

Evolution of the Sustainability Appraisal of the Birmingham Development Plan

1. Purpose of this Note

This Note sets out how the Sustainability Appraisal (SA) which accompanies the Birmingham Development Plan (BDP) has evolved and appraised the Plan's emerging spatial options, setting out their relationship and in so doing helping to address procedural issues which have been raised as part of the consultation on the draft BDP.

2. Summary of the Evolution of the BDP and its SA

In accordance with legislative requirements, the BDP and its SA have been prepared in tandem with the intention of testing emerging options for their sustainability performance and taking into account these considerations in subsequent editions of the Plan.

The BDP has been in preparation since 2008 and therefore been subject to significant contextual change in the form of revisions to housing projections and the national policy context. There have been two distinct phases to the evolution of the BDP and its SA:

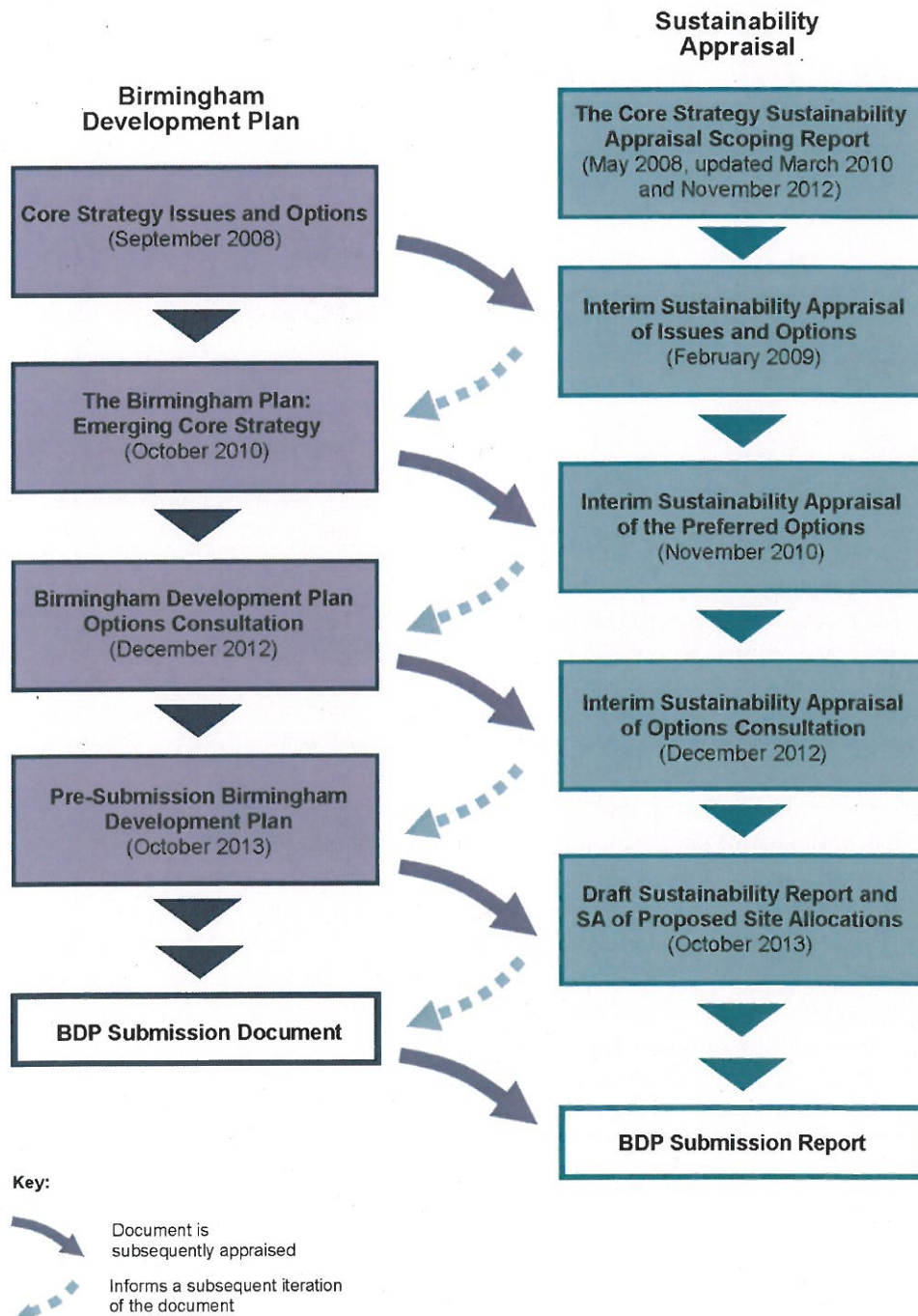
1. In the period 2008-2011, initial preparation of the Birmingham Core Strategy centred on delivering 57,500 homes and 180ha of employment land within the City's boundaries for the period 2006-2026. The BDP documents associated with this phase are:
 - a. Core Strategy Issues and Options (September 2008);
 - b. Birmingham Plan Emerging Core Strategy (October 2010)
2. The period 2012-2014, reflecting a revised plan timeframe (2011-2031) and a revised housing target of approximately 80,000 homes (51,100 within the City and around 30,000 delivered by adjacent authorities) and 200+ha employment land, reflecting an updated SHMA completed in late 2012. The BDP documents associated with this phase are:
 - a. Options Consultation (December 2012)
 - b. Pre-Submission BDP (October 2013)

