

# Sustainability Appraisal Post-Adoption Statement for the Bordesley Park Area Action Plan

## Post-Adoption Statement

March 2020



**LEPUS** CONSULTING  
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

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# Acronyms and Abbreviations

<b>AAP</b>	Area Action Plan
<b>BCC</b>	Birmingham City Council
<b>BDP</b>	Birmingham Development Plan
<b>EA</b>	Environment Agency
<b>EU</b>	European Union
<b>GI</b>	Green Infrastructure
<b>HRA</b>	Habitats Regulations Assessment
<b>HS2</b>	High Speed 2
<b>LDF</b>	Local Development Framework
<b>NPPF</b>	National Planning Policy Framework
<b>PPG</b>	Planning Policy Guidance
<b>RTPI</b>	Royal Town Planning Institute
<b>SA</b>	Sustainability Appraisal
<b>SEA</b>	Strategic Environmental Assessment
<b>SHLAA</b>	Strategic Housing Land Availability Assessment
<b>SPD</b>	Supplementary Planning Document
<b>SuDS</b>	Sustainable Drainage Systems

# 1 Introduction

## 1.1 Context and purpose of this report

- 1.1.1 This report comprises the Sustainability Appraisal Post-Adoption Statement for the Bordesley Park Area Action Plan (AAP).
- 1.1.2 The Bordesley Park AAP has been prepared by Birmingham City Council (BCC) and is a development plan that will help to shape the employment and housing growth and regeneration strategy over the period to 2031, providing the basis for development within Bordesley Park.
- 1.1.3 During the preparation of the Bordesley Park AAP, the Council was required to carry out a Sustainability Appraisal (SA) of the plan. SA is a statutory process incorporating the requirements of the European Union Strategic Environmental Assessment (SEA) Directive.
- 1.1.4 The AAP has been subject to examination by an independent inspector appointed by the Secretary of State. The Plan Examination took place on 30<sup>th</sup> May 2019, and the subsequent Inspector's Report<sup>1</sup>, received on 20<sup>th</sup> August 2019, found the Bordesley Park AAP to be sound as submitted, with no Main Modifications required.
- 1.1.5 The purpose of this Post-Adoption Statement is to outline how the SA process has informed and influenced the AAP development process, and to demonstrate how consultation on the SA has been taken into account.

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<sup>1</sup> Bridgewater, J. (2019) Report on the Examination of the Bordesley Park Area Action Plan. Available at: <https://www.birmingham.gov.uk/downloads/file/13981/report-on-the-examination-of-the-bordesley-park-area-action-plan> [Date Accessed: 23/12/19]

## 1.2 Relationship with the BDP

1.2.1 The main planning document driving the process is the Birmingham Development Plan<sup>2</sup> (BDP). Within the BDP, Policy GA7: Bordesley Park provides some background to the AAP and options as follows:

1.2.2 *“An AAP will be prepared for the Bordesley Park area. Future growth and development will be brought forward in line with the policies set out in the AAP.*

1.2.3 *The AAP will plan for the following levels of growth; 750 new homes and up to 3,000 new jobs.*

1.2.4 *The AAP covers an area of around 580 ha to the immediate east of the City Centre, including parts of Washwood Heath, Bordesley Green, Bordesley Village and Small Heath. The development of the AAP provides the opportunity to work with the local community to build upon this area's assets and to establish:*

- *A focus for growth including a wide range of employment opportunities for local people.*
- *Attractive and thriving local centres.*
- *High quality housing suitable for the needs of existing and new communities.*
- *Infrastructure that meets the current and future needs of business and residents.*
- *A connected place including enhanced public transport and a high quality pedestrian environment.*
- *A clean, safe, attractive and sustainable environment in which to live and work.*
- *Protection for and, where appropriate, enhancement of the varied sports facilities currently located in the area, including at Birmingham City Football Club and Birmingham Wheels Park”.*

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<sup>2</sup> Birmingham City Council (2017) Birmingham Development Plan, Part of Birmingham's Local Plan: Planning for Sustainable Growth. Available at: [https://www.birmingham.gov.uk/downloads/file/5433/adopted\\_birmingham\\_development\\_plan\\_2031](https://www.birmingham.gov.uk/downloads/file/5433/adopted_birmingham_development_plan_2031) [Date Accessed: 08/01/20]

## 1.3 Bordesley Park

- 1.3.1 Bordesley Park AAP is a development plan produced to guide growth and regeneration of the area to the east of Birmingham (**Figure 1.1**), which includes Vauxhall, Washwood Heath, Bordesley Village, Bordesley Green and Small Heath.
- 1.3.2 Bordesley Park is located to the east of Birmingham City Centre (See **Figure 1.1**) The AAP area has a population of just under 33,000 (2011 Census). The age profile of the AAP area is notably younger than that of both Birmingham as a whole and England.
- 1.3.3 Within the AAP area there is a mixture of residential, mixed use and industrial neighbourhoods as well as large local centres at Coventry Road and Alum Rock Road. The areas of employment land within and near to the AAP area are of poor quality and do not generally meet the needs of new and growing employers. There are a number of formal parks, such as Small Heath Park, and smaller areas of incidental open space within the area, as well as linear green/blue space along the Birmingham and Warwick Junction Canal. The area is dominated by significant transport corridors including major rail lines, the ring road (A4540) and the A45 which connects the City Centre with Birmingham Airport and the NEC. The area will be affected by the construction and operation of the HS2 line.



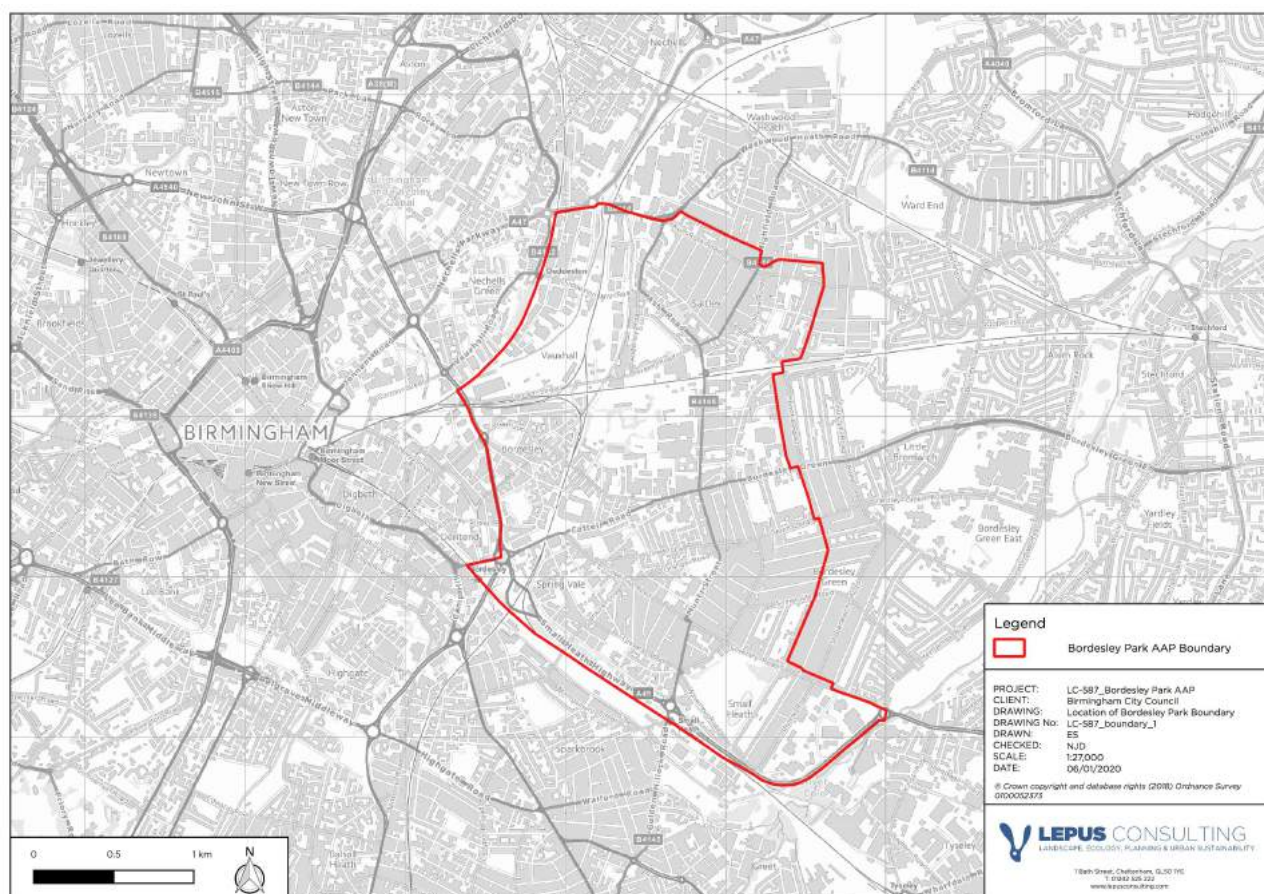


Figure 1.1: Boundary of Bordesley Park Area Action Plan.

## 1.4 Requirement for the Post-Adoption Statement

- 1.4.1 In order to meet the legislative requirements of the European Directive 2001/42/EC and the Environmental Assessment of Plans and Programmes (2004), a Post-Adoption Statement is required to be published “as soon as reasonably possible after the Plan has been adopted”<sup>3</sup>.
- 1.4.2 SEA Regulation 16<sup>4</sup> sets out the post-adoption procedures, including the requirement to produce a statement containing a number of particulars (Regulation 16 Paragraph 4). **Box 1.1** below presents the requirements of this SEA Post-Adoption Statement.

