Birmingham Local Plan Viability and Delivery Assessment

Birmingham City Council

This policies matrix sets out the emerging draft Preferred Options policies and describes how we have incorporated the cumulative impact of the policies into the viability assessment. The matrix sign-posts the reader to particular cost and values evidence which reads across into the financial appraisals.

* Those policies with a Direct impact on viability include policies such as affordable housing, minimum housing standards etc. that have a quantifiable impact on viability. These have been explicitly factored into our economic viability appraisals through cost and value assumption etc.

Those policies with an Indirect impact have been incorporated into the viability study indirectly through the property market cost and value assumptions adopted e.g., market values, benchmark land value and BICS costs etc. It is important to note that all the policies have an indirect impact on viability. The Birmingham Local Plan sets the 'framework' for the property market to operate within. All the spatial policies have an indirect impact on viability through the operation of the property market (price mechanism).

Some policies are for very narrow specific circumstances of Development Management. These policies have no material impact on the value and cost assumptions for the viability Plan-making viability assessment.

Policy	**Policy Contents […paraphrased where appropriate for ease]**	**Impact on Viability ***	**Implications for Local Plan and CIL Viability Assessment**
Policy PG1: Overall Levels of Growth	Over the Plan period significant levels of housing, employment floorspace, infrastructure and community facilities will be planned for. The Birmingham Local Plan will deliver: - Xno. additional homes by 2042 - Minimum ongoing 5-year reserve of 67ha of readily available employment land - Xno. site allocations for X housing, X mixed use and X for employment development/ industrial use as shown on the policies map and set out in tables XX	Indirect	This is an overarching policy in which we have assumed no impact for this study. This strategic policy sets out the overall vision to more detailed policies. As such, there is only an indirect impact on viability through the price mechanism for land and property assets.

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	- Employment sites at Peddimore (71 ha), Washwood Heath (24ha) and the former Wheels site (XXha) - New retail, leisure, office developments in line with the Centres policies - Xno. site allocations to meet the needs of Gypsies, Travellers and Travelling Show people - New waste facilities to increase recycling and disposal capacity and minimise the amount of waste sent directly to landfill. The council will work actively with local authorities in the Housing Market Area (HMA) to ensure appropriate provision elsewhere is made in the HMA to meet the shortfall of Xno. homes.		
Policy PG2: Birmingham as an international city	Birmingham will be promoted as an international city supporting development, investment etc to raise the City's profile and strengthen its position nationally and internationally.	Assumed no impact	This policy is an overarching policy which sets out the vision for Birmingham to raise the city's profile. Thus, we have assumed no impact.
Policy PG3: Place making	All development will achieve high quality, sustainable design informed by the site's character/ surrounding context. Proposals should contribute to create a sense of place, good architecture and deliver landscape and green infrastructure gains to meet the needs of users and contribute to well-being. New development must: - Adhere to spatial requirements (DM10 & HNXX) and density standards (HNXX) and reflect the latest Birmingham Design Guide SPD, National and Local Design Codes and Conservation Area Management Plans relevant to the site. - Enhance local identity and sense of place through design that responds to physical, cultural, historical and socially distinct characteristics of the site/ local area. - Create safe environments that design out crime and encourages social interaction and natural surveillance through e.g., active frontages - Legible, accessible, permeable, well-connected environments to local services and facilities (through walking/ cycling) and provision of active travel and public transport infrastructure.	Direct	This policy sets out design principles that new developments should follow in order to ensure that Brimingham's difference characteristics and qualities are maintained. There is therefore a direct impact on the construction cost. Notwithstanding this, the minimum design standard is the Building Regulations and therefore the cost of compliance is reflected in the BCIS costs that we have used within our appraisals.

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	- Inclusive, attractive, functional streets and public realm for pedestrian priority. Use good quality materials, landscaping, street furniture, lighting and signage. - Make multi-functional landscape and green infrastructure integral to scheme design, including urban greening and measures for climate adaptation e.g., tree canopy coverage. - Deliver buildings of architectural cohesion and visual interest that use attractive, robust and sustainable materials based on a well-defined rationale arising from its context. - Use existing buildings and efficient use of land to be sustainably designed and constructed to reduce carbon emissions and respond to climate change. - Minimise adverse impact on natural resources and maximises the restoration and enhancement of biodiversity and the delivery of BNG. - Be inclusive, accessible and adaptable to promote social cohesion, meet the needs of as many as possible and allow for flexibility to respond to changing circumstances over the lifetime of the development. - Measures to ensure they are well managed and maintained - Promote health and wellbeing and the creation of sustainable, healthy and liveable neighbourhoods.		Note also that good design leads to high quality environments which are reflected in the value of real estate. We have used current values (and costs) within our appraisals. Costs may include expenses related to architectural design, quality materials additional amenity provisions, access and parking infrastructure, and compliance with highway safety standards.
Policy HN1: New residential development	New housing in Birmingham is expected to contribute to making sustainable places. New residential development will be supported where it: - Is accessible to local facilities (shops, schools, open space, leisure, recreation & work opportunities) by modes of transport other than the car; - Adds choice of housing sizes, types and tenures and meets identified housing needs catering for all incomes and ages; - Is well designed, sustainably constructed and climate resilient; - Be adequately serviced by existing or new infrastructure which should be in place prior to housing; - Sympathetic to historic, cultural or natural assets; - Does not conflict with other policies in the Local Plan.	Assumed no impact	This is an overarching policy in which we have assumed no impact for this study. Where the policies have been more specific, we have implemented the associated costs reflected in the value assumptions within our appraisals.

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Policy HN2: Affordable Housing	1.Developments of 10 or more dwellings will be required to provide 35% (subject to viability assessment) of dwellings as affordable homes. 2.Affordable housing will be required on other forms of residential development outside of Use Class C3 such as purpose-built student accommodation (Policy HN7), large scale shared housing (Policy HN8) and housing for older people and others with support and care needs (Policy HN5). 3.The size and tenure of affordable homes provided on individual sites should reflect local need and will be determined by negotiation, guided by Birmingham's Housing and Economic Development Needs Assessment 2022 (HEDNA) (or any subsequent equivalent), other up to date evidence of need, the Council's housing waiting list and site characteristics. 4. The tenure mix of affordable housing provided should comprise 70% social or affordable rent and 30% affordable home ownership (including First Homes). 5. Affordable housing provision should be met on site and indistinguishable from that of open market homes. Off-site provision or financial contributions in lieu of on-site provision will only be accepted in exceptional circumstances where it is robustly justified and contributes to mixed and sustainable communities. The commuted sum will be equivalent to the uplift in value resulting from the floorspace/units that would have been provided as affordable housing being delivered as unrestricted market housing. 6. In accordance with national planning guidance, Build to Rent schemes should provide 20% of units as Affordable Private Rent at a minimum rent discount of 20% of local market rents. Rents should also not exceed the Local Housing Allowance level. 7. Where a development proposal cannot provide the percentage of affordable housing set out above, a financial viability assessment undertaken in accordance with national planning guidance must be submitted. The Council will instruct an appropriate professional to examine the financial viability assessment, the cost of which will be met by the applicant. Where provision of reduced rates of affordable housing has been accepted, the Council reserves the right to require review mechanisms/ overage clauses.	Direct	Our typologies will adopt the affordable housing rates and tenure expressed in policy HN2 Our scheme Typologies Matrix and viability appraisals are specifically designed to test the viability of this policy in the context of the cumulative impact of all of the new policies herein. The drafting of this policy is an iterative process having regard to the results of the viability appraisals and specifically the sensitivity appraisals. Note that in accordance with the PPG, policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision-making stage. (Paragraph: 002 Reference ID: 10-002-20190509, Revision date: 09 05 2019)

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Policy HN3: Housing type and size mix	New housing developments should provide a mix of sizes, types and tenures to meet in order to meet local needs and support the creation of mixed, sustainable and inclusive communities. Account will need to be taken of: - The Birmingham HEDNA 2022 (or subsequent revision); - Local housing needs assessment; - Locality and ability of the site to accommodate a mix of housing; and - Market signals and local housing market trends. Provision of affordable housing will be required in accordance with Policy HN2 Affordable Housing.	Direct	This policy will have a direct impact through affecting the maximum achievable GDV on a development site. This is impacted by the tenure/ dwelling no. and range of property types achieving different values. This will also have a cost implication as delivering a range of different property types will likely result in varying levels of construction cost. The scheme mix and relevant density assumption(s) are set out within the Typologies Matrix. We have had regard to the requirements of this policy in determining the relevant scheme typologies.
Policy HN4: Residential Density	New housing should be provided at a target density responding to the site, context and housing need with densities of at least: - 400 dwellings per ha in and within 400m of the city centre - 70 dwellings per ha in and within 400m of urban centres and areas well served by public transport. - 40 dwellings per ha elsewhere.	Direct	We have had regard to the requirements of this policy in determining the relevant scheme typologies. We have sought to research the market in Birmingham for density and have reflected this in our BCIS build cost assumptions.

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	When assessing suitability of new residential development, full consideration will be needed to the site and context. For mixed-use applications, densities may vary. There may be occasions when a lower density would be appropriate in order to preserve character of the locality. Applicant will be expected to justify the density proposed where necessary.		The relevant density assumption and unit mix is set out on the Typologies Matrix.
Policy HN5: Housing for older people and other with support and care needs	All major housing developments will be required to demonstrate how it contributes to meeting the needs of older people and those with disabilities as part of the housing mix provided on the site. In accordance with Policy HN2, homes for older and disabled people should be provided within both the market and affordable sectors, guided by the Council's latest Housing and Economic Development Needs Assessment, any relevant local housing need surveys and the Council's Housing Register. All new build housing should be designed to be accessible and adaptable, complying with Building Regulations Part M4(2) 'Accessible and adaptable dwellings' except for those dwellings that are designed to be wheelchair adaptable or accessible. At least 10% of housing on major development sites should designed to be wheelchair adaptable, complying with Building Regulations Part M4(3a) 'Wheelchair adaptable dwellings.' In exceptional circumstances, factors such as vulnerability to flooding, site topography and where the provision of a lift to dwelling entrances may not be achievable, may determine a reduced requirement in terms of Building Regulation M4(2) and M4(3) accessibility standards. A minimum of XX% of units will be affordable, subject to viability. Applications for specialist housing for older people and younger adults with support or care needs will be supported where it meets the requirements of Policy DM12 of the Development Management in Birmingham.	Direct	This policy will have a direct impact on the plan viability assessment as retirement housing typologies will need to be assessed. There will be informed by what is currently being developed/ offered in the Birmingham area. This policy will then affect the wider retirement housing market within the Birmingham area through the provision of additional supply, by meeting the demand this may apply downward pressures on existing stock / forthcoming retirement developments. There is an implication as this requires the provision of specialist accommodation for older people and people who require other care needs. The provision of specialist accommodation is typically more costly to build than typical dwellings. We have carried out separate analysis and

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			appraisals for older persons housing.
Policy HN6: Protecting existing housing	Best use will be made of the existing dwelling stock and the Council seek to: - Prevent the loss of existing residential accommodation to other uses (through conversion or redevelopment). Such loss will only be permitted if there are good planning justifications or to provide for essential infrastructure/ community facilities. - Resist the conversion of 2 – 3-bedroom houses (Use Class C3) into flats, Houses in Multiple Occupation or other shared housing. Conversion of properties with 4+ bedrooms will be assessed in accordance with Policy DM11 'Houses in multiple occupation' and Policy DM12 'Residential conversions and specialist accommodation'. - Develop and implement initiatives to improve the condition of older private sector stock and the Council's own dwellings. Many initiatives involve the Council working with public & private sector partners. - Bring vacant residential properties back by encouraging the use of existing buildings and through implementation of the Council's Empty Homes Strategy, including where necessary the use of its compulsory purchase powers. The Council will encourage retrofitting of existing dwelling stock to achieve sustainability standards set out.	Direct	In terms of costs associated with this policy, they can vary depending on the specific characteristics of the existing dwellings. Costs may include expenses related to architectural design, quality materials, additional amenity provisions, waste management infrastructure, access and parking infrastructure and compliance with highway standards. Additionally, developers may need to invest in sustainable measures or innovative design features which could incur additional costs. These should be considered on a site-by-site basis, we have therefore not included any costs associated with this policy.
Policy HN7: Purpose built student accommodation	Proposals for purpose-built student accommodation provided on campus will be supported subject to satisfying design and amenity considerations. Proposals for off campus provision will be considered favourably where: - There is a demonstrated need for development including evidence of a nomination agreement with one or more higher education providers and the demand for the type of accommodation proposed; - Proposed development is well-located to educational establishment that it will serve and to local facilities by sustainable modes of transport;	Direct	This policy will have a direct impact through affecting the maximum achievable GDV on a development site. Impacted by the tenure and no. of dwellings and the range of property types achieving different values and

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	- Proposed development will not have an unacceptable impact on the local neighbourhood and residential amenity or place pressure on local infrastructure and includes a management plan to mitigate any potential harm; - The scale, massing and architecture of the development is appropriate for the location and active ground floor uses are incorporated wherever possible; - Design, layout and size of accommodation and facilities are an appropriate standard and are suitable by virtue of being adaptable to alternative future residential use; - The proposed development is car free and measures are included in the management plan to prevent occupants from parking cars elsewhere in the city; - Minimum of 20%/ 30%/ 40%/ 50% of student rooms will be affordable for students, subject to viability in the context of student maintenance loans/ rents; and - Rent for affordable student rooms should be set at a maximum of 50% of the maximum income that a new full-time student studying in Birmingham and living away from home could receive from the government's maintenance loan for living costs for that academic year.		varying levels of construction costs. The viability can be tested as a through our appraisal mechanism through a Student housing typology.
Policy HN8: Large scale shared accommodation	Development proposals for large scale shared accommodation will be supported where: 1. There is a satisfactory demonstration of need for the development; and 2. It is located within central Birmingham where car free development is expected, has excellent public transport, walking and cycling connectivity and is well served by a wide range of local services and facilities (of which provision made within the proposal can be taken into account); and 3. The private bedroom size is a minimum of 25 sq.m. for a single occupancy room; and 4. The average internal communal amenity space* is at least 4.5 sq.m. per bedspace; and 5. A satisfactory management plan is provided; and 6. It adheres to the guidance set out in the Council's Large Scale Shared Accommodation Supplementary Planning Document (or any subsequent revision); and 7. It does not compromise the delivery of self-contained housing to meet the city's housing need having regard to:	Direct	This policy will have a direct impact through affecting the maximum achievable GDV on a development site. Impacted by the tenure and no. of dwellings and the range of property types achieving different values and varying levels of construction costs. The viability can be tested as a through our appraisal mechanism through a co-living typology.

