Birmingham City Council

The Birmingham Development Plan

Sustainability Appraisal

Post Adoption Statement

January 2017

Contents

1. Introduction

1. This document is the Sustainability Appraisal Post Adoption Statement for the Birmingham Development Plan (BDP) which was adopted on 10th January 2017 by Birmingham City Council.

2. The BDP forms part of the statutory development plan for Birmingham and sets out a spatial vision and a strategy for the sustainable growth of the city over the period 2011- 2031. The BDP and all adoption documentation can be viewed online at: www.birmingham.gov.uk/plan2031.

3. A Sustainability Appraisal was undertaken to accompany the development of the BDP. The purpose of the Sustainability Appraisal is to ensure that environmental, social and economic issues are considered throughout the preparation of the BDP with the aim of achieving more sustainable outcomes than might otherwise have been the case.

4. The Birmingham Development Plan has been subject to examination by an independent inspector appointed by the Secretary of State. Hearing sessions were held in October and November 2014. Following the hearing sessions the Inspector published a schedule of proposed modifications which he considered were necessary for the Plan to be 'sound' in July 2015. The Council consulted on these proposed modifications to the Plan.

5. The Inspector's final report was published in March 2016 which concluded that, subject to the modifications being made, the Plan is sound, it satisfies the requirements of Section 20(5) of the 2004 Act and it provides an appropriate basis for the planning of the City. The report states that Birmingham City Council has carried out an adequate Sustainability Appraisal and undertaken an adequate Habitats Regulations Assessment.

6. The purpose of this Post Adoption Statement is to meet the legislative requirements of European Directive 2001/42/EC and the Environmental Assessment of Plans and Programmes Regulations (2004).

7. European Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment ('the SEA Directive') states that a Strategic Environmental Assessment is mandatory for plans prepared for town and country planning and land use purposes. The SEA Directive is transposed into UK law through the Environmental Assessment of Plans and Programmes Regulations (2004), which requires the Sustainability Appraisal of Local Plan documents.

8. The Town and Country Planning (Local Planning) Regulations (2012) (as amended) states that a sustainability appraisal report must be completed for Local Plan documents in accordance with section 19(5) of the Planning and Compulsory Purchase Act (2004).

9. Article 9 of the SEA Directive requires that when a plan or programme is adopted, the Council makes available a statement summarising:

   > *"how environmental considerations have been integrated into the plan or programme and how the environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8 and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with."*

10. This requirement in European law has been transposed into UK law through Regulation 16(4) of the Environmental Assessment of Plans and Programmes Regulations (2004), which requires the responsible authority to produce a statement containing the following information as soon as reasonably practical after the adoption of a plan or programme:

- how environmental considerations have been integrated into the plan or programme (Section 2 of this Statement);

- how the environmental report has been taken into account (Section 3, Appendix A of this Statement);

- how opinions expressed in response to:

   i. the invitation referred to in regulation 13(2)(d);

ii. action taken by the responsible authority in accordance with regulation 13(4), have been taken into account; (Section 4, Appendix B of this Statement)

- how the results of any consultations entered into under regulation 14(4) have been taken into account;

- the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; (Section 5 of this Statement) and

- the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme (regulation 16) (Section 6 of this Statement).

2. How environmental considerations have been integrated into the Birmingham Development Plan

1. Sustainability Appraisal entails the assessment of the performance of a plan or programme against a series of sustainability objectives to determine whether there are likely to be significant environmental, social or economic effects.

2. The sustainability objectives were developed as part of the Scoping Stage of the Sustainability Appraisal taking into account the following matters:

   a. The objectives of other plans and programmes at local, national and international scales.

   b. The environmental, social and economic characteristics of Birmingham and its regional context.

   c. The key environmental issues identified relating to Birmingham (Table 2.1).

Table 2.1: Key Sustainability Issues Identified in Relation to the BDP

SA Theme	SA Objectives	Key sustainability issues
1. NATURAL RESOURCES AND WASTE	1. Resource Use: Use natural resources such as water and minerals efficiently.	New additional water management measures or water resources needed to ensure there is sufficient water for new housing proposed. Resource Use is linked to issues related to water quality.
	7. Waste Reduction and Minimisation: Encourage and enable waste minimisation, reuse, recycling and recovery.	Landfill diversion rates are increasing in the City, and past targets for recycling have been met. The percentage of waste sent to landfill within the City has declined between 2002/03-2010/11 from 23% to 10.37%. Given European and National targets it is likely this trend will continue. Waste Reduction and Minimisation is linked to issues related to air quality, soil quality, natural landscape and built and historic environment.
	8. Efficient use of land: Encourage land use and development that optimises the use of previously developed land and buildings.	Good use is being made of previously developed land as a very high proportion of new housing and office development has taken place on previously developed land. The efficient use of land is linked to issues related to soil quality, natural landscape, built and historic environment, biodiversity culture, sport and recreation and sense of place.
2. CO_2 EMISSIONS	2. Sustainable design, construction and maintenance: Promote and ensure high standards of sustainable resource-efficient design, construction and maintenance of buildings, where possible exceeding the requirements of the Building Regulations.	There are several examples of good design in Birmingham, but more could be done in the future to regenerate certain parts of the City. Sustainable Design, Construction and Maintenance is linked to issues related to energy efficiency, climate change mitigation and adaptation and housing.
	3. Renewable Energy: Encourage development of alternative and renewable resources.	Use of renewable energy could be significantly improved. Renewable Energy is linked to issues related to climate change mitigation and adaptation.

SA Theme	SA Objectives	Key sustainability issues
	4. Energy Efficiency: Reduce overall energy use through energy efficiency.	Recent developments have shown evidence of energy efficiency, but the large number of old properties in the City will need improving to make them more energy efficient, building on current initiatives. Energy Efficiency is linked to issues related to renewable energy, sustainable design, construction and maintenance, housing and social and environmental responsibility.
	5. Sustainable Transport: Increase use of public transport, cycling and walking as a proportion of total travel and ensure development is primarily focused in the major urban areas, making efficient use of existing physical transport infrastructure.	Although the city has good public transport infrastructure, it needs expanding and upgrading to help minimise the high level of car use in Birmingham. A commitment is set out to achieve this. Emphasis will be placed on 'smarter travel', discouraging unnecessary journeys and encouraging people to use public transport. Congestion is a significant issue at certain times on both road and rail. Sustainable Transport is linked to issues related to air quality, reducing the need to travel, health, climate change mitigation and adaptation.
	6. Reduce the need to travel: Ensure development reduces the need to travel.	A very small proportion of people who work and live in the city (one tenth) work from home and therefore avoid travelling to work. There is little evidence of people being actively encouraged to work from home. More emphasis needs to be placed on 'smarter travel', discouraging unnecessary journeys and encouraging people to use public transport. Reducing the need to travel is linked to issues related to sustainable transport, air quality, health, climate change mitigation and adaptation and noise.
	9. Reduce climate change: Minimise Birmingham's contribution to the causes of climate change by reducing emissions of greenhouse gases from transport, domestic, commercial and industrial sources.	Birmingham's residents and businesses emit over 6.6 million tonnes of CO_2 per year. If global emissions are not reduced Birmingham could see average annual temperatures rise by 1.5ºC by 2020 and winter rise by 1.3ºC and 3.7ºC and 2.9ºC 4.5ºC by 2080. Reducing Climate Change is linked to issues related to sustainable transport, reducing the need to travel, air quality, biodiversity health and natural landscape.
3. CLIMATE CHANGE ADAPTATION	10. Manage Climate Change: Implement a managed response to the unavoidable impacts of climate change, ensuring that the design and planning process takes into account predicted changes in Birmingham's climate including flood risk.	Birmingham City Council has a good record of taking on board Environment Agency comments in terms of proposed development in flood risk areas. There is limited information on this objective although it is recognised by the City Council that measures will need to be put in place to manage the unavoidable impacts of climate change. Mitigation of climate change effects is linked to issues related to sustainable transport, reducing the need to travel, air quality, biodiversity health and natural landscape.
4. HISTORIC ENVIRONMENT, LANDSCAPE, BIODIVERSITY AND GEODIVERSITY	12. Built and Historic Environment: Value, protect, enhance and restore Birmingham's built and historic environment and landscape.	Birmingham has a large amount of land designated as Conservation Areas, some of which are nationally recognised such as the Jewellery Quarter and Bourneville. The City also has an extensive number of archaeological remains Listed Buildings and Registered Parks & Gardens. Built and Historic Environment is linked to issues related to sense of place, housing, sustainable design, construction and maintenance, crime and poverty.
	13. Natural Landscape: Value, protect, enhance and restore Birmingham's natural landscape.	Although much of Birmingham is built up, there is a significant amount of open land within the City including areas of agricultural land to the north east and south west of the City. The City falls within the National Character Areas (NCAs) of Arden to the south and Cannock Chase and Cank Wood to the north. The assessment of these areas for the Countryside Quality Counts project for Natural England indicates that they are subject to a high rate of change. Most of Birmingham is built up, but 15% of the City is designated as Green Belt. Natural landscape is linked to issues related to biodiversity, health, soil quality, sense of place, culture, sport and recreation, climate change mitigation and adaptation.
	14. Biodiversity: Value, protect, maintain, restore and re-create local biodiversity and	The City has 2 SSSIs and a number of other designated sites which cover approximately 10% of the City. The West Midlands Biodiversity Partnership has developed a number of area based