<sup>3</sup> RTPI (2018) RTPI Practical Advice: Strategic Environmental Assessment – Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: <https://www.rtpi.org.uk/media/2668152/sea-sapRACTICEadvicefull2018c.pdf> [Date Accessed: 23/12/19]

<sup>4</sup> The Environmental Assessment of Plans and Programmes Regulations (2004) Available at: <http://www.legislation.gov.uk/ukxi/2004/1633/part/4/made> [Date Accessed: 23/12/19]

**Box 1.1: SEA Regulation 16 Post-Adoption Procedures****Information as to adoption of plan or programme**

16.—

- 1) As soon as reasonably practicable after the adoption of a plan or programme for which an environmental assessment has been carried out under these Regulations, the responsible authority shall—
  - a) make a copy of the plan or programme and its accompanying environmental report available at its principal office for inspection by the public at all reasonable times and free of charge; and
  - b) take such steps as it considers appropriate to bring to the attention of the public—
    - i) the title of the plan or programme;
    - ii) the date on which it was adopted;
    - iii) the address (which may include a website) at which a copy of it and of its accompanying environmental report, and of a statement containing the particulars specified in paragraph (4), may be viewed or from which a copy may be obtained;
    - iv) the times at which inspection may be made; and
    - v) that inspection may be made free of charge.
- 2) As soon as reasonably practicable after the adoption of a plan or programme—
  - a) the responsible authority shall inform—
    - i) the consultation bodies;
    - ii) the persons who, in relation to the plan or programme, were public consultees for the purposes of regulation 13; and
    - iii) where the responsible authority is not the Secretary of State, the Secretary of State; and
  - b) the Secretary of State shall inform the Member State with which consultations in relation to the plan or programme have taken place under regulation 14(4), of the matters referred to in paragraph (3).
- 3) The matters are—
  - a) that the plan or programme has been adopted;
  - b) the date on which it was adopted; and
  - c) the address (which may include a website) at which a copy of—
    - i) the plan or programme, as adopted,
    - ii) its accompanying environmental report, and
    - iii) a statement containing the particulars specified in paragraph (4), may be viewed, or from which a copy may be obtained.
- 4) The particulars referred to in paragraphs (1)(b)(iii) and (3)(c)(iii) are —
  - a) how environmental considerations have been integrated into the plan or programme;
  - b) how the environmental report has been taken into account;
  - c) 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;
  - d) how the results of any consultations entered into under regulation 14(4) have been taken into account;
  - e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
  - f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

- 1.4.3 Following best practice guidance, Birmingham City Council incorporated the SEA into the SA of the Bordesley Park AAP. Therefore, this Post-Adoption Statement provides sustainability information beyond the strict environmental parameters outlined in **Box 1.1**, to reflect the broader sustainability appraisal process.

## 1.5 Using this document

- 1.5.1 This Post-Adoption Statement should be read alongside the Bordesley Park AAP and associated SA documents, which can be found on the BCC website<sup>5</sup>.
- 1.5.2 This report follows the SEA Regulation requirements. The chapters are structured as per the criteria presented in **Box 1.1**:
- **Chapter 2** presents how environmental considerations have been integrated into the Bordesley Park AAP;
  - **Chapter 3** presents how the Environmental Report has been taken into account;
  - **Chapter 4** presents how opinions of consultation bodies and the public have been taken into account;
  - **Chapter 5** presents why the adopted AAP was chosen, in light of reasonable alternatives; and
  - **Chapter 6** presents how the environmental and sustainability effects of the AAP may be monitored.

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<sup>5</sup> Birmingham City Council (2019) Bordesley Park Area Action Plan Submission Documents, Examinations and Inspector's Report. Available at: [https://www.birmingham.gov.uk/info/20054/planning\\_strategies\\_and\\_policies/1159/bordesley\\_park\\_area\\_action\\_plan/2](https://www.birmingham.gov.uk/info/20054/planning_strategies_and_policies/1159/bordesley_park_area_action_plan/2) [Date Accessed: 20/12/19]

## 2 How environmental and sustainability considerations have been integrated into the Bordesley Park AAP

### 2.1 Integrated approach to SA and SEA

2.1.1 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both obligations using a single appraisal process.

2.1.2 The European Union Directive 2001/42/EC<sup>6</sup> (SEA Directive) applies to a wide range of public plans and programmes on land use, energy, waste, agriculture, transport and more (see Article 3(2) of the Directive for other plan or programme types). The objective of the SEA procedure can be summarised as follows: *“the objective of this Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development”*.

2.1.3 The SEA Directive has been transposed into English law by The Environmental Assessment of Plans and Programmes Regulations 2004<sup>7</sup> (SEA Regulations). Under the requirements of the SEA Directive and SEA Regulations, specific types of plans that set the framework for the future development consent of projects must be subject to an environmental assessment. Therefore, it is a legal requirement for the Bordesley Park AAP to be subject to SEA throughout its preparation.

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<sup>6</sup> SEA Directive. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN> [Date Accessed: 23/12/19]

<sup>7</sup> The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: <http://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date Accessed: 24/12/19]

- 2.1.4 SA is a UK-specific procedure used to appraise the impacts and effects of development plans in the UK. It is a legal requirement as specified by S19(5) of the Planning and Compulsory Purchase Act 2004<sup>8</sup> and should include an appraisal of the economic, social and environmental sustainability of development plans. The present statutory requirement for SA lies in The Town and Country Planning (Local Planning) (England) Regulations 2012<sup>9</sup>. SA is a systematic process for evaluating the environmental consequences of proposed plans or programmes to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of decision-making.

## 2.2 Best Practice Guidance

- 2.2.1 Government policy recommends that both SA and SEA are undertaken under a single sustainability appraisal process, which incorporates the requirements of the SEA Directive. This can be achieved through integrating the requirements of SEA into the SA process. The approach for carrying out an integrated SA and SEA is based on best practice guidance:

- European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment<sup>10</sup>.
- Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive<sup>11</sup>.
- Ministry of Housing, Communities and Local Government (2018) National Planning Policy Framework (NPPF)<sup>12</sup>.
- Ministry of Housing, Communities and Local Government (2018) Planning Practice Guidance (PPG)<sup>13</sup>.

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<sup>8</sup> Planning and Compulsory Purchase Act 2004. Available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Date Accessed: 24/12/19]

<sup>9</sup> The Town and Country Planning Regulations 2012. Available at: <http://www.legislation.gov.uk/uksi/2012/767/contents/made> [Date Accessed: 24/12/19]

<sup>10</sup> European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment. Available at: [http://ec.europa.eu/environment/archives/eia/pdf/030923\\_sea\\_guidance.pdf](http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf) [Date Accessed: 24/12/19]

<sup>11</sup> Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/7657/practicalguidesea.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf) [Date Accessed: 24/12/19]

<sup>12</sup> National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date Accessed: 24/12/19]

<sup>13</sup> Planning practice guidance. Available at: <https://www.gov.uk/government/collections/planning-practice-guidance> [Date Accessed: 24/12/19]

- Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans<sup>14</sup>.

2.2.2 The SA (incorporating SEA) of the Bordesley Park AAP began in 2009. This Post-Adoption Statement follows on from the SA Scoping Report (2010)<sup>15</sup>, Options SA Report (2011)<sup>16</sup>, Preferred Options SA report (2013)<sup>17</sup>, Pre-Submission Plan SA (2017)<sup>18</sup> and Submission Plan SA Addendum (2018)<sup>19</sup>.

## 2.3 SA Framework

2.3.1 The SA Objectives included within the SA Framework were derived from those used to appraise the Birmingham Development Plan (BDP), and were developed by BCC as part of the SA Scoping Report. The purpose of the SA Framework is to provide a way of ensuring that the AAP considers the sustainability needs of the area in terms of its social, environmental and economic effects.

2.3.2 The Environment Agency, Natural England and Historic England were consulted during the development of the SA Framework in the Scoping Report consultation in 2009 to ensure that key interests of the statutory bodies were addressed by the SA Framework.

2.3.3 The sustainability objectives were developed during the Scoping Stage of the SA process, identifying those significant sustainability issues which became the focus of the SA, taking into account other relevant national, regional and local plans and programmes.

<sup>14</sup> Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: <http://www.rtpi.org.uk/media/2668152/sea-sapracticeadvicefull2018c.pdf> [Date Accessed: 24/12/19]

<sup>15</sup> Birmingham City Council (2010) SA Scoping Report

<sup>16</sup> UE Associates (2011) SA of the Bordesley Park AAP: Options SA Report

<sup>17</sup> Lepus Consulting (2013) SA of the Bordesley Park AAP: Preferred Options SA Report

<sup>18</sup> Lepus Consulting (2017) BPAAP: Sustainability Appraisal. Available at: [https://www.birmingham.gov.uk/downloads/file/6005/bpaap\\_sustainability\\_appraisal\\_february\\_2017](https://www.birmingham.gov.uk/downloads/file/6005/bpaap_sustainability_appraisal_february_2017)

<sup>19</sup> Lepus Consulting (2018) SA of the Bordesley Park AAP Addendum. Available at: [https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=2ahUKEwi-9ZCbqMznAhVgRBUIHVqBa8QFjAAeqQIAxAB&url=https%3A%2F%2Fwww.birmingham.gov.uk%2Fdownload%2Fdownloads%2Fid%2F11685%2Fbordesley\\_park\\_area\\_action\\_plan\\_sustainability\\_appraisal\\_addendum\\_july\\_2018.pdf&usq=AOvVaw3uLlKswErbI\\_vpqdwAbkZ5](https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=2ahUKEwi-9ZCbqMznAhVgRBUIHVqBa8QFjAAeqQIAxAB&url=https%3A%2F%2Fwww.birmingham.gov.uk%2Fdownload%2Fdownloads%2Fid%2F11685%2Fbordesley_park_area_action_plan_sustainability_appraisal_addendum_july_2018.pdf&usq=AOvVaw3uLlKswErbI_vpqdwAbkZ5)



2.3.4 The SA Objectives included within the SA Framework, and the sustainability theme to which they relate, are set out in **Table 2.1**.