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	i. whether a proposal would result in the loss of existing C3 residential accommodation ii. whether a site has been allocated for housing or protected for other uses iii. whether a site has been identified in the city's Housing and Employment Land Availability Assessment (HELAA) as having the capacity for conventional housing, unless the applicant can demonstrate that the permitted C3 scheme is not deliverable or viable; and iv. whether the site has an extant planning permission for C3 housing, unless the applicant can demonstrate the permitted C3 scheme is not deliverable or viable. Exceptions to the minimum space standards will only be considered where a robust justification has been provided to the satisfaction of the Council. Affordable housing will be required and this will be sought as a single upfront financial contribution, based on at least 20 per discount off the market value (including any service charges) of XX% of the units, and secured through a section 106 legal agreement (subject to viability). * The calculation of the average communal space per bed is detailed in the Large-Scale Shared Accommodation SPD.		
Policy HN9: Housing regeneration	The regeneration and renewal of existing housing areas will continue to be promoted to ensure that high quality accommodation and environments are provided in line with the principles of sustainable neighbourhoods. The initial priorities will be the following Housing Action Areas: Ladywood; Druids Heath; Perry Barr; Newtown South; St. George's; Bloomsbury; Duddeston; Highgate; Pershore Road; Balsall Heath/ Sherbourne Road Estate; Aberdeen Street Estate; and The Meadway. Replacement rates on cleared sites will be maximised subject to the provision of high-quality accommodation within a high-quality environment. In redeveloping cleared sites, the focus will not only be on addressing housing needs, but will need to identify/ provide opportunities to improve local employment, open space provision, sports facilities and the quality of the local environment and community, health and education facilities.	Direct	In terms of costs associated with this policy, they can vary depending on the specific characteristics of the existing dwellings. Costs may include expenses related to architectural design, quality materials, additional amenity provisions, waste management infrastructure, access and parking infrastructure and compliance with highway standards. Additionally, developers may need to invest in sustainable measures or

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			innovative design features which could incur additional costs. These should be considered on a site-by-site basis, we have therefore not included any costs associated with this policy.
Policy HN10: Gypsies, Travellers and Travelling Show people	The following sites are allocated to provide for accommodation for gypsies and travellers: - Tameside Drive, Castle Vale (permanent and transit provision) - Rupert Street/ Proctor Street, Nechells (transit provision) - Hubert Street/ Aston Brook Street East, Nechells (transit provision) The following is proposed to be allocated for accommodation for gypsies and travellers: - Sycamore Road, Nechells (transit provision) The following sites are allocated for travelling show people: - Shipway Road, Hay Mills (private) The following is proposed to be allocated for travelling show people: - George Street, Handsworth Other proposals for accommodation for Gypsies, Roma, Travellers and travelling show people will be permitted where: - The site is sufficient size to accommodate and accommodate appropriate levels of storage space. Any amenity buildings proposed are of an appropriate scale and reasonably related to the size of the pitch(es) they serve. - The site is well-designed with clearly demarcated site and pitch boundaries using appropriate boundary treatment and landscaping sympathetic to the surrounding area. Tree and hedgerow boundaries should be retained and strengthened.	Indirect	This policy regards the provision of pitches for Gypsy and Traveller, and Travelling Show people across the plan period, aiming to ensure that a sufficient supply of pitches are delivered to meet the needs of gypsies, travellers and travelling show people and appropriate criteria are included for allocating sites and determining planning applications. This is a minority sector of the property market. The supply of G&T sites and new development may impact indirectly on the property market through the price mechanism (e.g., the land cannot therefore be allocated as a residential site). We have used current values (and costs) within our appraisals.

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	- There is safe and convenient pedestrian/ vehicular access to and from the public highway and adequate space for vehicle parking and manoeuvring within the site. - Accessible to shops, schools, health facilities, employment opportunities and essential services (mains water, power and waste disposal) - The amenity of the site's occupiers and neighbouring residential properties is protected in accordance with relevant national/ local policies. Sites must be designed to ensure privacy between pitches and between the site/ adjacent users. - No conflict with other relevant policies e.g., those relating to the protection of the Green Belt, other greenfield land and industrial land and those concerned with development within areas at risk of flooding and on contaminated land. - Where proposal is for transit site, proposals should be in locations with good access to the strategic highway network.		
Policy HN11: Education Facilities	The development/ expansion of higher and further education facilities, and other research and development opportunities linked to them, will be supported in line with other policies in the Local Plan. Development, expansion/ upgrading of schools (early years, sixth form and SEN) will be supported where: - It meets a recognised need, in line with the Council's sufficiency assessments; - The proposal is readily accessible by walking, cycling and public transport; - Suitable provision for outdoor facilities for sports and recreation; and - Proposal is of appropriate scale and design for the location. Where existing local school/ early years provision is inadequate to meet projected needs arising from proposed development, additional provision will be sought to meet any identified shortfall. Provision may be on-site or the enhancement/ improved access to existing facilities.	Direct	This policy will have an impact on viability as the provision of these community facilities will need to be funded through a combination of Section 106 and Community Infrastructure Levy receipts, both of which are collected from developers and have to be costed into their viability appraisals. This policy has a direct impact on the development costs. We have explicitly factored into the appraisals all the relevant infrastructure costs for the various typologies. The explicit costs can be seen in the Typologies Matrix. These have

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			been the subject of consultation at the stakeholder workshop. This will be reflected in the typologies we appraise through a £ per unit / £ psm cost allowed for these items. We have allowed for a total s106 cost of £4300 per unit.
Policy HN12: Healthy neighbourhoods	The Council is committed to reducing health inequalities, increasing life expectancy and improving quality of life by: - Requiring development proposals to demonstrate they positively contribute to the health and wellbeing of residents in a Health Impact Assessment. Where development has significant negative / positive health and wellbeing (or social infrastructure) impacts, the Council may require applicants to provide for the mitigation / provision of such impacts through planning conditions and/or financial/ other contributions secured via planning obligations and/or CIL charging schedule. - Promoting liveable neighbourhoods (15/20 min neighbourhoods) through growth zone policies and health impact assessment. - Improving road safety, promoting active travel by enhancing pedestrian and cycle routes and encouraging sustainable travel choices - Retaining, increasing and enhancing green infrastructure (incl. urban greening, tree planting, open spaces) - Facilitating opportunities for physical activity and recreation through good access to open space and sports facilities - Supporting the network of local centres; including supporting cultural infrastructure - Seeking to improve air quality and managing noise in the city; - Providing good quality & well-designed housing and improving the existing housing stock - Delivering new and improved health services and facilities in areas accessible by sustainable transport	Direct	We have included appropriate allowances for Health Impact Assessments (HIA) or Health Impact Assessment Screening Report with pre-planning and professional fees cost allowances. Any negative impacts that are identified (and the costs of mitigation) should be deducted from the price paid for the land.

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	- Delivering inclusive, safe, well-designed places that are accessible to all - Encouraging opportunities for access to fresh food through the retention of provision of allotments, community gardens, orchards and growing spaces - Requiring buildings to be sustainably constructed, utilise low and zero carbon energy and ensure the risk of flooding is managed effectively.		
Policy CE1: Climate Change	Development should make a positive and significant contribution to both mitigating against and adaptation to climate change, meeting local and national climate objectives, through: - Actions to reduce impact of human activity on the climate system, through reducing greenhouse gas emissions. In particular, net zero. - Adjustments to natural or human systems in response to the actual or anticipated impacts of climate change, to mitigate harm or exploit beneficial opportunities (climate change adaptation). This will be achieved by new development that contributes to Birmingham achieving Net Zero and climate change resilience by: - Increasing the resilience of place and communities to: (a) Accommodate climate change mitigation measures by minimising embodied and operational emissions. (b) Adapt to climate change through: - Future proofed design of all major schemes (more than 10 dwellings or 1,000m2 of floor space) to accommodate systems that enable scaling up of energy systems to cope with extreme changes in temperature. - Flood resilient buildings and infrastructure design of all developments (c) Improve Birmingham's natural and semi-natural environments and ecology. - Increasing efficiency by:	Direct	Within the Jacobs net zero report commissioned by BCC it is stated that: 'The 2025 operational carbon targets can be met by adding heat pumps, with an investment between £10,000-15,000 (depending on the dwelling archetype). Complementing heat pumps with a maximised PV system would increase these costs to approximately £30,000, achieving near net zero operational emissions' On this basis we will apply a cost of £10,000 per unit to be in line with the 2025 operational carbon targets. We will run sensitivities from £0 - £30,000 to assess the impact on viability across the range.

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	(a) Removing the need for energy through: Increasing active travel and up-take of public transport (limiting private car use); highest standard of energy efficiency; maximising on-site generation of renewable energy. (b) Emissions conservation through the application of the carbon hierarchy that follows principles of Avoid, Switch and Improve, focusing on the reuse of buildings and structures and using materials and construction methods that minimise waste and emissions. - Increasing Birmingham's capacity for water conservation and sustainable drainage Demonstrated by: New development is expected to demonstrate climate change mitigation and adaptation in its design from the outset and considered at all stages of the design and build process via completion of a sustainability statement. Initial details below. Sustainability Statements must include: - Whole life cycle assessment - Energy statement - Emissions statement - Circularity statement - Water efficiency statement - Transport statement - Design and access statement All proposals should demonstrate how the principles form the energy, waste, transport and carbon GHG emissions hierarchies. A sustainability statement must be issued for planning applications for: - All new build residential houses and flats - Multi-occupation residential buildings with 5+ rooms/ units / occupiers		

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	- Residential refurbishments, conversions and change of use for: 10+ dwellings, or 1,000sqm+ of floorspace - Non-residential development of 1,000sqm+ of floor space (incl. offices, retail and industrial) - Mixed use development of 1,000sqm+ of floor space of 10+ buildings.		
Policy CE2: Retrofitting Existing Buildings	Interventions to improve the energy efficiency of existing buildings, their resilience to climate change and their ability to accommodate technologies to generate, store, distribute and manage energy supply and demand will be encouraged as a key component of Birmingham's local plan presumption against demolition (CE4). All development proposals involving changes to existing residential/ non – residential buildings are supported if they: - Reduce the operational emissions and support co-ordinated programmes of improvement at scale and pace. All major schemes of 10+ dwellings / 1,000m2 of floor space should demonstrate: - The energy intensity of the building(s): - Through asset management and retrofit plans- how improvements align with approved capital budgets; - The opportunities for the retention and adaptation (CE3/ CE4) of existing buildings and structures within the defined development site have been included within the scheme. Affordable housing must achieve EPC rating E (HN2) Houses in Multiple Occupation properties must achieve EPC rating E (HN9) The council encourages improvements in energy efficiency and accommodation technologies to generate, store, distribute and manage energy supply and demand will be encouraged where it is demonstrated to have detrimental impact on the special characteristics of these heritage assets for the future. Proposals will be considered against national planning policy. Includes listed buildings, buildings of solid wall / traditional construction and in conservation areas. All change of use applications must produce an emission assessment and statement (CE4) to achieve the following EPC standards:	Direct	We recommend a site specific approach to the viability on the retrofitting of existing buildings, as no two buildings are the same.

