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Dear Gary and team,

OUR FUTURE CITY: DRAFT CENTRAL BIRMINGHAM FRAMEWORK 2040 - CONSULTATION RESPONSE

The Framework

The non-statutory consultation document sets out 'a strategic vision for central Birmingham to 2040'. We understand from the information available that consultation feedback would be used to inform the Local Plan review.

The Framework identifies various challenges and opportunities along with a 'Bold Vision' to be inclusive, creative, resilient and connected. In addition, the document sets out six 'city themes' to help deliver the vision focussing on growth for all, nature, centres and neighbourhoods, connections, knowledge and innovation, and city layers and distinctiveness.

Visual information forms part of the document and includes various images of tall buildings and other development in locations which are already in the planning process and some which are not.

We engaged with the 2021 Our Future City Plan: Shaping our city together consultation and welcome the opportunity to engage with the current Framework document.

Summary

Birmingham's challenges and opportunities are shared with countless communities throughout the world, but what makes the city unique is its rich and varied heritage.

From its modest beginnings at the moated manorial site at the foot of the city ridge, linking in with a place of worship and market charter, followed by medieval town and



trade growth down to the River Rea, Birmingham moved forward to become a place of enlightenment, innovation and growth that boasted one thousand trades, and developed into England's second city.

Whilst the city's non-statutory Framework suggests an intention to conserve or enhance its heritage, the conceptual imagery and development aspirations set out in the document would suggest otherwise.

One opportunity identified in the Framework is for the city to become a 'Global leader in a green future'. The greening of the city, subject to delivery, would have the opportunity to enhance and better reveal the historic environment, heritage assets and their setting.

In contrast, the huge carbon cost of large-scale demolition would be at odds with the Council's commitment to tackle its climate emergency and climate change in the wider sense. Repurposing, rather than demolishing, existing designated or non-designated historic fabric should be an option to explore. The Local Plan review offers opportunity for that to take place.

The Framework seeks to learn from the past. If lessons are to be learnt from the past, the Bold Vision for the city could be to reverse the pattern of large-scale demolition and rebuild currently envisaged in the Framework. There is opportunity to move forward with robust policies for the historic environment, site allocations for residential and employment sites, tall buildings, and whole life carbon cost assessments, amongst others, firmly embedded in the emerging statutory Local Plan.

The Framework themes and areas: Heritage significance and potential impacts

Framework themes and overarching Framework heritage impacts

The six 'city themes' to help deliver the vision of the Framework focus on growth for all, nature, centres and neighbourhoods, connections, knowledge and innovation, and city layers and distinctiveness. Historic England agrees that these themes could help shape the city for the future, and they already, or have potential to, align with Historic England's corporate areas of focus: Thriving Places; Connected Communities; and, Active Participation.

In our 2021 response to the Our Future City Plan consultation, we submitted concerns about the included Computer Generated Images (CGI) which showed buildings removed and untested tall buildings in their place, including the Council building at Lancaster Circus, many of which have the potential to cause harm to the significance of Birmingham's wonderful heritage assets, or their setting.

The current Framework consultation includes advanced imagery of whole swathes of the city and we maintain our concerns about potential harm to heritage. In some cases there appears to be the potential for substantial harm to heritage assets.



The National Planning Policy Framework (NPPF, para. 200) states that ‘any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

We note the small print on P.29 of the document which sets out that the CGI images are ‘conceptual and illustrative to demonstrate the overall vision’, and that ‘all future development would be subject to planning’. This is referred to further in a short paragraph on ‘Statutory Planning’ on p.185 of the draft Framework. Notwithstanding these notes, whilst it is appreciated the images may only be indicative at this stage there remains concern that their ambiguity could raise expectations of stakeholders, including developers.

Furthermore, whilst suggesting far reaching change in the built environment, and potential harm to heritage assets and their setting, the Framework has no supporting evidence base. It is, therefore, unclear how the Framework itself might form part of the evidence base for the emerging Local Plan.

