adopted BDP set a precedent for Green Belt release, proposing a 6,000 dwelling sustainable Urban Extension (SUE) in the green belt at Langley in Sutton Coldfield, north east of Birmingham.

7.105 **Housing:** This option is likely to produce beneficial effects with respect to housing as it is likely to boost housing land supply thus contributing towards the housing growth required in the BLP. It may also enable the provision of more affordable housing, particularly on larger sites and could provide a different type of housing than would be possible at higher densities in the City. Whilst the locations are relatively remote from the rest of the City, development in the form of SUE's would partly compensate for this by providing necessary infrastructure and community services (e.g. health, education and retail) and some of the locations are in close proximity to local centres (e.g. Sutton Coldfield). Importantly, this option may be critical to fulfilling the unmet housing need, as such, it is predicted to produce **likely significant positive effects** on housing.

7.106 **Equality, diversity and community development:** Whilst there are relatively small areas of deprived neighbourhoods in the north east, the majority of Green Belt areas are less deprived than more central locations in Birmingham. In this context development in the Green Belt is less likely to help those in the most deprived locations.

7.107 However, large schemes (e.g. Langley SUE) can provide more affordable housing, new employment opportunities and new community services which would be particularly beneficial to the deprived households in Birmingham. However, this would only apply to large scale SUE schemes, smaller scale development within the Green Belt may not be well placed with respect to employment and community services (e.g. healthcare and education) which may adversely impact the ability of residents to access such services. Therefore, whilst some positive effects are possible due to improved housing provision and access to jobs and services,

green space and active travel infrastructure, particularly if these are in the form of SUEs. Furthermore, the enhanced housing provision, including affordable hous

7.115 **Flooding:** Some Green Belt locations are in areas of low flood risk. Though there are areas that contain flood zone 2 and 3, it is presumed that these would be sequentially avoided. Therefore, this approach is predicted to have **neutral effects**.

7.116 **Historic environment:** Green Belt areas within Birmingham present varied sensitivities with regards to heritage. Though the number of assets are reduced compared to urban areas, there are still sensitive assets such as scheduled monuments and









**Employment Option 2 Accommodate the shortfall within other authorities in the wider Housing Market Area (HMA):**

7.17 This option would involve working with other authorities within the wider Housing Market Area (HMA) to address the shortfall. The Council would discuss this with other HMA authorities to determine whether any employment land proposed in their forthcoming plans can meet some of Birmingham's need. For example,



7.31 **Biodiversity and geodiversity:** Effects would be dependent on the location of sites selected for development in the wider HMA. From a Birmingham perspective

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