SA Theme	SA Objectives	Key sustainability issues
	geodiversity.	projects which look at different ways of protecting biodiversity by reducing fragmentation of habitats and species. These areas are known as Biodiversity Enhancement Areas. In such areas biodiversity should improve. There is one Local Nature Reserve designated in order to protect its geodiversity. Biodiversity is linked to issues related to air quality, soil quality, water quality, natural landscape, health). Geodiversity is linked to issues related to water quality, soil quality and natural landscape.
5. POLLUTION	15. Air Quality: Minimise air pollution levels and create good quality air.	The whole of Birmingham is designated as an Air Quality Management Area (AQMA), the main source pollutant being nitrogen dioxide as a result of pollution from vehicle emissions. There is a strong correlation between traffic congestion and poor air quality. Given the allocation of an AQMA, air quality should improve within the City. Air Quality is linked to issues related to biodiversity, health, sustainable transport reducing the need to travel, climate change mitigation and adaptation.
	16. Water Quality: Minimise water pollution levels and create good quality water.	The chemical and biological quality of rivers and waterways in Birmingham is generally poor compared to the West Midlands and England as a whole. Water Quality is linked to issues related to resource use, soil quality, health, biodiversity, climate change mitigation and adaptation).
	17. Soil Quality: Minimise soil pollution levels and create good quality soil.	There is very little high quality soil due to the built-up nature of Birmingham; however there are some small areas of Grade 3 agricultural land in the north of the City. The history of land use within the City including landfill sites, extensive manufacturing and transport leads to the potential for land contamination. Soil Quality is linked to issues related to biodiversity, water quality, natural landscape, and health.
	18. Noise: Minimise noise pollution levels.	Noise pollution is a problem in some parts of the city, with Birmingham airport and traffic being the principal sources. It is anticipated this trend will continue. Noise is linked to issues related to sustainable transport, housing and health.
6. ECONOMIC GROWTH	20. Economy and Equality: Achieve a strong, stable and sustainable economy and prosperity for the benefit of all of Birmingham's inhabitants.	Birmingham is the major employment centre for the West Midlands Recent trends show an increase in service sector jobs, a continued decline in manufacturing jobs and an increase in unemployment. Birmingham still has a high proportion of economically inactive people e.g. students, people caring full-time for relatives. Unemployment is higher than the national average. The economic activity rate for Black and Minority Ethnic residents is far higher than that for white residents. There is significant disparity in terms of average household income between Birmingham's constituencies. Economy and Equality is linked to issues related to poverty, learning and skills, equality, housing and community involvement.
	21. Learning and Skills: Promote investment in future prosperity, including ongoing investment and engagement in learning and skills development.	The proportion of people in Birmingham with few or no qualifications is above the national average, but improvements are being made in educational achievement. The percentage of Birmingham residents with a NVQ level of 3 or above has been increasing since 2002[1]. The percentage of residents on Job Seekers Allowance has increased significantly since November 2007. Whether this trend will continue is likely to depend on wider national economic trends. Learning and Skills is linked to issues related to economy and equality, community involvement, equality, poverty and social and environmental responsibility.
7. COMMUNITIES, HEALTHY LIFESTYLES AND EQUALITY	11. Sense of Place: Encourage land use and development that creates and sustains well-designed, high quality built environments that incorporate green space, encourage	Birmingham people are positive about their city; according to the Community Cohesion Strategy, opinion polls show that three quarters of people think it is a good place to live. No public open space is currently being lost, and environmental improvements have been made and continue to be made to various parts of the City. Sense of Place is linked to issues related to built and historic

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[1] https://www.nomisweb.co.uk/reports/lmp/la/2038431965/subreports/quals_time_series/report.aspx

SA Theme	SA Objectives	Key sustainability issues
	biodiversity, and promote local distinctiveness and sense of place.	environment, natural landscape, housing, health, biodiversity, culture, sport and recreation and crime.
	19. Social and Environmental Responsibility: Encourage corporate social and environmental responsibility, with local organisations and agencies leading by example.	Social and Environmental Responsibility is linked to issues related to equality, community involvement, learning and skills, economy and equality, waste reduction and minimisation.
	22. Community Involvement: Enable communities to influence the decisions that affect their neighbourhoods and quality of life.	Birmingham experiences varied election turnouts from constituency to constituency, typically ranging from a 45% in Ladywood, to 60% in Sutton Coldfield. The Sustainable Community Strategy indicates that in 2006, 40% of people agreed that they can influence decisions that affect their local area, an improvement of 22% from 2004. Community Involvement is linked to issues related to economy and equality, learning and skills, poverty, sense of place and housing.
	23. Equality: Ensure easy and equitable access to services, facilities and opportunities, including jobs and learning.	Birmingham has a relatively youthful population composed of people from a wide variety of national, ethnic and religious backgrounds. There are inequalities relating to access to services such as to jobs and health services, which is partly to do with geographical location, but also related to social and economic disadvantage. There is generally good accessibility in most places at most times for those households without a car, due to the extensive bus network. Two particular problems have been identified with access for unemployed people to attend job interviews and with access to major NHS hospitals by public transport. Equality is linked to issues related to economy and equality, learning and skills, community involvement, poverty, crime and housing.
	24. Poverty: Address poverty and disadvantage, taking into account the particular difficulties of those facing multiple disadvantage.	About 40% of Birmingham's residents live in areas that are in the most deprived 10% of areas in England. Concentrations are very high in wards to the east, north and west of the City Centre and also in Tyburn and Kingstanding Wards to the north of the M6 motorway. Unemployment rates are above the national average. Poverty is linked to issues related to health, crime, community involvement, learning and skills and equality.
	25. Health: Improve health and reduce health inequalities by encouraging and enabling healthy active lifestyles and protecting health.	The number of residents feeling in poor health is higher than the national average, and people in Birmingham have generally less healthy lifestyles than the English average. Life expectancy in Birmingham is below the England average. Health is linked to issues related to air quality, water quality, biodiversity, natural landscape, culture, sport and recreation, equality and crime.
	26. Crime: Reduce crime, fear of crime and antisocial behaviour.	Birmingham has the lowest overall crime rate of the eight major English cities. There have been over 5,300 less victims of crime based on figures for April to June 2012, compared to the same period in 2009. Crime is linked to issues related to poverty, equality, learning and skills and housing.
	28. Culture/Sport/ Recreation: Improve opportunities to participate in diverse cultural, sporting and recreational activities.	Birmingham has many strengths in this area and is internationally recognised for sports and exhibitions. The City's popularity amongst international visitors has increased and is now the fourth most popular city in the UK. Culture/ sport/recreation is linked to issues related to health, poverty, community involvement, biodiversity, natural landscape, sense of place and efficient use of land.
8. HOUSING	27. Housing: Provide decent and affordable housing for all, of the right quantity, type, tenure and affordability to meet local needs.	Birmingham faces several issues relating to housing such as the increase in the number of households and the need for improvement in the social housing stock. The affordability of housing for poorer families and first-time buyers has declined due to other national economic conditions. Housing is linked to issues related to poverty, equality, built and historic environment, natural landscape, sense of place, resource use, energy efficiency and

SA Theme	SA Objectives	Key sustainability issues
		sustainable design, construction and maintenance.

3. The sustainability appraisal framework for the BDP (Table 2.2) considers each of the topics set out in Annex 1 of the SEA Directive and Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations (2004), ensuring that the full range of considerations are considered as part of the preparation of the BDP.

4. The Environment Agency, Natural England and Historic England (formerly English Heritage) were consulted as part of the development of the sustainability appraisal framework in the Scoping Report. This ensured that the sustainability framework addressed the key interests of other organisations.

Table 2.2: The Sustainability Appraisal Framework Used to Assess the BDP

SA Theme	SA Objectives	Guide Questions for the SA Will the Birmingham Development Plan help to…	Principal SEA Directive Topic
1. Natural resources and waste	**1. Resource Use**: Use natural resources such as water and minerals efficiently.	• Incorporate energy efficiency measures into new land use and developments, redevelopment and refurbishment? • Promote and support resource efficient technologies? • Reward efficient resource use? • Reduce water consumption?	Material assets
	7. Waste Reduction and Minimisation: Encourage and enable waste minimisation, reuse, recycling and recovery.	• Divert resources away from the waste stream, including the use of recycled materials where possible?	Material assets
	8. Efficient use of land: Encourage land use and development that optimises the use of previously developed land and buildings.	• Encourage the efficient use of land and minimise the loss of greenfield land? • Value and protect the biodiversity/geodiversity (of previously developed land and buildings)?	Material assets
2. CO_2 emissions	**2. Sustainable design, construction and maintenance**: Promote and ensure high standards of sustainable resource-efficient design, construction and maintenance of buildings, where possible exceeding the requirements of the Building Regulations.	• Reduce dependence on fossil fuels? • Increase the number of buildings which meet recognised standards for sustainability?	Material assets
	3. Renewable Energy: Encourage development of alternative and renewable resources.	• Reduce dependence on fossil fuels? • Promote and support the development of new high value and low impact technologies, especially resource efficient technologies and environmental technology initiatives? • Increase the proportion of energy generated from renewable and low carbon sources, including micro generation, CHP, district heating and transportation?	Material assets
	4. Energy Efficiency: Reduce overall energy use through energy efficiency.	• Reduce energy consumption?	Material assets

SA Theme	SA Objectives	Guide Questions for the SA Will the Birmingham Development Plan help to…	Principal SEA Directive Topic
	5. Sustainable Transport: Increase use of public transport, cycling and walking as a proportion of total travel and ensure development is primarily focused in the major urban areas, making efficient use of existing physical transport infrastructure.	• Reduce road traffic congestion, pollution and accidents? • Encourage walking and cycling? • Reduce travel by private car? • Promote accessibility for disabled people?	Material assets
	6. Reduce the need to travel: Ensure development reduces the need to travel.	• Reduce traffic volumes? • Reduce average journey length?	Material assets
	9. Reduce climate change: Minimise Birmingham's contribution to the causes of climate change by reducing emissions of greenhouse gases from transport, domestic, commercial and industrial sources.	• Reduce emissions of greenhouse gases by reducing energy consumption?	Climatic factors
3. Climate change adaptation	**10. Manage Climate Change**: Implement a managed response to the unavoidable impacts of climate change, ensuring that the design and planning process takes into account predicted changes in Birmingham's climate including flood risk.	• Minimise the risk of flooding from rivers and watercourses to people and property? • Reduce the risk of damage to property from storm events? • Protect, enhance and extend green infrastructure resources? • Address climate change adaptation for biodiversity fragmentation?	Climatic factors
4. Historic environment, landscape, biodiversity and geodiversity	**12. Built and Historic Environment**: Value, protect, enhance and restore Birmingham's built and historic environment and landscape.	• Protect and enhance features of built and historic environment and landscape?	Cultural heritage
	13. Natural Landscape: Value, protect, enhance and restore Birmingham's natural landscape.	• Safeguard and enhance the character of the local landscape and local distinctiveness? • Improve the landscape quality and character of the countryside?	Landscape
	14. Biodiversity: Value, protect, maintain, restore and re-create local biodiversity and geodiversity.	• Use approaches that improve the resilience of natural systems such as linking fragmented habitats where possible? • Conserve and enhance natural/semi-natural habitats and conserve and enhance species diversity? • Lead to habitat creation delivering BAP priorities?	Biodiversity, flora and fauna
5. Pollution	**15. Air Quality**: Minimise air pollution levels and create good quality air.	• Improve air quality? • Reduce CO_2 emissions?	Air
	16. Water Quality: Minimise water pollution levels and create good quality water.	• Improve water quality?	Water
	17. Soil Quality: Minimise soil pollution levels and create good quality soil.	• Maintain and enhance soil quality? • Minimise the loss of soils to development?	Soil
	18. Noise: Minimise noise pollution levels.	• Reduce noise pollution?	Human health