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	- Dwelling (use class C3) to being put to a commercial use (all other use classes) must achieve a minimum of C rating. - Commercial use (all other use classes) to a dwelling use (C3) must achieve a minimum of D rating. - Commercial use to another commercial use must achieve a minimum of E rating.		
Policy CE3: Sustainable design and construction	All new developments, refurbishments or expansions within Birmingham should achieve highest possible standards, acknowledged that it may not always be feasible / viable. Where it is demonstrated that it is not feasible / viable, proposals are required to demonstrate an optimised and balanced approach between efficiency, operational sufficiency and climate change resilience through: - Assessment of development proposals against energy, waste, transport, emission hierarchies in CE1 climate change and requirements of CE4 embodied carbon. - Use of whole life cycle assessment - Use of dynamic energy modelling (for all major development projects over 10 dwellings or 1,000m2) to develop a dynamic simulations model using CIBSE TM54 methodology to assess the operational energy consumption and emissions of design options, reducing the risks for performance gap and can enable design teams to make informed decisions - The use of future energy scenarios produced and energy supply area (ESA) level data and analysis National Grid and for developments to be assessed against Local Area Energy Plans (or equivalent) and heat network zones (CE6) Where the use of onsite solutions for operational sufficiency (e.g., renewables to meet total energy consumptions and/ or technologies to reduce water consumption) is demonstrated to not be technically feasible then off site solutions will need to be demonstrated that address the developments operational requirements or will provide a net benefit to Birmingham overall. The Carbon hierarchy should be used to demonstrate how planning & design of the development proposal has been shaped in accordance with PAS2080:2023 (Avoid-Switch-Improve). Planning submissions should show how at all design stages, actions are taken to reduce embodied and operational emissions. The carbon hierarchy can be vital for change of use and major retrofit projects to minimise construction waste and maximise use of existing elements of buildings and components within existing buildings.	Direct	Within the Jacobs net zero report commissioned by BCC it is stated that: 'The 2025 operational carbon targets can be met by adding heat pumps, with an investment between £10,000-15,000 (depending on the dwelling archetype). Complementing heat pumps with a maximised PV system would increase these costs to approximately £30,000, achieving near net zero operational emissions' On this basis we will apply a cost of £10,000 per unit to be in line with the 2025 operational carbon targets. We will run sensitivities to test the viability of the net zero costs, ranging from £0 - £30,000. We have also used current costs based on the BCIS and

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	Major non- residential development of 1,000m2+ will be required to achieve a BREEAM accreditation. BREEAM 'Excellent' rating will be expected as a minimum standard for all developments. For residential / mixed-use development of 1,000m2 / 10+ building units, a BREEAM Communities assessment will be required. A BREEAM Communities 'Excellent' rating will be required. Where relevant, the voluntary use of quality assurance methods e.g., Passivhaus certification to support compliance with Policy CE3 will be encouraged. CE3.2.2 New build residential development will aim to achieve zero operational emissions by reducing heating, cooling, and power demand by reducing consumption, optimised energy efficiency with on-sit generation and storage with the aim of: - Operational energy use (kWh/m2/annum) and embodied carbon (kgCO2e/m2) in accordance with RIBA 2030 climate change target metrics - On site renewable energy generation and storage to match a minimum of 25% of the total energy use (kWh or GWh/ annum) - Connection to a low- or zero-emission heat network where available CE3.3 In accordance with CE4, the Birmingham Local plan has a resumption against the demolition of building and structured. Significant weight will be given to developments using existing buildings and structures that contribute to the development's whole life efficiency. Proposals that help to increase resilience to climate change and secure a sustainable future for any buildings and assets will be supported where they result in construction and operational efficiency, design, character, appearance, and historical significance of the building. CE3.4 The council will support residential and non-residential schemes with high levels of building integrated and/or onsite renewables. Proposals should seek to minimise visual impact wherever possible. Where fixed to a listed building, proposals must ensure that: technology will not significantly impact the appearance and special historic character of the building; require minimal intervention with the fabric of the building; and shall be easily reversible.		rebased them to Birmingham which take into consideration costs of 'typical' development across Birmingham. We acknowledge that incorporated within the BCIS costs are the 2021 PART L building regulations costs.

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	CE3.6 All residential schemes should aim to achieve an estimated water consumption of no more than 100 litres / person / day through the incorporation of water saving measures where feasible. Domestic development proposals for 10+ dwellings and non-domestic development with a floor space of 1,000m2+ should incorporate water reuse / recycling and rainwater harvesting measures. CE3.7 All development proposals should minimise use of minerals and creation of waste and promote opportunities for a circular economy through: - Prioritising the use of previously developed land and buildings, whilst maintaining and enhancing local character and distinctiveness - Reuse and recycling of appropriate materials that arise through demolition and refurbishment, incl. the reuse of non-contaminated excavated soil and hardcore within the site - Prioritising the use of locally sources/ sustainable materials and construction techniques that have smaller ecological and emissions footprints through the provision of Environmental Product Declarations (EDP)s as part of the whole life cycle assessment requirements - Considering the lifecycle of the development / surrounding area, incl. how they can be adapted to meet the changing community needs and how materials can be recycled at the end of their lifetime - Providing adequate space to enable and encourage greater levels of re-use and recycling across developments		
Policy CE4: Embodied Carbon	The Birmingham Local plan has a presumption against demolition of buildings / structures aiming to increase the reuse / repurposing of the established built environment unless it can be demonstrated that the retention of a building or structure poses a significant risk to health and safety. A whole life-cycle approach will be a key consideration in determining planning applications with whole life-cycle assessments required for all development proposals that: - Involve the demolition of any building, structure, substructure over 250m2 in footprint; or - Involve the development of 5+ buildings and or structures; or - Involve more than one development phase	Direct	Within the Jacobs net zero report commissioned by BCC it is stated that: 'The 2025 operational carbon targets can be met by adding heat pumps, with an investment between £10,000-15,000 (depending on the dwelling archetype).

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	WLC assessments require development proposals to demonstrate how: - Its location and design comply with the energy, carbon, transport and waste hierarchies - They minimise embodied emissions through: the retention of structures and materials on the site of the proposed development; the use of materials and construction methods that minimise emissions; and its operational emissions are met with on-site zero emission generation and storage with the embodied of these systems included in the overall development emissions lifecycle footprint. The approach to WLC assessments incl. when they should take place, what they should contain, minimum standards and how information should be reported will be set out in supporting guidance. Guidance will require WLC assessments to be in conformity with recognised standards incl. BSEN15978:2011 – sustainability of construction works assessment of environmental performance of buildings – calculation method. The assessment should cover the development's emissions and environment impacts over all stages of design lifecycle: - A1-A5 upfront embodied carbon - B1-B5 in-use stage embodied carbon - B6-B7 operational carbon - C1-C4 end of life carbon Development proposals will be required to provide an emissions assessment considering the different design options based on the carbon hierarchy as outlined in the PAS2080:2030. Avoid – switch – improve, to demonstrate design stage actions taken to reduce embodied carbon and maximise opportunities for reuse of existing assets and materials rather than demolition and new build. Avoid - Assessing existing conditions and considering options to reduce the need for new assets & components - Reusing/ retrofitting repurposing existing assets & components - Exploring alternative means for satisfying the need for whole life performance whilst not constructing a new asset. Switch		Complementing heat pumps with a maximised PV system would increase these costs to approximately £30,000, achieving near net zero operational emissions' On this basis we will apply a cost of £10,000 per unit to be in line with the 2025 operational carbon targets The Future Homes Standard 2019 Consultation on changes to Part L (conservation of fuel and power) and part F (ventilation) of the building regulations for new dwellings: Impact Assessment sets out the costs to reduce carbon emissions from new homes towards meeting the government's net zero emissions target. We have assumed that the 2021 FHS Part L is incorporated into BCIS costs.

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	- Assessing alternative solutions and adopt one which reduces whole life emissions through alternative scope, design approach, materials, technologies for operational carbon reduction. Improve - Identifying & adopting solutions / techniques that improve the use of resources and design life of an asset / network, incl. applying circular economy principles to assess materials/ products in terms of their potential for reuse or recycling after end of life. Offsetting is accepted only as a last resort, following agreement with the Council and only once the following has been demonstrated: - WLC emissions have been minimised in accordance with all policies - The applicant discloses its current emissions, accounting practices, targets to reach net zero & type of offset it uses - Will be using offsets that are verifiable and correctly accounted for and have a minimal risk of not achieving additionality, reversal, and creating negative unintended consequences for people and the environment. The council will look to develop an emission offsetting strategy that will provide the framework for agreeing and implementing offsets in a consistent, efficient / effective, that maximise the speed/ scale of emission reduction.		
Policy CE5: Renewable and Low Carbon Energy	Proposals for renewable and low carbon energy generation and storage, will be supported in the context of sustainable development and climate change, where they: - Contribute to Birmingham increasing installed local energy generation and storage capacity; - result in net gain in biodiversity - integrate well with the design of new and existing buildings and infrastructures; - are located on previously developed land; - enable: a. an increase in renewable energy and storage that is consumed locally co-location of energy producers with energy consumers, provides for biodiversity net gain.	Direct	This policy will have a direct impact on viability through the cost of achieving Future Homes Standard – this will be reflected in the typologies / appraisals through the inclusion of cost allowance for Part L (building regulations) costs for achieving greater energy efficiencies. The viability and delivery of the strategic energy infrastructure

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	b. It provides for a local benefit, helping people access to clean, affordable energy b. there has been an WLC assessment conducted of the proposal's energy system to ensure the embodied and operational impacts of the proposed energy system are quantified and it can be demonstrated that it is the lowest carbon (and other impact) energy source for the development Planning permission will be required for energy schemes (and associated infrastructure) that: - Exceed: a. 8 m3 or b. 2 meters in height or c. 5 m2 in footprint - have an existing energy technology on a building or within the gardens or grounds - is within 1meter of a property boundary - is on a pitched roof and more than 200mm from the roof slope or wall surface or less than 1meter from the edge of a flat roof - on a wall which fronts a highway, and any part of that wall is above the level of the ground storey - is in a conservation area, on a wall or roof which fronts a highway, or be nearer to any highway which adjoins the property than any part of the building - where the building(s) or structure(s) a listed building, or within the garden or grounds of a listed building, with listed buildings, requiring a planning permission and listed building consent. - they do not comply with noise standards set out in the Local Plan. CE5.1 Energy generation Solar PV and thermal energy development proposals, including both building integrated and standalone ground mounted installations and extensions or repowering of solar installations will be supported. CE5.2 Heat pumps		projects is not part of the scope of the plan viability. We have made appropriate allowances for EV charging points etc

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	Heat pumps take warmth from the ground, air, and water to supply heating or hot water to a building. Heat pumps require a planning permission where: - the volume of an air source heat pump unit (including housing) exceeds 0.6 cubic metres - there is an existing air source heat pump on a building or within the gardens or grounds - it is within 1m of the property boundary - it is on a pitched roof or less than 1m from the edge of a flat roof - on a wall which fronts a highway, and any part of that wall is above the level of the ground storey - in a conservation area, it would be on a wall or roof which fronts a highway, or be nearer to any highway which adjoins the property than any part of the building - the building(s) or structure(s) a listed building, or within the garden or grounds of a listed building, with listed buildings, requiring a planning permission and listed building consent. - they do not comply with noise standards set out in the Local Plan. CE5.3 Deep geothermal and mine water energy development proposals will be supported as part of the transition to a low carbon economy where: a. the significance of heritage assets and their settings, and the character of historic townscapes, landscapes and seascapes are conserved and, where appropriate, enhanced; b. there would not be a significant adverse impact on the water regime and water quality impacts are assessed and adequately mitigated; and c. the visual impact of associated buildings and equipment is minimised. CE5.4 Energy storage: A smart and flexible energy system is essential for integrating high volumes of low carbon power, heat, and transport. Flexibility is critical to Birmingham's energy security to ensure and efficiently match supply and demand and minimise waste was recognised in the British Energy Security Strategy. There is a presumption in favour of energy storage where it meets one or more of the following: a. makes use of existing built structures in Birmingham / brownfield land		

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	b. is co-located with an existing or proposed renewable energy development. c. it can be shown that it alleviates energy system constraints. d. enables further renewable local developments and/ or EV charging to be deployed. CE5.5.1 Electricity Electricity storage can be short- and long-term duration technology that forms part of a wider package of technologies such as flexible demand (Demand-side Response) and interconnectors. Electricity storage covers a range of technologies that can deploy at different scales and provide output for different durations. This includes (but not limited to) lithium-ion battery storage and pumped hydro storage as well as emerging technologies such as sodium-ion battery storage, liquid air energy storage, flow batteries with large-scale, long-duration electricity storage (LLES). CE5.1.2 Thermal (including seasonal) • Reduce the need to buy fossil fuels. • Help renewable heating systems work more efficiently. • Combine with a secondary heating source. Planning and coordination of renewable and low carbon energy The Council will be adopting a long-term approach to the planning of renewable energy, storage, and distribution. This will be developed with key stakeholders using approaches such as Local Area Energy Planning (or equivalent energy plans), future energy scenarios and Energy Supply Area (ESA) data to plan and coordinate development proposals with wider energy infrastructure and energy intervention planning and programme / project delivery.		
Policy CE6: Renewable energy networks and shared energy schemes	The Local Plan supports the city-wide growth of local energy systems to decarbonise new development in ways that support the decarbonisation of the existing built environment, with policy CE6 considered together with policies CE1 and CE5. CE6.1 Heat Networks The development of heat networks and associated infrastructure is strongly encouraged and should be approved unless it results in significant adverse impacts on the environment.	Indirect	The implementation of this policy will impact the real estate market through the quality of the environment and the strength of the economy created. This will impact real estate values (and costs e.g.,

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	Although Heat Network Zones are a separate regulatory regime, they do interact with the wider planning system and local government's functions within it. Consequently, the current policy position address develop proposal that fall inside and outside of future designated Heat Network Zones. Development proposals inside designated Heat Network Zones Priority areas for the delivery of Heat Networks are identified in Birmingham's designated Heat Network Zones. Each Zone requires all new buildings, public sector buildings, non-domestic buildings, and communally heated domestic premises within zones to be connected to a heat network through implementation and enforcement in accordance with the Energy Security Bill and regulations. Development proposals outside designated Heat Network Zones All development proposals outside a Heat Network Zone that are characterised by one or more of the following requirements will be required to engage with the Council to establish the suitability to connect to an operational and/ or planned heat network that is within 250 of the proposal: - 1 MW/ GWh pa of heat demand; 2,000 sqm or more of floorspace; 5 or more number of buildings Where major residential (more than 10 dwellings) and non-residential development (more than 1,000 sqm) proposals are outside a Heat Network Zone or more than 150 meters of an operational and/ or planned heat network will need to the applicant will be required to engage with Council to establish its suitability to be: - be heated and cooled using a community energy system(s); or - develop its own, on-site system for supplying heating and cooling to existing and/ or other planned buildings within 250 meters of the proposal; or Where developments demonstrate that these requirements of Policy CE6 cannot be achieved i, due to technical feasibility or financial viability, or due to site or development specifics the Councill will engage with the applicant to establish opportunities for the development to be "network ready" and designed to connect to heat network in the future. All development subject to the requirements of Policy CE6 must be supported through the submission of a Sustainability Statement in compliance with Policies CE1 and CE3. CE6.2 Smart Grids and Micro Grids Smart Grids and Micro Grids will play a key role in optimising the efficiency, reliability, and sustainability of electricity distribution systems in Birmingham providing better planning and management of existing and future		land) over time through the price mechanism.