Framework areas - heritage significance and impacts

The Framework sets out five key areas for Birmingham as City Heart, Central East, Central North, Central South, and Central West. For each area, the document sets out sections on a bold future, bold proposals, growth zones, major development sites and then matters relating specifically to those individual areas such as greenways, green and blue infrastructure, connectivity, revitalising streets and spaces, and night time economy amongst others.

As set out earlier in this response, Historic England and the City Council share similar aspirations for the city in the wider theme sense around:

- climate action;
- ensuring appropriate and beautiful development incorporating better community connectivity;
- exploring opportunity to enhance and better reveal the historic environment, heritage assets and their setting; and,
- utilising the city’s unique heritage as a catalyst for environmental, social and economic investment within the five areas identified.

Our concerns relate particularly to the potential heritage harm within the city that the Framework suggests. Area based heritage concerns are set out below, and are supported with images which are included at Appendix 1.

City Heart

This area includes the Bull Ring, Colmore District, Snowhill, Steelhouse, Southside and Westside. The Framework sets out that the area is ‘A thriving commercial centre for the UK economy and global investment; The focus of city life and living; The



beating heart of cultural activity and civic pride'.

Heritage wise the area includes Colmore Row and Environs Conservation Area, the Steelhouse Lane Conservation Area, and two of the city centre's principal public open spaces, Victoria Square and St Philip's Cathedral (Grade I listed). The civic core area contains an impressive and deliberate collection of institutional buildings where the lavishness of the architecture speaks of the city's civic values.

This is evident in the number of highly graded listed buildings in the area. Among them are some of Birmingham's most significant civic buildings, including the Hall of Memory, Town Hall (both Grade I listed), and Council House and City Museum and Art Gallery (Grade II* listed).

The Framework indicates three main growth zones: as Park Birmingham, Snowhill and Western Gateway.

Park Birmingham envisages a sweeping change for High Street and Dale End with a green space, improved connections between St Philip's cathedral (Grade I listed) and Moor Street (Station Grade II listed), and between The Rotunda (Grade II listed) and Priory Queensway. While urban greening and improved pedestrian connectivity offer potential opportunities to improve the public realm and better appreciate the historic environment the Framework presents images including large scale demolition and rebuild which would result in harm to various listed buildings, Colmore Row and Environs Conservation Area and Steelhouse Lane Conservation Area.

From the CGI images it is unclear whether the former Powell's Gun Shop on Carr's Lane (Grade II listed) and St Michael's Roman Catholic church (Grade II listed) would be demolished as part of the suggested large-scale clearance and redevelopment with tall buildings. The hard copy document and online information differ in that the published document doesn't show the church remaining, but the online information does.

The existing Marks and Spencer building, whilst not a designated heritage asset, adds value to the High Street and Moor Street streetscenes and is shown as being replaced with a tall building. We are not aware of any applications having been submitted on these sites.

The green space along the High Street towards The Rotunda indicates a set back to the existing building line which would open up the view towards this iconic listed building and could offer opportunity to enhance. However, the large-scale demolition of the existing blocks to the immediate north east of The Rotunda, and replacement with tall buildings would have the potential to erode the significance of the listed building and its' iconic position in Birmingham's skyline. That same building block of redevelopment would harm the Grade II* listed City Arcade, Union Street, possibly substantially, since it is not clear whether the vision includes retention of the designated asset or not. Again, we are not aware of any applications having been submitted on these sites.



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The city block between High Street, Union Street, Bull Street and Corporation Street along with the city block including the existing Rackhams/House of Fraser building is also shown as large-scale demolition and redevelopment with tall buildings and other lower level development. These would have the potential to cause harm to St Philip's cathedral (Grade I listed) the Colmore Row and Environs and Steelhouse Lane Conservation Areas and possibly other nearby listed buildings.

Snowhill growth area would link in with Park Birmingham at its northern edges and images on pp.44-45 of the document indicate further tall buildings all of which have the potential to cause harm to the Steelhouse Lane Conservation Area and the distinctive tower of the Central Methodist Hall (Grade II* listed) at the end of Corporation Street. In addition, while remodelling of the A38 offers potential to enhance and better reveal St Chad's cathedral (Grade II* listed), new development has the potential to harm the significance of the designated heritage asset.

