



## Technical note:

# Birmingham Development Plan Examination - Response to Comments on the Revised Sustainability Appraisal Report

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## 1. Introduction

- 1.1 The Revised Sustainability Appraisal Report (EXAM 146) was published in March 2015 in response to the Inspector's Interim Findings (EXAM 131) which requested some additional work on this issue. Interested parties were given an opportunity to comment on the Revised SA and ten responses were made.
- 1.2 Some of the responses are supportive of the revised SA. Many of the points raised in the critical responses question aspects of the scoring of various options and sites.
- 1.3 The following paragraphs deal with the more substantive points raised in the responses.

## 2. The SA should reflect the revised OAHN

- 2.1 This point is made by Turley on behalf of Richborough Estates (EXAM 146F) and others promoting specific alternative green belt sites. The argument is that an increase in the OAHN could result in the need for a different strategy and for the consideration of different alternatives.
- 2.3 It is the Council's view that the City cannot accommodate its full OAHN on the basis of the numbers in the submitted plan. The effect of any increase in the OAHN would be to increase the size of the 'overspill' and there would be no impact on the strategy within Birmingham. For this reason the Council considers that there is no substance to this argument.
- 2.4 In any event, the PBA OAN Supplementary Report (EXAM145) shows no significant difference from the figure discussed at the hearings.

## 3. Other "reasonable alternatives" should have been considered

- 3.1 Turley on behalf of Richborough Estates (EXAM 146F) argue (for the first time) that a 7,500 dwelling SUE should have been considered.
- 3.2 The Revised SA considers SUEs of 'around 5,000' and 'up to 10,000' dwellings as per paragraph 49 of the Inspector's Interim Findings, which requested that "*Once the choice of one or other of those alternatives has been justified ...*" [emphasis added], then alternative sites should be compared. The conclusion of the SA assessment (p.77) is clearly that a smaller SUE is preferable.

- 3.3 The methodology on this point was agreed with the Inspector, and this is reported on page 75 of the Revised SA: *“it was agreed with the Inspector that the appraisal should be re-visited in order to test the sustainability effects of different scales of Sustainable Urban Extension (SUE) of around 5,000 dwellings and up to 10,000 dwellings, and thereafter the relative merits of different areas which could comprise a SUE (either singly or in combination) i.e. drawn from areas A, B, C and D and sub-options A2, B2 and C2 (all of which could in principle accommodate around 5,000 dwellings).”*
- 3.4 CBRE (EXAM146B) and JVH (EXAM 146E) argue that an option involving smaller urban extensions should also have been considered and linked to this they also argue that the site assessments were undertaken at a level which ignores the possibility that plots of land within the larger green belt areas (i.e. parts of Areas A and B) might be suitable for development.
- 3.5 At the further Growth Options Stage, three options were considered in the SA - no additional growth in Birmingham, strategic green belt release for 5 -10,000 dwellings, more intensive development within the urban area. The Inspector concluded (para 48 of the interim findings) that there were no significant defects in the SA process up to and including this point. His concern was over the lack of SA justification for the subsequent choice of 5,000 over 10,000 dwellings.
- 3.6 A smaller green belt sites option was not considered at this stage, because it was not judged to be a reasonable alternative as it would add pressure to existing infrastructure without providing the critical mass necessary to enable the provision of new facilities. This point is recognised on page 77 of the Revised SA: *“A development of around 5,000 dwellings in a single location is preferable over a series of small sites because of the ability to deliver supporting infrastructure as part of a single masterplan which can be appropriately phased.”*
- 3.7 In view of this conclusion it was not necessary to appraise sub-divisions of the green belt areas, since these would not have been able to accommodate an SUE of the required scale.

#### 4. Sites not considered on an equivalent basis – transportation issues

- 4.1 It is suggested by Turley and CBRE that options have not been considered on an equivalent basis because more transport information is available in relation to the impact of a 5,000 dwelling extension than for 10,000 dwellings, and more information is available for Area C than for the other areas.
- 4.2 The SA assessment utilised the Transport Analysis of Green Belt Options prepared by Phil Jones Associates (TA3) which covered all the green belt locations at an equivalent level of detail. More detailed transport assessments have been undertaken for Area C in order to enable specific transport solutions to be developed for that site. It is not the Council's position (nor is it the conclusion of the SA) that any of the green belt areas are individually

unacceptable for traffic reasons. The SA does conclude that there are differences in terms of sustainable transport for reasons arising from the evidence.

- 4.3 The Phil Jones work did not consider combinations of green belt locations. The judgements made in the SA in relation to the 10,000 dwelling SUE option therefore utilise the information that is available, notably the views of the Highways Agency which raise concerns over this option. In the context of the overall assessment process, which inevitably has to deal with data gaps, it is not considered that this constitutes a failure to consider the options on an equivalent basis.

## 5. The relevance of housing delivery

- 5.1 Turley and others criticise the weight given to this consideration, arguing that it is an ex post facto justification for the Council's position. They also question the conclusions drawn.
- 5.2 Delivery is recognised as a critical factor and it is an issue on which evidence has been provided (PBA, June 2104) and which was discussed at the Hearings. It is therefore correct for it to be taken into account in the SA. The weight to be attached to it is a matter of judgement.

## 6. Reasons for rejecting some sites not given.

- 6.1 This point is made by Turley who point out that no reason is given for the rejection of areas A1, B1 and C1. Areas A1 and B1 were rejected on size grounds, because neither could accommodate a 5,000 dwelling SUE (as identified in section 5.1 p.75 first paragraph of the SA Report). This is clear in the agreed methodology, but for added clarity additional wording could be included at p.75 stating that "*Areas A1 and B1 are on their own too small to accommodate around 5,000 dwellings*". However, it should also be noted that an appraisal of these sites has been carried out and the results of this are contained in Appendix C of the Revised SA. This confirms that these sites do not perform as well as Area C, the selected option. Area C1 includes the whole of Area C2 and is the same as Area C, which is assessed as an option for a 5,000 dwelling SUE.

## 7. Miscellaneous

- 7.1 Various minor detailed errors are noted and these will be corrected before formal consultation takes place.



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