*Table 2.1: SA Framework objectives and corresponding sustainability theme*

SA Objective		Sustainability theme
1	Use natural resources such as water and minerals efficiently.	Material assets, air, water and soil.
2	Reduce overall energy use and contributions to the causes of climate change.	Climate change, accessibility and transport.
3	Make efficient use of the existing transport infrastructure by promoting sustainable transport, promoting modal shift and minimising the need to travel by private car.	Climate change, accessibility and transport.
4	Encourage and enable waste minimisation, reuse, recycling and recovery.	Material assets.
5	Encourage land use and development that optimises the use of previously developed land and buildings.	Material assets.
6	Ensure that the design and planning process reduces the impact of climate change and the risk of flooding.	Climate change.
7	Promote the expansion and improvement of a comprehensive and multifunctional green infrastructure network.	Biodiversity and geodiversity.
8	Value, protect, enhance and restore the AAP area's built and historic environment and landscape.	Historic environment and townscape.
9	Value, protect, enhance, restore and re-create local biodiversity.	Biodiversity and geodiversity.
10	Minimise air pollution levels and create good quality air.	Air, accessibility and transport.
11	Minimise water pollution levels and improve water quality.	Water.
12	As part of new development address and mitigate land contamination issues with the AAP area.	Soil.
13	Minimise noise pollution levels.	Accessibility and transport.
14	Encourage corporate social and environmental responsibility, with local organisations and agencies leading by example.	Economic factors.
15	Encourage regeneration and economic growth to achieve a strong, stable and sustainable economy that benefits the inhabitants of the AAP area.	Economic factors, population and quality of life.
16	Promote investment in future prosperity, including on-going investment and engagement in learning and skill development.	Population and quality of life.
17	Enable communities to influence the decisions that affect their neighbourhoods and quality of life.	Population and quality of life
18	Promote social inclusion by ensuring easy and equitable access to services, facilities and opportunities, including jobs and learning.	Accessibility and transport, population and quality of life, economic factors.
19	Address poverty and disadvantage, taking into account the particular difficulties of those facing multiple disadvantages.	Population and quality of life, housing.
20	Improve health and reduce health inequalities by encouraging and enabling healthy active lifestyles and protecting health as well as providing equitable access to health services and facilities.	Human health.
21	Improve community safety and reduce crime, fear of crime and antisocial behaviour.	Population and quality of life, human health.
22	Provide decent and affordable housing for all, of the right quantity, type, tenure and affordability to meet local needs.	Housing, population and quality of life.
23	Improve opportunities to participate in diverse cultural sporting and recreational activities.	Human health, population and quality of life.

2.3.5 The likely sustainability effects of the AAP as identified as part of the Regulation 19 SA Report are presented in **Table 2.2**.

*Table 2.2: Potential sustainability effects of the AAP*

Potential sustainability effects of the AAP
<b>Accessibility and transportation</b> <ul style="list-style-type: none"> <li>Strong focus on supporting a modal shift from the private car to more sustainable forms of transport.</li> <li>Promotion of rapid transit routes through the area which provide better sustainable transport links to the city centre and airport.</li> <li>A combination of measures to reduce traffic and congestion.</li> <li>Supports enhancements in walking and cycling routes.</li> <li>There is the potential for an increase in local traffic as a result of additional parking facilities.</li> </ul>
<b>Air quality</b> <ul style="list-style-type: none"> <li>Improved accessibility and promotion of sustainable modes of transport are likely to improve baseline air quality in the area.</li> <li>An anticipated net reduction in traffic and congestion is likely to improve air quality.</li> </ul>
<b>Biodiversity and geodiversity</b> <ul style="list-style-type: none"> <li>Natural environments will be protected and enhanced in line with the principles of the Birmingham and Black Country Nature Improvement Area, with new opportunities for wildlife and biodiversity encouraged as part of new and existing development.</li> <li>The plan seeks to enhance green spaces, the canals, River Rea, parks and playing fields, all of which are likely to have associated biodiversity benefits.</li> <li>Enhancements to the area's Green Infrastructure (GI) network as well as developing pedestrian friendly water spaces, can help support and protect biodiversity within the area and improve the connectivity between habitats.</li> <li>Opportunities to create new GI are also encouraged and a GI network is actively promoted within each neighbourhood.</li> </ul>
<b>Climate change</b> <ul style="list-style-type: none"> <li>Strong focus on promoting sustainable transport and reducing the area's carbon footprint.</li> <li>Improves the energy efficiency of the city's buildings and homes and reduces the City's reliance on traditional energy sources.</li> <li>Promotion of digital technology infrastructure facilitation which will be an important part of the future knowledge economy and help contribute to improved transport, health provision, access to education and employment, and the City's green agenda.</li> <li>Recognition that new development should demonstrate measures to mitigate against flood risk and to ensure that they do not increase flood risk elsewhere.</li> </ul>



Potential sustainability effects of the AAP	
Economic factors	
	<ul style="list-style-type: none"> <li>• Strong focus on building an extensive and co-ordinated programme of support for businesses and improving the economic vitality of Bordesley Park.</li> <li>• The creation of major new employment uses at the Wheels site will provide much needed employment opportunities for local people.</li> <li>• Support for sustainable methods could create a new thriving and vibrant green economy.</li> <li>• New transportation links improve business accessibility.</li> </ul>
Health	
	<ul style="list-style-type: none"> <li>• Improvements to the legibility, attractiveness and safety of walking and cycling, as well as the wider network of GI.</li> <li>• Health and wellbeing is supported by the encouragement of non-car use and healthier modes of travel.</li> </ul>
Historic environment and townscape	
	<ul style="list-style-type: none"> <li>• Aims to recognise and enhance the historic environment, as well as historically significant buildings and sites across the area.</li> <li>• The historic environment will also be used to influence the design of new development.</li> <li>• The sympathetic re-use of historic buildings is supported.</li> </ul>
Housing	
	<ul style="list-style-type: none"> <li>• Commitment to demonstrate best practice in sustainable development including sustainable construction and design of the built environment.</li> <li>• Delivery of up to 750 new homes to meet existing and future housing needs.</li> </ul>
Material assets	
	<ul style="list-style-type: none"> <li>• Improves vacant and under used buildings and sites to bring them back into productive use.</li> <li>• Focus on redeveloping vacant and derelict properties where possible.</li> </ul>
Population and quality of life	
	<ul style="list-style-type: none"> <li>• The focus on employment and providing a stable economy could help improve job opportunities in an area characterised by low employment.</li> <li>• Aim to improve the learning and skills base of Bordesley Park.</li> <li>• Enhancements to the area's GI network will be a key contributor to overall quality of life.</li> </ul>
Water and soil	
	<ul style="list-style-type: none"> <li>• Improvements to Bordesley Park's general environment could improve the River Rea's water quality, which is currently poor.</li> <li>• Improvements to Bordesley Park's general environment are likely to help with the remediation of contaminated land in the area.</li> <li>• Contaminated land such as the Wheels site is to be developed which will require remediation.</li> </ul>

## 2.4 Habitats Regulations Assessment

- 2.4.1 The AAP was also subject to a Habitats Regulations Assessment (HRA) in accordance with the Conservation of Habitats and Species Regulations 2017 as amended<sup>20</sup> (the Habitats Regulations). This was carried out by Lepus in February 2017<sup>21</sup>.
- 2.4.2 No European sites are located within the 10km zone of influence, however, nine European sites considered to be hydrologically connected to the Plan area were assessed within the HRA screening report.
- 2.4.3 The HRA concluded that no development proposed within the AAP is likely to lead to adverse effects on any European site and it was therefore considered that a likely significant effect on a European site, as a result of the AAP, could be objectively ruled out.

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<sup>20</sup> The Conservation of Habitats and Species Regulations 2017 (2017) SI No. 2017/1012, TSO (The Stationery Office), London.

<sup>21</sup> Lepus Consulting (2017) Habitats Regulation Assessment of the Bordesley Park Area Action Plan Options Report. Available at: <http://www.hwa.uk.com/site/wp-content/uploads/2018/11/BPAAP-Habitats-Regulations-Assessment-February-2017.pdf>

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

### 3.1 SA Recommendations

3.1.1 The SA of the Bordesley Park AAP, where relevant, made recommendations for mitigating likely negative effects as well as recommending measures to enhance sustainability.

3.1.2 The SA has presented recommendations at the following stages of the plan making process:

- Options Sustainability Appraisal Report, September 2011;
- Sustainability Appraisal of the Bordesley Park AAP Preferred Options, July 2013; and
- Sustainability Appraisal Report to accompany the AAP Pre-Submission Report, February 2017.

3.1.3 The recommendations, which include changes to the wording of policies, are set out in **Table 3.1** below and explain how the recommendations have been incorporated into the Plan making process.

**Table 3.1:** Recommendations from the SA process and how they have been taken into account by BCC

SA Report	SA Recommendations	Birmingham City Council Response
Options Sustainability Appraisal Report (September 2011)	<p>The SA report made recommendations on the following topics:</p> <ul style="list-style-type: none"> <li>• <b>Accessibility and transportation;</b> a key consideration for the AAP should be to ensure provision of safe, accessible and appealing walking and cycling routes;</li> <li>• <b>Air quality;</b> the AAP should seek to limit traffic growth and enhance the natural environment;</li> <li>• <b>Biodiversity and geodiversity;</b> the AAP should seek to improve the biodiversity value of the area;</li> <li>• <b>Climate change;</b> development should be designed to support climate change adaptation;</li> <li>• <b>Economic factors;</b> new and existing employment sites should be supported by improvements to public transport provision, walking and cycling routes;</li> <li>• <b>Health;</b> provision of accessible health services and promotion of walking and cycling;</li> <li>• <b>Historic environment;</b> the significance of local distinctiveness and the historic environment in the area should be a central consideration;</li> <li>• <b>Housing;</b> the AAP should consider the incorporation of targets for energy efficiency and sustainable development for new homes;</li> </ul>	See <b>Appendix A</b>

SA Report	SA Recommendations	Birmingham City Council Response
	<ul style="list-style-type: none"> <li>• <b>Material Assets</b>; the AAP should support the development of waste facilities at sustainable locations;</li> <li>• <b>Population</b>; the AAP should seek to meet the needs of the young and growing demographic;</li> <li>• <b>Quality of life</b>; support the provision of new and improved open space</li> <li>• <b>Soil</b>; detailed studies on land remediation required;</li> <li>• <b>Townscape</b>; connection with the natural environment providing GI networks;</li> <li>• <b>Water</b>; limit and reduce the release of diffuse and point source pollutants into local watercourses.</li> </ul>	
Sustainability Appraisal of the Bordesley Park AAP Preferred Options (July 2013)	<p>The SA report concluded that adverse effects were due to:</p> <ul style="list-style-type: none"> <li>• Increases in parking provision;</li> <li>• Flood risk; and</li> <li>• Loss of housing.</li> </ul> <p>The mitigation recommendations included within this report were as follows:</p> <ul style="list-style-type: none"> <li>• Limit the increase in parking provisions;</li> <li>• Introduce new and existing greenspace;</li> <li>• Promote GI;</li> <li>• Avoid building in flood prone areas;</li> <li>• Place stronger emphasis on the protection of historic buildings;</li> <li>• Offset the potential housing loss; and</li> <li>• Improve the water quality of all watercourses in the AAP area.</li> </ul>	See <b>Appendix A</b>
Sustainability Appraisal Report to accompany the AAP Pre-Submission Report (February 2017)	<ul style="list-style-type: none"> <li>• Place stronger emphasis on the protection of the historic buildings and emphasise the role of good design in enhancing the historic environment;</li> <li>• Ensure that development takes place on previously developed land where possible in accordance with the NPPF and local development plan;</li> <li>• The principal of no net loss of biodiversity should be upheld; and</li> <li>• The Grand Union canal is currently classified as of 'moderate' ecological quality, which could be improved by remediation and general environmental improvements in the area. Care should be taken to improve the water quality of all watercourses in the AAP area. This could be done through a reduction in pollution, Sustainable Drainage Systems (SuDS) and general environmental improvements.</li> </ul>	See <b>Appendix A</b>

## 4 How opinions of consultation bodies and the public have been taken into account

### 4.1 Consultation responses

4.1.1 At each stage of the Bordesley Park AAP, an SA Report was published for consultation both with the public and statutory bodies. The AAP consultation stages relating to the SA documents as well as the consultation responses received relating to the SA are summarised in **Table 4.1**.