SA Theme	SA Objectives	Guide Questions for the SA Will the Birmingham Development Plan help to…	Principal SEA Directive Topic
		• Propose mitigation measures to minimise noise pollution?	
6. Economic growth	**20. Economy and Equality**: Achieve a strong, stable and sustainable economy and prosperity for the benefit of all of Birmingham's inhabitants.	• Encourage and support a culture of enterprise and innovation, including social enterprise? • Improve business development and enhance competitiveness? • Promote growth in key sectors? • Reduce unemployment, especially amongst disadvantaged groups?	Population
	21. Learning and Skills: Promote investment in future prosperity, including ongoing investment and engagement in learning and skills development.	• Ensure that Birmingham's workforce is equipped with the skills to access high quality employment opportunities suited to the changing needs of Birmingham's economy whilst recognising the value and contribution of unpaid work?	Population
7. Communities, healthy lifestyles and equality	**11. Sense of Place**: Encourage land use and development that creates and sustains well-designed, high quality built environments that incorporate green space, encourage biodiversity, and promote local distinctiveness and sense of place.	• Improve the satisfaction of a diverse range of people with the neighbourhoods where they live?	Population
	19. Social and Environmental Responsibility: Encourage corporate social and environmental responsibility, with local organisations and agencies leading by example.	• Encourage local stewardship of local environments, for example enabling communities to improve their neighbourhoods? • Encourage good employee relations and management practices? • Encourage ethical trading?	Population
	22. Community Involvement: Enable communities to influence the decisions that affect their neighbourhoods and quality of life.	• Encourage local stewardship of local environments, for example enabling communities to improve their neighbourhoods? • Encourage engagement in community activities for example through the establishment of social and cultural facilities that address the needs of equalities groups? • Increase the ability of people to influence decisions?	Population
	23. Equality: Ensure easy and equitable access to services, facilities and opportunities, including jobs and learning.	• Promote environmental justice, recognising that deprived areas and disadvantaged communities are more likely to be affected by environmental damage and degradation? • Ensure that people are not disadvantaged with regard to ethnicity, gender, age, disability, faith, sexuality, background or location?	Population
	24. Poverty: Address poverty and disadvantage, taking into account the particular difficulties of those facing multiple disadvantage.	• Promote environmental justice, recognising that deprived areas and disadvantaged communities are more likely to be affected by environmental damage and degradation? • Reduce household poverty, especially the	Population

SA Theme	SA Objectives	Guide Questions for the SA Will the Birmingham Development Plan help to…	Principal SEA Directive Topic
		proportion of children living in poor households?	
	25. Health: Improve health and reduce health inequalities by encouraging and enabling healthy active lifestyles and protecting health.	• Provide equitable access to health services? • Provide sufficient areas of accessible natural greenspace?	Human health
	26. Crime: Reduce crime, fear of crime and antisocial behaviour.	• Reduce crime? • Reduce the fear of crime amongst all social and cultural groups?	Population
	28. Culture/Sport/Recreation: Improve opportunities to participate in diverse cultural, sporting and recreational activities.	• Encourage participation in sport and cultural activities for all the diverse communities in Birmingham?	Population
8. Housing	**27. Housing**: Provide decent and affordable housing for all, of the right quantity, type, tenure and affordability to meet local needs.	• Reduce homelessness? • Increase the range and affordability of housing for all social and cultural groups? • Reduce the number of unfit homes?	Material assets

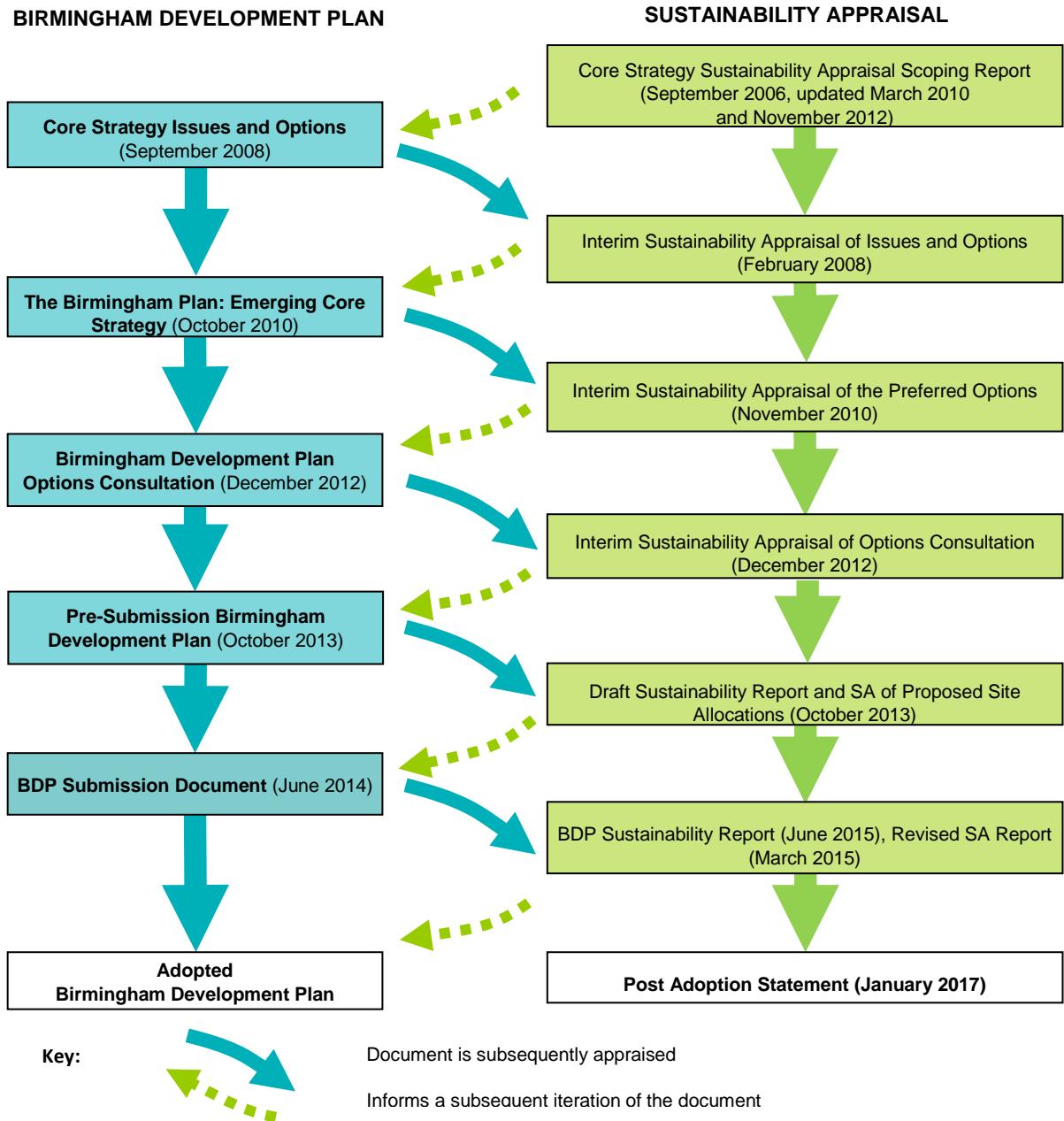## 3. How the Environmental Report has been taken into account

1. The Sustainability Appraisal of the BDP recommended a series of measures to help reduce or avoid potential adverse effects and maximise beneficial effects of the BDP. At each stage of preparation of the Plan, the findings of the Sustainability Appraisal were taken into account to inform the development of policies and proposals.

2. The Environmental Report presented recommendations at the following stages:

   a. Sustainability Appraisal Scoping Report (2006, revised 2010 and 2012)

   b. Interim Sustainability Appraisal of the Issues and Options (February 2008)

   c. Interim Sustainability Appraisal of the Preferred Options (November 2010)

   d. Interim Sustainability Appraisal of Options Consultation (December 2012)

   e. Interim Sustainability Appraisal of Proposed Site Allocations (October 2013)

   f. BDP Sustainability Report (June 2015) (Revised March 2015)

3. The recommendations, which involve changes to the wording of policies and other text, are set out in **Appendix A** alongside an explanation of how these recommendations have been taken into account.

4. How the opinions raised during consultation have been taken into account

1. The role of the Sustainability Appraisal is to inform the decision making process during the development of the Plan, by providing information on likely sustainability effects. Whilst there is a statutory requirement to consider the results of the Sustainability Appraisal, there is no legal duty to select the most sustainable option as it is acknowledged that there are other factors to consider.

2. There were six stages of consultation on the Sustainability Appraisal, illustrated in Figure 4.1.

3. **Appendix B** sets out the main points raised by consultees and shows how these were responded to as part of the evolution of the BDP and the Sustainability Appraisal.

