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Your Ref JQ NP Reg 16  
Our Ref CRTR-POL-2022-36657  
Wednesday 14 September 2022

By email only: [CityCentreDevelopmentPlanning@birmingham.gov.uk](mailto:CityCentreDevelopmentPlanning@birmingham.gov.uk)

## Draft Jewellery Quarter Neighbourhood Plan - Regulation 16 Consultation

Thank you for your consultation on the above document.

We are the charity which looks after and brings to life 2,000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a statutory consultee in the Development Management process.

The Trust was previously consulted on the Regulation 14 Draft Neighbourhood Plan. Our consultation response was provided on 23 September 2020, under reference CRTR-POL-2020-30599.

We are pleased to note that many of our comments on the Regulation 14 Draft have been incorporated into the Regulation 16 Draft.

### Importance of the canal network

It is often remarked that Birmingham has more miles of canal than Venice, and Birmingham's extensive canal network is part of what makes the city unique and special. The canal network has been central to the development of the city from the very beginning of the industrial revolution and remains core to the city's redevelopment – they are one of the city's most important historic features. The canal network is engrained into Birmingham's character, historic environment and cultural identity.

Approximately 0.7 km of the Birmingham & Fazeley Canal, including nine of the Farmers Bridge Locks (a flight of 13 locks in total), lies within the Jewellery Quarter Neighbourhood Plan area.

The Birmingham & Fazeley Canal forms part of an expansive network of blue-green infrastructure, and the towpath network provides fantastic leisure opportunities throughout the city. The towpaths also often serve as the most direct routes linking neighbourhoods with the city centre, thereby functioning as links for commuting on foot or by bicycle.

### Canal & River Trust

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## Section 3 – Moving around the Jewellery Quarter

### Section 3.2 Key routes

Section 3.2 focuses on “Key Routes” in the Jewellery Quarter, which it defines as “the main pedestrian routes to/from and through the area designated to address the issues raised by businesses and residents of navigation in and connection to the area”. These routes are shown on Map 2: Key routes (Page 44).

In our response to the Regulation 14 Draft, we noted that the canal towpath is not identified as a Key Route and suggested that its inclusion would be justified given the substantial pedestrian use seen by our city centre towpath network.

Unfortunately, our suggestion has not been picked up, and we therefore make a further request that the Birmingham and Fazeley Canal towpath be included as a Key Route. A popular pedestrian/cyclist access point to the Jewellery Quarter is via the towpath from the west, and it is hoped that the canal entry point at the eastern end of the plan area will become a similarly used point of entry to the Jewellery Quarter in the future.

It should also be noted that National Cycle Network routes 5 (Reading to Lichfield City) and 535 (Birmingham City Centre to Sutton Park) pass close to the plan area, using the canal towpaths. The towpath through the plan area is therefore provides links to a network of long-distance walking and cycling routes which span the country.

### Section 3.7 Acknowledging the canal network

We welcome the references (on page 53) to the canal as an important heritage feature, and to the Farmers Bridge Locks as a non-designated heritage asset.

We support the ambition in Policy 3f (Policy 3e in the Regulation 14 Draft) to reinstate historic canal arms, improve access to the canal, and improve natural surveillance of the canal through new development proposals.

#### New towpath access points

It is noted that Policy 3f provides support for the creation of a number of new towpath access points, as follows:

- i. Newhall Street
- ii. Charlotte Street
- iii. Near 32-35 Water Street
- iv. Junction of Constitution Hill and Lionel Street

The Trust understands that the new towpath access at Newhall Street has recently been completed. Meanwhile, the Trust requests clarification of the proposals for new access points at Charlotte Street and Near 32-35 Water Street. As to the proposal for a new access point at the Junction of Constitution Hill and Lionel Street, we would advise that there is an existing access point very nearby at Old Snow Hill/Clive Passage, albeit this access would benefit from improvement, particularly in relation to wayfinding and signage.

The Trust considers that the existing towpath access point from Livery Street (currently via a staircase) is in particular need of improvement, especially given its prominent location near to Snow Hill Railway Station. The Trust is happy to work with others to improve this access. We consider that reference to this should be made in Policy 3f.

#### Vehicle parking

The Trust welcomes the addition to Policy 3f (iii.) which provides for visual screening and a physical barrier where vehicular parking is proposed near to the canal.

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## Biodiversity

We welcome the changes to Policy 3f (iv.) which support the Trust's ambition to promote biodiversity along the canal corridor.

In particular, the incorporation of our suggestion about the control of external lighting along the canal corridor, to avoid adverse impacts to nocturnal species which use the canal, such as bats.