The following SA documents were produced to accompany the emerging BDP:

- Sustainability Appraisal Scoping Report (2008, revised 2010 and 2012);
- Interim Sustainability Appraisal of Issues and Options (February 2009);
- Interim Sustainability Appraisal of Preferred Options (November 2010);

- Interim Sustainability Appraisal of Options Consultation (December 2012); and
- Draft SA Report of the BDP (October 2013) and SA of Site Allocations (October 2013).

The relationship between the various stages of the BDP and its SA is illustrated below.



3.1 Phase I: 2008 - 2011

Accompanied by the SA Scoping Report¹ and an Interim Sustainability Appraisal², the Core Strategy Issues and Options document (September 2008) presented three options for the growth of the City as follows:

	Option 1	Option 2	Option 3
Number of additional dwellings 2006-2026	50,600 2,500 dwellings per annum (dpa)	55,000-60,000 2,750-3,000 dpa	Up to 65,000 3,250 dpa
SPATIAL STRATEGY			
Housing	<u>50,000 within the core of the city</u> City centre focus with high density developments. Steps taken to ensure more family housing. A sustainable urban neighbourhood at Longbridge. No changes to Green Belt required.	<u>As per Option 1 plus 5,000-10,000 more within city</u> Development in the city centre but also in three key centres: Perry Barr, Selly Oak and the Meadway. Significant housing redevelopment/renewal of east and south western parts of the city supported by around four further sustainable neighbourhoods (in addition to Longbridge) including: No changes to Green Belt anticipated.	<u>As per Options 1 and 2 plus further 5,000-10,000 on urban extensions</u> In addition to strategy under Option 2, urban extensions will also be necessary, requiring selective reviews of the Green Belt: - north/north east of the City (into Lichfield District); and/or - south of the City (into Bromsgrove District).
Focus for regeneration	Three estates in Kings Norton as well as at Newtown and Aston. Western Growth Corridor would remain a key regeneration programme.	Same as under Option 1, but Eastern Corridor also identified.	Same as under Option 2, but Green Belt development phased to ensure brownfield focus.

Subsequently, a Preferred Options Document (October 2010) was produced which proposed a level of growth of around 57,500 dwellings to be accommodated within the existing urban area through a regeneration-based strategy. The Interim Sustainability Appraisal³ accompanying the Preferred Options Document again tested the various growth options, including sub-options of Option 2:

- **Option 1:** baseline - current growth of 50,600 (2,500 dwellings per annum [dpa]).
- **Option 2a:** baseline + 10% (up to 55,000 (2,750 dpa)).
- **Option 2b:** baseline +20% (up to 60,000 (3,000 dpa)).
- **Option 3:** baseline +30% (up to 65,000 (3,250 dpa)).

¹ Entec/AMEC (2008, 2010, 2012) **Sustainability Appraisal of the Birmingham Development Plan: Scoping Report**

² Entec (2009) **Birmingham City Council - Interim Sustainability Appraisal of the Core Strategy Issues and Options**

³ Entec (November 2010) **Sustainability Appraisal of the Birmingham Plan - Interim Sustainability Appraisal of the Core Strategy Preferred Options**

The Interim Sustainability Appraisal recommended that no one option performed significantly better than the others, although on balance, Option 2b was marginally preferred. The proposed scale of growth in the Birmingham Plan at 57,500, with no Green Belt release, closely reflected Option 2b. The main sustainability issue identified for Option 2b was the level of development in the existing urban area and the likely pressures on features within the natural and historic environment and make it harder to incorporate strategic-scale measures for climate change adaptation.

3.2 Phase II: 2012 - 2014

3.2.1 BDP Options Consultation (2012)

A fresh analysis⁴ of the City's likely housing requirement over the plan period yielded significantly higher numbers than previously. At the same time a review of the City's employment land requirements also indicated a shortage of available land. In order to accommodate the projected growth of around 80,000 dwellings to 2031 and increase employment land provision, the Options Consultation of Autumn 2012 made the case for the need for the allocation of additional greenfield land and set out where development might potentially be located through a sustainable urban extension (SUE). This is effectively Option 3 of the issues and options document combined with the need for approximately 30,000 dwellings to be accommodated by surrounding authorities. An Interim Sustainability Appraisal⁵ assessed various options relating to the proposed approach, namely:

- Option 1: Do nothing i.e. not seeking to accommodate the additional projected growth (i.e. the level of growth proposed in the Preferred Option [2010]).
- Option 2: Accommodate additional projected growth within the existing urban area.
- Option 3: Strategic Green Belt Release (plus sub-options relating to individual sites):
 - Area A: Hill Wood, East of Watford Gap (two sub-options).
 - Area B: West of the M6 Toll (two sub-options).
 - Area C: West of the Sutton Coldfield Bypass, Walmley (two sub-options).
 - Area D: East of the Sutton Coldfield Bypass, Walmley.