*Table 4.1: Bordesley Park AAP and related SA reports consultation periods.*

Published AAP document and consultation period	Published SA/SEA Report and consultation period	Consultation responses <sup>22</sup>
Evidence gathering /Baseline AAP Report (2009)  October 2009	SA Scoping Report (May 2010)  October 2009	The SA scoping report was produced by BCC and consultation on this document took place in October 2009.  Consultation responses were received from the statutory consultees. Natural England highlighted that the SA should refer to the importance of GI and should mention the West Midlands GI Prospectus. Centro and the Highways Agency flagged up sustainable transport and the need for air quality to be considered through the plan making process.
Early Development Options - Unpublished (July 2010)	SA of the Bordesley Park AAP: Options SA Report focused in Wheels site Options (August 2010)	No consultation was undertaken at this stage.
AAP Options Report (August 2011)  August – October 2011	SA of the Bordesley Park AAP: Options AS Report (September 2011)  August – October 2011	Of the statutory and general consultees there was broad support for the plan received from English Heritage (now formally known as Historic England) , Environment Agency (EA), Centro, Canal and Rivers Trust and Network Rail.  Most comments received related to the future of existing sports facilities. Comments were also received about environmental issues caused by a number of businesses operating in the area as well as support for enhanced provision of school places.
Preferred Options Report (July 2013)	SA of the Bordesley Park AAP: Preferred	Consultation responses were received from the statutory consultees. In general

<sup>22</sup> Birmingham City Council, BPAAP Consultation Statement July 2018. Available at:  
[https://www.birmingham.gov.uk/downloads/file/11687/bpaap\\_consultation\\_statement\\_july\\_2018](https://www.birmingham.gov.uk/downloads/file/11687/bpaap_consultation_statement_july_2018)

Published AAP document and consultation period	Published SA/SEA Report and consultation period	Consultation responses <sup>22</sup>
July – August 2013	Options SA Report (July 2013)  January 2014	comments recognised how earlier comments had been addressed. The EA acknowledged increased reference to the River Rea and suggested further information was required regarding sustainable drainage. English Heritage suggested that a map of historic assets should be included (incorporated into Pre-Submission report).
Pre-Submission Report (February 2017)  March – May 2017	Sustainability Appraisal Report to accompany the AAP Pre-submission Report (February 2017)  March – May 2017	The Pre-Submission consultation was the final opportunity for comments before the AAP was submitted for independent examination. The consultation took place between March and May 2017 with the statutory consultees.  Consultation responses were received from the statutory consultees. In general comments recognised how earlier comments had been addressed. The EA continued to set out the importance of the River Rea, and Historic England suggested greater reference to the historic environment.
Submission Version of the AAP 2018	Bordesley Park Area Action Plan Sustainability Appraisal Addendum (July 2018)	Submitted to the Secretary of State on 9 November 2018 for independent examination.

## 5 Why the adopted AAP was chosen, in light of reasonable alternatives

### 5.1 Reasonable alternatives

5.1.1 At each stage of the plan making process, policies and site allocations were identified, considered and appraised using the SA Framework, as required by the SEA regulations (12)(3). Assumptions for each of the SA objectives were developed and supported by the methodology.

5.1.2 Where an assessment of reasonable alternatives was carried out, these findings were reported and subject to public consultation. Section 3 and 4 of the Final SA Report (February 2017) sets out reasonable alternatives considered at each stage of the Plan and outlines the reasons for selection and rejections of options.

### 5.2 Dealing with Uncertainty

5.2.1 Where assessment uncertainty prevailed this was due to a lack of information available to fully assess the policy or site, for example: because the policy relies on behavioural change which may or may not occur; because the effect development has depends upon its design and layout, whereby issues such as flood risk could be mitigated by designing the development in such a way as to minimise the risk; or an ambiguity in how a policy could be interpreted, such as uncertainty over whether community facilities or housing will be developed on site.

5.2.2 Those opportunities identified as uncertain have been treated as being potentially adverse in nature. They should be monitored in order to establish early on in the process of plan implementation whether they will in fact become negative, as well as provide time to compensate for and mitigate these potential negative effects. The uncertain impacts of the AAP should be mitigated where possible so that only positive impacts remain.

## 5.3 Options SA Report (August 2010)

5.3.1 In 2010 the Council presented reasonable alternatives for the potential re-development of the Wheels site and Environs. The following options were considered:

- Do minimum;
- Community uses;
- Commercial uses; and
- Major leisure attraction.

5.3.2 The findings are presented in the August 2010 Options SA Report<sup>23</sup> and concluded that the Community uses option would be likely to result in the greatest number of positive sustainability impacts. The Commercial uses or Major leisure attraction options would be likely to result in the greatest number of adverse sustainability impacts.

## 5.4 SA of the Bordesley Park AAP: Options SA Report (September 2011)

5.4.1 In 2011 the council presented reasonable alternatives for those parts of the AAP are that would be identified as areas with key opportunities for change. The following options were considered:

- The Wheels site and environs;
- Adderley Park;
- Alum Rock Road; and
- Small Heath Local Centre.

5.4.2 The September 2011 Options SA Report<sup>24</sup> presented an appraisal of alternative options for each of the four Transformational Change Areas in Bordesley Park. Each area had alternatives as follows:

- The Wheels site and environs (four alternative options);
- Adderley Park (three alternative options);
- Alum Rock Road (two alternative options); and
- Small Heath Local Centre (two alternative options).

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<sup>23</sup> UE Associates (2010) Sustainability Appraisal of the Bordesley Park Area Action Plan. August.

<sup>24</sup> UE Associates (2011) Sustainability Appraisal of the Bordesley Park Area Action Plan. September.



5.4.3 The findings are presented in the 2011 Options SA Report and identified that many of the options would be likely to result in a range of positive and negative sustainability impacts.

5.4.4 Despite the Wheels site option 4 (industrial & employment) being identified as having the greatest number of adverse sustainability impacts, the options were not mutually exclusive in order for different aspects of the options to be combined to best meet the cities emerging needs. It was acknowledged that there was a need identified in the Cities Employment Land Review 2012<sup>25</sup> for an increase in supply of best quality employment land and job creation, and that this need had to be addressed, whilst militating against some of the issues identified in the Options SA report. SA Objective 23 was recorded as having an uncertain effect due to the need for the existing Wheels leisure and cultural facilities to relocate vs the economic gains proposed. However, the Council as part of its mitigation strategy has committed to supporting the Wheels occupiers in the relocation process and has proposed new and improved green infrastructure across the neighbourhoods and the Area Action Plan Area. This would be expected to provide new and improved areas to take part in sport and active recreation. There is also an adopted Green Infrastructure development principle in the AAP which will guide any development coming forward in the area, which along with the measures specifically proposed for Green Infrastructure should help to mitigate the loss of the leisure and cultural facilities on the Wheel site. The economic gains on the site will also be help contribute to reducing unemployment, reduce local deprivation, and indirectly improve the health of residents.

## 5.5 **SA Report to accompany the AAP Preferred Options Report (July 2013)**

5.5.1 In July 2013, BCC published the Area Action Plan Preferred Options Report for consultation. This document set out the work undertaken on the AAP to date, in particular the public consultation that was undertaken on the Bordesley Park Options Report in 2011.

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<sup>25</sup> Birmingham City Council (2012) Employment Land Review 2012. Available at: [https://www.birmingham.gov.uk/downloads/file/1196/employment\\_land\\_review\\_2012](https://www.birmingham.gov.uk/downloads/file/1196/employment_land_review_2012) [Date Accessed: 25/03/20]

5.5.2 The Preferred Options AAP Report includes four Development Principles, six Neighbourhoods and five Key Opportunities for Change Areas. All content has been assessed against the SA Framework of objectives and indicators.

5.5.3 The SA report identified numerous positive effects that had materialised in the Preferred Options SA Report in response to earlier SA work. Negative effects were identified due to:

- Increases in parking provision;
- Potential loss or damage to SLINC and priority habitat for biodiversity preservation;
- Flood risk; and
- Loss of housing.

5.5.4 The SA report concluded that through applying a suite of mitigation measures (see **Table 3.1**), it is possible to ensure most residual significant adverse effects are overcome.

## 5.6 Policy appraisal

5.6.1 The SA of the Pre-Submission version of the AAP assessed the likely sustainability impacts of each proposed policy in the AAP. The impacts were identified as predominantly positive and negligible, with a limited number of uncertain effects identified.

## 5.7 The Birmingham Wheels site

5.7.1 The Options Report (2011) presented four options for the purposes of Consultation. These were derived following careful consideration of viability and deliverability matters. They were deliberately not mutually exclusive in order that combinations of options or individual elements could be considered. The options for the Wheels site were:

- W1: Incremental Change
- W2: Residential
- W3: Major Leisure Attraction
- W4: Industrial and Employment

5.7.2 The Councils preferred option for the Wheels site was W4: The promotion of new industrial and employment opportunities, creating a high-quality employment site in an improved environment.

5.7.3 The Industrial and Employment option emerged as the preferred option for the Wheels site, as it was necessary to respond to a range of other factors. In developing the preferred option for the Wheels site, it was necessary to reflect the city's requirement to meet demand for industrial land and job creation whilst mitigating against some of the issues identified in the Options SA Report<sup>26</sup>. The incremental approach was not supported as it is not capable of delivering the large scale, necessary economic benefits, that this site can potentially realise and for which there is a clear need.

