

Comments.

Birmingham Local Plan Issues and Options (24/10/22 to 05/12/22)

Comment by Birmingham Friends of the Earth

Question 3

Do you agree with the proposed vision?

Partly

Please provide reasons for your answer:

We welcome your recognition, as stated in the text, that "the green economy offers exciting opportunities to transition to a cleaner and greener place that can deliver jobs, homes and places". Concentration on delivering a green economy will in itself serve to progress and deliver many of the objectives and should be the overarching guide to planning decisions.

Question 4

Are these the right objectives for the Birmingham Local Plan to achieve?

Partly

Question 48

What else can be done to encourage people to walk and cycle more and use their car less?

We support the aims of The Birmingham Transport Plan. It is essential to make journeys that are not in car more attractive and convenient so as to make a car free lifestyle more prevalent. Marking out routes and distances is a low-cost way to increase participation. Birmingham's low level of cycling can be an opportunity, Projections of rising traffic levels treated as justifications for road widening schemes must be resisted.

All councillors should be required to use public transport or walk or cycle when conducting council business (with only very limited exceptions for severe mobility problems that are not catered for by current provision - which should be urgently addressed). This would provide an essential model of commitment to sustainable transport.

A rewards scheme - possibly building on Modeshift STARS - could be established in partnership with local businesses - if people gain a certain number of points by walking, cycling or using public transport, they could exchange those for a reward (journeys to be monitored through an app).

<https://modeshiftstars.org/business-case-studies/celebrating-the-first-modeshift-stars-business-bronze-accreditation-to-be-awarded-to-a-birmingham-workplace/>

Paragraph 8.4 in the consultation document states that reallocating road space away from private cars in favour of public transport and active travel networks "may be necessary". We believe it is essential and that this expectation should be strengthened in future drafts of the Plan.

Question 49

How can public transport be improved so that more people will use it?

We support the aims of The Birmingham Transport Plan. It is essential to make journeys that are not in car more attractive and convenient, so as to make a car free lifestyle more prevalent.

The urgent need is to re-regulate the buses. Only regulation of the service can improve frequency and reliability which, when erratic, are the main deterrents to people using the buses instead of cars or taxis.

Covered bus shelters provide shelter when weather becomes a deterrent so should be the rule. Similarly, level (not sloping) seats in a bus shelter mean that frail people can feel comfortable waiting at bus stops.

Attention must be paid to connections between buses, given that waiting for a connection, especially late at night or in a deserted location, can contribute to fears of a lack of safety. Connections are also important for multi-stage journeys e.g. someone visiting several clients in a day. Conductors on buses, at peak times and after a certain time at night, also serve to reassure travellers in terms of safety and antisocial behaviour.

Real time information is required at all bus stops, allowing people more control on their time - and includes people who do not have internet access.

The Plan should address and cater for gender differences in the use of public transport. Many women tend to have more complex travel patterns due to their unpaid caring responsibilities and may feel, and actually be, less safe on public transport or waiting for public transport.

Powered by Objective Keystone - page 2 The design of public transport should take more account of the needs of caregivers (often still gendered) including those with prams, shopping bags/trolleys, wheelchairs etc. There should be sufficient space to meet people's needs. New development should be along public transport routes and in existing centres, not on the urban fringe where it generates car journeys.

Projections of rising traffic levels treated as justifications for road widening schemes must be resisted.

Question 50

Should new development be required make provision for future proof digital infrastructure?

Yes

Please provide reasons for your answer:

We welcome the idea of connectivity as the aim, rather than physical movement (which is always a cost). It should be an aim to work with recent trends towards working and shopping

from home which are reducing the need to travel, especially the need to commute - see National Travel Survey 2021.

We strongly support requiring developers to make provision for future-proof digital infrastructure. We believe this is not controversial as developers acknowledge the need for this themselves e.g. Balfour Beatty:

<https://www.balfourbeatty.com/how-we-work/public-policy/innovation-2050-a-digital-future-for-the-infrastructure-industry/> We believe that there is sufficient awareness of the likely directions of future digital infrastructure to make it possible for current developments to use technical design principles that allow for future infrastructure demands.

