



Development Management in Birmingham Examination

Birmingham City Council Hearing Statement

Matter 6: Connectivity Policies

October 2020

Policy DM14 Highway Safety and Access

Q79. Is the wording of the Policy consistent with national policy? Does the Council's proposed modifications address the shortcomings in this regard?

79.1 The Council's proposed change to DM14 will ensure consistency with national policy wording (CSD4 Schedule of Proposed Minor Changes).

Q80. Is the Policy wording effective in promoting sustainable travel?

80.1 Yes. While the scope of DM14 is to set out the detailed transport and traffic considerations relevant to individual development proposals and the promotion of sustainable travel is included within policies in the Birmingham Development Plan (BDP), the Council consider the policy is worded effectively to promote sustainable travel.

80.2 DM14 requires development to ensure safe, convenient and appropriate access arrangements are in place for all users, but priority shall be given to the needs of sustainable transport modes (Part 2 of DM14). Development proposals that generate significant amounts of traffic are required to provide, implement and monitor a Travel Plan that sets out the means by which the developer will encourage users to adopt more sustainable modes of travel (Part 4 of DM14).

Q81. Would the provisions of the Policy restrict the operations of employment areas outlined in Policy TP19 of the Birmingham Development Plan and therefore be inconsistent with this Policy?

81.1 No. The policy requirements will not restrict the operation of employment areas. On the contrary, the policy aims to ensure safe, convenient and appropriate access arrangements are in place for all types of development and in all locations.

Q82. Is it clear what is meant by 'Birmingham strategic highway network and other principle distributor routes'? Would the Council's suggested amendment address the shortcomings in this respect?

82.1 The Council's proposed change to Part 5 of DM14 will provide clarity and address the shortcoming (CSD4 Schedule of Proposed Minor Changes).

Q83. Is criterion 6.e of the Policy effective? Would the Council's suggested amendment address the shortcomings in this respect?

83.1 The Council's proposed change 6.e. of DM14 will provide consistency and address the shortcoming of the policy (CSD4 Schedule of Proposed Minor Changes).

Q84. Should the Policy identify the types of planning obligation requirements expected of developers?

84.1 The policy does not refer to specific types of planning obligations expected from developers. This will vary on a case by case basis, ranging for example, from the provision of traffic signals, cycleways, connections to cycle ways, car clubs, or canal towpath improvements. Any list would not be exhaustive, and if set out in the policy, could be misinterpreted as precluding other specific types of obligations. Policy TP47 'Developer Contributions' in the Birmingham Development Plan sets out that development will be expected to provide, or contribute towards the provision of physical, social and green infrastructure to meet the needs associated with

development. The Implementation section of the policy recognises that the policy requirements may need to be delivered through planning obligations.

Policy DM15 Parking and Servicing

Q85. Is the Policy consistent with national policy?

- 85.1 Yes. The policy is consistent with Section 9 of the NPPF in promoting sustainable travel, making efficient use of land, creating safe and suitable access to sites and places which are safe, secure and attractive.
- 85.2 While parking standards do not form part of the policy, paragraph 105 and 106 of the NPPF have been adhered to in preparing the new draft Parking Supplementary Planning Document which will replace the existing Parking Guidelines Supplementary Planning Guidance (2012).

Q86. Does the wording of the Policy attempt to give Development Plan Document status to the Parking Supplementary Planning Document? Would the Council's proposed modifications address the shortcomings in this regard?

- 86.1 The Council's proposed change to Part 2 of DM15 will provide clarity as to the status of the Parking Supplementary Planning Document (SPD) and address the shortcomings of the policy in this regard, ensuring that Development Plan Document status is not given to the Parking SPD (CSD4 Schedule of Proposed Minor Changes).

Q87. Is the inclusion of electric vehicle parking charging points within the Policy justified?

- 87.1 Yes. Inclusion of electric vehicle parking charging points within the policy DM15 is justified. Paragraph 110 of the NPPF says that "*applications for development should... e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.*" This is reflected in Part 2 of policy DM15.

Q88. Has the impact of electric vehicle charging points on viability been adequately considered?