Western Gateway aspirations for improved pedestrian connectivity would better reveal some of the city's historic layers associated with rail and canal infrastructure. However, it is not clear from the Framework imagery or associated information whether listed buildings along Gas Street Basin would be proposed for demolition since new development is shown at that location.

In addition, there are clear visual links between New Street railway station and the group of civic buildings built purposefully on the city's ridge to command attention. These include the Town Hall (Grade I listed), the Council House and Birmingham Museum and Art Gallery (Grade II* listed) and Colmore Row and Environs Conservation Area. The conceptual images in the Framework suggest potentially harmful tall buildings on the existing Grosvenor casino site and situated in the city blocks between Pinfold Street and Hill Street as well as extending into the Paradise Phase 3 area to the rear of the Birmingham New Street Signal Box (Grade II listed).

Central East

This area includes Bordesley, Digbeth and Small Heath. The Framework identifies the area as 'The city's centre for creativity and entrepreneurship; Rooted in a rich heritage of industry and making; Places and communities of character, uniqueness, and diversity'.

Digbeth's history has been particularly shaped by transport infrastructure, including the River Rea, the main road into Birmingham, the canals, and the railways. The special interest here is derived from very different and quite modest components all intertwined with a vibrant range of creative uses that in themselves helped to define the 'place' and the tapestry of the small that characterises the area. Digbeth, Deritend and Bordesley High Streets, and Warwick Bar Conservation Areas form a large part of the Central East area, and various listed buildings feature too.

The growth areas indicated at Garrison Park Quarter and Bordesley Park, along with the major development sites not yet in plan, would need to consider any heritage impacts should they come forward as part of the Local Plan review. The Framework



(p.74) offers ‘potential for higher density residential and landmark buildings to the west’ within the Garrison Park quarter. At present without any evidence base to support that statement it is unclear whether that would be achievable or not in respect of the historic environment.

It is also interesting to note that the document appears to frame ‘landmark’ buildings as being buildings with height. Any masterplan work for sites being progressed through the Local Plan process could consider other types of landmark. As an identifying feature in the streetscene or cityscape these can be something of a modest scale such as a piece of public art, open space or a public realm feature such as the Jewellery Quarter clock tower (Grade II listed).

Central North

This area includes Eastside and Aston Triangle, the Gun Quarter, Nethells and Newtown. The Framework identifies the area as ‘A city gateway - a place of arrival, exchange, and opportunity; A leading centre of learning, invention, research, performing arts and creativity; Home to strong, young and diverse community focused neighbourhoods’.

Growth areas are proposed at the Gun Quarter which is situated to the north east of the Jewellery Quarter Conservation Area and north west of the Steelhouse Lane Conservation Area, and also Curzon Gateway around the site of the proposed HS2 terminus, along with Heartlands Eco-Town.

This part of the city is situated at a lower level to the City Heart and Central East areas and new development would have the potential to harm designated and non-designated heritage assets. Various listed buildings are situated within the area. Whilst not great in number, this offers opportunity to consider the specialness of an asset to a community and place and ensure new development reflects the heritage of that place.

Major development sites include some in plan but also some sites that are not. The Framework sets out opportunity for ‘the potential for a landmark tower’ on the former offices of the City Council. At present without any evidence base to support that statement it is unclear whether that would be achievable or not in respect of the historic environment.

Taller buildings at the outer edges of the city have the potential to erode the special qualities of the city’s heritage. At present the city has a definite ridge and without a tall building strategy there is concern that taller buildings could appear incongruous within the wider cityscape at odd locations around the City Heart, or be of such a number and height that new development results in a homogenous taller cityscape bearing little relevance to the city’s unique heritage. Any familiar heritage features forming part of iconic city views, such as The Rotunda, church and cathedral spires, Central Methodist Hall’s tower, and the Birmingham Museum and Art Gallery clock tower would potentially be lost in such a scenario.



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Central South

This area comprises Balsall Heath, Edgbaston and Highgate. The Framework identifies the area as ‘Green neighbourhoods, steeped with history and character; Active creative communities; World-class learning, research and sporting facilities’.