Question 51

Should all developments be required to meet an accredited standard for digital connectivity?

Yes

Please provide reasons for your answer:

We welcome the idea of connectivity as the aim, rather than physical movement (which is always a cost). It should be an aim to work with recent trends towards working and shopping from home which are reducing the need to travel, especially the need to commute - see National Travel Survey 2021.

We strongly support the idea of requiring developments to meet an accredited standard for digital connectivity. These standards should cover both offices and homes. Using an accredited standard would not only encourage better connectivity but also more efficient operation of the buildings themselves, i.e. smart buildings, reducing the whole life carbon footprint of a building.

Question 52

Do you agree with the principles for identifying opportunity areas?

No

Is there anything missing?

We oppose the loss of Green Belt land for development. We suggest that empty and underused homes are addressed as part of identifying an opportunity area so that building conversion and brownfield land use are targeted first, followed by brownfield development in neighbouring authorities under the council's duty to co-operate, and lastly the release of green field and Green Belt land. Release of Green Belt land must be strictly controlled and held back until all other brownfield sites and options are used up or substantially used up (say in excess of 90% used). This approach would safeguard the Green Belt and encourage new housing development thus providing housing on the most sustainable sites first.

Question 53

What are your views on the proposed approach to the opportunity areas?

We oppose the loss of Green Belt land for development. We suggest that empty and underused homes are addressed as part of identifying an opportunity area so that building conversion and brownfield land use are targeted first, followed by brownfield development in neighbouring authorities under the council's duty to co-operate, and lastly the release of green field and Green Belt land. Release of Green Belt land must be strictly controlled and held back until all other brownfield sites and options are used up or substantially used up (say in excess of 90% used). This approach would safeguard the Green Belt and encourage new housing development thus providing housing on the most sustainable sites first.

Question 54

Have we identified the correct opportunity areas?

No

Is there anything missing?

We suggest that empty and underused homes are addressed as part of identifying an opportunity area so that building conversion and brownfield land use are targeted first, followed by brownfield development in neighbouring authorities under the council's duty to co-operate, and lastly the release of green field and Green Belt land. Release of Green Belt land must be strictly controlled and held back until all other brownfield sites and options are used up or substantially used up (say in excess of 90% used). This approach would safeguard the Green Belt and encourage new housing development thus providing housing on the most sustainable sites first.

Question 27

How should the city's green infrastructure network be improved and expanded?

The section on the green infrastructure network (paragraphs 6.4 and 6.5) currently consists of a definition with justification for green infrastructure and reference to the Urban Forest Masterplan. We strongly support the aspirations of the Urban Forest Masterplan but are concerned about the lack of detail in this section of this consultation document and look forward to more detail in the next draft. We support the proposed policy changes regarding a more proactive approach to expanding the green infrastructure network. We hope that future drafts will include specific details relating to the implementation of:

- targets for tree cover in parts of the city that are deficient in trees as this is vital to shade and cool streets and buildings in a warming climate. While the Urban Forest Masterplan contains many useful targets, we would like to see more emphasis and detail in this consultation document on targets that relate to R4 in the Urban Forest Masterplan (page 35)
- inclusive greening policies that proactively engage local residents in areas that are deprived of green space, respond to need and avoid 'green gentrification'; measures to support scientists/experts and local residents from all types of housing to work together
- urban greening that also focuses on greening what is already in existence, not only prioritising new developments
- mechanisms for the maintenance of green infrastructure in all sectors e.g. including the private rented sector (we are unclear as to the detail of the work being done with large private landholders)

under C5 in the Urban Forest Masterplan and how such landowners are being held to account)
- measures to address all elements of green infrastructure including e.g. private gardens (not just the trees in them), green roofs and walls, and sustainable drainage (strengthening T8 in the Urban Forest Masterplan). Regulations relating to the slabbing over of private gardens need to be publicised and enforced; developers should be required to meet the UK Green Roof Code of Practice.

Question 28

Should we explore a higher than 10% Biodiversity Net Gain for all major developments?