Figure 4.1: The Evolution of the BDP and its Sustainability Appraisal

BIRMINGHAM DEVELOPMENT PLAN

SUSTAINABILITY APPRAISAL

Core Strategy Issues and Options (September 2008)

Core Strategy Sustainability Appraisal Scoping Report (September 2006, updated March 2010 and November 2012)

The Birmingham Plan: Emerging Core Strategy (October 2010)

Interim Sustainability Appraisal of Issues and Options (February 2008)

Birmingham Development Plan Options Consultation (December 2012)

Interim Sustainability Appraisal of the Preferred Options (November 2010)

Pre-Submission Birmingham Development Plan (October 2013)

Interim Sustainability Appraisal of Options Consultation (December 2012)

BDP Submission Document (June 2014)

Draft Sustainability Report and SA of Proposed Site Allocations (October 2013)

Adopted Birmingham Development Plan

BDP Sustainability Report (June 2015), Revised SA Report (March 2015)

Post Adoption Statement (January 2017)

Key: Document is subsequently appraised

Informs a subsequent iteration of the document

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5. Reasons for choosing the Plan as adopted, in light of other alternatives dealt with

1. The BDP is a growth and regeneration-led strategy focusing on the transformation of a number of growth areas throughout the City, complemented by strategic allocations which meet specific needs. The housing need of approximately 89,000 dwellings over the plan period is to be delivered through provision for 51,000 dwellings within the City boundary and the remainder through agreement with adjacent authorities. Employment growth, retail development and other supporting uses are also to be provided for.

2. Proposed development sites have come forward through the periodically reviewed SHLAA[2], have existing planning permission or are allocations, and are of varying character, being principally brownfield but also using greenfield land to meet specific needs. Green Belt options have been tested in the Options Consultation (October 2012) and again through the Green Belt Assessment (October 2013) which has been prepared in light of additional survey work to test their relative merits, as well as analysis in the Sustainability Appraisal. Only those sites within Birmingham's administrative boundary are appraised, notwithstanding the likely need to provide for additional development in the wider City Region to accommodate Birmingham's growth needs.

3. The approach to the distribution of new development seeks to provide a reasonable balance between accommodating growth within the existing urban area (accounting for the majority of the housing and employment requirement), and providing for additional growth requirements through the allocation of greenfield land, using the principles of a sustainable urban extension to guide residential-led development, whilst also allocating land for employment purposes.

4. The Sustainable Appraisal of Options[3] concluded that: "*The various effects associated with each option presents dilemmas in the selection of a preferred solution to the demands for growth of the City associated with projected population increase. The baseline strategy of accommodating growth within the existing urban envelope using sustainable neighbourhoods as the focus for development remains, but needs to be modified through additional land allocation. Over-intensification of the existing urban area threatens not only quality of life (notably through the erosion of limited open space resources and over-burdening of services), but also the capacity of the City to respond to future economic growth where employment land is used for housing. The appraisal concludes that, notwithstanding issues associated with loss of greenfield land and effects on nature conservation and cultural heritage, a sustainable urban extension on land to the north east of the City presents a relatively sustainable solution to accommodating the additional housing required.*"

5. The proposed growth areas, strategic sites and other sites all demonstrate a relatively strong sustainability performance, being located in relative proximity to existing transport and service infrastructure whilst providing opportunities for incorporating measures which will help to mitigate impacts, such as best practice design delivering energy efficient development, green infrastructure and on the larger sites renewable energy generation and distribution.

6. The proposed Sustainable Urban Extension (SUE) and employment site to the north east of Birmingham were subject to the consideration of reasonable alternatives in respect of size and specific location. It was determined that a development of around 5,000 dwellings at Langley (compared to larger and smaller alternatives) would offer the greatest certainty in respect of:

- More predictable housing delivery rates within a reasonable timescale with associated infrastructure provision linked to clear trigger points.
- Lower cumulative impacts on landscape, biodiversity and cultural heritage.
- Preferable to a series of small sites as can be masterplanned as a single development with appropriate infrastructure provision.

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[2] Birmingham City Council (2015) Strategic Housing Land Availability Assessment (SHLAA)
https://www.birmingham.gov.uk/downloads/download/360/strategic_housing_land_availability_assessment_2015
[3] Sustainability Appraisal of Options Consultation (October 2012)

7. The chosen site at Langley offers advantages in respect of:

- Relatively low landscape impacts, being a mixture of medium and low sensitivity to residential development.
- Relative proximity to the provision of higher order services.
- Best performance in respect of transport accessibility (by all modes of transport), sustainability (accessibility to facilities only by walking, cycling and public transport), and transport capacity (albeit with impacts on some significant junctions on the A38 and Heartlands Spine Road).

8. Alternatives offered comparatively poor performance in respect of:

- Relatively greater landscape and biodiversity impacts.
- Relatively poor transport accessibility (by all modes of transport), sustainable access (to facilities only by walking, cycling and public transport), and transport capacity.
- Relative remoteness from higher order services.

9. Concentration of the majority of growth on sustainable neighbourhoods will help to maintain and reinforce community vitality, and absorb pressures for the outward growth of the City. Concentrating development in existing centres provides wider sustainability benefits through limiting the need to travel (particularly cross-town trips), providing alternative travel options based around public transport, walking and cycling, and in so doing reducing air pollution. Potential problems associated with 'town-cramming', such as loss of open spaces and the character of localities can be mitigated through the development and application of policies on design.

10. There may be some site-specific environmental effects associated with the housing allocations, both positive and negative, depending on their location and characteristics, but BDP implementation policies seek to manage impacts and improve environmental performance (such as through energy efficiency and good design) which together will help to realise positive environmental effects. Social impacts are likely to be similarly positive, through the support of existing services and the provision of new ones where appropriate, and wider opportunities for the enhancement of green infrastructure and encouragement of more active modes of travel, for example. The maintenance and enhancement of economic vibrancy across the City is critical, and the allocations seek to provide such opportunities, supporting housing growth and reducing out-commuting.

11. Most of the proposed growth locations and sites demonstrate at worst neutral, but often positive or significantly positive performance in relation to key criteria such as sustainable transport, access to jobs and services and the opportunities to provide for affordable housing. This reflects the location of the proposed developments, largely within the current built-up area, using brownfield land and, using opportunities for regeneration to realise sustainable goals for the City, for example through the creation of sustainable neighbourhoods. Much rests on the quality of design and implementation, however, both in terms of avoiding negative impacts such as over-intensification, but also ensuring that new development makes the most of the potential associated with the provision of renewable energy, for example, or helps to realise green infrastructure improvements which in turn improve access to recreational opportunities.

12. The majority of sites outside the Growth Areas demonstrate a positive (or at worst neutral) performance, with the only potential negative effects relating to possible loss of informal open space or wildlife resources, both of which could be mitigated through masterplanning. On a number of sites, uncertainties exist over potential contamination which could have secondary sustainability effects such as water pollution, although again survey work and site remediation would address such issues. No instances of potential significant negative effects were identified. Overall, the sites perform well in respect of delivering housing and employment in the places where this is likely to be most needed (notably in, or adjacent to, areas of relatively high deprivation) and can contribute to the achievement of sustainable neighbourhoods through the re-use of brownfield land and development of a sense of place through investment and redevelopment.

13. Inevitably, additional development compromises some sustainability objectives, notably atmospheric and noise pollution which are typically associated with traffic generation. However, any disbenefits are outweighed by re-use of brownfield land in the case of the majority of proposed sites, the aspirations for the creation of sustainable neighbourhoods as part of regeneration, and the opportunities for a sustainable urban extension where significant greenfield land release is proposed. Here, the conclusions on the sustainability performance of release of greenfield land for strategic employment uses are more complex, but again to some degree effects can be mitigated through intelligent design.

14. In the case of a sustainable urban extension, whilst significant negative impacts are associated with the irreversible loss of greenfield land, there are significant opportunities to create a development which meets a range of sustainability objectives, *inter alia*: the development of services which meet new and existing needs, sustainable transport infrastructure, green infrastructure, and waste management measures.

15. Overall, the proposed sites contribute to meeting the sustainability aspirations of the BDP and whilst there are predicted negative effects which accompany growth which will require monitoring and perhaps mitigation, particularly at the site level, there should be positive effects.

6. Measures that are to be taken to monitor the likely significant effects of the implementation of the Plan

1. It is a requirement of the SEA Directive to establish how the significant sustainability effects of implementing the plan, programme or strategy will be monitored, helping to:

   - identify the significant effects of the plan;

   - isolate unforeseen effects;

   - ensure that there is action to offset any undesirable significant effects; and

   - provide a baseline for ongoing monitoring of the plan.

2. However, as former guidance on Sustainability Appraisal of RSS and LDDs noted (ODPM 2005): *"it is not necessary to monitor everything, or monitor an effect indefinitely. Instead monitoring needs to be focused on significant sustainability effects"*.

3. Table 6.1 sets out the likely significant sustainability effects identified in the Sustainability Report and suggested indicators for measuring these, many of which correspond with those used in the BDP monitoring framework. Monitoring of the significant environmental effects of the Plan will be published in the Council's Authority Monitoring Report (AMR).

4. Monitoring is required to ensure that the approach set out in the Plan continues to be relevant and effective. Regular monitoring will include analysis of data and trends and reviews of the evidence base and provides the basis to trigger a review of actions, strategies and policies to reflect changing circumstances. These will be incorporated into subsequent reviews of the Birmingham Development Plan and associated Sustainability Appraisal.