5.7.4 **Table 5.1** identifies the SA Objectives against which the Industrial and Employment option was assessed negatively in the Options SA Report (2011), and the measures emerging in the preferred option to mitigate against these.

*Table 5.1: Mitigation measures envisaged by BCC in relation to negative sustainability effects identified through the SA process*

SA Objective	SA Concerns	Consideration of mitigation in preferred option
SA Objective 2: Reduce overall energy use and contributions to the causes of climate change.	Potential increase in traffic flows, including HGVs and an increase in energy demand are the main concerns.	Buildings over 1000sqm will be required to meet BREEAM 'Excellent' standard.
		Increased traffic flows are inevitable as a result of new employment uses on a previously underutilised site, but traffic management measures will be implemented.
SA Objective 3: Promoting sustainable transport, modal shift and minimising reliance on private car.	Potential increase in traffic flows.	Improvements to rail and bus services, as well as development of a rapid transit route (Metro) through the area and improvements to the pedestrian and cycling provision will ensure jobs can be accessed without reliance on the private car.
SA Objective 8: Value, protect, enhance & restore the area's built and historic environment.	The main concern in SA terms arose from the impact of freight traffic on the townscape.	This has been recognised as a significant issue, and measures to better manage HGV traffic are included in the preferred option.
SA Objective 10: Minimise air pollution and create good quality air.	Potential increase in traffic flows, including HGVs is the main concern.	Promoting sustainable travel by employees (use of public transport etc.) will help address this.
		The new development should be designed such that deliveries and distribution is properly accommodated within the site, which will reduce queuing, enable better management of emissions, etc.
SA Objective 11: Minimise water pollution and improve water quality.	Concern was that lower levels of remediation required for this use might have less of an impact in terms of reducing water pollution, and that new industries	Remediation will be considered in more detail as proposals develop, with this concern borne in mind.
		The nature of businesses expected to be attracted to the area, and the requirement for BREEAM 'Excellent' standard, should minimise risk of water pollution.

<sup>26</sup> UE Associates (2011) Sustainability Appraisal of the Bordesley Park Area Action Plan: Options SA Report

SA Objective	SA Concerns	Consideration of mitigation in preferred option
	moving in might be polluters.	
SA Objective 13: Minimise noise pollution levels.	Increased traffic, particularly HGVs, is the main concern.	The new development should be designed such that deliveries and distribution is properly accommodated within the site, which will reduce queuing, enable better management of noise emissions, etc.
SA Objective 17: Enable communities to influence the decisions that affect their neighbourhoods and quality of life.	The impact of a significant new employment use on the surrounding neighbourhoods is the main concern.	Improving the gateways to the site will improve the visual amenity of the area.
		Creating jobs for local people may better position them to influence the future of their neighbourhood.
SA Objective 19: Address poverty & disadvantage, taking into account the particular difficulties of those facing multiple disadvantages.	The concern in this case focuses largely on the potential negative impacts on the local environment.	Mitigation against impacts on the public realm and pollution levels are addressed above.
		Access to sustainable employment opportunities is likely to have the greatest and most significant impact on local residents who suffer from high levels of unemployment.
SA Objective 21: Improve community safety and reduce crime, fear of crime, and anti-social behaviour.	Concern relates largely to the perceived lack of improvement to the public realm as a result of this option.	Measures to improve the public realm, particularly pedestrian safety can be incorporated in the AAP and within any development of the Wheels site.
SA Objective 22: Provide decent, affordable housing for all, of the right quantity, type, tenure and affordability to meet local needs.	The negative assessment arises from a lack of proposals for new housing and the potential impact of the development on surrounding neighbourhoods.	There are no proposals for residential development, as this could not be successfully combined with employment uses. Other areas, such as the Cherrywood Road area, have more potential for residential development.
		A range of measures to mitigate the potential impacts of employment uses are detailed above and can be included in the AAP.

### **Evidence Base**

- 5.7.5 The BDP has identified the Wheels site as an important location for growth, and states:
- 5.7.6 *“The Wheels site and surrounding environs is the major opportunity for transformational change in the area and provides the potential for new employment uses that are integrated with the adjoining areas of Saltley, Bordesley and Small Heath. There are issues with regard to land contamination (the Wheels site is a former landfill site) and infrastructure (mainly transport and access) that will need to be addressed as proposals for the area come forward. The site currently accommodates the Birmingham Wheels Park, providing a range of wheeled sports facilities including speed-skating and go-kart tracks and a stock-car racing circuit, which attract users and spectators from across Birmingham, the West Midlands and further afield. Some of the facilities are extensively used by young people from local schools and community groups. The importance of these facilities is recognised and the AAP will need to support their continued operation through equivalent or better quantity and quality replacement provision elsewhere and/or consolidation on site, in conjunction with any redevelopment of the Wheels site. This will include consideration of the catchment area of the participants involved. Appropriate provision will also need to be made for other existing business occupiers of the site”.*
- 5.7.7 There is a limited supply of significant employment sites in the city, with pressure exacerbated as a result of the proposals for the route of High Speed 2 to run through the area and the subsequent designation of safeguarded area for the railway by the Secretary of State for Transport. The scale, accessibility and availability of this site make it an important strategic opportunity, responding to the need to increase the supply of high quality employment land identified in the Employment Land Review 2012. The focus will be on job creation, training and promoting education and community facilities. It also correlates well with areas of high unemployment, and so site use is strategically justified, and is designated as a core employment area within the BDP.

### **Viability & Deliverability**

- 5.7.8 Whilst the options for the Wheels site all pose challenges, this option appears to be more deliverable than other options due to:

- The cost of reclamation for employment uses is less than that for residential, for example;
- There is market interest in delivering employment uses on the site (to date, no interest has been expressed in delivering residential or major leisure uses); and
- The development of employment uses could be phased to enable some of the existing uses to remain, should this be necessary.

### **Community & Stakeholder Consultation**

5.7.9 Each of the consultation options secured a range of comments, with many relating to the need to safeguard the existing sporting activities on site, explore opportunities for improved educational facilities, and address issues relating to some of the existing industrial premises (such as potential expansion or the environmental and amenity impact of particular businesses upon adjoining residential/educational uses). Although there was some support for the arena proposal as part of improving local sporting facilities, there was no interest shown from potential occupiers at that time, which limited the scope of this option from moving forward.

5.7.10 Constraints regarding the past use of the site also limits the potential for residential development. Local people, businesses and other stakeholders have expressed support for employment uses on the sites, particularly when associated with measures to support local people in accessing jobs, training etc.

5.7.11 There was significant concern from stakeholder groups associated with the Wheels occupiers as to their future operations.

## **5.8 Adderley Park**

5.8.1 Each Adderley Park option acknowledged issues relating to the setting of Adderley School and the opportunities for further improvements to Adderley Park. The options proposed for Adderley Park were:

- A1: Do Minimum
- A2: Residential & Community
- A3: Employment

5.8.2 The preferred option for Adderley Park is a combination of A1, A2 and A3: a flexible range of uses, including employment and community uses, within an improved environment.

- 5.8.3 The preferred option includes elements of all three options (although not residential uses), and largely reflects those elements of the options which were identified as positive in the Options SA Report (2011), e.g. reuse of brownfield land (SA Objective 5), enhancement of GI (SA Objective 7), encouraging economic growth (SA Objective 15), promoting future prosperity (SA Objective 16), promoting social inclusion (SA Objective 18), improving health (SA Objective 20), and improving diversity of opportunities (SA Objective 23). Measures to mitigate against the predicted impact of increased HGV traffic may support a reduction in air and noise pollution on a localised basis (SA Objective 10 and SA Objective 13). The preferred option does not support the provision of decent and affordable housing (SA Objective 22) included as part of Option A3, but this is balanced by the provision of housing elsewhere in the AAP area.

### **Community & Stakeholder Consultation**

- 5.8.4 The most significant factor in the direction taken for the preferred option was the responses to public consultation. The main comments received included a desire for a greater range and mix of uses in the area and opportunities to address environmental issues and the number of poorer quality industrial premises, particularly those on Adderley Road that face the park. There were also a number of comments made about the need to improve the general environment of the area, including the setting of Adderley School and the facilities within Adderley Park itself. The preferred option enables these comments to be addressed whilst limiting the impact on the industrial area to the west and providing a 'buffer' between the industrial uses and the community/residential uses around Adderley Park.
- 5.8.5 The comments and submissions received during consultation on the Options Report were principally in support of the second option, plus the education and community elements of the third option, as well as suggestions that each of the options had proposals that should be carried forward into the final plan. There was some support for the allocation of land for new education and community facilities. Adderley Road and Bordesley Green Road was supported as the best locations for such new facilities. It is in this location that land, and buildings, have been vacant for many years.

### Other factors

- 5.8.6 The residential option (A2) would have seen the introduction of housing alongside the railway, very close to the proposed new employment uses on the Wheels site. Residential development would also have required relocation of existing uses. As such, this option was not considered an appropriate way forward.
- 5.8.7 The preferred option offers scope for a wider range of uses along Adderley Road that could include both retention of existing business uses and opportunities for the promotion of new employment uses and community and education facilities. Adderley Road would become an area of transition between the park, to the east, and the area of heavier industry beyond the canal to the west.
- 5.8.8 The emphasis of the preferred option will be on securing improvements to buildings and the environment, enhancing the amenity of nearby housing and the setting of both the park and school.

## 5.9 Alum Rock Road

- 5.9.1 The options proposed for Alum Rock Road were:
- AR1: Do Minimum
  - AR2: Growth of centre to the east
- 5.9.2 The preferred option for Alum Rock Road is a combination of AR1 and AR2: Investment encouraged within the centre, and expansion to the east, accommodating demand for growth of local centre uses. The preferred option supports the maximisation of development opportunities within the existing centre.
- 5.9.3 The two options were assessed as having similar effects against the majority of SA Objectives. Only one SA Objective was assessed as negative for both options. This related to noise pollution (SA Objective 13), but it was recognised that traffic management measures could alleviate this to some extent.



- 5.9.4 By combining the options, the preferred option reflects the more sustainable option in relation to all but one SA Objective. The preferred option encourages the use of previously developed land and buildings (SA Objective 5). It also encourages economic growth (SA Objective 15) and social inclusion (SA Objective 18), and addresses poverty and disadvantage (SA Objective 19).