Suggested growth areas at Rea Valley and Hagley Road Corridor include a variety of buildings. As with other areas and sites highlighted in the Framework, to meet the city’s climate emergency whole life carbon cost assessments would be helpful to clarify whether it could be more sustainable to repurpose existing fabric at a site rather than clear entirely and rebuild with new. There may be a number of non-designated heritage assets, such as Five Ways House in the Hagley Road Corridor Growth area, as well as others in the Rea Valley growth area that could be repurposed as part of any development scheme. We recommend that this is considered as part of the Local Plan review.

There are a number of Conservation Areas, listed buildings, registered parks and gardens, and scheduled monuments in the Central South area and heritage impacts in relation to growth areas and major development sites would need to be considered fully through the Local Plan review.

We have welcomed opportunity to partner with the City Council and other stakeholders to bring valuable community and heritage assets back into use in this part of the city. We have been able to invest in the Moseley School of Art building (Grade II* listed) as well as the Moseley Road Baths (Grade II* listed) and works at Highbury Hall (Grade II listed in a Grade II registered park and garden).

Central West

This area comprises Hockley, the Jewellery Quarter, Ladywood and Spring Hill. The Framework identifies the area as ‘A world centre for the jewellery manufacturing and trading since the 1800’s; A celebration of the city’s unique industrial heritage and the entrepreneurial spirit; Contemporary urban living closely tied with a burgeoning creative industry sector’.

It is a part of the city well renowned and celebrated as a unique manufacturing quarter, distinguished for its international importance. The significance of the Jewellery Quarter is fundamentally rooted in its domestic origins as a predominantly residential extension of the city.

The area was developed on the Colmores’ New Hall Estate as the settlement of Birmingham expanded down the hill from the newly-built St Philip’s in the early 18th century. By the late 18th century this saw a large area set out for development centred around a square with a new church, St Paul’s (Grade I listed), to attract development.

The jewellery and metalwork industry grew out of this predominantly domestic environment, around humble, small-scale artisan manufacturers which expanded



rapidly throughout the 19th and 20th centuries. This important aspect of its history and identity translates directly into the historic townscape experienced today which retains a low-scale character and appearance.

The Framework aspirations for growth areas and major development sites offer opportunities to enhance and better reveal the historic environment, heritage assets and their setting but there would also be the potential for new development to be harmful. For example, if a greenway is formed at Hockley, the context and setting of William Mitchell's mural (Grade II listed) would be removed so careful consideration would need to be made in relation to any heritage impacts.

In addition, any taller elements of new schemes would have the potential to disrupt the characteristic low-scale character of the area. We would anticipate heritage impacts to be considered as part of the Local Plan review and appreciate that this is reflected in the draft Framework.

The City Council is aware that Historic England is keen to ensure Icknield Street School (Grade II* listed) is conserved, and we welcome the Framework's reference about protecting and restoring the heritage asset.

Position

The foreword to the Framework sets out that there is a golden decade of opportunity ahead, and there are real lessons to be learnt from the past to inform the future. Whilst we appreciate the Framework is a non-statutory and unevidenced document, much of the CGI information suggests Birmingham's history of large-scale demolition and rebuild would be continued. This approach would have the potential to harm designated heritage assets or their setting and would not be in accordance with requirements of the NPPF.

We recommend that the City Council consider undertaking a Tall Building Strategy or forming a tall building policy as part of the Local Plan Review to identify least and/or most heritage sensitive areas to help guide development proposals.

In addition, the aspirations for new green infrastructure offer opportunities to enhance the city visually and wellbeing wise for all. Existing Historic Landscape Characterisation/Urban Survey information could assist with form and type in masterplans for larger schemes and/or citywide.

However, the city's climate emergency cannot be met by introducing new green infrastructure alone. For the city to learn from its past and be a true global leader in a green future, exploring options for repurposing existing built fabric should be a key part of its aspirations. This could be embedded in the Local Plan review through new climate change policies such as requiring whole life carbon cost assessments for major development planning applications.