Table 6.1: SA Objectives, Likely Significant Effects and Monitoring Indicators

SA Theme	SA Objectives	Likely Significant Effects	Recommended Monitoring Indicator	Applicable BDP/AMR Indicator
1. Natural resources and waste	**1. Resource Use**: Use natural resources such as water and minerals efficiently.	The key effects here concern the relationships between the level of growth proposed in the Birmingham Development Plan and the significant demand for natural resources (minerals, water and land) and the production of waste.	• Number of applications submitted which require a minerals investigation • Number of new homes and commercial developments connected to CHP or other forms of low or zero-carbon energy generation	• TP16 • TP4
	7. Waste Reduction and Minimisation: Encourage and enable waste minimisation, reuse, recycling and recovery.	See above	• Tonnage of waste produced in Birmingham by methods of disposal	• TP13
	8. Efficient use of land: Encourage land use and development that optimises the use of previously developed land and buildings.	See above	• Dwelling completions by greenfield/brownfield location • Dwelling completion by density	• TP28 • TP30
2. CO$_2$ emissions	**2. Sustainable design, construction and maintenance**: Promote and ensure high standards of sustainable resource-efficient design, construction and maintenance of buildings, where possible exceeding the requirements of the Building Regulations.	The City Council is committed to securing reductions in CO$_2$ emissions, with the Sustainable Community Strategy setting a target for a 60% reduction in emissions by 2026. The main source of emissions is likely to come from the built environment and transport, both of which are sources that the Birmingham Development Plan can influence through encouraging the greater co-ordination of where people live and work to reduce the need for commuting. Currently, for example, some 50% of those who live and work in Birmingham commute by car, and this rises to around 75% of those who live outside Birmingham but work in Birmingham.	• Number of new homes meeting zero-carbon standards • Number of commercial developments meeting BREEAM standard excellent (	• TP3
	3. Renewable Energy: Encourage development of alternative and renewable resources.	See above	• Number of new homes and commercial developments connected to CHP or other forms of low or zero-carbon energy generation • Low-carbon initiatives supported	• TP4 • TP5
	4. Energy Efficiency: Reduce overall energy use through energy efficiency.	See above	• Number of existing homes adapted through Birmingham Energy Savers • Number of new homes meeting zero-carbon	• TP3

SA Theme	SA Objectives	Likely Significant Effects	Recommended Monitoring Indicator	Applicable BDP/AMR Indicator
			standards	
			Number of commercial developments meeting BREEAM standard excellent	
	5. Sustainable Transport: Increase use of public transport, cycling and walking as a proportion of total travel and ensure development is primarily focused in the major urban areas, making efficient use of existing physical transport infrastructure.	See above	• Modal split information • Percentage of trips made by cycle • Rail, rapid transit and bus enhancements delivered • Percentage of trips by public transport	• TP38 • TP40 • TP41
	6. Reduce the need to travel: Ensure development reduces the need to travel.	See above	• Changes in journey times • Percentage of major developments meeting specified accessibility standards	• TP45
	9. Reduce climate change: Minimise Birmingham's contribution to the causes of climate change by reducing emissions of greenhouse gases from transport, domestic, commercial and industrial sources.	See above	• Reduction in CO2 emissions from 1990 levels	• TP1
3. Climate change adaptation	**10. Manage Climate Change**: Implement a managed response to the unavoidable impacts of climate change, ensuring that the design and planning process takes into account predicted changes in Birmingham's climate including flood risk.	The City will need to be prepared for a range of potential impacts including increases in flooding, summer droughts and a greater probability of extreme weather events (heat waves and extreme floods for example).	• Number of developments approved against Environment Agency advice in relation to floodrisk	• TP6
4. Historic environment, landscape, biodiversity and geodiversity	**12. Built and Historic Environment**: Value, protect, enhance and restore Birmingham's built and historic environment and landscape.	Historic environment: The key effects here are likely to relate to the impacts of new development and infrastructure on Birmingham's historic environment, including scheduled ancient monuments, listed buildings, conservation areas, registered parks and gardens and canal network which are potentially vulnerable to the pressures of urban intensification.	• Number of designated heritage assets • Number of applications approved adversely affecting or providing positive enhancement to a designated heritage asset or its setting • Number of heritage assets at risk • Number of completed Conservation Area Appraisal and Management Plans	• TP12

SA Theme	SA Objectives	Likely Significant Effects	Recommended Monitoring Indicator	Applicable BDP/AMR Indicator
	13. Natural Landscape: Value, protect, enhance and restore Birmingham's natural landscape.	Landscape: New development is likely have an impact on the City's landscapes both within the existing urban area (parks, gardens and other greenspace) and outside of urban area where greenfield development is required. Within the main urban area the impacts could relate to development pressures on landscape features including parks, gardens and water courses.	• Proposals approved resulting in a loss of green infrastructure • New green infrastructure provided	• TP7
	14. Biodiversity: Value, protect, maintain, restore and re-create local biodiversity and geodiversity.	Biodiversity: The City accommodates a range of designated sites of nature conservation importance and will have other non-designated areas which make an important contribution to biodiversity. This will include both previously developed land and buildings and greenfield sites. New development will have a detrimental impact on ecology and biodiversity where this involves the loss of habitats or leads to activities which will adversely impact on these features. Geodiversity: Concerns the variety of rocks, minerals and landforms and the processes which have informed these features over time. There could be impacts outside of the City in relation to the demand for minerals to build new homes, businesses and infrastructure (explored under SA Theme 1).	• Number of development proposals approved within or adjoining designated sites (SSSIs, NNRs, LNRs, SINCS and SLINCS) • Number and area of designated sites	• TP8
5. Pollution	**15. Air Quality**: Minimise air pollution levels and create good quality air.	Air pollution: The whole of Birmingham was designated an Air Quality Management Area (AQMA) in 2003 to help improve air quality in the City. The main pollutant is nitrogen dioxide (NO_2), arising from both transport and industry.	• Changes in Birmingham's AQMA.	• Reported in AMR
	16. Water Quality: Minimise water pollution levels and create good quality water.	Water pollution: The proportion of Birmingham's waterways which are of a good biological or chemical quality is significantly below national and regional averages.	• Watercourses of good chemical and biological quality.	• Reported in AMR
	17. Soil Quality: Minimise soil pollution levels and create good quality soil.	Soil pollution: Outside of the urban area to the north and north east of the city as well as to the south west are areas of Grade 3 (moderate to good quality) agricultural land which could clearly be impacted on where greenfield development is proposed.	• Number of planning permissions with a condition requiring ground investigation	• Reported in AMR

SA Theme	SA Objectives	Likely Significant Effects	Recommended Monitoring Indicator	Applicable BDP/AMR Indicator
	18. Noise: Minimise noise pollution levels.	Noise pollution: The key effects here are likely to relate to the specific of particular development proposals rather than direct impacts associated with the levels of growth proposed, notwithstanding that an expanded BIA could have a potential impact in terms of increased air traffic over the city.	• Number of planning permissions with noise attenuation condition(s)	• Reported in AMR
6. Economic growth	**20. Economy and Equality**: Achieve a strong, stable and sustainable economy and prosperity for the benefit of all of Birmingham's inhabitants.	The main effect that the Birmingham Development Plan will have on economic growth relates to whether or not it provides a sufficient and flexible supply of employment land and premises, attractive to developers and investors wishing to expand or establish themselves in Birmingham.	• Employment land developed by category • Loss of employment land to alternative uses • Progress towards growth levels for each centre • Major tourism schemes completed/approved	• TP17 • TP20 • TP21 • TP25
	21. Learning and Skills: Promote investment in future prosperity, including ongoing investment and engagement in learning and skills development.	See above	• New school provision completed/approved	• TP36
7. Communities, healthy lifestyles and equality	**11. Sense of Place**: Encourage land use and development that creates and sustains well-designed, high quality built environments that incorporate green space, encourage biodiversity, and promote local distinctiveness and sense of place.	The Birmingham Development Plan will have a range of effects on Birmingham's existing and new communities relating to the new growth that it proposed in terms of meeting people's housing needs and opportunities for employment. It will also impact on their ability to access education, healthcare and other services, considering the capacity of existing facilities and opportunities for enhancement aligned with proposed growth.	• See Monitoring Indicators for BDP Policy PG3	• PG3
	19. Social and Environmental Responsibility: Encourage corporate social and environmental responsibility, with local organisations and agencies leading by example.	See above	• Participation by BIDs in community activity	• Reported in AMR
	22. Community Involvement: Enable communities to influence the decisions that affect their	See above	• Progress on Neighbourhood Development Plans	• Reported in AMR

SA Theme	SA Objectives	Likely Significant Effects	Recommended Monitoring Indicator	Applicable BDP/AMR Indicator
	neighbourhoods and quality of life.			
	23. Equality: Ensure easy and equitable access to services, facilities and opportunities, including jobs and learning.	See above	• Percentage of major developments meeting specified accessibility standards	• TP45
	24. Poverty: Address poverty and disadvantage, taking into account the particular difficulties of those facing multiple disadvantage.	See above	• IMD • Employment levels	• Reported in AMR
	25. Health: Improve health and reduce health inequalities by encouraging and enabling healthy active lifestyles and protecting health.	See above	• Wards falling within the lowest 20% IMD Health Domain.	• Reported in AMR
	26. Crime: Reduce crime, fear of crime and antisocial behaviour.	See above	• Recorded crime levels.	• Reported in AMR
	28. Culture/Sport/Recreation: Improve opportunities to participate in diverse cultural, sporting and recreational activities.	See above	• Percentage of population within distance thresholds to open space • Open space/playing fields/allotments/sports facilities lost to development • New open space/playing fields/allotments/sports facilities created	• TP9
8. Housing	**27. Housing**: Provide decent and affordable housing for all, of the right quantity, type, tenure and affordability to meet local needs.	The key effects relate to whether or not the Birmingham Development Plan will provide enough housing, in the right locations and of the right type. There will need to be a suitable supply of both market and affordable housing to meet the needs of existing and new residents. The availability of housing also has significant linkages with economic growth, in terms of providing local housing to house the labour force. A failure to provide sufficient housing within the City to support economic growth could lead to unsustainable travel patterns with high levels of 'in-commuting' and undermining self-containment or, as a worst case, the decline of the City's economy.	• Annual net dwelling completions • Completions by dwelling types (apartment/house) • Affordable housing completions by tenure and delivery mechanism • Net/gross completions within housing regeneration areas	• TP29 • TP30 • TP31 • TP32

Appendix A: Recommendations made as part of the Sustainability Appraisals

Recommendations from the Interim Sustainability Appraisal Report [Issues and Options] (November 2009) and the BCC response