### **Evidence Base**

- 5.9.5 There is a significant evidence base in place demonstrating demand for growth in Alum Rock Road local centre. This informed both the AAP and the adopted Shopping & Local Centres Supplementary Planning Document<sup>27</sup>.
- 5.9.6 The Shopping and Local Centres SPD sets out proposals for the expansion of the local centre to the east and this also gained support from local residents and businesses. The SPD also contains a number of policies to protect the core retail function of the local centre and prevent the over concentration of A3, A4 and A5 uses.
- 5.9.7 The BDP sets out a number of proposals for local centres including the opportunities for growth and regeneration of key local centres such as Alum Rock. It also includes detailed draft policies that set out how an AAP will be prepared to guide development and regeneration in the area, and how the Alum Rock Centre will be the focus of work to enhance its role as an important local centre; supporting its growth, maximising employment and training opportunities, and the promotion of the efficient use of existing sites and buildings. The proposal to expand the centre to the east has been taken forward in the Shopping and Local Centres SPD (following public consultation).
- 5.9.8 Addressing traffic and parking issues is recognised to be difficult as opportunities for off-street parking development are limited. However, this aim is vital in order to improve traffic flows, which could actually reduce air and noise pollution.

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<sup>27</sup> Birmingham City Council (2012) Shopping and Local Centres Supplementary Planning Document

- 5.9.9 Other proposals within the preferred option relate to issues identified through the evidence base or through consultation (i.e. potential for extension of the school site).

### **Community & Stakeholder Consultation**

- 5.9.10 Consultation responses supported growth of the local centre to the east, and also reflected the need to improve traffic flow and parking provision as well as the image of the centre. Promoting the development of sites within the centre will help improve its image, as well as promoting sustainable long term growth (i.e. growth will not just be focussed at the eastern end of the centre).

## **5.10 Small Heath Local Centre**

- 5.10.1 The options proposed for Small Heath Local Centre were:

- SH1: Do Minimum
- SH2: The Gateway
- SH3: Local Centre Consolidation

- 5.10.2 The preferred option for Small Heath Local Centre is a combination of SH1, SH2 and the Whitmore Road proposal from SH3: Support for investment to improve the centre, and the creation of a 'gateway' including new development to define the western end of the centre. In all options the potential to address traffic congestion and improve public realm and the pedestrian environment was outlined.

- 5.10.3 The three options were assessed as having similar effects against the majority of the SA Objectives, with Option SH2 marginally more positive overall. None of the options were identified as having an explicitly negative effect against any of the SA Objectives. The preferred option combines elements of all of the options, and in general, reflects the elements of each option that performed most positively against the SA Objectives. In particular, it encourages the use of previously developed land and buildings (SA Objective 5), enhancement of GI (SA Objective 7), and economic growth (SA Objective 15). It also addresses poverty and disadvantage (SA Objective 19) and supports the provision of decent and affordable housing (SA Objective 22) through proposals for new housing development.

### **Evidence Base**

- 5.10.4 The Shopping and Local Centres SPD defines the boundary of the centre. The SPD also contains a number of policies to protect the core retail function of the local centre and restrict the over concentration of A3, A4 and A5 uses.
- 5.10.5 The BDP sets out a number of planning and regeneration proposals for local centres including the opportunities for growth and regeneration of key local centres such as Small Heath, which is one of several key centres along the A45 corridor.
- 5.10.6 The evidence base and consultation supported the progression of proposals relating to Parliament Street and the surrounding area. Measures to improve the image of the centre and to address traffic/parking issues were also supported by the evidence base and consultation comments.

### **Community & Stakeholder Consultation**

- 5.10.7 The consultation on the Options Report (2011) generated significant interest in proposals for the centre, and many commented on the current limited opportunities for growth. There was support for the growth of the local centre - particularly to the west to create an improved gateway into the centre, and further opportunities for businesses within the established centre that would complement existing facilities.

## **5.11 Cherrywood Road**

- 5.11.1 The Options Report (2011) did not identify Cherrywood Road as an area for significant change, and as such the Options SA Report (2011) did not examine options for this area in any detail.
- 5.11.2 The potential for change here was identified in the Neighbourhood 4 – Bordesley Green section of the Options Report, where improvements to public transport (including the introduction of Metro), improvements to Bordesley Green local centre, opportunities for expanded education uses, and opportunities for new housing at Cherrywood Road were all identified. These form the key elements of the proposals that emerge in the Preferred Options Report for the Cherrywood Road area.

- 5.11.3 Development opportunities have arisen from the Options Consultation and a 'call for sites' through the review of the Strategic Housing Land Availability Assessment (SHLAA). These comprise former industrial land at Cherrywood Road (1.61ha) and land at Humpage Road/ Cherrywood Road (2.02ha) both of which have been included in the SHLAA 2011. Both sites are in private ownership and offer potential development opportunities that could contribute to the transformation of the area.
- 5.11.4 The preferred option for Cherrywood Road is for the creation of a new residential neighbourhood with improved community facilities and local environment. This will contribute to meeting local housing needs, allowing the provision of a wider range of housing types and tenures.
- 5.11.5 The area presently suffers from conflicting business, residential and community uses which are often in close proximity to each other. The opportunity to review land use and promote new development would enable these issues to be resolved.

## **5.12 Neighbourhoods**

- 5.12.1 For the purposes of the AAP, the area is split into six neighbourhoods to enable a number of issues and potential opportunities to be considered in more detail. The six neighbourhoods are Vauxhall, Washwood Heath, Bordesley Village, Bordesley Green, Small Heath (North) and Small Heath (South). It is acknowledged that these boundaries are to a degree artificial, and that there will be cross boundary issues that affect two or more neighbourhoods. In particular, the local centres will draw trade from a much wider area. Nevertheless, this approach provides a means to focus on a number of issues at the local level.
- 5.12.2 The proposals for Neighbourhoods reflect local concerns expressed through the consultation on the Options Report and policies within the BDP. The emphasis on local issues within these neighbourhoods, focusing on small sites, traffic, housing and local employment has driven the policies within the AAP. No reasonable alternative options were identified for any of these policies.

## 6 How the environmental and sustainability effects of the AAP will be monitored

### 6.1 Monitoring

6.1.1 The SEA Regulations require that significant effects resulting from the implementation of the plan should be monitored. SEA Regulation 17 states that:

6.1.2 *“The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action”.*

6.1.3 The monitoring requirements typically associated with the SA process are recognised as placing heavy demands on authorities with SA responsibilities. For this reason, the proposed monitoring framework focuses on those aspects of the environment that are likely to be negatively impacted upon, where the impact is uncertain or where particular opportunities for improvement might arise. The themes specified for monitoring include:

- Housing including the amount of affordable housing built versus the amount needed;
- The effect of parking changes on improving ease and accessibility of driving, and its consequent on the number of car users’
- Flood risk;
- The behavioural response of residents to ensure a modal shift in transportation methods;
- The water quality of local water bodies;
- The design of new development; and
- The impact of housing proposals on the local economy.

6.1.4 Monitoring proposals are set out in **Table 6.1**.

**Table 6.1: Proposals for monitoring**

Theme	Indicator	Scale and frequency	Trigger
Housing	Proportion of affordable housing units built versus the number of affordable housing units required	Annual, Plan area wide	Affordable housing built significantly below number required
Parking and accessibility	Traffic flows on A roads and motorways	Annually, along key routes	Traffic flow increases annually e.g. DfT AADT counts <sup>28</sup>
	Rates of public transport uptake	Annually, Plan area wide	Rates of uptake declining or showing no signs of improvement
Flood risk	Increased development on floodplains	Annually, Plan area wide	Quantity of development in Flood Zones 2 and 3 increases annually
	Urbanisation increasing run off into a stream or river	Annually, Plan area wide	Annual increases to urbanisation and impermeable surfaces increasing run off
Water quality	Input into a water source from anthropogenic activity that reduces water quality	Annually, Plan area wide	Annually there is risk to water pollution through construction related activities, waste disposal and occupation
Water resources	Increased demand on the water resource	Annually, Plan area wide	Increased use of a scarce water resource can lead to an inability to meet demand locally
Local economy	Decrease in employment and opportunities	Annually, Plan area wide	Proportion of employment land lost to residential development
Greenhouse gases emissions	Proportion of energy from renewable sources and carbon footprint of the District	Annually, Plan area wide	Annual increases in the use of coal and oil sourced energy e.g. DBEIS statistics on local authority energy consumption <sup>29</sup>

<sup>28</sup> Available at: <https://www.dft.gov.uk/traffic-counts/index.php>

<sup>29</sup> Available at: <https://www.gov.uk/government/statistical-data-sets/total-final-energy-consumption-at-regional-and-local-authority-level>

## Appendix A: BCC Response to the SA process

*Table A.1: BCC Response to recommendations from the SA process*

SA Issue	BCC Response
Options SA Report 2011 – Based on Bordesley Park Area Action Plan Options Report	
<b>Accessibility and transportation:</b> a key consideration for the AAP should be to ensure provision of safe, accessible and appealing walking and cycling routes.	<p>The Council amended and added a number of recommended changes as a result of reviewing the options appraisal report. In the introduction to the preferred options report the need for a clean, safe, and attractive environment is directly referenced.</p> <p>The vision also includes an expanded section on local character, where the importance of high-quality design and community safety in new development is addressed. The section then goes on to support the development of green infrastructure to enhance the natural environment, promote connectivity, and improve health.</p> <p>Under the “Development Principles” chapter, improvements to connectivity are made more explicit, and the plan commits to improving walking routes, and green spaces, including safety improvements to encourage journeys by foot. The chapter further emphasises under the “design” section that new walking routes should be designed to be accessible, safe, and overlooked to promote walking and outdoor activity.</p> <p>Under the Neighbourhoods section on improvements to Bordesley Village, the preferred strategy states that it will improve the pedestrian flow from the city centre to the Bordesley Park area, by improving access at the ring road junctions and upgrading the locally listed canal bridge on the Coventry Road to encourage pedestrian movement. Likewise, within this area it is emphasised that environmental improvements to the wildlife assets of the canal corridor will be supported, and bridges, embankments, and towpaths will be enhanced to improve pedestrian access. Improvements recommended in the Small Heath (South) neighbourhood call for better coordination of environmental works, street furniture and public transport infrastructure, and for improving the environment, public safety and linkages between Small Heath Park, Sara Park and the surrounding residential area.</p>
<b>Air quality:</b> the AAP should seek to limit traffic growth and enhance the natural environment.	<p>In the introduction to the preferred option the importance of creating a connected place with enhanced public transport and a high quality pedestrian environment is emphasised. The plan aims to encourage those using private transport to transfer onto public transport services, or to cycle or walk.</p> <p>Under the “Vision” of the preferred options the plan commits to an improved environment, and under connectivity emphasises the need to enhance public transport across the area, including the promotion of rapid transit services, as well as local rail and bus services. This should result</p>