Yes

Please provide reasons for your answer:

We strongly support the suggested requirement of over 20% BNG with standards for the quality of these gains (e.g. habitat quality not quantity). Robust measures should be included to ensure that viability calculations are fair to the climate. As suggested by the Wildlife Trusts in response to the 2019 government consultation, these gains should be “secured and managed in perpetuity”. Arrangements for investment, management, monitoring and enforcement must be stipulated in future versions of the plan.

Question 29

Should the new Local Plan seek to identify/allocate sites to provide off-site Biodiversity Net Gain?

No

Please provide reasons for your answer:

We are concerned that the Local Plan could inadvertently encourage the use of off-site BNG. This should be a last resort. However, it might be necessary to identify areas of grass and tarmac etc that will be used for compensating for biodiversity loss elsewhere.

Question 30

Should the Council introduce an Urban Greening Factor policy?

Yes

Please provide reasons for your answer:

We strongly support the development of an Urban Greening Factor as this would assist planners in understanding planning applications in terms of green infrastructure and the quality as well as quantity of urban greening. It should also be helpful to developers as a design tool and assist them in thinking about the different types of green infrastructure that they could incorporate.

We see the benefits of an Urban Greening Factor to include the following:

- earlier design, and therefore easier inclusion, of green infrastructure in the planning process
- encouragement of co-design through discussions about urban greening
- encouragement of different types of green infrastructure, including green roofs and living walls
- supporting the achievement of other goals at the same time e.g. biodiversity net gain.

The Plan should draw on the experience of cities such as London to avoid potential pitfalls such as in the calculation of existing vegetation including the value of trees which may vary depending on their location (and may constrain whether they reach maturity) and age. The development of the Urban Greening Factor should be done in a multidisciplinary way.

Question 31

Do you agree with the proposed new standards for open space?

Yes

Please provide reasons for your answer:

We welcome the distinction between different types of green space. The proposed new standards appear to adhere to the 15-minute accessibility idea, which we support.

Regarding food growing: it is important to recognise and protect land used for food growing; see the Birmingham Food System Strategy.

Regarding sport, it is important to remember that the most common forms of exercise are walking, running, cycling and gardening, rather than team games. Marking out routes and distances is a low-cost ways to increase participation. Birmingham's low level of cycling can be an opportunity if safe routes are provided.

Question 32

How can we ensure that residents have good access to quality open space?

While safety is likely to be fundamental to good access, in general we believe that genuinely engaging local people in each area of the city is essential in order to be able to clarify and address their access needs effectively.

We think that the Local Plan is being developed based on sound principles and ideas relating to good access. However we would like to see specific details on how these will be implemented and monitored in future drafts. As stated in your own Sustainability Appraisal (AECOM Interim Report Oct 2022, page 60), the assessment of Option 6 to release Green Belt for housing produces negative effects on major environmental factors: air quality, water quality, land and soil health, the historic environment, the natural landscape and biodiversity. . . . "and potentially negative implications due to loss of high quality green/ open space which is currently underprovided in Birmingham.

Question 33

How can the Birmingham Local Plan achieve high quality design in all developments?

We suggest the following:

- Respecting the local character of different areas of the city, including the historic environment – and curtailing demolition of our heritage. The high levels of development mentioned in paragraph 6.16 should absolutely not be allowed to involve yet more destruction of heritage assets.
- Prioritise movement for all; prioritising pedestrian footways and cycleways as well as access for those with limited mobility

- Supporting habitat links and protecting the health of residents (from air, noise and light pollution).

Question 34

Are there any specific issues that the Birmingham Local Plan needs to address regarding the environment?

While we strongly support the initiatives focused on new developments, we think that urban greening of what is already in existence should not fall into second place. This current consultation document appears to focus on new developments and we would be concerned if this was at the expense of other urban greening. We would also like the planting of native species which can support a range of fauna (rather than isolated exotic trees) and species that can withstand high and low temperatures and low rainfall to be prioritised.

Question 1

Do you agree with the challenges and opportunities identified?