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	electricity distribution and transmission grids; actively manage supply and demand; and enable new energy services and energy efficiency improvement. Smart grids are electricity networks that use data and digital technologies, communication infrastructure and devices to monitor and manage the transport of power from sources of generation to meet that demand and/ or enable faster restoration of energy supplies following outages. Micro Grids sit within a Smart Grid, they are also electricity networks with generation storage and loads (i.e. electricity demand) and enable an area to operate in “island mode” without the need for the main grid. We support and encourage development proposals that support the deployment of Smart Grids and Micro Grids in Birmingham that: Enhance Energy Efficiency: Promote measures to reduce energy losses and optimise energy consumption through the deployment of advanced monitoring, control, and automation technologies and infrastructures. Enable Demand Response: Encourage the implementation of demand response that incentives energy consumers change their electricity usage based on energy system conditions and pricing signals. Increase and Integrate Renewable Energy and Energy Storage Deployment: Facilitate the integration of distributed renewable energy generation, into the grid system and minimising curtailment, while ensuring grid stability and reliability Improve Grid Resilience: Enhance the resilience of the grid against climate change impacts other potential disruptions through the adoption of robust infrastructure, redundancy, and advanced grid management systems. Support Electric Vehicle Infrastructure: Plan and develop adequate charging infrastructure to support the widespread adoption of electric vehicles, considering the projected growth of EVs and their impact on the grid. Accelerate Grid Modernisation: The Local Plan will be used to inform the roadmap for grid modernisation in Birmingham, outlining the deployment of advanced metering infrastructure (AMI), distribution automation, and grid optimisation technologies. CE6.3 Community Energy Schemes The Local Plan strongly supports community-led energy schemes as a critical element of Birmingham achieving Net Zero. Supports the development of Neighbourhood Development Plans as they provide an opportunity for Birmingham’s communities to plan for community led renewable energy developments and the use of		

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	Neighbourhood Development Orders and Community Right to Build Orders to grant planning permission for renewable energy development.		
Policy CE7: Flood Risk Management	All new developments should ensure that flood risk from all sources can be managed for future occupants, and that they do not contribute to increasing flood risk to third party land. A Sustainable Drainage Assessment and Operation and Maintenance Plan will be required for all major developments, as defined in Article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015. As part of their Flood Risk Assessment (FRA) and Sustainable Drainage Assessment developers should demonstrate that the disposal of surface water from the site will not exacerbate existing flooding and that exceedance flows will be safely managed. For all developments where a site-specific Flood Risk Assessment and/ or Sustainable Drainage Assessment is required, surface water discharge rates shall be limited to the equivalent site-specific greenfield runoff rate for all return periods up to the 1 in 100 year plus climate change event. Sustainable Urban Drainage (SuDS) To minimise flood risk, improve water quality and enhance biodiversity and amenity all development proposals will be required to manage surface water through Sustainable Drainage Systems (SuDS). Wherever possible the natural drainage of surface water from new developments into the ground will be preferred. Surface water runoff should be managed as close to its source as possible in line with the following drainage hierarchy: Store rainwater for later use; Discharge into the ground (infiltration); Discharge to a surface water body; Discharge to a surface water sewer, highway drain or other drainage system; and Discharge to a combined sewer. All SuDS must protect and enhance water quality by reducing the risk of diffuse pollution by means of treating at source and including multiple treatment trains where feasible. All SuDS schemes should be designed in accordance with the relevant national standards and there must be long term operation maintenance arrangements in place for the lifetime of the development. Drainage strategies should be designed to incorporate SuDS to achieve the three key principles of SuDS; Quantity Control, Quality Control and Biodiversity & Amenity Value and support climate change adaptation for new developments. Nature based solutions to manage surface water should be prioritised within new all new developments as they can contribute to climate change adaptation and mitigation whilst supporting biodiversity net gain targets.	Direct	For the purposes of our viability assessment, we have assumed that the cost of professional fees for the relevant flood risk assessments and drainage strategy reports etc are included in our overall professional fee budget. This policy is to ensure the appropriate management and treatment of surface water runoff and foul water disposal to reduce the flood risk. Wherever possible, the natural drainage of surface water from new developments will be preferred. There are associated costs with this policy and therefore it has a direct impact on viability. It is important to stress that developers should consider sustainable drainage solutions and demonstrate that they reduce flood risk. The cost of SUDs is factored into our viability appraisals through:

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	Schemes to retrofit SuDS that can demonstrate that they reduce flood risk and enhance biodiversity to existing developments and communities should be approved without delay. Please note that Birmingham LLFA is awaiting details of the enactment of Schedule 3 of the Flood & Water Act which would create SuDS Approval Body (SAB) – which will require development serving more than one property to submit details to for sustainable drainage to them for approval prior to applying for planning permission. This may require a tweak to the policy stating that developments must have SAB approval in principle for their scheme prior to applying for planning permission. Rivers and streams are liable to natural flooding and will be managed in ways which will ensure that this can take place in locations which will not place built development or sensitive uses at risk. River corridors are also important elements of the City's green infrastructure network. The management of floodplains will also need to take into account the potential to increase benefits to wildlife. The following development principles will apply: - A 20-metre easement should be provided between development and watercourses. - Developments with canalised or culverted watercourses should re-instate natural river channels. - Culverted watercourses should be naturalised. - Existing open watercourses should not be culverted - A minimum 10 metre easement from flood risk infrastructure should be provided to ensure future maintenance and improvement to the asset can be undertaken. - New developments should be designed to include active frontages to watercourses. - Enhancements of Water Resources As well as providing water and drainage, the City's rivers, streams, canals, lakes and ponds are an important amenity and are also valuable as wildlife habitats. Opportunities to increase the wildlife, amenity and sporting value of natural water features and canals will also be encouraged, provided that there is no adverse impact upon water quality, flood risk or the quality of the natural environment. Proposals should demonstrate compliance with the Humber River Basin Management Plan exploring opportunities to help meet the Water Framework Directive's targets. Development will not be permitted where a		- The net to gross site area assumptions – particularly for larger sites which have more landscaping areas and buffer; - External works costs.

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	proposal would have a negative impact on surface water (rivers, lakes and canals) or groundwater quantity or quality either directly through pollution of groundwater or by the mobilisation of contaminants already in the ground. Where development is within 20 metres of a raised reservoir, details regarding any construction and groundworks should be submitted for assessment with the relevant statutory undertaker. Land required for future flood risk management should be safeguarded from future development that could compromise the ability of Birmingham to manage future flood risk. Trees and woodland can provide significant benefits in terms of water management and flood alleviation and as part of SuDS in addition to their wider landscape, recreation, economic and ecological benefits. The provision of additional trees and woodland will therefore be encouraged.		
Policy CE9: Sustainable Waste Management	The Council seeks to prevent the production of waste, and where this is not feasible, seeks to move and manage Birmingham's waste up the waste hierarchy. This will require an increase in alternative disposal capacity. New developments should be designed to minimise the amount of waste they create; treat waste as a resource and encourage recycling, reuse and composting. Major developments will be required to prepare a Waste Management Strategy and should incorporate appropriate infrastructure for facilitating recycling and composting on site. New developments and building conversions should be designed and adapted to extend their useful lifetime. Design should also allow for the salvage of building components and materials for reuse or recycling. Design should also consider the use of secondary and recycled aggregates to help reduce the need to import aggregates into the city. The following locations are considered suitable for developments that involve the management treatment and processing of waste: - The Tyseley Environmental Enterprise Area which has the potential to accommodate new waste and sustainable energy technologies, including recycling, combined heat and power and waste recovery. - Other industrial areas including the Core Employment Areas identified on the Policies Map. - Sites currently or previously in use as waste management facilities.	Indirect	This policy is about the provision of waste infrastructure and future requirements. It is not subject to specific policy obligations e.g., affordable housing, CIL etc over and above site-specific mitigation (e.g., noise, dust mitigation etc). There is no direct impact on plan viability, but the lack of provision for waste will impact on the deliverability of new homes and employment. This policy will have no impact on viability.

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	- Appropriate sites adjacent to existing waste management facilities. - Proposals for New or Expanded Waste Management Facilities Proposals for new or expanded waste management facilities, including in the locations listed above, will be considered against the following criteria: - The effect of the proposed waste facility upon the environment and neighbouring land uses - The impact of traffic generated by the proposal and the availability of alternative transit modes, such as rail and waterways. All new waste treatment and management facilities will need to take account of the following: - The need for pollution control measures appropriate to the type of waste to be processed or handled. - The impact of proposals on residential amenity. New waste facilities will not normally be approved adjacent to existing housing and proposals for anaerobic digestion will not be approved within 250m of existing housing. - Careful consideration should be given to the need to minimise environmental and visual impact. Wherever feasible, waste operations should be enclosed within buildings or sealed structures in order to minimise the impact on adjacent land uses from noise, odour, vermin and wildlife. - Proposals advocating open air unenclosed storage of organic odour producing material will not be supported.		
Policy CE10: Green Infrastructure and Nature Recovery	The City Council will maintain and expand Birmingham's Green Infrastructure Network, which includes Birmingham's Urban Forest using the Local Nature Recovery Strategy and City of Nature Plan to guide the expansion of the network. Birmingham's tree and woodland resource (The Birmingham Urban Forest) will be conserved and enhanced. Particular attention will be given to protecting the City's ancient woodlands and significant trees* as irreplaceable semi-natural habitats. All trees, groups, areas and woodlands will be consistently and systematically evaluated for protection and all new development schemes must incorporate appropriate tree planting. New developments will be required to protect the integrity of the GI Network, they should also contribute to its enhancement and expansion. Any development proposal that would sever or significantly reduce a GI link will not be permitted.	Assumed no impact	This is a strategic level policy which emphasises the benefits of connecting new development into the existing GI network. We have incorporated into our appraisals the cost of biodiversity net gain and SuDs etc as these are a requirement. We have taken into consideration net biodiversity

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	New developments must fully consider the multifunctional benefits that Green Infrastructure can deliver as part of site design and to contribute to wider place making. These benefits do not have to be mutually exclusive and include nature recovery and resilience; climate change mitigation, water management; addressing social inequalities; improving air quality, health and mental wellbeing and providing opportunities for recreation and community food growing. The City's urban water infrastructure and habitats will be protected and enhanced. The Council will seek to maximise opportunities within development adjacent to rivers, watercourses and the canal network to improve and expand the green network surrounding them through the use of easements and naturalisation of channels and de-culverting. Applicant's will also need to take into account the Biodiversity Net Gain requirements that are set out in Policy CE12. At a site level, management and maintenance considerations must be included early in the design process in order to positively manage GI to provide benefits into the future. Applicants will be required to demonstrate how the functionality and connectivity of existing and proposed GI features will be retained, protected and enhanced through the development's lifetime. Major developments must incorporate a GI Plan as part of their Design and Access Statement. This should set out how the development proposals will deliver local green infrastructure policies, proposals and development requirements. The GI associated with new developments should be managed, maintained and monitored for a minimum of 30 years.		gain costs based on the DEFRA Impact Assessment Biodiversity net gain and local nature recovery strategies IA no: RPC Reference no: RPC-4277(1)-DEFRA-EA dated 15/10/2019
Policy CE11: Biodiversity and Geodiversity	The maintenance, enhancement and restoration of sites of national and local importance for biodiversity and geodiversity will be safeguarded and enhanced in line with the mitigation hierarchy. Habitats should be protected by appropriate buffers and, if necessary, barriers in order to prevent adverse impacts. These include Sites of Special Scientific Interest (SSSIs); National Nature Reserves (NNRs); Local Nature Reserves (LNRs); Sites of Importance for Nature Conservations (SINCs); Sites of Local Importance for Nature Conservation (SLINCs); Irreplaceable Habitats, Ancient Woodlands and Significant Trees. Habitats should be protected by appropriate buffers and, if necessary, barriers in order to prevent adverse impacts, including those resulting from recreational use. An appropriate buffer of a minimum of 15 metres around ancient woodland should be set All development must support the enhancement of Birmingham's natural environment and avoid fragmenting or severing connectivity between habitats. Proposals must have regard to strategic objectives for the maintenance,	Direct	For the purposes of our viability assessment, we have assumed that the relevant cost of professional reports (e.g., Biodiversity Action Plans (BAPs) and / or Geodiversity Action Plans (GAPs) and mitigation strategies etc.) is included in the professional fee budget. We have assumed that the cost of relevant mitigation is included in:

Policy	Policy Contents […paraphrased where appropriate for ease]	Impact on Viability *	Implications for Local Plan and CIL Viability Assessment
	restoration and creation of ecological and geological assets, such as those identified in the City of Nature Plan and the West Midlands Combined Authority Local Nature Recovery Strategy. Developments will not be permitted where they would result in the loss of or have negative impacts on irreplaceable habitats, unless there are wholly exceptional circumstances. Where these are justified, losses must be kept to a minimum with an appropriate compensation strategy to be submitted and implemented before any works proceed. New development proposals must demonstrate how they comply with the mitigation hierarchy as follows: - Avoid harm to biodiversity, particularly where it is irreplaceable, and include consideration of alternative sites where appropriate. - Mitigation for any harm to biodiversity must be directed as close as possible to the source of the impact, ideally within the red line boundary in the first instance. - Compensating for any remaining harm to biodiversity within the city area. All development proposals, including those that are exempt from mandatory Biodiversity Net Gain requirements, must provide biodiversity and geodiversity enhancement measures that are appropriate to the nature and scale of the development. All developments must incorporate ecological design features including biodiversity roofs and walls, integrated bird nesting and bat roosting boxes for swifts and other target species, hedgehog highways in walls and fences, insect homes, water features, native trees, shrubs and wildflowers. Development proposals must clearly identify how the ongoing management of biodiversity and geodiversity enhancement measures will be secured, including combating invasive non-native species.		• the net-to-gross site area assumption in terms of land take; • the external works cost and the net-biodiversity gain costs etc; Where there are particularly nature conservation issues that arise from particularly sensitive development sites, that this is known to the developer as part of their site due diligence, the costs of mitigation should be factored into the price paid for the land.
Policy CE12: Biodiversity Net Gain	New developments (unless exempt from mandatory Biodiversity Net Gain (BNG) must provide a minimum of (10/15/20)% BNG. The Council will use DEFRA's Statutory Metric to establish the baseline and post development gains for biodiversity units. All three separate modules of the Biodiversity Metric must be completed where the relevant habitats are present and development proposals must demonstrate a minimum of 10/15/20% BNG for all three Biodiversity Unit (BU) types. Applications within the 10 metre zone adjacent to the river(s) bank(s) will also be required to apply the Watercourse Unit Biodiversity Metric and ensure that the required levels of BNG for watercourse biodiversity units can be achieved. New developments must deliver BNG on site, unless there is robust evidence that it is not be feasible to do so.	Direct	This policy will have a direct implication on the plan viability as there is a financial cost associated with delivering biodiversity net gain within a scheme. These costs are reflected in the typologies we appraised where we allow for a cost per unit / £ psm for biodiversity.

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	On Site BNG Delivery Applicants must be able to demonstrate that BNG and associated habitat features have been fully considered from the scheme's outset. An ecological consultant should input into the master planning and design process. Accompanying Design and Access Statements and Biodiversity Net Gain Reports must include reference to BNG and how this has been addressed within the scheme design. This will also be important in addressing the requirements as set out in the Council's Urban Greening Factor Policy (CE13). Off Site BNG Delivery Any required residual number of biodiversity units to be delivered off site, must be delivered in one of the following options (in decreasing order of preference). Applicants must provide robust ecological justification if they are not able to follow the hierarchy of preference as set out below: 1. Habitat creation, enhancement and landscaping on sites within the City boundary which are either owned by Birmingham City Council, or its identified partners, particularly those identified through the Local Nature Recovery Strategy (LNRS) and the City of Nature Plan. 2. Habitat creation, enhancement and landscaping on land registered within a private habitat bank within the Local Nature Recovery Strategy (LNRS) area or West Midlands region. 3. As a last resort, delivering landscape scale and strategic habitat creation delivering nature based solutions through the Statutory Biodiversity Credit scheme. Delivery and Monitoring BNG will be secured through the use of Conditions, Section 106 and/or Conservation Covenants. These mechanisms will also be used to secure the ongoing management and monitoring over the required 30 year period. A Habitat Management and Monitoring Plan will be the key document setting out how BNG will be delivered over the 30 years and the associated monitoring regime. All biodiversity units delivered as part of the minimum 30-year period will be retained thereafter for the lifetime of the development.		Costs associated with these requirements are included based on the DEFRA biodiversity net gain and local nature recovery strategies impact assessment (15/10/2019) (Ref no: RPC-4277(1)-DEFRA-EA). This allows £1,003 per unit for greenfield and £287 per unit for brownfield sites.
Policy CE13: Urban Greening Factor	Planning applications for major developments that comprise mainly residential uses shall include urban greening sufficient to achieve a minimum urban greening factor score of 0.4. [RB1] Planning applications that comprise mainly of Class E (commercial business and service uses) shall include urban greening sufficient to achieve a minimum urban greening factor score of 0.3.	Direct	This policy identifies the need for major developments to achieve a minimum greening factor. This has a direct impact on viability as green

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	Major developments that comprise largely B2, B8, F or sui generis uses shall include urban greening sufficient to achieve a minimum urban greening factor score of 0.3. Planning applications for major residential led; Class E, B2, B8, F or sui generis uses led development must be supported by a calculation of the urban greening factor score of the proposed development calculated using the established formula and values set out in the Birmingham Urban Greening Factor Scoring Table. • The urban greening factor is calculated as follows: • each surface cover type in the development is assigned the applicable urban greening factor using Table X; • the area of each surface cover type in square metres is measured; • the factor score is multiplied by the area of the corresponding surface cover type; • the scores for each surface type are added together; then • the combined score is divided by the total site area in square metres to determine the development's UGF score. Applicants are required to submit details of maintenance and operational management for the upkeep of green walls and green roofs alongside the scheme specific UGF score.		infrastructure has an additional cost to development. We have associated a cost of £100psm of roof space for the implementation of green roofs. We have used a bespoke calculator to assume the floorplates for each typology.
Policy CE14: Open Space	1. Planning permission will not be granted for development of open space for other uses unless: the site is demonstrated by an up-to-date assessment to be surplus to requirements in that: following the development of the site, the level of public open space in the ward will continue both to exceed the minimum quantity standard set out in Appendix X for that typology of open space and to exceed the 2.75 hectares per 1000 persons standard for the overall level of public open space in the ward; and it is not practicable for the open space to be repurposed to make up a shortfall of another typology (as set out in Appendix X) of open space in the ward, and	Direct	This policy is to promote the retention of, safeguarding of and improving open space. It outlines the need for a contribution from new residential development towards the provision of open space. This has been taken into consideration within our viability appraisals through:

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	following development of the open space, residents in the vicinity will retain access to alternative open space of adequate quality of the same typology as that which is being lost within the relevant access standard set out in Appendix X, and the open space to be lost is not of high quality; OR The lost site will be replaced by a similar open space which will be of at least equivalent accessibility, quality and size; OR The open space is underused because it has inherent problems such as poor site surveillance, physical quality or layout, which cannot be realistically addressed, and the proposal would result in the loss of a small part of the open space but deliver significant improvements to the quality and recreational value of the remaining area; OR The development is for alternative sport or recreational provision, the benefits of which clearly outweigh the loss; OR The site is a small informal green space or natural green space of less than 0.15ha in area and has limited public recreational function; AND There are no overriding non-recreational reasons that indicate that retention of the open space is in the public interest, for example its biodiversity; contribution to visual amenity, landscape or townscape character or the setting of heritage assets; or its role in the wider green infrastructure network. New residential developments that are major development shall provide public open space on-site and/or make financial contributions to off-site public open space provision or improvements and, where applicable, maintenance in accordance with the standards and requirements set out in Appendix X. Public open space (with the exception of allotments) must be fully publicly accessible and remain so in perpetuity.		- the net-to-gross developable area assumptions as part of the BLV calculations; - the density assumption (dph) which is to allow for the relevant open space; - external works costs which allow for the relevant open space costs; - site specific S106 contributions (see Typologies Matrix) This is captured within the cost of £4300 per unit for s106 costs.
Policy CE15: Playing pitches and sports facilities	All existing playing pitches and sports facilities in Birmingham shall be protected and only considered for redevelopment under the following circumstances: - the development proposal is supported by a carefully quantified and documented assessment of current and future needs which demonstrates, to the satisfaction of Sport England, that there is an excess of playing field/sports facility provision in the catchment and has no special significance to the interests of sport, based on evidence within the latest Playing Pitch and Outdoor Sports Strategy for the City.	Direct	Directly, the policy requires developers to consider the retention of existing playing fields and sports facilities unless specific conditions are met. This can influence the layout and design of a development, potentially affecting its overall viability.

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	- the proposed development is for ancillary facilities supporting the principal use of the site as a playing field/sports facility and does not affect the quantity and quality of playing pitches/sports facilities at that location or otherwise adversely affect their use. - the proposed development affects only land incapable of forming part of a playing pitch/sports facility and does not: reduce the size of any playing pitch; result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas); reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain quality; result in the loss of other sporting provision or ancillary facilities on the site; prejudice the use of any remaining areas of playing field on the site - The playing field or fields to be lost as a result of the proposed development would be replaced, prior to the commencement of development, by a new playing field site or sites: of equivalent or better and of equivalent or greater quantity; in a suitable location and; subject to equivalent or better management arrangements. The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice of use, of the area of the playing field/sports facility All new major residential development will make a contribution towards sports facilities and playing pitches which will be secured through a S106 agreement, or equivalent, and informed by the latest Playing Pitch and Outdoor Sports Strategy as well as other relevant sports strategies, and endorsed by Sport England through its Playing Pitch Calculator. Any such agreement must also include contributions to cover appropriate maintenance payments for a substantial period into the future. Where possible, options should be explored to allow community access and use of the City's educational establishments, in order to reduce shortfalls in provision of playing pitches and sports facilities. Where new schools or colleges are provided, these should be designed to facilitate community access where possible in partnership with Sport England and relevant national governing bodies for sport. Provision of new community facilities for sport should be located in easily accessible sites, with safe pedestrian and cycle access as well as being close to local public transport routes.		In terms of assessing costs, it would typically involve evaluating the financial implications of implementing the policy requirements. This may include determining the costs associated with retaining or replacing existing playing fields, providing new sports facilities, or making financial contributions. A thorough cost assessment would involve considering factors such as construction costs, land acquisition expenses, ongoing management and maintenance costs, and any potential revenue generation from the facilities. The assessment should be conducted in a comprehensive and transparent manner, considering both short-term and long-term financial implications for the local plan. To assess the direct cost, we consider this would need to be dealt with on a site-specific basis, we have therefore not applied a cost in our appraisals.

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	Facilities for participation sport which attract large numbers of visitors and incorporate elements of entertainment, retail or leisure uses which operate for many hours of the day should be located in highly accessible locations, preferably in or adjacent to town centres.		
Policy CE16: Green Belt	There is a general presumption against inappropriate development within the Green Belt, and such development will not be permitted unless very special circumstances exist. Development Proposals including previously developed land and buildings in the Green Belt, will be assessed in relation to national planning policy. The Green Belt in Birmingham includes a number of areas of countryside which extend into the City, often along river valleys. Such areas are particularly important because of the valuable links which they provide to the open countryside, their visual quality and their accessibility. Measures to improve the quality of these Green Belt areas and public access to them will be supported. Outdoor sport and recreational facilities will also be supported, provided that their provision preserves the openness of the Green Belt, and does not conflict with the purposes of including land within it.	Direct	Green Belt land is currently constrained by the green belt policy. They therefore have a very low Existing Use Value (EUV) as agricultural land etc. Where green belt sites are released for development, there is a significant uplift in land value for the proposed use (e.g., residential development). The loss mitigation is to be paid for out of this land value uplift. For the purpose of this study, we have not applied a specific cost for the green belt policy as this should be assessed on an individual basis, should special circumstances for development be made.
Policy CE17: Historic Environment	Birmingham's heritage assets will be valued, protected, enhanced and managed for their contribution to character, local distinctiveness, knowledge and sustainability. Development will be expected to conserve or enhance heritage assets in a manner appropriate to their significance. Great weight will be given to the conservation of the city's heritage assets. Proposals for new development affecting a designated or non-designated heritage asset (as defined in paragraph xx), or its setting, will be determined in accordance with national and local policy. Historic identity of Birmingham	Direct	Birmingham City Council, through planning and development decisions, will work with partners to proactively preserve, protect and enhance the character, appearance, archaeological and historic value and significance of Birmingham's

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	All proposals should aim to preserve and where appropriate enhance the significant elements that contribute to the distinct historic identity of Birmingham. These significant elements include: Archaeological remains and historic landscapes from the prehistoric period to the industrial age. Surviving pre-industrial settlements and landscapes that have been subsumed by the expansion of the city such as Sutton Coldfield, Kings Norton, Yardley, Aston, Moseley, Edgbaston, Handsworth, Harborne and others. The surviving buildings, structures and buried archaeological remains of Birmingham as a pioneering industrial centre of international importance. The public buildings of late 19th and early 20th century Civic Birmingham including schools, libraries, university, courts, police stations, fire stations, post offices, Council offices, waterworks, cemeteries, health and welfare institutions, Transport infrastructure including, the canal network, railways, tramways, highways and their associated structures. Sites of power and energy production including watermills, steam engines, gasworks and electricity infrastructure. Birmingham's 19th and early 20th century suburbs, garden villages, purpose-built housing for factory workers and early, innovative social housing schemes. Parks, gardens, cemeteries, and public open spaces. Sporting venues including swimming pools, sports grounds and their pavilions, gymnasiums illustrating the City's role as a cradle of modern sport. The inter-war period suburbs with their parades of shops, large roadhouse public houses and cinemas. Commerce - The elaborate commercial architecture of the later 19th and early 20th century city centre and suburbs often displaying extensive use of terracotta; premises for shops, banks, insurance companies, hotels, public houses. The significant elements of Birmingham's post-war redevelopment; modernist commercial buildings, educational buildings, public spaces, transport infrastructure and public art. Places of worship reflecting the diversity of worship in the city.		designated and undesignated heritage assets and their settings. This is to be achieved to various mechanisms listed in the policy. We have used current costs based on the BCIS and rebased them to Birmingham which take into consideration costs of 'typical' development across Birmingham. We acknowledge that construction costs are likely to be higher within designated heritage environments, but values are also likely to be higher. Furthermore, developments involving heritage assets are likely to require a bespoke approach to viability e.g. enabling development and/or grants. Similarly site specific assessments are a recommended to assess the nuances of the historic environment associated to the development, to assign an appropriate cost.