SA Issue	BCC Response
	<p>in encouraging more walking and cycling, enhancing the quality of the environment, and developing a network of green infrastructure across the area.</p> <p>Under “Development Principles” the plan commits to protecting and enhancing parks and local open spaces which form part of a wider green infrastructure network. The plan also supports improving the quality and frequency of rail services and connections to Adderley Park, Small Heath, and Duddeston stations. It also commits to working with bus operators to improve bus services in the area, making them more reliable and attractive. Cycle routes, cycle storage facilities and a commitment to improved walking routes and green spaces are also supported under this section of the plan. The plan highlights that new and enhanced pedestrian crossing points should be provided to connect the area with the network of streets and squares that have been created across the city centre. Specifically under “environment” the design section of the development principles chapter states it will support the provision of trees, planting, and green roofs.</p> <p>Under the “Wheels Site &amp; Environs” chapter a commitment is again made to the improvement of pedestrian connections across the area, with the potential for a rapid transit route along Garrison Lane, and Bordesley Green, and to accommodate any land take required in order to contribute to this scheme.</p> <p>The Adderley Park option highlights the need to improve the quality and use of Adderley park as a recreational and green asset for the area.</p> <p>Under “Neighbourhood 2 – Washwood Heath” a key priority highlighted is that of improving the quality of the green infrastructure network across the neighbourhood. This is the same for Bordesley Village, Bordesley Green, Small Heath North, and Small Heath South.</p>
<p><b>Biodiversity and geodiversity:</b> the AAP should seek to improve the biodiversity value of the area.</p>	<p>The introduction to the Preferred Options confirms that a sustainable environment is recognised as a key focus of the plan. The vision goes into more detail on this, confirming that the plan is committed to enhancing the environment across the whole AAP area, and that it will develop a network of green infrastructure, building upon the areas existing assets, and that this will enhance the natural environment.</p> <p>Under the “Development Principles” chapter it is again confirmed that the plan will protect and enhance the use of parks and open spaces which form part of a wider green infrastructure network. Indeed, this section specifically highlights that the Grand Union, and the Birmingham and Warwick Junction Canal will provide an opportunity to not only enhance linkages into the city centre, but build upon the canals potential as nature conservation assets. Furthermore under this section support is given to improving connections to the city centre and the Green Infrastructure network to the west of the AAP area, by creating new green infrastructure assets, and for the provision of tree planting and green roofs.</p>



SA Issue	BCC Response
	<p>In each of the sections on neighbourhood areas, emphasis is placed on improving the quality of the green infrastructure network and the use of green walls/roofs to promote biodiversity. Specifically within Vauxhall, improvements to the Birmingham and Warwick Junction Canal are supported, and enhancements to the River Rea, and working with the environment agency to open it up to the public, (as it is currently largely in culverts).</p>
<p><b>Climate change:</b> development should be designed to support climate change adaptation.</p>	<p>The introduction to the Preferred Options highlights that the AAP is committed to creating a sustainable environment. A number of other key measures taken holistically throughout the AAP also contribute to the reduction of the effects of climate change.</p> <p>For example in the “Vision” under connectivity there is a commitment to enhancing sustainable public transport and encouraging more walking and cycling in the urban environment, and developing a network of green infrastructure that will enhance the natural environment, but also improve connectivity. It also states that developments should demonstrate best practice in sustainable development.</p> <p>Under the “Development Principles” chapter, a commitment is made to improving the quality and frequency of the rail services in the area, and connections to the Adderley Park, Small Heath, and Duddeston stations. It also supports delivery of two rapid transit routes in the area, that will promote the use of public transport over the private car. A commitment is also made to improving the areas bus services and interchanges to make public transport more convenient and simple to use, and for the provision of “way finders” and improved walking routes to encourage journeys on foot and by bike as per the vision of the AAP.</p> <p>Under the Green Infrastructure section of the “Development Principles”, the AAP commits to improve GI links between the city centre and the areas existing GI network, and to improve the value of existing river and rail corridors. Trees and planting of particular environmental importance are also encouraged as well as the provision of green roofs.</p> <p>Under the sustainability section of the “Development Principles” chapter the AAP commits to reducing carbon dioxide emissions and to support the BDP’s goal of reducing emissions by 60% by 2027. The AAP also commits to sustainable construction practices, improving the energy efficiency of the city’s homes and buildings, supporting local carbon energy generation, promoting sustainable transport systems, and reducing the need to travel by putting services and facilities within walking distance of residents. It further states that all new residential development within the AAP area should be a minimum of Code Level 4 sustainable homes and level 6 from 2018 ( However this has since been amended by government circulars, and changes to building regulations are proposed) All new non-residential development is also required to meet BREEAM standards “very good” and “excellent”. Finally this section also presents an opportunity to introduce a Combined Heat and Power system (CHP) given the proximity of the Tyseley energy facility.</p>

SA Issue	BCC Response
	<p>The APP then mentions under the chapter “Wheels Site and Environs” about improving the connections to Adderley Park Railway Station, major bus routes , and the future rapid transit routes.</p> <p>Under the “Neighbourhood” section support is given in a general sense in each neighbourhood for Improving the quality/extent of green infrastructure linkages and the use of green walls/ roofs. In terms of specific projects, improvements of the linkages around the Birmingham and Warwick Junction Canal are supported, working with the Environment Agency to reduce the risk of flooding along the River Rea, improving the energy efficiency of homes, improving existing rail services at Adderley Park station, bringing vacant properties back into use, and the introduction of a CHP network.</p> <p>Since the public examination of the BP AAP, the city council has also declared a climate emergency, and an intention for the city to move to being zero carbon by 2030. Initiatives will be developed within east Birmingham ( including the AAP area) that will contribute to meeting this objective.</p>
<p><b>Economic factors:</b> new and existing employment sites should be supported by improvements to public transport provision, walking and cycling routes.</p>	<p>The “introduction” chapter to the Preferred AAP Options, confirms a commitment to pursuing enhanced public transport and a high quality pedestrian environment. The “Vision” chapter again confirms commitment to improving linkages across the area, with the city centre and other areas of activity, and connecting local residents with business and economic opportunities. The AAP commits to enhancing public transport, including the promotion of the aforementioned rapid transit routes, improving local rail, bus services, and encouraging walking and cycling.</p> <p>Under the “development principles” chapter, the APP again mentions its commitment to improving rail and bus services, supporting two high quality rapid transit routes through the area between the city centre and the airport. In regards to rail connections to Adderley Park is specifically mentioned given its proximity to the wheels site. It further commits in this section to providing safe and convenient cycle facilities with cycle parking in key locations, as well as improved walking routes to encourage journeys by foot, and improved pedestrian and cycle routes/ crossings to improve links to railway stations, and employment opportunities. Under “design”, the AAP highlights that these routes should be accessible, safe, and overlooked in order to promote their use.</p> <p>Under the “Wheels Site and Environs” section it is specifically pointed out that the AAP will improve pedestrian connections across the area, particularly in regard to Adderley Park Rail Station, major bus routes, and the future rapid transit routes. The plan is committed to accommodate any land take required to facilitate the delivery of the rapid transit routes.</p> <p>In the neighbourhood section for Bordesley Green there is specific mention to improving the services at Adderley Park Railway Station to provide improved access to employment opportunities at the airport and adjoining business parks.</p>

SA Issue	BCC Response
<p><b>Health:</b> provision of accessible health services and promotion of walking and cycling.</p>	<p>Support for this recommendation can be found throughout the Preferred Options APP. The introduction refers to the need to provide a quality pedestrian environment and the vision for the plan commits to providing improved linkages across the area, and to develop/improve a network of green infrastructure that will enhance connectivity and improve health. This is particularly the case when improving connections between the AAP area and the city centre.</p> <p>Under the “Development Principles” chapter there is a commitment to providing safe and convenient cycling routes through the area and improved walking routes and green spaces focusing on safety in order to encourage journeys on foot to improve health. The Design section states that these routes should be designed to be accessible, safe, and overlooked in order to increase take up. The sustainability section of the development principles chapter is also committed to reduce the need for travel by providing important services and facilities within walking distance for local residents.</p> <p>Under the “Neighbourhoods” section there is support for improved linkages along the Birmingham and Warwick Junction Canal, and enhancement to the surrounding environment. This is also supported, along the River Rea, the Grand Union Canal, and the Cole Valley.</p>
<p><b>Historic environment:</b> the significance of local distinctiveness and the historic environment in the area should be a central consideration.</p>	<p>Within the “Vision” statement the preferred AAP includes a section on local character and how the plan will hope to enhance the quality of the local environment. Specifically the vision sets out to build upon local character and promote high quality design.</p> <p>Under the chapter “Development Principles” a Historic Landscape Characterisation of the AAP area is provided. It confirms that there are a number of historic assets within the area and the AAP will expect the historic environment to influence the design of new development in the area, which will enhance these assets and their settings and produce high quality design.</p> <p>Under the “Cherrywood Road” chapter, the AAP confirms that while it will be promoting the rapid transit route along Bordesley Green, it will also be safeguarding historic buildings, and that new development along the Bordesley Green frontage, should complement and adjoin nearby housing. Under the Adderley Park chapter, support is given to securing improvements to existing buildings, and enhancing the setting of the nearby park, housing, and school. In the Alum Rock Road Area, the AAP encourages the improvement of existing buildings, and maximising the use of upper floors of existing properties. Within the Small Heath local centre the AAP again supports investment in existing buildings, to safeguard heritage and bring upper floors back into use, and in Bordesley Village, an opportunity is highlighted to upgrade the locally listed canal bridge to encourage pedestrian movement from the city centre to the area.</p> <p>In the “Neighbourhoods” chapter, support is given within the area of Small Heath North to bringing vacant sites and buildings back into use</p>