Topic	Recommendations	BCC Response
Spatial Vision	Amend the spatial vision to more explicitly identify the need to deliver both adaptation to, and mitigation of, future climate change. This will help to substantiate the overarching context for responding to climate change.	The Vision contains the statement that: *"The City will have achieved high sustainability credentials with resilient, adaptive environments with all new developments built to high standards of design."*
Climate Change	Revise wording of spatial objective 2 to reflect climate change adaptation, mitigation and an efficient use of resources.	Contained within Objective 6: *"To create a more sustainable City that minimises its carbon footprint and waste while allowing the City to grow."*
Resource Use	Provide core policies which require an efficient use of resources (minerals, water and land), minimise waste and maximise recycling	Polices: TP13 Sustainable management of the City's waste TP14 New and existing waste facilities TP15 Location of waste management facilities
CO2 emissions	Consider how CO_2 emissions can be reduced by reducing the need to travel and achieving a modal shift, particularly in respect of car use.	Policies TP1 Reducing the City's carbon footprint TP26 Sustainable neighbourhoods TP37 A sustainable transport network TP38 Walking TP39 Cycling TP40 Public transport TP41 Freight TP42 Low emission vehicles TP43 Traffic and congestion management
Zero and low-carbon energy	Make provision for zero and low carbon energy systems and infrastructure at a 'strategic' scale, helping to reduce the City's depending on fossil fuels for meeting energy needs.	Policies: TP1 Reducing the City's carbon footprint TP2 Adapting to climate change TP3 Sustainable construction TP4 Low and zero carbon energy generation TP5 Low carbon economy
Energy efficiency	Increase energy efficiency within the built environment and providing for on-site renewables, helping to minimise demand for energy associated with new development.	As above
Climate change	Consider the impacts of climate change at a 'strategic' level to enable appropriate responses in Core Strategy, thus helping to ensure that Birmingham is resilient to future climate change, which could impact on the health and well-being of the City's residents.	Policies: TP2 Adapting to climate change TP3 Sustainable construction
Environmental protection and enhancement	Provide core policies for the protection and enhancement of the historic environment, landscape, biodiversity and geodiversity.	Policies: TP7 Green infrastructure network TP8 Biodiversity and geodiversity TP9 Open space, playing fields and allotments TP12 Historic environment

Topic	Recommendations	BCC Response
Landscape capacity	Consider landscape capacity within and on the edge of the City to accommodate new development.	Policies: PG3 Place making GA5 Langley Sustainable Urban Extension GA6 Peddimore
Biodiversity	Consider how biodiversity could be enhanced at a strategic level.	Policies: TP7 Green infrastructure network TP8 Biodiversity and geodiversity
Impacts on natural resources	Provide a Core Strategy policy/policies requiring development proposals to demonstrate their impacts on air quality, noise, water quality and soils.	Policies: TP3 Sustainable construction TP4 Low and zero carbon energy generation TP13 Sustainable management of the City's waste
Employment land	Develop a Core Strategy policy which seeks to protect sufficient employment land to provide a diversity of supply in locations which meet the needs of local communities. This will help to ensure that the City is able to facilitate economic growth, with a range of opportunities for employers and businesses to start-up and grow	Policies: TP16 Portfolio of employment land and premises TP17 Regional Investment Sites TP18 Core Employment Areas TP19 Protection of employment land TP25 Local employment
Service capacity	Consider the capacity of existing services and facilities, the demand associated with new growth and the potential for a CIL type approach to securing funding for future improvements. This will help to ensure that the community benefits that can be derived from new development are maximised.	Chapter 10: Implementation
Local housing needs	Within the allocation of housing, pay close attention to local needs, perhaps through area-specific policies which reflect the character of the locality which will be receiving housing growth, thereby helping to ensure that new housing provision meets the needs of Birmingham's communities.	Policies: TP26 Sustainable neighbourhoods TP27 The location of new housing TP28 The housing trajectory TP29 The type, size and density of new housing TP30 Affordable housing TP31 Housing regeneration

Recommendations from the Interim Sustainability Appraisal Report [Preferred Options] (November 2010) and the BCC response

Topic	Recommendation	BCC Response
Growth	Notwithstanding the likely negative effects associated with some SA Objectives, overall this policy group is effective in communicating intentions and identifying appropriate mitigation, but could be strengthened by reference in SP1 to quality of life issues as part of growth; cross-referencing to other policies in SP3 along with the re-ordering of the bullet points to reflect the structure of the document; and specification in SP4 of the relationships of the SUNs with the rest of the City.	Approach now centered on Policy PG3 Place making. SUNs approach now contained within Policy TP26 Sustainable neighbourhoods
Climate Change	Whilst the suite of policies are in the main complementary to one another, they would benefit from more cross-referencing (particularly between SP7, 8 & 9), along with clarification in the supporting text of SP7 as to why this BREEAM target has been adopted. A justification should be provided in the supporting text to Policy SP8 for the thresholds set out in the policy in order to help demonstrate that the policy is deliverable.	Climate change policies revised within: TP1 Reducing the City's carbon footprint TP2 Adapting to climate change

Topic	Recommendation	BCC Response
	Policy SP11 (GI Network) contributes positively to a number of objectives, however given that it is set within the Climate Change policy section within the Plan, it's role in delivering climate change benefits could be strengthened. Indeed, the supporting text only makes specific mention of climate change mitigation as the penultimate point in the list of GI benefits. The supporting text could be made stronger by setting out the benefits of GI in adapting to and mitigating against climate change together with other recreational and amenity benefits. Existing benefits listed could be related to climate change where appropriate. As the policy has wider sustainability benefits beyond climate change it would benefit from cross-referencing to other policies/ issues. This could include connectivity within the City, biodiversity, sport and recreation and city character. At present there is no information indicating how the GI network has been defined and ideally there should be reference to a proposals map, the evidence base and perhaps a City-wide network map. We note that a "Green Infrastructure evidence base for Birmingham" has been produced and there would be benefit in referring to this in the supporting text to provide further justification for the policy.	TP3 Sustainable construction TP4 Low and zero carbon energy generation TP5 Low carbon economy Green Infrastructure Policy TP7 Green infrastructure network, including cross-referencing and mapping.
Employment	Whilst the package of new employment land proposals and protection of key employment areas is likely to be beneficial overall, greater clarification is needed on how the benefits will be spread City-wide and complement other policy aspirations, an issue which could be related to the need for greater spatial definition of their extent and influence.	Specific proposals and spatial definition contained within Policies: TP16 Portfolio of employment land and premises TP17 Regional Investment Sites TP18 Core Employment Areas TP19 Protection of employment land
Centres	Greater cross-referencing with supporting policies would be helpful, particularly in respect of transport and connectivity, along with the relationship between these policies and the creation of Sustainable Urban Neighbourhoods. Further supporting text regarding the justification for the hierarchy of centres would be beneficial. Will, for example, SUNs merit special treatment in respect of these policies such that Policy SP4 can be delivered? Should there be a stronger policy to encourage small independent retailers in deprived neighbourhoods and areas of BME concentration? Should there be a stronger set of criteria for limiting/allowing the permission of non-retail uses?	Centres approach defined within Policies: TP20 The network and hierarchy of centres TP21 Convenience retail provision TP22 Small shops and independent retailing TP23 Promoting a diversity of uses within centres
Housing	Reference to SUNs, perhaps in SP24, would be helpful in demonstrating an integrated approach to housing strategy across the City, anticipating future approaches to its spatial character. The justification for the approach to affordable housing in SP27 should be set out more clearly in the supporting text. There should be a more explicit statement on encouraging community facilities to be developed within new housing areas of a certain size. Consider setting a target for social-rented housing.	SUNS approach superseded. Approach now within Policies: TP26 Sustainable neighbourhoods TP27 The location of new housing
Housing Environment	The justification for the housing density targets set out in Policy SP31 should be explained in the supporting text. For Policy 32 further explanation should be given regarding mix and tenure of replacement housing and whether balanced communities can be encouraged when municipal housing estates are renewed without a loss of social housing.	The approach to housing is set out in Policies TP29 The type, size and density of new housing TP30 Affordable housing TP31 Housing regeneration
Connectivity	Further consideration should be given to the relationship between Policy SP34 and SP17 and additional supporting text provide to show how these policies can be implemented effectively together. Further justification of the accessibility standards set out in SP36 should be provided in the supporting text including consideration as to whether they are appropriate across all parts of the City. -	The approach to integrated transport provision is set out in Policies: TP37 A sustainable transport network

Topic	Recommendation	BCC Response
	SP41 could cover cycling as well as pedestrians also providing some links to Green Infrastructure.	TP38 Walking TP39 Cycling TP40 Public transport
Waste	Policy SP42 should be reworded to clarify the approach to the waste hierarchy in Birmingham. This includes adding reference to energy recovery as an alternative to landfill when re-use, recycling and composting is not possible. Further clarity as to what is meant by "disposal" capacity in this policy should be provided. Ideally this group of policies should set out in quantitative terms the likely capacity requirements which are referred to. Further justification of the approach should be set out in the supporting text.	The approach to waste management is contained within Policies: TP13 Sustainable management of the City's waste TP14 New and existing waste facilities TP15 Location of waste management facilities
Cultural Facilities	Policy SP45 would benefit from further detail regarding the quality standards to be applied, the approach to open space in new developments where on-site provision is not feasible. The supporting text should provide greater justification for the policy thresholds and also outline the links to other relevant policies particularly green infrastructure. There could be more detail on the specification of accessibility standards for open space sufficient for all equality groups.	Provision specified in Policies: TP7 Green infrastructure network TP9 Open space, playing fields and allotments TP11 Sports facilities
Natural and Cultural Resources	Greater use of cross-referencing amongst policies would clarify how these policies are to be implemented together, particularly in helping to realise aspirations for Green Infrastructure (SP11), for example, SUNs (SP4) and the City-wide centres approach (SP17 & 18). The key principles for urban design should include more detailed points on accessibility for disabled people, and parents/carers, and also on community safety. Reference to Secure by Design and the appropriate guidelines on disability access would be useful. Cross-referencing to policies that encourage walking and cycling as a transport mode should be included in SP48 as this will help tackle obesity and encourage healthier lifestyles. A reference (either here or in SP52) on encouraging safe routes to school would be beneficial for school children.	Policies considered to be suitably cross-referenced and detail on building design e.g. for the disabled with be included with the Development Management Policies DPD.
Area Focused Policies	Further appraisal of the policies set out in Chapter 6 should be carried out taking account of the issues set out below. Whilst sustainable development is aspired to City-wide, the practical expression of these in the area-specific policies is focused on the creation of Sustainable Urban Neighbourhoods. Their definition in principle supports the objectives set for sustainable development, but equally raises a number of points of clarification that would assist their definition and help to better explain how and why this policy initiative is an appropriate response. The following questions summarise these matters: • Why are not all SUNs centred on public transport corridors? • What is the rationale behind the location of SUNs in the context of their area location? • How have the boundaries for SUNs been drawn? • What distinguishes the SUN from its surrounding urban context? • What are the key relationships between the SUNs and adjacent centres in terms of functional relationships e.g. retailing and travel to work? As agreed with Birmingham City Council this report does not specifically consider whether there are reasonable alternatives to the policies put forward in Chapter 6. This analysis would need to be undertaken before completing the SA process to ensure that other relevant options are appraised. Without this information it is	SUNS approach superseded. Approach now within Policies: TP26 Sustainable neighbourhoods

Topic	Recommendation	BCC Response
	not clear on what basis the preferred policy options have been selected. It is therefore recommended that a more detailed appraisal of the policies, including any relevant options, will be undertaken during the next iteration of the Plan following public consultation.	