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	Memorials and Civic monuments commemorating events and significant persons of 19th and early 20th century Birmingham. Buildings and places telling the stories of the cycles of immigration into Birmingham and the communities they created. The homes, workplaces, and performance venues of significant historical figures from the arts, sport, politics, science, and industry. Heritage assets All development proposals affecting the significance of heritage assets, or their settings will need to demonstrate how they contribute to their conservation and how any adverse impact has been minimalised in an accompanying heritage assessment. Information generated by the development process such as archaeological reports and historic building recording reports will be submitted to the Birmingham Historic Environment Record to ensure it is the definitive, dynamic source of information on the city's historic environment. Proposals that would result in substantial harm or total loss of a heritage asset would not be supported unless it can be demonstrated that it is necessary to achieve substantial public benefits or meet the relevant tests outlined in national policy. Conservation Areas Where a Conservation Area Character Appraisal and Management Plan has been prepared it will be a material consideration in determining applications for development and will be used to support and guide preservation or enhancement and due regard should be given to the policies it contains. Development proposals in conservation areas will be supported where they preserve or enhance the character and appearance of the area by respecting and reinforcing the established, positive characteristics of the area in terms of design, location, layout, nature, height, density, form, scale, materials and detailing. Development proposals should also protect the setting of the area including views in to and out of the area. The loss of buildings, trees, important open spaces or other important landscape features, or key views and vistas that make a positive contribution to character and appearance will not be supported. Development proposals involving demolition in a conservation area, including façade retention schemes, will only be supported if the building or structure does not make a positive contribution to the character and appearance of the area, and if the proposed replacement scheme will enhance the area. The existing building		

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	shall not be demolished until a contract for the replacement building has been made to avoid creating empty spaces. This will be secured by a legal agreement. Scheduled monuments Development that would result in harm to the significance of a scheduled monument or other nationally important archaeological assets of equivalent significance to a scheduled monument, including their setting, will not be supported. Archaeological assets Applications for development on sites of archaeological potential must be accompanied by an initial archaeological desk-based assessment. Where the desk-based assessment concludes that significant archaeological remains are present and may be impacted upon by the development, an archaeological field evaluation will be required. The evaluation should define the character, condition and importance of the archaeological deposits. Where significant archaeological remains are found to exist, the Council will seek to ensure their preservation in-situ as a preferred solution. Where preservation in-situ is not justifiable the developer will be required to make adequate provision for the investigation of the site including excavation and recording of the deposits followed by post-excavation analysis, reporting and publication of the findings and archiving. The Council will seek to identify opportunities for incorporating archaeological remains into the design of new developments to reinforce local character and identity and to increase public awareness and understanding of the city's archaeological remains through publications, displays and interpretive designs. Carbon reduction and whole life cycle of buildings The Council will work with applicants to better understand the whole life cycle of buildings and the carbon embedded within them and ensure that the full carbon costs of demolition and construction are transparent and inform decision making. The Council will support the retention and reuse of historic buildings as opposed to their demolition and replacement as part of their approach to reducing the city's carbon emissions. Measures for improving energy efficiency of historic buildings and the installation of microgeneration equipment to reduce carbon emissions will be supported where they do not cause harm to their significance. Heritage assets at risk Where heritage assets are deemed to be seriously at risk of being lost the Council will use its statutory powers to preserve them. Developments affecting heritage assets deemed to be at risk by national and local registers will be supported where the proposals constitute the optimum viable use, consistent with the conservation of the		

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	heritage asset. Where a proposed development would conflict with other plan policies to secure the conservation of the asset, the council will consider whether the benefits of the conservation would outweigh any harm caused from departing from other policies. The extent of any enabling development should be no greater than necessary to make the conservation of the asset viable.		
Policy CE18: The Canal Network	The canal network will continue to be promoted as a vital asset for the City, supporting movement; by water and by towpath, have environmental and biodiversity quality and provide character settings for development. Birmingham lies at the heart of England's canal network and several canals meet in the city centre. The canals in the city centre and in the neighbouring areas, offers alternative commuting routes and access for physical activity, recreation and leisure, in areas where, access to green space, is deficient. The canal network links into the wider green infrastructure network. They also, offer, a historic environment and a leisure and recreation resource, for people, citywide. Improving access to the city centre and also between neighbourhoods beyond with a high-quality network of pedestrian/cycle routes, taking advantage of canal network will be a priority. This will provide, sustainable routes for the movement of people and opportunities to improve connectivity and biodiversity. Much of the canal network however, is hidden with development backing onto it. This and the lack of site surveillance and the distances to points of egress has and does dissuade greater use. Promoting the wider use of the canal through improving access, signage and opening up the canals with better site surveillance will be a key priority. Therefore: All development proposals will have to demonstrate a positive aspect to the canal. Where development proposals are adjacent to rivers or canals, buildings should orientate towards the water and allow for continuous public access along the waterside OR Where there is no option but to put car parking and service facilities near canal, then these should be screened by soft landscaping where possible. Hedges and bushes can help absorb air pollutants. Canals form part of the open space network, therefore, off site open space contributions, from new residential schemes within 400m of a canal, can be used considered for providing, canal improvements e.g., access, towpath surfacing, lighting and landscaping. Canals are corridors of movement, for people whether by water or towpath and for wildlife. They are important for biodiversity and form part, of the wider blue infrastructure network, along with rivers. Canals benefit urban cooling. Proposals that would adversely affect water quality and have impacts upon flooding will not be supported.	[assumed no impact]	

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	Proposals that would adversely affect canals and impact upon their contribution to the wider green and blue network will not be supported. Opportunities to strengthen and enhance the network will be supported. The city council, together with the Canals and Rivers Trust, will identify opportunities for canal improvements, e.g., relating to access, hard and soft landscaping, biodiversity, signage and interpretation. Opportunities through potential development will also be noted. The historic importance of canals is acknowledged, and important groups of canal buildings and features will be protected, especially where they are listed or in a Conservation Area. Where appropriate the enhancement of canals and their settings will be secured through development proposals. Proposals that would improve and enhance access onto the canal and improve signage will be supported. The canal network provides homes for people either permanent in residential moorings or for those using the canals for boating holidays. Residential and commercial moorings and facilities for boaters on Birmingham's canals will be supported in suitable locations as long as: - they do not negatively impact on navigation, water quality, the openness and character of the water space and the amenity of surrounding residents; - they will not hinder navigation; and - they can be satisfactorily serviced by utility services and the road network. The existing network of canals in Birmingham also offers some potential for freight transport.		
Policy CE19: Minerals	Prior to the commencement of development on any site of over 5 ha, an investigation should be undertaken into the existence of mineral deposits on the site and any viability workable minerals should be extracted. Minerals infrastructure, including sites for concrete batching, the manufacturing of coated materials, other concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material, and any associated bulk transport facilities will be protected. Proposals that would lead to the loss of such facilities without adequate replacement would usually be refused, subject to exceptional circumstances associated with the particular planning application.	Assumed no impact	This policy is about the provision of minerals. It is not subject to specific policy obligations (e.g., affordable housing, CIL etc) over and above site-specific mitigation (e.g., noise, dust mitigation etc). There is no direct impact on Plan viability, but the lack of provision of minerals will impact

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			on the deliverability of new homes and employment.
Policy EC1: Industrial Land Provision	Subject to other development plan policies, the City Council will support new industrial developments in the B2 and B8 use classes that will contribute towards achieving the requirement for 296 ha of industrial land to be developed over the plan period to 2042. This will include the development of new land as well as the redevelopment of existing industrial land. To ensure a continual supply of industrial land over the plan period, there will be an ongoing requirement to maintain a supply of 67 ha of industrial land which is readily available* for industrial development to delivered within 5 years. This supply will comprise of: - 22.4 ha on sites of 10+ ha - 22.4 ha on sites of 2.4 to 10 ha - 11.2 ha on sites of 1 to 2.4 ha - 11.2 ha on sites of less than 1 ha	Indirect	This is an overarching policy in which we have assumed no impact for this study.
Policy EC2: Core industrial areas	Core Industrial Areas will be the focus for new B2 and B8 developments over the plan period. Other uses of an industrial nature can also be considered as appropriate, for example E(g)(ii) and E(g)(iii) uses where they can be restricted by planning conditions from changing to another class E use, and Sui Generis uses that would be inappropriate for residential areas such as builders' merchants, wholesale retailers and waste and minerals developments. Losses of B2 and B8 uses within the Core Industrial Areas will be strongly resisted. Proposals for non-industrial uses within the Core Industrial Areas will only be permitted in the following circumstances: - Where the proposed new use is ancillary to a B2 / B8 use, or it can be demonstrated that the new use will support B2/ B8 uses in the wider core industrial area. OR - Where it can be demonstrated that there are no suitable and available sites elsewhere for the proposed use. Where the development proposal is for a main town centre use then it should also conform to the requirements of the local centres policy. OR - Where other City Council planning documents (including masterplans, SPDs and neighbourhood plans) have been adopted that identify that the proposed non-industrial use will be appropriate.	Indirect	This is an overarching policy in which we have assumed no impact for this study.

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<tr><th>Policy</th><th>Policy Contents […paraphrased where appropriate for ease]</th><th>Impact on Viability *</th><th>Implications for Local Plan and CIL Viability Assessment</th></tr>
<tr><td></td><td>Improvements will be sought to transport infrastructure (including the movement of freight by rail), environmental quality, market attractiveness and functional efficiency of the Core Industrial Areas, to facilitate inward investment and to encourage clustering and networking of industrial sectors. Investment priorities for each Core Industrial Area are provided in Appendix X. Improvements will be delivered through developer contributions and CIL payments where appropriate.</td><td></td><td></td></tr>
<tr><td>Policy EC3: Protection of other industrial land</td><td>Existing B2 and B8 uses that are outside the Core Industrial Areas will be protected from redevelopment or changes to another land use, unless it can be demonstrated that either:
The existing B2 or B8 use is not in a predominantly industrial area and does not conform to its surroundings. The redevelopment of isolated B2 or B8 uses in predominantly residential areas will be particularly supported; or,
The existing industrial site is no longer attractive to B2 and B8 uses. In such cases the applicant must demonstrate that new B2 or B8 occupiers have been actively sought through an active marketing period of at least 12 months. The potential to redevelop the site to make it more attractive for new B2 or B8 occupiers should also be explored. Where it is argued that this would not be financially viable then an assessment will be required to support this and will be subject to independent review.</td><td>[assumed no impact]</td><td></td></tr>
<tr><td>Policy EC4: Urban Centres</td><td>Birmingham’s Urban Centres will be prioritised as the preferred locations for town centre uses (as defined in national planning policy) in the network and hierarchy identified in this policy, taking account of the different roles of the City Centre, Town, District and Local Centres.

A diverse range of facilities and uses will be encouraged and supported consistent with the scale and function of each centre to meet people’s day-to-day needs, enhance the quality of the environment, and improve access.

Network and Hierarchy of Urban Centres:

<table><tr><th>Tier</th><th>Definition</th><th>Centres</th></tr><tr><td>City Centre</td><td>The highest level of centres, of regional and national importance. The city centre serves a regional / national catchment, is geographically and economically large, and embraces a very wide range of activities. It also acts as a national transport hub.</td><td>Birmingham City Centre</td></tr><tr><td>Principal Town Centre</td><td>The top tier of town centres, being the principal (sub-regional) town centre, both in terms of offer and scale.</td><td>Sutton Coldfield</td></tr></table></td><td>[assumed no impact]</td><td>This policy is to sustain and enhance the vitality and viability of a network and hierarchy of centres in Birmingham by ensuring that new, appropriate scale of retail, leisure and office development is encouraged in sequentially preferable locations.

