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Response to Revised Sustainability Report.

On Behalf of Mr M Neachell

1 Timescales

The revised SA was sent out to the participants on the 24th March 2015 with a window of just over 2 weeks to respond including the Easter Holidays. This is simply too short a timescale for respondents given their commitments, holidays and length and complexity of the document.

2 Status of the Document

The Document is effectively a new SA and has not yet been the subject of any formal consultation. If the document had been subject to formal consultation then full responses could have been made to the document with the statutory timescale. In a similar instance in East Staffs where the examination is suspended for further work, the revised SA has been the subject of a full 6 week consultation before the examination resumes in May 2015. It is therefore unclear as to why the document has not been subject to full consultation and when indeed this is proposed to take place.

3 Document Rationale

The document sets out that

Following discussion at the Examination in October 2014, it was agreed that the detail of reasonable alternatives should be revisited in respect of the following approach:

- First, the sustainability performance of the extensions of around 5,000 dwellings and up to 10,000 dwellings are appraised to determine the likely significant effects of such developments to the north east of Birmingham.
- Second, in light of the outcome of this appraisal determine what reasonable alternatives should be taken forward for detailed site appraisal. If an extension of around 5,000 dwellings is determined to be on balance more sustainable then the merits of the whole of areas A, B, C and D, and sub-options A2, B2 and C2 which could individually accommodate around 5,000 dwellings, should be appraised as reasonable alternatives. If an extension of up to 10,000 dwellings is determined to be on balance more sustainable, then the relative merits of different delivery combinations which together could deliver up to 10,000 dwellings (namely areas A&C vs A&B vs B&C vs C&D) will be appraised as reasonable alternatives.
- Third, the significant effects of a strategic employment site of approximately 80ha at this location appraised, using the reasonable alternatives of sites C and D.

With regard to the discussions at the examination, the question was raised and has never been answered as to why urban extension sites of 5,000 up to 10,000 only were to be examined, and no examination has taken place on sites less than 5,000 either individually or collectively. There is no rationale in the examination papers as to why 5,000 dwellings was the starting point. The documents set off therefore on the wrong premise.

Given that the OAN is still under discussion and the scale of the housing issue remains outstanding how can the SA look at reasonable alternatives to accommodate the required development. The development quantum in this SA is guesswork.

4 Document Detail

Section 5

It is clear from this para 5.1 that what is being tested is a single SUE of 5,000 or up to 10,000. [which would comprise 2 x SUES of 5,000 each] This does not as far as can be seen include sites that are smaller than 5,000 dwellings which meet the requirements in part either collectively or individually.

Table 5.1 purports to show the two main scenarios and clearly a larger development will take more land, but there is no analysis in this table of the effect of these homes not being provided within the City area and their delivery being delayed or not provide at all, this will clearly have an adverse effect on the City and the welfare of residents. It is obvious that 5,000 new homes will take less land and have less impact than 10,000 homes, but the issue is wider than the simplistic approach in the table. Furthermore it is simply not accepted that the market will not be able to deliver the homes. It cannot therefore be reasonably concluded that 5,000 dwellings is automatically more sustainable which is what happens at 5.2.

Because of the single site 5,000 dwelling threshold the chunks of green belt that are reviewed are very large and contain diverse areas. However the analysis looks at broad areas and fails to deal with them on a sensible scale. For example my client's site forms part of area A1 and performs well on sustainability criterion. The scale at which the appraisal is taking place it is too broad brush and does not assist at all with the concept of several sites assisting in meeting the requirement.

It is not clear why table 5.1 does not look at all the sub areas as part of the identified areas.

5 Site Comparative A2 to A1

Part C11

The table compares A2 and A1. We do not agree with the scorings in this table and the relative scoring for other sites. Site A 1 is underscoring on many counts for example

Part1

A1 includes PDL at Woodside Farm within my clients ownership and this is not included or scored within Part 1 on the efficient use of land.

Part 2

A1 should be scored positive on opportunity for self-containment there is opportunity for employment generating uses within the area.

Part 4

The landscape sensitivity score for A1 is incorrect based on the documents in the evidence base regarding sensitivity.

Part 5

No allowance in the A1 score for the removal of noise source and removal of pollution on part of the area.

Part 7

The Area A1 has an active community based on the community centre at harvest Fields Centre and local centres. There is no rationale to assume that there is no positive from community involvement, in the light of the locational circumstances.

Part 8

The scores for delivery of homes should be more positive, this is an attractive location for living where new buildings and housing delivery have been tested in the past and an area where people want to live. The area can provide a variety of homes. The scoring is therefore incorrect.

We do not agree with the overall assessment which still contains the anomalies we referred to previously and no approach has been made to agree any of these previously identified matters.

These comments are not exclusive but indicative only of the problems with the document.

JVH 10th April 2015.