Recommendations from the Interim Sustainability Appraisal of Proposed Site Allocations (October 2013) and the BCC response

Topic	Recommendation	BCC Response
Strategic approach to major development proposals	The need to avoid piecemeal development which could miss the opportunities associated with improving the sustainability of localities in general through the use of sustainable transport networks, for example. This entails all major development being strategy and masterplan-led, with clear references to their wider context and to the opportunities for synergies between adjacent areas.	Noted – issue to be considered within the policies of the submission BDP.
Design of new development	Close attention to design issues of areas and buildings will be critical in ensuring that high standards are achieved in practice, particularly in respect of ensuring the energy efficiency of new buildings, using opportunities to incorporate district heating networks, cycle and footpaths, and the incorporation of green infrastructure which serves multiple purposes.	Noted – issue to be considered within the policies of the submission BDP.
Topic-specific guidance on key sustainability matters	The use of City-wide initiatives to reinforce sustainability policies and practice e.g. through topic-specific SPGs and strategies such as for green infrastructure and nature conservation, could be helpful in developing a rounded approach to sustainable neighbourhoods in particular, but also the progression of the City on a more sustainable path. Work should progress on the development of detailed approaches to the enhancement of green infrastructure/biodiversity (advancing the Green Living Spaces Strategy), recreation, sustainable transport and access, local economic development and renewable energy.	Noted – issue to be considered within the policies of the submission BDP.
Linking housing and service provision with job creation	Clear links between housing and service provision and job creation as part of the concept of 'sustainable neighbourhoods' need to be established. Further work is required on establishing the form and function of such areas, in particular what changes to their current structure are needed to help create the conditions for more sustainable living and their integration with adjacent areas.	Noted – issue to be considered within the policies of the submission BDP.

Recommendations from the Sustainability Appraisal Report (June 2014) and the BCC response

Topic/BDP Section	Recommendation	BCC Response
VISION, OBJECTIVES and STRATEGY		
BDP Vision	No recommendations	NA
Strategic Objectives	The BDP Objectives has been appraised against the SA Objectives and found to be broadly compatible. Where potential incompatibilities exist, these are inherent (for example between growth and resource	NA

Topic/BDP Section	Recommendation	BCC Response
	use), or can be mitigated through the implementation of policies throughout the plan (for example in relation to the promotion of sustainable neighbourhoods as part of housing growth).	
Strategy	No recommendations, apart from close monitoring of the impacts of policy implementation in order to ensure that this is effective and meeting the aspirations set out in the objectives and strategy.	NA
PLANNING FOR GROWTH		
PG1: Overall Levels of Growth **PG2: Birmingham as an International City** **PG3: Place Making**	Notwithstanding some potential negative effects associated with some SA Objectives, overall this policy group is effective in communicating the intentions of sustainable growth across Birmingham which will drive the delivery of the Plan's vision and objectives. In doing so, there is perhaps opportunity to cross reference policies or groups of policies which will help to deliver these intentions, such as the intention to create sustainable neighbourhoods (Policy TP26) which reflect and translate many of the growth aspirations. PG1: Reference in the policy to the role of regeneration and the creation of sustainable neighbourhoods would be a useful addition. PG2: The policy might be strengthened through the addition of reference to the importance of protecting the existing environmental qualities of the City. PG3: The policy might benefit from reference to the creation of 'sustainable neighbourhoods' (TP26) and defining precisely how these might look and function.	PG1 – sustainable neighbours covered in PG3 PG2 – environmental quality is covered in PG3 PG3 – cross-reference inserted
SPATIAL DELIVERY OF GROWTH		
GA1: City Centre **GA2: Greater Icknield** **GA3: Aston, Newtown and Lozells** **GA4: Sutton Coldfield Town Centre** **GA5: Langley Sustainable Urban Extension** **GA6: Peddimore** **GA7: Bordesley Park** **GA8: Eastern Triangle** **GA9: Selly Oak and South Edgbaston** **GA10: Longbridge**	The AAP and masterplan-led approach to these areas provides significantly more detail on implementation and the balancing of economic, social and environmental objectives. Nevertheless, greater emphasis in this suite of policies needs to be placed on achieving balanced growth that is ensuring that strong and rapid change does not cause undesirable side-effects such as the compromising of environmental quality. This is particularly the case with the City Centre but also applies to other growth areas on a lesser scale and in different ways where particular issues such as greenspace or air quality could be prominent. Cross-referencing to selected implementation policies would therefore be beneficial as well as re-assurance over the monitoring of key effects such as the provision of greenspace as part of new development. GA1: The dangers of benefits not spreading to deprived communities must be recognised, as should the need to ensure that environmental enhancement accompanies economic growth and physical change, and the role of independent retailing in adding to character to the City. The policy could be strengthened by reference to these issues. GA4: The policy could perhaps be improved through reference to environment and design quality, sense of place and synergy with the overall strategy of the BDP. GA9: The policy could useful include reference to how	GA1 – environmental enhancement references inserted GA4 – references made to environment and design quality in policy and supporting text GA9 – noted in supporting text

Topic/BDP Section	Recommendation	BCC Response
	the area might function in combination with the intended investment into the City Centre.	
ENVIRONMENT AND SUSTAINABILITY		
TP1: Reducing the City's Carbon Footprint **TP2: Adapting to Climate Change** **TP3: Sustainable Construction** **TP4: Low and Zero Carbon Energy Generation** **TP5: Low Carbon Economy** **TP6: Managing Flood Risk** **TP7: Green Infrastructure Network** **TP8: Biodiversity and Geodiversity** **TP9: Open Space, Playing Fields and Allotments** **TP10: Green Belt** **TP11: Sports Facilities** **TP12: Historic Environment** **TP13: Sustainable Management of the City's Waste** **TP14: New and Existing Waste Facilities** **TP15: Location of Waste Management Facilities** **TP15A: Minerals**	Whilst this suite of policies is in the main complementary to one another, they would benefit from more cross-referencing demonstrating key relationships, between Green Infrastructure and climate change for example. The supporting text of Policy TP9 (Open Space, Playing Fields and Allotments) would benefit from further clearer links to Policy TP7 (Green Infrastructure) (and vice versa) in order to help demonstrate how these closely related policies are related and need to be delivered together. Ideally this group of policies should set out in quantitative terms the likely capacity requirements which are referred to. Further justification of the approach should be set out in the supporting text.	TP9 – GI referenced in supporting text
ECONOMY AND NETWORK OF CENTRES		
TP16: Portfolio of Employment Land and Premises **TP17: Regional Investment Sites** **TP18: Core Employment Areas** **TP19: Protection of Employment Land** **TP20: The Network and Hierarchy of Centres** **TP21: Convenience Retail Provision** **TP22: Small Shops and Independent Retailing** **TP23: Promoting a Diversity of Uses within Centres** **TP24: Tourism and Tourist Facilities** **TP25: Local Employment**	Whilst the package of new employment land proposals and protection of key employment areas is likely to be beneficial overall, greater clarification would be helpful on how the benefits will be spread City-wide and complement other policy aspirations. Reference to partner strategies on education and social inclusion could be helpful in this regard, as would cross-referencing of policies, for example in relation to tourism and environmental protection. TP18: The interaction with other policies for employment provision (notably TP16, TP17 and TP10) could perhaps be identified. TP19: The interaction with other policies for employment provision (notably TP16, TP17, TP18 and TP25) could perhaps be identified. TP20: The relationship with complementary policies such as TP16, TP23. TP25 and TP26 could be referenced to identify the importance of a strategic overview of the type and location of employment provision. What, for example, might be the implications of City Centre growth and how is the competition between centres such as Longbridge and Northfield likely to be managed to ensure the sustainable growth of each? TP21, 22 & 23: The policies could perhaps be	TP18 – cross-referencing made. TP19 – cross-referencing made. TP20 – references considered to be sufficient. TP21, 22 & 23 – cross-referencing made.

Topic/BDP Section	Recommendation	BCC Response
	enhanced through reference to the promotion of sustainable neighbourhoods.	
HOMES AND NEIGHBOURHOODS		
TP26: Sustainable Neighbourhoods **TP27: The Location of New Housing** **TP28: The Housing Trajectory**	Reference to Sustainable neighbourhoods in all related policies would be helpful in demonstrating an integrated approach to housing strategy across the City, anticipating future approaches to its spatial character. TP26: What the policy currently doesn't do and which might be strengthened by is reference to strategies for the delivery of these aspirations, sectorally and spatially. In principle, many of the proposed regeneration areas (Aston, Bordesley, Icknield Loop, Eastern Triangle) could pioneer some of the initiatives, although much will depend upon available investment.	TP26 – cross-referencing to criteria in policy and supporting text considered sufficient.
TP29: The Type and Size of New Housing **TP30: Affordable Housing** **TP31: Housing Regeneration** **TP32: Student Accommodation** **TP33: Provision for Gypsies, Travellers and Travelling Showpeople** **TP34: The Existing Housing Stock** **TP35: Education** **TP35: Health**	Further explanation could be given regarding mix and tenure of replacement housing and whether balanced communities can be encouraged when municipal housing estates are renewed without a loss of social housing.	TP29 – references within policy and supporting text
CONNECTIVITY		
TP37: A Sustainable Transport Network **TP38: Walking** **TP39: Cycling** **TP40: Public Transport** **TP41: Freight** **TP42: Low Emission Vehicles** **TP43: Traffic Congestion and Management** **TP44: Accessibility Standards for New Development** **TP45: Digital Communications**	Further consideration should be given to how the connectivity policies are likely to work in concert and with other policies throughout the Plan to achieve more sustainable outcomes for the BDP as a whole. For example, could the policy relating to cycling be linked to those on green infrastructure, health promotion and sustainable communities? Reference to clear strategies which will help to deliver the goals of sustainable transport policies would be helpful in promoting an integrated, City-wide approach. TP39: The policy could benefit from cross-referencing with other Policies such as TP25: Sustainable Neighbourhoods and the range of policies on encouraging sustainable transport. TP40: Implementation of the policy will be of particular importance in realising Sustainable Neighbourhoods and to this end cross-referencing to Policy TP26 would be helpful in demonstrating an integrated approach.	TP39 – references to employment made in the supporting text TP40 – neighbourhood references considered to be sufficient