We also welcome the incorporation of our suggestion that new planting schemes should be linked to the Trust's planting strategy for Birmingham City Centre (which includes orchard/fruit trees for people and wildlife, and plants and shrubs of value to pollinators and wildlife, as well as edible species).

### 4.2 Creating high-quality public realm

We welcome the addition of the reference (on page 60) to the potential need, for safety reasons, to salvage and re-lay historic surfaces e.g., adjacent to the canal.

### 4.6 Biodiversity in the Jewellery Quarter

The Trust welcomes the addition of text which refers to our linear orchard project, and the recommendation that planting schemes adjacent to the canal corridor should seek to complement our project to increase biodiversity net gain and green infrastructure.

Policy 4g and its supporting text appear to have a number of suitable recommendations relating to more appropriate and suitable management of green spaces alongside the canal corridor.

In particular, the trust welcomes moves towards incorporating habitat and biodiversity features as part of new developments including bird and bat boxes (bird boxes with particular focus on black redstarts), inclusion of brown and green roofing, installation of insect houses and native pollen and fruit-bearing plant species planting (as opposed to ornamental species).

The reference to sensitive lighting along the canal corridor, and particularly that lighting should adhere to the recommendations set out by the Bat Conservation Trust, are also welcome.

The trust considers that a useful addition to the policy would be the inclusion of the recommendation to ensure, wherever possible, that green spaces are linked to avoid excessive isolation of such spaces.

### 4.9 Car parking provision

The Trust welcomes the addition of text (at page 70) referring to, when considering below-ground parking, the need to be aware of potential adverse impacts to the structural stability of historic structures including the canal.

## Design in the Jewellery Quarter

We recognise this document, which promotes high quality design in the Jewellery Quarter. We encourage the addition of a *canal side design* section to this document, as principles of good waterside design are unique. This could be achieved in collaboration with the Canal & River Trust, however some initial advice can be found at <https://canalrivertrust.org.uk/specialist-teams/planning-and-design/creating-successful-waterside-places>.

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## Pathway to success - The Developer's Roadmap

We support the document's approach of positively encouraging developers to canvas our views and seek pre-application consultation on the design of new development.

Page 11 poses the question to developers as to whether contributions from third sector organisations such as "Canal & Rivers Trust" could inform design. We ask that this be corrected to "Canal & River Trust". We note that this typographic error is repeated on page 17.

We note the step on page 12 which suggests that applicants "Submit a pre-application enquiry" to Birmingham City Council. It is further suggested that applicants "may also wish to undertake informal preapplication discussion with other parties". The Trust is always happy to be approached by applicants for pre-application advice, which can include advice on design. Applicants are directed to <https://canalrivertrust.org.uk/specialist-teams/planning-and-design/our-statutory-consultee-role/what-were-interested-in/pre-application-advice> for further information.

We ask that where sites fall within the area where the Trust is a statutory consultee at planning application stage, we be included by Birmingham City Council in the pre-application discussion process in order that our advice can be provided as early on as possible in the design process.

### The macro scale: Movement

Positive connectivity recommendations to the canal network are welcomed as a part of the design process. We ask that applicants consult the Trust at an early stage about good access practices and obtaining the Trust's agreement to the creation of any new towpath access.

The Trust is pleased to note that the reference to "canal footpaths" on page 20 (page 13 in the Regulation 14 Draft) has been corrected to "canal towpaths".

### The macro scale: Scale

We repeat our observation that there is some ambiguity as to the meaning of key question 2 on Page 23 (previously page 17), which relates to the acceptability of tall buildings. We suggest that this question is re-phrased to provide clarity.

### The micro scale: Frontages

The benefits of building frontages onto the canal can enhance visual surveillance of the waterway, promote the navigation as a publicly accessible place of amenity, and enhance the canals' usability to local communities and as an active travel option as a sustainable, vehicular free route.

The Trust welcomes the addition of text (on page 36) which refers to frontages to canals and pedestrian routes, rather than just streets.

### Spaces between buildings

We welcome the addition of text (on page 38) which refers to the requirement that spaces between buildings should be designed so as to avoid unsafe places and dark, hostile environments.

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## Context: A Short History of Urban Design in the Jewellery Quarter

As we noted in our response to the Regulation 14 Consultation, the reference to the canal in this section (at page 51, previously page 8) correctly dates 1789, but is (incorrectly) found in the 19th century section. We ask that this be reconsidered in any further reformatting that occurs.

## Future engagement

The Trust hopes that the above advice is helpful and are willing to engage with the groups involved in creating this plan and guidance in order that we can seek to achieve the shared aims they contain, where possible.

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

James Dunn MRTPI  
Planning Assistant

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