The definition of Centres may have an impact on land values, rents and yields creating distinct market areas/uses. We have undertaken a detailed</td></tr>
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		The principal town centre has a wider catchment than other centres and provides a wider range of convenience and comparison shopping, business and leisure opportunities.			market analysis of retail and commercial uses to highlight any implications in terms of viability and deliverability. Vibrant centres will help to under-pin the attractiveness of Birmingham as a place to live, work and visit. This will manifest indirectly through the price mechanism for land and property values – including residential development.
	Town Centres	The main centres in the city, providing a wide town centre offer and a mixture of business and community uses. Typically, greater than 125 units in size.	Acocks Green Alum Rock Coventry Road Erdington Harborne Kings Heath Longbridge Northfield Perry Barr Selly Oak Sheldon Soho Road		
	District Centres	Comprising groups of shops containing at least one supermarket, range of non-retail services and public facilities. District centres provide for everyday needs, and are focal points for business, leisure and service needs. Functional considerations prevail - no definitive centre size range but typically less than 125 units.	Castle Vale Edgbaston Five Ways Fox and Goose Hay Mills Maypole Mere Green Moseley New Oscott Sparkhill Springfield Swan, Yardley Stirchley Witton		
	Local Centres	Including a range of small shops of a local nature, serving a localised catchment and typically meeting a ‘top-up shopping’ need. May also be a location for small scale local leisure and/or specialist service activities. Typically, 25+ units.	Alcester Road Kings Heath Balsall Heath Barnes Hill Boldmere		

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		* Partial cross-boundary centre	Bordesley Green College Road Cotteridge Curdale Road, Bartley Green Dudley Road East Meadway Frankley Glebe Farm Green Lane Green Lane (Blake Lane) Grove Lane, Handsworth The Parade, Hall Green Hagley Road West Hamstead* Handsworth Wood Hawthorn Road Highfield Road, Hall Green Highgate Ivy Bush Jewellery Quarter Kings Norton Green Kingsbury Road Kingstanding Circle Ladypool Road Lea Village Lozells Meadway Newtown		

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			Olton Boulevard (Fox Hollies) Pelham Queslett* Quinton* Raddlebarn Road Robin Hood, Hall Green Rookery Road Scott Arms* Shard End Six Ways, Aston Slade Road Sparkbrook Stechford Stockland Green (formerly referred to as Short Heath) Stoney Lane The Radleys Timberley* Tower Hill Tyseley Villa Road Walmley Ward End Warren Road Weoley Castle West Heath Wylde Green Yardley Road Yardley Wood Yew Tree		

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	The City Centre boundary, City Centre Retail Core boundary and boundaries for other Centres and Primary Shopping Areas are shown on the Policies Map. Primary Shopping Areas are areas with a concentration of retail uses (as defined in the NPPF). The boundaries of Primary Shopping Areas are shown on the Policies Map to help achieve a focus for the retail function of centres and ensure the continuance of a compact, attractive and sustainable shopping environment. It remains important to ensure that centres maintain their predominantly retail function and provide shops to meet day to day needs. A range of facilities and uses will be encouraged and supported within the network and hierarchy of centres, including: - Retail, Leisure uses, Offices, Restaurants, takeaways, pubs and bars, Community uses, Cultural facilities, Tourist-related uses (including hotels), Residential where it provides good quality, well designed living environments. As well as these uses, it is also recognised that centres vary in terms of the mix of uses they contain, and some have niche roles (for example the Jewellery Quarter and those within the 'Balti Triangle'). These niche roles will continue to be supported. Proposals which will make a positive contribution to the diversity and vitality of Birmingham's Urban Centres will be encouraged, particularly where they can help bring vacant buildings back into positive use, or contribute to a safe, vibrant and well-balanced evening economy. The scale of any future developments should be appropriate to the size and function of the centre. The potential for future new centres will be determined in the Central Birmingham Framework and other plans. Alongside new development, proposals will be encouraged that enhance the quality of the environment and improve access. The vitality and viability of the centres within the network and hierarchy will be maintained and enhanced. Except for any specific allocations in this Plan, proposals for main town centre uses outside the boundaries of the network of centres will not be permitted unless they satisfy the requirements set out in national planning policy. An impact assessment will be required for proposals greater than 2,500 sqm. (gross) floorspace.		

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	Hot Food Takeaways- To maintain a healthy balance of uses, no more than 10% of units within a Town, District or Local Centre or within any frontage in those Centres and Neighbourhood Centres should consist of hot food takeaways. Outside Town, District or Local centres, proposals for new hot food takeaways, or extensions or increases in opening hours, will not be permitted where the application is within 400 metres of a school. The opening hours of hot food takeaways may be controlled through conditions where this is considered necessary to manage impacts on neighbouring residential amenity. All hot food takeaways should provide suitably sized, screened waste storage systems, appropriate extraction systems for the removal of odours, and public waste bins when these are lacking within the vicinity. Applications for food and drink uses where home delivery of food is proposed should include a Delivery and Servicing Plan providing details of the scale of operation, delivery collection points, locations for delivery vehicles and hours of operation, to enable assessment of impacts.		
Policy EC6: Tourism and Cultural Facilities	1. The provision of new or expanded arts and cultural facilities will be supported where they enhance the visitor experience and cultural offer within Birmingham and do not conflict with other policies in the Local Plan. 2. Planning Applications for large scale developments, (200+ dwellings or 1,000 sq.m or more) are required to submit a Cultural Needs Assessment to demonstrate how the proposals will meet these needs. Depending on the outcome of the assessment, where appropriate, developer contributions will be sought to support new and expanded cultural facilities. 3. Planning permission will not be granted for a proposal which would result in the loss of a visitor attraction, arts or cultural facility unless one or more of the following criteria is met: a. The facility to be lost is not of particular heritage value, or has important cultural value to the local community. b. The facility to be lost is demonstrated to not be economically viable through evidence of at least 24 months' active marketing for its current use at appropriate rates. c. The proposed development would deliver a replacement facility or that there is a suitable alternative facility that can accommodate the needs of the local community.	Direct	The provision of large scale developments to submit a cultural needs assessment in order to assess developer contributions to support cultural facilities has a direct impact on viability. For the purpose of this study, this should be assessed at a site specific level.

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	4. The temporary and meanwhile use of vacant buildings and sites for creative, cultural and community organisation is supported, particularly in town centre locations. Such proposals should add vibrancy to the street frontage and enhance the public realm where possible. 5. The provision of supporting facilities such as hotels will be important and proposals for well designed and accessible accommodation will be supported.		
Policy EC7: Evening and night-time economy	Planning permission will not be granted for a proposal which would result in the loss of an existing public house, night club, theatre, live music or other arts venue unless one or more of the following criteria is met: - The venue to be lost is not of particular heritage value, or has important cultural value to the local community. - The venue to be lost is demonstrated to not be economically viable through evidence of at least 24 months' active marketing for its current use at appropriate rates. - The proposed development would deliver a replacement venue of equivalent value to the local community. Westside, Southside and Digbeth, as shown on the policies map, will be the sequentially first choice location for high-capacity night-time economy venues within the city. Subject to paragraph 2 of this policy, new night-time economy venues should be located in the city centre, district centres or local centres as defined on the policies map in line with the sequential test in the NPPF. Proposals for night-time economy venues should be of a scale and nature appropriate to the role and character of the centre in which they are located. Proposals for NTE uses may be resisted if they would lead to an overconcentration of such uses within the centre which would be likely to significantly harm the vitality and viability of that centre, lead to or exacerbate problems of crime or littering, or harm residential amenity.	Assumed no impact	This is an overarching policy in which we have assumed no impact for this study.
Policy EC8: Tourism and cultural facilities	The provision of new or expanded cultural and tourist venues and facilities will be supported should the scheme: - Enhance the visitor experience and cultural offer within Birmingham. - Not adversely impact on the operation of existing businesses or the quality of residential amenity of local residents.	Indirect	A vibrant cultural and visitor economy will help to underpin the attractiveness of Birmingham as a place to live, work and visit. This will manifest indirectly through the

Policy	Policy Contents […paraphrased where appropriate for ease]	Impact on Viability *	Implications for Local Plan and CIL Viability Assessment
	Planning permission will not be granted for a proposal where there is an identified harm or loss to cultural facilities unless: - The continuation of the cultural use of the facility is not viable and at least 24 months of active marketing information for its current use has been submitted. - The proposed development would deliver a replacement facility or that there is a suitable alternative facility that can accommodate the needs of the local community elsewhere. - The redevelopment would provide significant benefits for the local community that outweigh the loss of the cultural value of the site. - The proposed development mitigates against adverse impacts from adjacent noise generating activities in accordance with the agents of change principle.		price mechanism for the land and property values. That said, this policy is about enhancing the tourism economy. There is no impact on plan viability.
Policy EC7: Local Employment and skills	In order to ensure that new development contributes effectively to the levelling up of local communities, the City Council will seek to ensure that applicants of major development schemes submit a Social Value Action Plan which is aligned to the Birmingham Business Charter of Social Responsibility (or any successor document). Where such action plans are submitted, they should seek to deliver social value at 20% of the total development costs. This will be negotiated on a case-by-case basis and it may be appropriate to apply a lower proportion to reflect the size, scale, type and location of the development. The local spend element will be capped to 50% of the social value costs in order to protect social investment. Where it is not possible to deliver the full 20% social value costs upon the delivery of the development scheme, developers will be required to provide a financial contribution through S106 which equates to 10% of the measure value in lieu of any undelivered social value as detailed in the action plan. These requirements may be amended where there is clear evidence that they would undermine the financial viability of the development scheme. In such cases the applicant will need to provide a financial viability appraisal which will be subject to independent review.	Indirect	The implementation of this policy will impact the real estate market through the quality of the environment and the strength of the economy created. This will impact real estate values (and costs e.g., land) over time through the price mechanism. As each site is different, the cost of implemented 20% social value on a major development scheme cannot be assessed at a plan-wide level, we therefore recommend this is evaluated at a site specific level.
Policy CY1: A sustainable transport network	The development of a sustainable, high quality, integrated transport system, where the most sustainable mode choices also offer the most convenient means of travel, will be required and underpinned by the four principled of the BTP.	Assumed no impact	

Policy	Policy Contents […paraphrased where appropriate for ease]	Impact on Viability *	Implications for Local Plan and CIL Viability Assessment
	- Reallocating road space - Transforming the city centre - Prioritising active travel in local neighbourhoods - Managing demand through parking measures The delivery of a sustainable transport network will require: - Re-allocation of existing road space wherever possible to provide sustainable transport modes and seamless interchange between modes. - Enhanced choice by development and delivery of new and improved public transport, cycling and walking networks, supported by the implementation of Mobility Hubs to facilitate seamless interchange between sustainable transport modes including public transport. - The delivery of modes of transport that reduce carbon emissions and improve air quality. - Development and implementation of integrated new and improved road, rail & water freight and advanced air mobility (subject to appropriate legislation and guidance being issued by Government to regulate use and protect public safety) routes to support the sustainable and efficient movement of goods. - Reduction in the negative impact of road traffic, for example, congestion and road accidents. - Working with national, regional and local partners, and the private sector to support and promote sustainable modes and low emission travel choices. - Working with national, regional and local partners to lobby for interventions and policies outside of the Council's control - That land use planning decisions adopt sustainable travel strategies and the principles of the BTP. - Building, maintaining and managing the transport network in a way that reduces CO2, addresses air quality problems and minimises transport's impact on the environment.		

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Policy CY2: Active Travel	Walking is part of every cycling, public transport and car trip. The provision of safe and pleasant walking environments throughout Birmingham will be prioritised as set out in the Birmingham Transport Plan Delivery Plan. This will include: - Building upon the success in improving pedestrian safety and continuation of the support for the priority of pedestrians at the top of the road user hierarchy reflect this priority in centres, corridors and neighbourhood areas, and the public realm environment. - Mandating new development incorporates high quality pedestrian routes which will promote walking as an attractive, convenient, safe and pleasant option for travel including to and from bus stops, train stations and Metro stops. - Incorporating walking into the 'Interconnect' on-street wayfinding totems currently being updated across the City Centre, and using improved direction signing. - Application of Healthy Street principles ensuring good design of pedestrian routes/areas reflecting desire lines and providing adequate way finding facilities where appropriate whilst ensuring that routes/areas are free from unnecessary clutter, aligned to the principles of 15-minute neighbourhoods. - Providing pedestrian priority and crossing facilities where appropriate and ensuring footway surfaces are well maintained through application of Health Street principles. - Working with national, regional and local partners to lobby for interventions and policies outside of the Council's control. Cycling will be encouraged through a comprehensive city-wide programme of cycling infrastructure improvements, set out within the Birmingham Transport Plan Delivery Plan, (both routes and trip end facilities) supported by a programme of cycling promotion, accessible cycling opportunities, training and travel behavioural change initiatives. This will include: - Development of different route types e.g., improvements to major radial roads and other main roads including improved crossing facilities and creating new, quieter, parallel routes, using roads with lower speed limits and traffic flows, linking residential areas, green spaces, local centres and transport interchanges in order to encourage short trips and offer an alternative to busy A and B roads.	Assumed no impact	This is an overarching policy in which we have assumed no impact for this study. It is important to have a network of District and Local Centres to support 15-minute walking neighbourhoods. This is to ensure that there are appropriate services and amenities to support the communities across Birmingham. This policy indirectly affects the viability of the local plan by promoting economic activity, encouraging sustainable transportation to collectively contribute to the economic, social and environmental sustainability of the local plan area.