Appendix B: Consultation Responses and how these comments were addressed in the Environmental Report

Sustainability Appraisal of the Birmingham Development Plan with Main Modifications (October 2015): Key Representation Issues and BCC Responses

Summary Issue	BCC Response
Underestimation of OAHN and consequent effects on the SA.	The finalisation of the OAHN and its wider implications is a separate matter to be dealt with via other components of the evidence base. In addition, changes to the quantum of development need (within reasonable limits) would have no material effect on the judgements made within, and outcomes of, the Sustainability Appraisal which concludes that the proposed strategy for accommodating growth is a relatively sustainable one.
No SA of overspill.	It is unreasonable to expect that this SA should try and appraise the significant effects of a quantum of 'over-spill' development in neighbouring authorities which is yet to be agreed and distributed and which in any case will be appraised through individual development plans where the effects can be fully considered. It is understood that a Sustainability Appraisal of the HMA housing distribution has been commissioned to address this issue.
The SA seeks to justify existing strategy.	The Sustainability Appraisal has been undertaken by consultants on behalf of BCC and the outputs reflect their professional judgement. It is the role of the SA is to appraise the proposed Plan strategy and site allocations (including reasonable alternatives). In doing so, the appraisal does not seek to justify the proposed strategy *per se*, but report on the likely significant effects against reasonable alternatives. This has been done in a logical sequence of steps. The acceptability of the outcomes for those with specific site interests may not be the 'answer' that they hoped for, but the appraisal in testing their <u>relative</u> performance (as summarised in Table 5.1 p.80), does not dismiss any of the 'competing' sites as unsustainable but seeks to highlight their respective merits and drawbacks. At no point have objectors to the BDP strategy and its SA suggested that competing sites should be developed <u>instead</u> of those proposed (for example area B instead of area C as the site for a SUE). The argument of those with development interests to promote appears to be solely for additional development on the basis of overall housing need and market deliverability, either through a much larger development or some combination of smaller sites. This begs the question of why the SA is the focus of criticism when it demonstrates quite plainly that the proposed strategy on balance represents the most sustainable solution in the current circumstances and that changes to those circumstances, notably future reviews of development need and capacity, are likely to prompt further site evaluation. There appears to be confusion in the mind of objectors to the SA over the issue of site suitability and development timing. Conversely objectors to the principle of any Green Belt release appear not to have traced the evolution of the BDP and its SA which explored the issues associated with further intensification of development in the existing urban area and the balance to be struck between this, greenfield land release and seeking the accommodation of development need beyond the City's boundaries.
Scale of appraisal is too broad brush, with smaller options dismissed without justification. Smaller options need to be justified as reasonable alternatives which can be appraised to the same level of detail as the 5k and 10k scenarios.	See above. In addition, the Sustainability Appraisal is proportionate to the strategic nature of the Plan and the reasonable alternatives are appraised on that basis. The selection of the range of alternatives appraised in RSA2, including their wording (for example "around 5,000 dwellings" and "up to 10,000 dwellings") reflects this strategic approach. Appendix B sets out the evaluation of different scales of development, and as part of this exercise smaller options were clearly identified as placing additional pressure on existing infrastructure and services and being too small to accommodate a SUE. All site options have therefore been appraised to the same level of detail, using the same evidence base. Again, whilst those with specific site interests might wish to challenge the various professional judgements made against the available evidence, all sites have been afforded equal treatment.
Reasonable alternatives not specified and appraised, including a proposed new sub-area 'B3'.	Reasonable alternatives have been assessed on an equivalent basis. The introduction of sub-area 'B3' is unacceptable at this very late stage and in any case is simply a smaller parcel which would not be able to accommodate a SUE of around 5,000 units and would therefore be sieved out.
No links to updated historic environment evidence.	New evidence presented in respect of the historic environment was considered and scores adjusted accordingly.
Landscape, biodiversity and	Disagree – there are degrees of judgement associated with the interpretation of the

Summary Issue	BCC Response
historic environment impacts not supported by existing evidence.	evidence and the scores reflect the evidence available. In the case of biodiversity and landscape, there is a clear difference between Options B and C, with the latter performing marginally better than the former. At no point does the Appraisal state that, for example, Option B is unsustainable *per se*, but only that it performs <u>relatively</u> poorly in respect of key criteria such as landscape, biodiversity and transport, which in light of housing market delivery constraints make it less preferable than Option C.
Scoring errors in respect of biodiversity, landscape and transport.	Disagree - degrees of judgement associated with the interpretation of evidence and the scores reflect the evidence available. There was no admission by BCC at the EIP that there was no difference between Options B and C from a landscape and ecology perspective, and the report authors stand by their judgements on these matters.
No comparative assessment on transportation issues.	This issue has been addressed in the Council's response to the letter sent to the inspector by Turley which clearly sets out why a development of around 5,000 units on one location represents the most efficient and effective solution in respect of efforts to deliver sustainable transport in this locality. The heart of the argument rests with the failure of a smaller development to deliver a critical mass required for a step-change in provision; uncertainty associated with larger developments because of site fragmentation and market delivery uncertainties; and poorer environmental performance of smaller options (dominated by off-site travel) and larger options (higher emissions and uncertainties over scheme design costing and delivery).
Reasons and evidence for A1 and B1 not being capable of accommodating 5,000 units not given, and by contrast that A2, B2 and C2 could accommodate such a scale of development.	There is a clear statement at section 5.2 that areas A1, B1 and C1 are not large enough to accommodate a SUE of around 5,000 units (which is the fundamental delivery principle defining reasonable alternatives) and should therefore not be considered in detail.
Lack of evidence/no additional evidence presented on which to properly base decisions, particularly newly introduced options.	Disagree – evidence is clear and proportionate (as identified in NPPF para 58 and PPG para 009) and has been applied on an equivalent basis to all reasonable alternatives. It is not reasonable to assemble evidence *ad infinitum* and thereby fail to make judgements on <u>relative</u> sustainability performance.
The concept of a SUE and its supporting infrastructure (particularly the proposed Sprint service) is fundamentally flawed.	The rationale for a SUE in this location is set out in the BDP and is based on practice around the country. The City Council is content that taking all the evidence in the round, a SUE is the most sustainable option for accommodating significant peripheral growth for Birmingham, as demonstrated through the SA in its early stages. Detailed work on infrastructure development such as Sprint to support this type of development has been undertaken, and BCC are content that the proposals are a feasible solution to infrastructure provision.

Comments on the Submission Sustainability Appraisal (June 2014)

Summary Issue	BCC Response
About Birmingham There is a lack of justification for the release of Green Belt for development. The population projections should be re-evaluated. Population growth will lead to an overcrowded and less desirable City without the infrastructure in place to support communities. There are brownfield sites available which can meet the housing requirement. Vacant properties should be brought back into use.	The City has a major challenge to meet its own objectively assessed need for housing and employment land requirements. The options around the release of Green Belt to meet these needs have been considered throughout the production of the Plan and through the Sustainability Appraisal process. Consultation with the public and other stakeholders has been undertaken throughout the production of the Plan.
The Sustainability Appraisal (SA) process has not been undertaken correctly and is incomplete because it is silent on how cross-boundary housing needs can be met and reasonable alternatives to the preferred strategy have not been considered. The GBSLEP work should be completed first and the alternative approaches arising from this should be assessed and be subject to consultation. The BDP SA should have assessed all reasonable alternatives	The plan is supported by a SA, which considers reasonable alternatives. The approach taken is summarised in the paper on the Evolution of the Sustainability Appraisal of the Birmingham Development Plan. The issue of cross-boundary housing needs is not a legal compliance issue.

Summary Issue	BCC Response
on a comparable basis in order to determine the appropriate split of housing within and outside the city boundary. There is insufficient detail in respect of minerals.	
Sustainability appraisal does not assess alternatives. Failed in Duty to cooperate.

Insufficient infrastructure - transport, schools, hospitals, shops, doctors surgeries etc. Should be fully funded and timely. Develop brownfield. Not legally compliant - full objectively assessed housing needs not met. | See BCC response in relation to Langley (GA5), Peddimore (GA6) and Green Belt (TP10). |
Considers that the plan is not complete because cross-boundary needs have not been resolved, all reasonable alternatives have not been considered and there is no joint sustainability appraisal or technical analysis. Also considers that there should be an infrastructure plan.	The Plan is complete. The Council considers that 51,100 is the maximum number of new homes that could be delivered in Birmingham over the plan period. The Council is actively working with neighbouring Councils to identify a strategy to accommodate the shortfall. The Plan is supported by a Sustainability Appraisal and an Infrastructure Delivery Plan.
The SA process is not legally compliant because reasonable alternatives outside Birmingham's boundary have not been considered.	The Council considers that the Sustainability Appraisal process has considered reasonable alternatives.
The plan does not comply with the NPPF because it fails to make provision for all of Birmingham's housing requirement and alternative strategies have not been considered through the Sustainability Appraisal	Consistency with the NPPF is a soundness not a legal compliance issue. The Sustainability Appraisal does consider reasonable alternatives.
Argues that the Sustainability Appraisal process has not been undertaken correctly and is incomplete because it is silent on how cross-boundary housing needs can be met and reasonable alternatives to the preferred strategy have not been considered. The GBSLEP work should be completed first and the alternative approaches arising from this should be assessed and be subject to consultation. The BDP SA should have assessed all reasonable alternatives on a comparable basis in order to determine the appropriate split of housing within and outside the city boundary.	The plan is supported by a Sustainability Appraisal, which considers reasonable alternatives. The approach taken is summarised in the paper on the Evolution of the Sustainability Appraisal of the Birmingham Development Plan. The issue of cross-boundary housing needs is not a legal compliance issue.