Partly

Please provide reasons for your answer:

- i) We welcome the section on climate change in the document. However, it should be viewed as an opportunity and not a challenge: reducing carbon emissions to prevent greater climate change must be an overriding theme that guides all aspects of the Plan. Investment should be guided consistently towards moving this city off fossil fuels and adapting to higher temperatures, during the period of the Plan.
- ii) We support the prioritisation of brownfield sites in the city for development, instead of green fields on the urban fringe which would generate more traffic movements.
- iii) Building upwards, instead of sideways, to increase density has some environmental advantages but not if it is taken to extremes. There are disadvantages to tall buildings, such as heat loss and excess heat gain.
- iv) We are sceptical about any concentration on heat network zones. Heat networks could be a diversion of resource into a new infrastructure with cost and disruption. We question what the source of heat will be. The approach must not lock the city into burning waste which would contradict both the waste hierarchy and CO2 emissions reduction.

Question 2

Are there any other challenges and opportunities which are important?

We welcome your recognition, as stated in the text, that "the green economy offers exciting opportunities to transition to a cleaner and greener place that can deliver jobs, homes and places". Concentration on delivering a green economy will in itself serve to progress and deliver on many of the challenges Birmingham may face and should be the overarching factor in planning decisions.

Question 11

What type, size and tenure of homes do you think will be needed in the future?

In the past few years most of the new housing has been for middle or higher earners. Recently we have seen a vast number of high rise luxury flats in the city centre. The council had a target of 35% affordable housing but so far have fallen some way short of realising this. Developers invariably renege on any stipulated 'affordable' proportion at a late stage in the development on the grounds of that being no longer commercially viable. This needs to be challenged by the Council.

There are 5 classifications of 'affordable' with the least affordable of these being one where the rent is just 10% below the market rent. When market rents are so high this is not really an affordable level. There is overwhelming need for more good quality social housing. Many many people in Birmingham who are on low incomes are living in poor quality privately rented accommodation with poor insulation, generally poor standards, high rents and insecurity of tenure. The Council itself should become the land owners and developers of social housing for rent. This is otherwise a betrayal of the needs of a large proportion of the population.

Question 12

How do you think we can increase the supply of affordable housing?

Developers invariably renege on any stipulated 'affordable' proportion at a late stage in the development on the grounds of that being no longer commercially viable. This needs to be challenged by the Council. In the past few years most of the new housing has been for middle or higher earners. Recently we have seen a vast number of high rise luxury flats in the city centre. The council had a target of 35% affordable housing but so far have fallen short of realising this.

There are 5 classifications of 'affordable' with the least affordable of these being one where the rent is just 10% below the market rent. When market rents are so high this is not really an affordable level. There is overwhelming need for more good quality social housing. Many people in Birmingham who are on low incomes are living in poor quality privately rented accommodation with poor insulation, generally poor standards, high rents and insecurity of tenure. The Council itself should become the land owners and developers of social housing for rent. This is otherwise a betrayal of the needs of a large proportion of the population.

Question 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?

We are sceptical about reliance on 'affordable'. Developers invariably renege on any stipulated 'affordable' proportion at a late stage in the development on the grounds of that being no longer commercially viable. This needs to be challenged by the Council.

There are 5 classifications of 'affordable' with the least affordable of these being one where the rent is just 10% below the market rent. When market rents are so high this is not really an affordable level. There is overwhelming need for more good quality social housing. Many many people in Birmingham who are on low incomes are living in poor quality privately rented accommodation with poor insulation, generally poor standards, high rents and insecurity of

tenure. The Council itself should become the land owners and developers of social housing for rent. This is otherwise a betrayal of the needs of a large proportion of the population.

Question 15

Should we have a policy which requires a percentage of older persons housing on residential developments?

Yes

Question 16

Should we allocate sites specifically for older persons housing?

Yes

Question 19

What type and scale of development should Health Impact Assessments apply to?

All, including assessing any limitations on the 15 or 20 minute neighbourhood concept (enabling residents to access all of their needs within a 15 or 20 minute walk or bike ride from their home).

Question 20

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

Yes

If yes, please explain what other opportunities we should consider:

We welcome this section on climate change and it should be the overriding theme that guides all aspects of the Plan. We expect to see consistent policies to guide investment into energy efficiency and development of renewable zero carbon energy sources during the period of the Plan.