The Interim SA (December 2012) tested the option of a SUE against alternatives of not providing for the additional growth or further concentration of development in the urban area. The latter, it was concluded, would involve unacceptably high densities of development and the likely loss of open spaces and employment land. By contrast, it was concluded that a well-planned SUE in the right location would provide a scale of development that could support additional services, be relatively self-contained and therefore be relatively sustainable.

⁴ Roger Tym & Partners (2012) **Birmingham City Council Strategic Housing Market Assessment**

⁵ AMEC (December 2012) **Sustainability Appraisal of the Birmingham Development Plan - Interim Sustainability Appraisal of the Options Consultation Document**

During the preparation of the Interim SA Report on Green Belt Options (December 2012), a draft of the document made reference to an appendix which appraised in detail Green Belt sites. This appendix was subsequently removed as the detailed material was considered to better sit within the SA of proposed site allocations. The material was subsequently incorporated into the SA of Strategic Sites (October 2013).

3.2.2 Sustainability Appraisal of the Draft BDP and Strategic Sites

In respect of the proposed BDP development strategy, the Draft SA Report (October 2013)⁶ concluded that the 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 higher development densities, such as the provision of open spaces and the character of localities can be mitigated through the application of design policies.

To accompany the draft SA Report (October 2013) an Interim SA Report (October 2013)⁷ tested the performance of the proposed growth areas and site allocations which will help to deliver the BDP. The Green Belt/greenfield sites were also subject to a separate analysis by Birmingham City Council⁸ of their performance as suitable housing sites and this material was used to help inform the sustainability appraisal of these sites. The Report concluded that the sustainability performance of the proposed sites to deliver the scale of growth required over the plan period was overall a strong one, despite there being some significant adverse effects related to the loss of greenfield land associated with the proposed Green Belt release sites. This was to some degree balanced by the opportunities to create a new community which has a degree of self-sufficiency through new service provision and access to proposed employment opportunities, but equally has a strong connection to the existing urban area.

4. Conclusions

Sustainability Appraisal of plan options has been an integral part of the plan-making process throughout the evolution of the BDP. Revisions to the scale of objectively assessed housing needs has demanded new approaches to accommodating development, comprising brownfield and greenfield development within the City's boundaries and in adjacent authorities (which will be subject to their own SA), reflecting the functioning of the wider Birmingham housing market. Throughout the plan-making process the accompanying SA has appraised options presented in terms of proposed housing growth and its spatial distribution and acknowledged that the distribution of growth beyond the City boundaries is subject to ongoing work. This takes the form of technical studies through the GBSLEP and discussions with adjacent

⁶ AMEC (October 2013) **Draft Sustainability Appraisal Report of the Birmingham Development Plan**

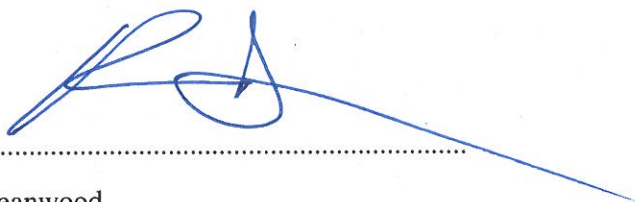
⁷ AMEC (October 2013) **Sustainability Appraisal of Site Allocations**

⁸ Birmingham City Council (September 2012) **Green Belt Options Assessment**

authorities under the Duty to Co-operate. The Draft SA Report (October 2013) acknowledges that: *“There are significant uncertainties over the likely sustainability implications of accommodating around 30,000 dwellings in surrounding authorities, given the absence of detail at this stage of where this portion of Birmingham’s housing need might go. It is understood that exploration of strategic housing and employment provision across the City region is being undertaken through the LEP planning process, and conclusions on the appropriate spatial balance of development could be reached which support or modify the aspirations of the BDP.”* Thus the SA of the preferred strategy of the Pre-Submission BDP reflects the consideration of alternatives (which include seeking to accommodate development at higher densities within the City, Green Belt release and the accommodation of development across the sub-region) in light of changing circumstances.

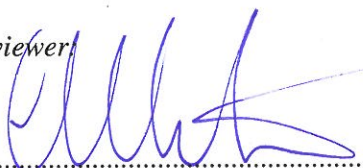
The updated evidence base through the GBSLEP work and DTC negotiations do not change the capacity of Birmingham to sustainably accommodate development (notwithstanding potential further Green Belt release). The appropriate split of development has been arrived at through appraisal of options to accommodate development within the City’s boundaries in a sustainable fashion i.e. using available brownfield land and proportionate release of greenfield land. The remaining 30,000 dwellings is the residual figure which cannot be physically accommodated without significant negative effects associated with over-intensification of the existing urban area. The final SA Report will appraise the strategy for dealing with the distribution amongst adjacent authorities, as far as agreed, will be set out in the Submission Document.

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