- 88.1 Yes. A Financial Viability Assessment (FVA) prepared by BNP Paribas Real Estate (November 2019) (EBD71) was undertaken in line with the NPPF and NPPG. The FVA assessed the policy requirements in the DMB Publication version alongside the policy requirements in the adopted Birmingham Development Plan.
- 88.2 The draft Parking Supplementary Parking Document (SPD) indicates that where schemes have allocated parking, the Council will require one active vehicle charging point per dwelling. Lower requirements apply to unallocated parking. The FVA assumes that 100% of spaces will require a charging point, which significantly exceeds the number of electric cars currently in use in the UK (which is currently 0.5% of all vehicles¹). The assumption of 100% of spaces exceeds current levels of supply. The FVA concludes that this does not have a significant impact on viability. (See sections 3.16, Table 4.5.1 and 5.5 in EBD71).

¹ <https://researchbriefings.files.parliament.uk/documents/CBP-7480/CBP-7480.pdf>

88.3 The Electric Vehicle Charging Point (ECVP) standards proposed in the draft Parking SPD align with draft proposals from the Department for Transport on 'Electric Vehicle Charging in Residential and Non-Residential Buildings'².

Q89. Has the impact on electric charging points on power supply been adequately considered?

89.1 The number of electric vehicles currently in use in the UK is only 0.5% (approximately 350,000) of all vehicles. The uptake of electric vehicles is expected to grow over the next 20 years adding greater demand for electricity and placing pressure on the UK's grid network operated by National Grid. This is, of course, is a national issue which National Grid are working with Government to plan for 36 million electric vehicles by 2040. "Smart charging" of electric vehicles is seen as a potential mechanism to help balance supply and demand on the grid.

89.2 The House of Commons Business, Energy and Industrial Strategy Committee's October 2018 report on Electric vehicles said that media concern about additional electricity demand were "overblown" and concluded that the electric vehicle transition is "unlikely to present a risk to the security of national electricity supply" and that any increased electricity demand would "necessitate investment in new generation. The Committee also made recommendations on managing higher demand including that charge points should have smart capacity, and that the Government should look further into the opportunity of vehicle to grid technology. (House of Commons Library Briefing Paper, Electric Vehicles and Infrastructure, March 2020).

Q90. In paragraph 5.15 of the supporting text is it clear what is meant by 'adequate functional space'?

90.1 The Council's proposed change to paragraph 5.15 provides clarity on what 'adequate functional space means' (CSD4 Schedule of Proposed Minor Changes).

Q91. Should point 3 of the Policy make reference to the design of servicing? Does the Council's proposed modification address the shortfall in this respect?

90.1 The Council's proposed change to Point 3 of DM15 includes reference to the design of servicing (CSD4 Schedule of Proposed Minor Changes).

Q92. Should the Policy also include standalone parking in regeneration areas?

92.1 No. The policy does not prevent the provision of standalone parking in regeneration areas, but ensures that where such provision is made, it serves to meet a deficit in local publicly available off-street parking or help to relieve on-street parking problems. Standalone parking provision which does not meet an existing deficit in parking can have the potential to generate additional traffic due to the excess of parking provision and therefore impact on air quality and contribute to climate change.

² HM Government, Electric Vehicle Charging in Residential and Non-Residential Buildings (July 2019) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/818810/electric-vehicle-charging-in-residential-and-non-residential-buildings.pdf

Policy DM16 Telecommunications

Q93. Is the policy effective in its treatment of digital services and mobile connectivity?

- 93.1 Yes. The focus of Policy DM16 is on ensuring that the development of telecommunication infrastructure protects the environment and local amenity. Policy TP46 'Digital communications' in the Birmingham Development Plan provides higher level policy on the promotion of digital infrastructure and access to digital services.

Policy Omissions

Q94. Is the Plan effective in the way it deals with matters of public realm, healthy living and active travel?

- 94.1 The matters of public realm, healthy living and active travel are covered by policies in the Birmingham Development Plan. The specific policies are PG3 'Place-making', TP27 'Sustainable neighbourhoods', TP37 'Health', TP38 'A sustainable transport network', TP39 'Walking', TP40 'Cycling'. The Local Plan should be read as whole so as to avoid unnecessary duplication.