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	- Further development and enhancement of an extensive off-road network of canal towpaths and green routes. - Incorporating cycling into the 'Interconnect' on-street wayfinding totems currently being updated across the City Centre, and using improved direction signing. - Improving cycle security with upgraded parking and trip end facilities within the City Centre, local centres and at railway stations. - Increasing access to bicycles with cycle loan and hire opportunities. - Providing enabling support to take up cycling through training and travel behaviour initiatives. - Working with national, regional and local partners to lobby for interventions and policies outside of the Council's control Mandating that new development incorporates appropriately designed facilities which will promote cycling as an attractive, convenient and safe travel method particularly within local centres / neighbourhoods aligned to the principles of 15-minute neighbourhoods.		
Policy CY4: Public Transport	The bus remains by far the most important mode of public transport in Birmingham. There continues to be a challenge in making bus travel attractive as a sustainable alternative to the private car. Working under the principles of Bus Back Better – National Bus Strategy for England – March 2021, the City Council will continue to work with Transport for West Midlands (TfWM) and bus operators to improve the bus network by: - Supporting partnership measures to develop and improve the bus network including the WMCA November 2022 – Enhanced Partnership and the November 2021 – West Midlands Bus Service Improvement Plan (BSIP). - Ensuring that road space is managed efficiently to support public transport through initiatives such as bus priority measures and infrastructure with access retained to city centre etc when private cars are more restricted. - Mandating that high quality bus services and facilities are developed and delivered to support new developments aligned to the targets for reducing CO2 emissions and the principles of the BTP.	Assumed no impact	This is an overarching policy in which we have assumed no impact for this study. Transport improvements generally assert influence on land and property values where sites with good accessibility are more sought after than sites with poorer access. We have sought to utilise appropriate evidenced/ justified land and property values within our analysis and we recommend

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	- Unless there is compelling strategic reason which supports the better operation of the transport system, developing park and ride will not be supported in congested urban centres or within 3 miles of Birmingham City Centre. - Mandating that high quality coach access, including parking and loading facilities, is provided for as part of new developments where it is required. - Shaping how buses and coaches operate in the city linked to the City Centre Movement Strategy which will transform the City Centre creating a network of pedestrianised streets and public spaces, integrated with public transport services and cycling infrastructure. - Working with national, regional and local partners to lobby for interventions and policies outside of the Council's control. The rail industry forecasts a circa two-thirds increase in rail travel across the West Midlands, with Birmingham at the centre of this, over the next 30 years compared to 2019 (before the pandemic), with overall travel returning to 2019 level by 2026. The City's suburban rail network is of only limited size and in need of enhancement. To respond to these challenges, Midlands Rail Hub (MRH) is supported as this is a transformational project that is central to the strategy for transforming the rail network in Birmingham; it unlocks the national rail network's capacity bottleneck in central Birmingham, improves access to HS2, enables the new local stations and services shown below, and delivers faster and more frequent connections across the West Midlands and beyond. MRH is composed of the following elements: - Two new Bordesley Chords connecting lines (East and West) to enable existing and new rail services into Moor Street station instead of congested New Street station which is effectively full; - Widening of the viaduct between Bordesley station (which may need to be closed to deliver MRH) and Moor Street station may be necessary to deliver additional track capacity; - Redevelopment of Moor Street station including expansion of track and platform capacity, and integration with the adjacent future HS2 Curzon Street station; - Redevelopment of Snow Hill station including increased passenger capacity, land use development above/around the station and reopening of Platform 4 to heavy rail. Proposals to enhance the City's rail network, enabled by MRH and other mechanisms, will be supported including:		that values are monitored for future reviews,

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	- Reopen to local passenger services the Camp Hill (stations at Balsall Heath, Moseley Village, Kings Heath, Pineapple Road) - Water Orton corridor lines for links to/from the East Midlands (stations at Fort Parkway and Castle Bromwich/Vale), and Sutton Park (stations at Minworth, Walmley, Sutton Park / Town, Streetly). - Improvements to local rail stations across the City are supported, including step-free access, passenger facilities improvements, and improvements to access/entrance arrangements including links to nearby land-use developments over the 'last mile'. Specifically, including provision of Mobility Hub facilities, cycle/ Micromobility parking, and improved walking/cycling routes, wayfinding. - Currently only part of the busy rail network in Birmingham is electrified with many diesel trains still in use. Electrification of the remaining unelectrified lines serving Birmingham is supported, to contribute to Net Zero Carbon, improve local air quality, and reduce journey times. With all lines serving Snow Hill / Moor Street stations (Birmingham to Leamington Spa/Stratford Upon Avon/Worcester) as a key priority, and all other routes to be covered through a rolling programme including: Camp Hill Line; Birmingham-Water Orton/East Midlands; and Sutton Park Line - Working with national, regional and local partners to lobby for interventions and policies outside of the Council's control The Council will continue to protect land within the designated HS2 Safeguarding Area. The area covered by the most recently issued Safeguarding Direction, at the time of the adoption of this plan, is shown on the Policies Map. Rapid Transit – Midland metro and Bus Rapid Transit The development and extension of metro/bus rapid transit to facilitate improvement/enhancement in the public transport offer on key corridors and to facilitate access to development and employment will be supported. This will include cross-boundary routes, for example to the Black Country. In particular support for: • An extension of the Midland Metro Tram network to Eastside, Southside and the Curzon Street High Speed 2 station. • Additional Bus Rapid Transit routes including cross city centre links on several key corridors including but not limited to:		

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	• Birmingham City Centre - Walsall. • Birmingham City Centre - Quinton. • Birmingham City Centre - Bartley Green. • Birmingham City Centre - Longbridge. • Birmingham City Centre - Airport (via East Birmingham). • Birmingham City Centre - Airport (via A45). • Birmingham City Centre - Maypole/Druids Heath. • Birmingham City Centre - Sutton Coldfield • Birmingham City Centre - Kingstanding. • Outer Circle/Route 11 Orbital. Working with national, regional and local partners to lobby for interventions and policies outside of the Council's control.		
Policy CY5: Freight	The safe and efficient distribution of goods and services is vitally important for the social and economic health of the city. All that we consume, buy or use has at some point been part of this system of distribution, which contributes directly towards market diversity and consumer choice. Freight decarbonisation - The urgent decarbonisation of freight will be prioritised, to respond to the climate emergency. Transfer of strategic and local freight movements from high carbon modes of transport to sustainable modal alternatives will be supported and encouraged. Freight consolidation and last mile deliveries - In support of an increasingly efficient freight delivery system for the city, Birmingham City Council will actively support initiatives to consolidate freight deliveries, such as consolidation centres and parcel lockers for example, as well as supporting greater use of low and zero-carbon modes of transport for last mile deliveries, such as cargo bikes. The Council will integrate these measures as appropriate, into the development of a comprehensive network of Mobility Hubs improving transport modal integration and encouraging greater use of sustainable modes for local 'last-mile' deliveries.	Indirect	This policy sets out to support the efficient movement of freight. The policy will impact the real estate market through the quality of the environment and the strength of the economy created. This will impact real estate values (and costs e.g., land) over time through the price mechanism.

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	Location of freight hubs - Developments which generate large volumes of freight traffic or involve the transport of bulk raw materials (such as aggregates) must be designed to limit their environmental impact and maximise operational efficiency. They should be in proximity to the Strategic Road Network, strategic rail freight facilities, and/or wharves, as appropriate, to minimise their environmental impacts. Planning conditions and obligations will be used to define and agree suitable traffic routes and the need for other necessary environmental and traffic management controls. Modal controls – Widespread use of motorised vehicles to distribute freight in residential areas and the city centre is a known cause of road safety issues and unsustainable on environmental grounds. The Council will impose restrictions on the size and type of vehicles which can access residential areas, as well as access restrictions at certain times of the day to address this. Working with national, regional and local partners to lobby for issues outside of BCC control primarily related to; infrastructure funding / policies to bridge the gap to reach zero carbon by 2030, specifically through the transfer of freight to sustainable and appropriate modes of transport.		
Policy CY6: Network Management	The optimum use of existing highway infrastructure across all modes will be encouraged plus priority investment in the highway network to support the city's sustainable transport network and development agenda will be promoted. As referenced in the NMS roads within Birmingham have and will be separated into several networks, depending on their relative strategic importance. The NMS defines the road hierarchy classifications as: - A-roads - these are main routes for the sustainable and efficient movement of people and goods, they include core mass transit corridors and facilitate key strategic movements within the authority area. It is expected that all remaining urban 40mph speed limits in the city will be removed, to ensure there is a consistent standard speed limit. - B roads – these are local distributor routes, which prioritise access for public transport and travel between A roads and local access roads and residential areas. These routes continue to provide local access for goods and servicing. Traffic speed limits are expected to be a maximum of 30mph, with certain roads reduced further to 20mph. - C-roads – these are routes for local access for those living and working in the area, providing vital links to public transport and connecting communities to local services. Lower speeds of 20mph are expected on the majority of routes to encourage safer environments for walking and cycling within these local areas.	Assumed no impact	

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	- Unclassified roads – these are predominantly residential roads, with traffic speed limits to be 20mph to create happy, healthy neighbourhoods with safe, active streets that communities can enjoy. The efficient, effective and safe use of the transport network will be promoted through the following policies aligned to the principles of the NMS the BTP and its Delivery Plan: - Discourage non-local motor traffic by encouraging the use of the Strategic Road Network for trips travelling through the BCC boundary and therefore do not start or end within the BCC boundary. - Ensure safe speeds are adhered to by providing adequate traffic management. - Reduce the environmental impact created by traffic by implementing traffic management measures to reduce environmental impact created by traffic. - Give priority to the needs of public transport by encouraging uptake of on-road public transport by providing roadside infrastructure/traffic management which prioritises on-road public transport. - Ensure safety and convenience of pedestrians and cyclists, or provide safe and convenient alternative routes for these users by providing adequate infrastructure to ensure pedestrians and cyclists can route along A/B-roads which are safe and convenient. - Accommodate longer distance traffic where either origin or destination is within the BCC boundary by ensuring longer distance travel can use A-roads to their destination (or from their origin) within the BCC boundary. - Restrict or prohibit on-street parking by implementing traffic management measures in areas of concern. - Discourage traffic where either origin or destination is within the BCC boundary along B/C/Unclassified roads (where reasonably practical) through the BCC boundary where only one trip end is within the boundary. - Give priority to the needs of pedestrians and cyclists by encouraging uptake of active travel by providing roadside infrastructure/traffic management which prioritises this mode. - Discourage all non-essential motor traffic by encouraging the use of public transport (on-road or rail) and active travel modes for trips. - Introduce traffic calming measures to maintain and encourage adherence to road speeds and development of streetscape to assist in people's speed awareness.		

Policy	Policy Contents […paraphrased where appropriate for ease]	Impact on Viability *	Implications for Local Plan and CIL Viability Assessment
	- Targeted investments, including the provision of new connections, which reduce the negative impacts of road traffic, for example congestion, air pollution and road accidents. - Targeted construction of new accesses to provide access to development/redevelopment sites. These accesses must respect the road hierarchy for new developments, i.e., unclassified roads should not access directly onto the A road network - Mandating that the planning and location of new development supports BTP principles and NMS. - The prevention or refusal of development on transport grounds where the residual cumulative impacts of development are severe. - A requirement for Transport Assessments/Statements and Travel Plans as necessary in line with the relevant national guidance. - Working with national, regional and local partners to lobby for interventions and policies outside of the Council's control. Highway Improvement Lines - To assist in delivering several of the City's aspirational highway improvements the City Council will maintain a number of highway improvement lines. The purpose of a Highway Improvement Line (HIL) is to protect land required for highway and public transport, active travel and highway schemes from other development(s). To avoid the unnecessary and costly sterilisation of land, HILs will only be maintained: - On the A and B roads where improvement is proposed. - When required for specific schemes not on the A and B roads but identified in a current programme. - Exceptionally when it is appropriate for the proper planning of an area to introduce or maintain an HIL for a scheme even though it is not in a current programme. - For the provision of appropriate public transport infrastructure and active travel facilities. Limited elements of the Strategic Highway Network will need upgrading to meet the requirements of the BTP and BLP. Elsewhere on A and B roads only limited improvements are anticipated and will be delivered within available resources and other funding opportunities. HILs will continue to be reviewed to ensure they reflect the transport priorities of the BLP and BDP. It is the City Council's intention to progressively revoke past HILs as and when detailed A and B road proposals are adopted (or delivered). Where new locations for improvements are identified, the City Council reserves the right to impose HILs in line with guidance and statutory processes. Moreover, HIL Schemes will be protected for public transport		

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	and active travel improvements. Development(s) that would prejudice the proposed highway improvement will not be permitted. The location of the improvement lines within the City are shown on the Policies Map (current as at?? 2023). In addition, there are several smaller-scale improvement lines which will continue to be protected. Latest locations and details of these are held by the City Council and are available on request. Where appropriate the HILs have been cross referenced with the relevant projects within the Infrastructure Delivery Plan.		
Policy CY7: Digital Connectivity	All new development should provide gigabit capable connectivity to all its end users through full fibre connection unless an affordable ultra-fast broadband alternative is made available. In locations where gigabit and full fibre connectivity are not currently available: • Developers will be expected to demonstrate that they have engaged with a range of providers to upgrade infrastructure to deliver gigabit capable connectivity; and • Where one or more providers have agreed to provide this, the development should be designed to connect this service to all its end users; or • Where no agreement can be reached to provide gigabit connectivity at the present time, the development will be expected to provide additional dedicated telecommunications ducting to enable the provision of ultra-fast broadband or full fibre connectivity in the future. In all cases, development should demonstrate how it will meet the requirements of this policy through a Broadband Connectivity Statement submitted with the planning application.	Indirect	This is a strategic level policy. The implementation of this policy will impact the real estate market through the quality of the environment and the strength of the economy created. This will impact real estate values (and costs e.g., land) over time through the price mechanism.
Policy IM7: Developer Contributions and Community Infrastructure Levy	Planning Obligations will be sought to mitigate the impact of unacceptable development to make it acceptable in planning terms where: - They are necessary to make the development acceptable in planning terms; - They are directly related to the development; and - They are fairly and reasonably related in scale and kind to the development. Development will be expected to provide infrastructure to address the impact of that development on the area.	Direct	To assess the direct cost, we consider this would need to be dealt with on a site-specific basis.

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