

**Comments on Revised SA (EXAM 146) from Mr Paul Gilmour**

The revised SA is flawed in three main areas

It does not assess all the reasonable alternatives

It does not assess those that it does using the same level of information

The outcomes are constrained by the pre-acceptance of the PBA report on delivery.

E131 states para 41. *“Secondly, there is no clear explanation in either HTY17 or SUB3 of why the potential urban extension areas were assessed on the basis that what was being sought was a single site for around 5,000 dwellings. That is a clear change from the position set out in the BDP Options Consultation document [HTY11], which referred to a range of between 5,000 to 10,000 dwellings.”*

E131 Para 49. States *“The first stage would compare the positive and negative effects of providing urban extension(s) for up to 10,000 dwellings, or for around 5,000 dwellings”.*

Nowhere in E131 can I find any suggestion that the only alternatives to be considered are 5,000 unit blocks of development.

Nowhere in E131 can I find any suggestion that only two alternatives (around 5,000 and 10,000) should be considered

However what we have is a SA which only considers 5k units or 10k units (in two 5k blocks).

It does not consider *“...site(s) for a range of between 5,000 to 10,000 dwellings as stated in HTY11”.*

There are clearly alternatives within areas A & B some small, some large that have not been considered because they cannot provide 5,000 units. The minimum required for this exercises without any explanation being given by the City.

As can be seen from the SHLAA only in the green belt is large scale delivery considered to only be achievable and deliverable on sites of 5,000.

In the green belt the Revised SA suggests that deliver of infrastructure could not be managed across two 5k unit sites yet in Neachells and Ladywood the city propose to deliver 6500 and 5500 units across dozens of sites without such issues.

E131 para 54. *“...ensure that all reasonable alternatives have been assessed at the same level of detail as the option taken forward in the submitted Local Plan”*

Yet at page 76 and throughout we see that the Revised SA does not contain comparable information for the 5k option and the 10k option.

Eg *“There is an absence of any evidence which shows how the traffic impacts from a larger development could be accommodated on the network”*

In the green belt the Revised SA accepts the underlying PBA assertion that sales across two 5k unit sites would be massively constrained by the market yet in Neachells and Ladywood

the city propose to deliver 6500 and 5500 units without such issues.

If area B together with area C can only generate 5,000 sales in 20 years surely the same must be true of Neachells plus Ladywood (under GA3).

*From page 77 of the revised SA "...The infrastructure delivery issue is particularly important in light of the need to carefully consider realistic market delivery rates of new housing. Although not a specific sustainability objective, consideration of the likely delivery of infrastructure and services is important in respect of its potential sustainability implications. The greater risk that not all the proposed housing associated with a larger scheme would be developed within a reasonable timescale is likely to result in key infrastructure and services not being delivered promptly or even not at all..."*

Yet the same commentary is not made on GA3 where multiple small sites in a CIL free value area will provide 12,000 units in the plan period.

*At para 50 E131 " In order to maintain the integrity of the SA process, it will be essential that those who undertake this additional SA work approach it with an open mind, and not on the basis of seeking to justify decisions previously taken"*

Yet it appears that throughout the Revised SA the justifying the chosen option is exactly what has happened.