



Walsall Council

**Birmingham Development Plan 2031
Examination Hearing**

Written Statement

**On Behalf of
ASSOCIATION OF BLACK COUNTRY AUTHORITIES
(ABCA)**

Matter M:

The natural and historic environment (BDP policies TP7-9 & TP11-12)

Does the Plan contain effective policies to protect and manage the natural and historic environment?

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1. Introduction

- 1.1 ABCA is the umbrella term for the four Black Country local authorities, Dudley, Sandwell, Walsall and Wolverhampton. As explained in our pre-submission representation, officers from the four authorities meet regularly with officers from Birmingham City Council to address strategic cross-boundary issues on a continuing basis through the metropolitan officers' Duty to Co-operate Group. We are also continuing to work jointly on the Strategic Housing Needs Study with the Greater Birmingham and Solihull Local Enterprise Partnership.
- 1.2 This written statement deals with Matter M but does not relate to a specific question number.
- 1.3 This statement sets out the position that the previous representations on Policies TP7 and TP8 are maintained, although officers from the Black Country authorities have been in positive discussions with officers from Birmingham.
- 1.4 Although the statement is being submitted to meet the deadline for Hearing Statements, it is considered that the matters involved can be addressed in writing without it being necessary to debate the issues at a hearing session.

2. Previous representations

- 2.1 When responding (28 February 2014) to the consultation on the Pre-Submission Draft Plan, ABCA made the following representations in respect of Policies TP7 and TP8.

POLICY TP7: GREEN INFRASTRUCTURE NETWORK

It should be recognised that, as closely interlinked urban areas, Birmingham and the Black Country share many environmental issues and that these issues do not stop at local authority boundaries. Indeed the plan refers to the work of the Birmingham and the Black Country Local Nature Partnership. It is important to ensure that linkages, such as wildlife corridors, should be protected and enhanced not just within an authority's boundaries but on a functional basis.

*Amend the first sentence to read: The City Council will seek to maintain and expand a green infrastructure network throughout Birmingham, **including with linkages to surrounding areas.***

POLICY TP8: BIODIVERSITY AND GEODIVERSITY

Similar considerations apply as for Policy TP7. Provision needs to be made to protect and enhance wildlife corridors that cross authorities' boundaries.

*Amend the fifth paragraph to read: The integrity of wildlife corridors and 'stepping stones', **including to areas outside the***

City's boundaries, will be protected from development which would harm their functions.

Amend the reasoned justification at para. 6.46 to refer to connecting sites both within the City and in surrounding areas.

2.2 The Modifications proposed by Birmingham do not include changes to Policies TP7 or TP8 in response to this representation. The City Council has not provided any reasons as to why the proposed amendments were not accepted nor does it seem to provide for situations where environmental linkages cross local authority boundaries. The Pre-Submission Summary of Comments and Council Response (SUB 9) says simply:

- In respect of TP7: *The policy seeks to protect, expand and maintain the green infrastructure network within the city's boundary. Noted.*
- In respect of TP8: *No change required. The policy recognises the importance of wildlife corridors and seeks to protect and maintain them.*

3. Changes sought to Policy TP7 & TP8

3.1 ABCA maintains its written representation. We feel it is important that environmental links between Birmingham and the Black Country should be maintained / sustained and that this should be supported through planning policy. We therefore re-state the amendments sought previously.

- (a) The first sentence of Policy TP 7 should be amended to read: *The City Council will seek to maintain and expand a green infrastructure network throughout Birmingham, **including with linkages to surrounding areas.***
- (b) The fifth paragraph of Policy TP8 should be amended to read: *The integrity of wildlife corridors and 'stepping stones', **including to areas outside the City's boundaries,** will be protected from development which would harm their functions.*
- (c) The reasoned justification at paragraph 6.46 should be amended to refer to connecting sites both within the City and in surrounding areas.

4. This submission

4.1 This statement can usefully add that these issues have been included among recent discussions between officers from Birmingham and the Black Country Authorities. We would like to think that the City Council might now not have objections to changes along the lines set out here.

4.2 ABCA would be willing to attend the relevant hearing session if this would be useful to the parties involved. However, we consider that the points made should be capable of resolution on the basis of this written submission.