Question 21

How should we encourage all developers to deliver net zero carbon development?

Insist on Passivhaus standards making buildings highly energy efficient using a 'fabric first' approach. Insist on using onsite solar, air source, ground source, which should make external energy sources a minor element going forward. Heat networks could be a diversion of resource into a new infrastructure with cost and disruption. We question what the source of heat will be.

The approach must not lock the city into burning waste, which would contradict the waste hierarchy and fail to prevent, reuse or recycle. We note that Wales has "minimal incineration" of waste.

Question 22

How can we ensure that the principles on waste management and resource efficiency are addressed by new development?

For energy generation in general, and for heat networks here mentioned in particular, we question

what the source of heat will be. Heat networks could be a diversion of resource into a new infrastructure with cost and disruption. The approach of local heat generation must not lock the city into burning waste, which would contradict both the waste hierarchy and CO2 emissions reduction. We note that Wales has a policy of “minimal incineration” of waste.

<https://birminghamfoe.org.uk/wp-content/uploads/Why-waste-incineration-has-no-future-in-Birmingham.pdf>

Birmingham City Council is burning most of the household, business and street waste that it collects. BCC owns the biggest single source of CO2 emissions in the city, namely Tyseley incinerator. We call for a plan to phase down and phase out this plant through transforming waste to separated collections in the lifetime of this Plan.

<https://birminghamfoe.org.uk/wp-content/uploads/Why-waste-incineration-has-no-future-in-Birmingham.pdf>

There should be a commitment to no new incineration facilities being built during the Plan period. Free ‘skyfilling’ cannot continue in a climate emergency. Indeed, Overcapacity of incineration is predictable and is predicted in the timescale of the plan by research by UKWIN <https://ukwin.org.uk/overcapacity/>

Much waste is compostable and this needs to be connected to food growing in the city. Fertility should not be burned - see the Birmingham Food System Strategy.

Question 23

Should we introduce higher water efficiency standards?

Yes

Please provide reasons for your answer:

to reduce water stress

Question 24

Do you agree with introducing a policy to prevent overheating of new buildings?

Yes

Please provide reasons for your answer:

Tree cover is vital to shade and cool streets and buildings in a warming climate so there should be targets for parts of the city that are deficient in trees. There are disadvantages in building tall such as heat loss and excess heat gain.

Question 25

Should the Plan include a policy to ensure that rivers within the city provide multi-functional benefits in relation to flood risk, ecology biodiversity and support health and wellbeing?

Yes

Question 26

Should the Plan include a policy to ensure a catchment-based approach to flood risk management from all sources and deliver climate

resilience?

Yes

Question 7

Are there any additional housing growth options that we should consider?

We oppose option 6, the loss of Green Belt land for development. We suggest that empty and underused homes are addressed as part of this target and that building conversion and brownfield land use are targeted first, followed by brownfield development in neighbouring authorities under the council's duty to co-operate, and lastly the release of green field and Green Belt land. Release of Green Belt land must be strictly controlled and held back until all other brownfield sites and options are used up or substantially used up (say in excess of 90% used). This approach would safeguard the Green Belt and encourage new housing development in existing built up areas that already have local facilities and infrastructure, especially public transport, thus providing housing on the most sustainable sites first. As stated in your own Sustainability Appraisal (AECOM Interim Report, Oct 2022, page 60) Option 6 to release Green Belt for housing produces negative effects on many major factors: air quality, water quality, land and soil health, achieving zero carbon living, the historic environment, the natural landscape and biodiversity.

Whilst the number and rate of growth of housing provision remains undetermined, in all cases we are emphatic that maximum reduction of carbon emissions should be the guiding principle.

Question 9(a)

Do you think the proposed densities are appropriate?

Yes

Question 9(c)

Please provide reasons for your answer:

We support higher densities appropriate to the area and with sufficient green and open space provision. Building upwards instead of sideways to increase density has some environmental advantages but not if it is taken to extremes. There are disadvantages in building tall such as heat loss and excess heat gain. High rise is not appropriate for families with children nor for elderly or people with mobility difficulties.