It is not clear how aspirations would be delivered costs wise and it would be helpful to



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understand whether planning obligations and Community Infrastructure Levy (or any future alternatives) would be rethought as part of the Local Plan review.

Recommendation

Historic England has concerns about the Framework on heritage grounds.

Be bold, be Birmingham could mean:

- the city takes stock of what has gone before and looks to use heritage as a key part of being a global leader in a green future taking into account carbon costs for demolition and new build;
- the City Council seeks to ensure that development responds to the needs of its communities and respects its rich historic cityscape through robust policies embedded in the statutory Local Plan; and,
- that Birmingham's very special historic environment is sustained for future generations to experience, understand and enjoy.

Historic England and the City Council have many shared objectives, and we have been successful partners on many projects that have safeguarded the city's heritage for local communities. It is our view that heritage plays a key role in shaping the future development of the city.

We would be happy to discuss our response with you further should you have any queries. You will be aware that we have signposted various Historic England digital resources previously but would be happy to meet with you to discuss these further if that would be of assistance. We look forward to engaging with you further as the emerging Local Plan progresses.

Yours sincerely,

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APPENDIX 1: BCC Future City Framework heritage impact images (individual assets, streetscene and cityscape) August 2023



Figure 1 above and Figure 2 below: Conceptual imagery in the draft Framework suggests St Michael's Roman Catholic Church, Moor Street and former Powell's gun shop, Carrs Lane, Birmingham, both Grade II listed, could be lost to new tall building and associated development.



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Figure 3 above: The existing Marks and Spencer building (from Moor Street); and, **Figure 4 below:** The front of Marks and Spencer is situated behind the trees on High Street and the streetscene shows the existing human scale context of the built environment with the iconic Central Methodist Hall (Grade II*) clock tower in the background. The Framework indicates the M&S building would be demolished and replaced with a tall building.





Figure 5 above: The Rotunda (GII) to the left, and mid ground view of buildings which Framework aspirations indicate would be removed and replaced with new development including tall buildings

Figure 6 below: The Grade II* City Arcade could be lost as a result of large-scale demolition and new development, including tall buildings, suggested in the Framework



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Figure 7 above: View down Corporation Street with city blocks either side to be demolished and redeveloped as part of Framework aspirations. New build elements would include tall buildings

Figure 8 below: View up Union Street towards St Philip's cathedral (not in image) where city blocks would be demolished and redeveloped as part of Framework aspirations – again including tall buildings.





Figure 9 above: View down Corporation Street towards Steelhouse Lane Conservation Area and the iconic Methodist Central Hall (GII*) clock tower which would potentially be harmed by Framework aspirations

Figure 10 below: View back to Steelhouse Lane Conservation Area and the back of Methodist Central Hall from James Watt Queensway. McLaren building is to the left hand side of the image providing context for existing tall buildings and taller proposals envisaged nearby in the draft Framework



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Figure 11 above: St Chad's Cathedral (GII*), the Framework offers potential for enhanced setting through closure of the A38 to vehicles and intentions for green space but potential development pressures including tall building development nearby



Figures 12 and 13 above and below: City blocks between New Street station and the Town Hall (G1), and Council House and Birmingham Museum and Art Gallery (GII*) envisaged for redevelopment with tall buildings in the draft Framework with the potential to harm heritage assets



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Figure 14 above: View down Hill Street to Grosvenor casino where the Framework envisages a tall building development which has the potential to harm key civic building heritage assets higher up on the city ridge

Figure 15 below: Views to the Birmingham Museum and Art Gallery clock tower now funnelled between new development at Chamberlain Square and with 103 Colmore Row behind



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Figure 16 above: The Onyx development to the left of the image and Childrens Hospital (GII) complex to the right, and the former fire station building (GII) in the distance. To the rear of the Onyx the Framework suggests tall building development potential at 1 Lancaster Circus

Figure 17 below: View from James Watt Queensway. The Children's Hospital to the right, former fire station to the left (both GII) and the Onyx in the mid ground with the top of the former Council offices showing where the Framework suggests potential for a taller building than the Onyx



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