SA Issue	BCC Response
<p><b>Housing:</b> the AAP should consider the incorporation of targets for energy efficiency and sustainable development for new homes.</p>	<p>The draft AAP at this stage highlighted in the introduction the need for high quality housing to service new and existing communities in the area. In the “Vision” it commits to enhancing the quality of the housing in the area.</p> <p>Under the key “Development Principles” chapter the APP commits itself to help to meet the targets in the then draft Birmingham Development Plan. It commits to supporting a 60% reduction in carbon dioxide emissions by 2027, promoting sustainable construction, and improving the energy efficiency of the city’s homes. It sets out that new homes built in the area should meet code level 4 sustainable homes and that they should meet level 6 by 2018.</p> <p>At this point many of the monitoring framework targets were draft, and many of these had the potential to be picked up by the wider monitoring framework of the draft Birmingham Development Plan. The draft monitoring framework and evaluation chapter does however state that the final monitoring framework will develop an indicator database, and take full account of the monitoring needs of the sustainability appraisal. However, the balance of what would be monitored through the AAP or the wider BDP would not be known until the BDP was adopted in 2017. For example, policies TP1-TP4 of the now adopted BDP address the issue of sustainability and energy efficiency and this information can be extracted for the AAP area.</p>
<p><b>Material Assets:</b> the AAP should support the development of waste facilities at sustainable locations.</p>	<p>The preferred options AAP states under the “Development Principles” section that a Combined Heat and Power network in the AAP area supplied from the nearby Tyseley Energy Recovery Facility in the Tyseley Environmental Enterprise District, would be supported, and that similar opportunities could also be based on waste disposal facilities.</p>
<p><b>Population:</b> the AAP should seek to meet the needs of the young and growing demographic.</p>	<p>The “Vision” chapter of the Preferred AAP Options, commits to creating up to 3000 new job opportunities within the area. In addition, it commits to providing a housing offer to meet local needs, and additional school places over the next 10 years citing specifically the young and growing population as a reason for this. It also commits to improving access to high quality leisure, community, and education facilities.</p> <p>Under “ Design Principles” the AAP also commits to providing affordable housing, and large family housing</p> <p>Under the “Wheels site and Environs” chapter a commitment is made to extending the site of the Bordesley Green Girl’s School. Providing an improved educational environment for teaching and learning.</p> <p>The additional “Cherrywood Road” section commits the APP to the creation of a new residential area with community facilities and housing that will meet local needs, and to evaluate the needs of the Al Hijrah School in terms of its current issues and proximity to industrial premises. Opportunities for other educational uses on the Bordesley Green frontage are also to be explored.</p>

SA Issue	BCC Response
	<p>Under the “Adderley Park” section the AAP commits to the retention of existing businesses and opportunities for the promotion of new employment uses, community, and education facilities.</p> <p>Specifically, under the “Neighbourhoods” chapter, the AAP in Washwood Heath supports the enhancement of educational provision in the area, by extending the site area of existing schools, and the improvement of the environment around individual school sites such as Parkfield School. In Bordesley Village there is further commitment to residential development, and within Small Heath North there is commitment to enhancing existing sports facilities and acquiring property to allow for the rationalisation of split site schools., and considering individual school requirements in terms of site area and new facilities. This is also the case for Small Heath North.</p>
<b>Quality of life:</b> support the provision of new and improved open space.	<p>The “vision” chapter commits the AAP to developing a network of green infrastructure, across the area, building upon existing open space.</p> <p>Under the “Design Principles” chapter there is also a commitment to improve Green Infrastructure connections with the city centre and the River Cole Linear open space. This will include the creation of new GI Assets and existing GI assets.</p> <p>Within the “Neighbourhood” chapter. There is a commitment to improve the Birmingham and Warwick Canal and improvements to the River Rea within Vauxhall, as well as improving the quality of green infrastructure across the neighbourhood. In Bordesley Village there is a commitment to supporting recreational use and wildlife assets of the canal corridor through environmental improvements, as well as enhancements to Kingston Hill Park, and Garrison Lane Park so they become high quality areas of open space. In Small Heath North there is also support for making enhancements to existing open space within the area. In Small Heath South there is also a commitment to the enhancement of Small Heath Park and Sara Park.</p>
<b>Soil:</b> detailed studies on land remediation Required.	<p>Under the “Wheels site and Environs” chapter, the AAP has committed to developing a detailed reclamation scheme for the site, which is on a former contaminated landfill site.</p>
<b>Townscape:</b> connection with the natural environment providing GI networks.	<p>Under the “Vision” chapter of the AAP, the plan commits to developing a network of green infrastructure across the area, building upon the areas existing assets, parks, open spaces and canals.</p> <p>Under the development principles chapter, the plan commits to improved walking routes and green spaces. Specifically, it states it will set out to improve connections with the city centre and the GI network to the west, and the River Cole linear open space. This will include the creation and enhancement of GI assets.</p>

SA Issue	BCC Response
	Under the “neighbourhood” section. The AAP states that in Vauxhall, improvements will be sought to the Birmingham and Warwick Junction Canal, and to the River Rea, improving the quality of the green infrastructure network across the neighbourhood. There are also commitments to improve the green infrastructure network in Bordesley Village, Bordesley Green, Small Heath North, and Small Heath south.
<b>Water:</b> limit and reduce the release of diffuse and point source pollutants into local watercourses.	<p>The “Introduction” chapter of the AAP commits the plan to creating a clean, safe, and sustainable environment. Within the “Vision” the plan also commits to demonstrating best practice in sustainable development.</p> <p>In terms of the “Development Principles” chapter, it commits the plan to reducing the levels of waste and encouraging the use of water as a resource. It also states that all new non-residential standard’s should be meeting BREEAM standard excellent, and encourages the development of a combined heat and power networked sourced from the Tyseley Energy Recovery, and finally it encourages other networks in the area based upon how waste is handled.</p>
SA Preferred Options Report – Based on Bordesley Park AAP Preferred Option Report	
<p>The SA report concluded that adverse effects were due to:</p> <ul style="list-style-type: none"> <li>• Increases in parking provision;</li> <li>• Flood risk; and</li> <li>• Loss of housing.</li> </ul> <p>The mitigation recommendations included within this report were as follows:</p> <ul style="list-style-type: none"> <li>• Limit the increase in parking provisions;</li> <li>• Introduce new and existing greenspace;</li> <li>• Promote GI;</li> <li>• Avoid building in flood prone areas;</li> </ul>	<p>It is the view of the Council that any adverse effects created by an increase in parking provision will be more than offset in the long term by the commitment in the “Development Vision &amp; Principles” chapter towards improving public transport. Measures that are supported are improving the quality and frequency of rail services, improving bus services and making them more reliable, as well as supporting the delivery of 2 rapid transit routes through the area. This will also be supported by a Parking Supplementary Planning document that is currently in a draft stage, which will complement the Council’s longer-term strategy to increase the use of public transport. The parking proposed in the AAP area will be within the local centres such as Alum Rock Road to meet identified demand and support the businesses within the local centres.</p> <p>Under “Principle 3: Local Character” the APP has also committed to developing a network of green infrastructure corridors across the area, linking together existing, assets, parks, open spaces and canals. Principle 3 also states that any development should build on local character to promote high quality design, taking account of the rich variety of townscape, buildings, and industrial heritage in the area. The supporting text further emphasises that sympathetic re use of historic buildings, and new designs which enhance these assets and settings will be supported, as well as bringing vacant properties back into use.</p> <p>In terms of offsetting any potential housing loss as proposed by the plan. The AAP under “Principle 1: Growth” commits to the delivery of up to 750 new homes to meet existing and future housing needs, and has identified the Cherrywood Road Area as having the greatest opportunity for residential development. There are however other opportunities proposed in the plan in the various neighbourhood areas such as Washwood Heath and Bordesley Village.</p>

SA Issue	BCC Response
<ul style="list-style-type: none"> <li>• Place stronger emphasis on the protection of historic buildings;</li> <li>• Offset the potential housing loss; and</li> <li>• Improve the water quality of all watercourses in the AAP area.</li> </ul>	<p>Flooding and drainage is specifically alluded to under “Principle 4: Sustainability”. It commits the plan to improving water quality and introducing sustainable drainage solutions in new developments to help reduce flood risk. The principle also states the plan will support proposals which benefit the natural environment, and enhance the wide range of green and blue infrastructure across the area. In the supporting text it is stated the water quality in the area is adversely affected by foul water drainage running into the River Cole and the River Rea, and that new development should rectify historical foul and surface water misconnections and replace dual manhole covers. These issues, as well as flooding and drainage considerations will be dealt with via the planning management process.</p>
SA Pre Submission Report – Based Upon Bordesley Park Pre-Submission Report	
<p>Place stronger emphasis on the protection of the historic buildings and emphasise the role of good design in enhancing the historic environment;</p> <ul style="list-style-type: none"> <li>• Ensure that development takes place on previously developed land where possible in accordance with the NPPF and local development plan;</li> <li>• The principal of no net loss of biodiversity should be upheld; and</li> <li>• The Grand Union canal is currently classified as of ‘moderate’ ecological quality, which could be improved by remediation and general environmental improvements in the</li> </ul>	<p>The submitted report, based upon the recommendations of the pre-submission report sustainability appraisal has addressed these issues.</p> <p>Principle 3: Local character, within the “Development Vision &amp; Principles” chapter commits as per the previous iteration of the AAP to building upon local character through high quality design in new development, and acknowledging the townscape, buildings, archaeology, parks, industrial heritage of the area and the role that plays in the promotion of high-quality design. The supporting text again confirms that the sympathetic re use of historic buildings is supported, and that enhancement of the areas historic streets, spaces, and places should influence the design of new development and new high quality design that should enhance these assets and settings. There is also a commitment in the AAP to working with Historic England to enhance these assets and their local setting.</p> <p>The AAP also commits to achieving a sustainable environment in its introduction. By definition this covers the brownfield first principal as advocated by the NPPF, and this is further confirmed under the built environment section of the “Development Vision &amp; Principles” chapter where the AAP states that all development should make the most efficient use of land. All of the key development opportunities in the AAP are on previously developed land, such as the Wheels Site, Cherrywood Road, Adderley Park, or involve the re use of vacant buildings or demolition of existing buildings within the centres of Alum Rock Road, and Coventry Road.</p> <p>The principal of no net loss to biodiversity has also been upheld throughout the document. Principle 3: Local Character, confirms that a network of green infrastructure will be developed across the area that will enhance the natural environment. The role of green infrastructure in supporting biodiversity is acknowledged in the supporting text to the “Development vision and principles” chapter, and the text also supports development proposals which introduce sustainable drainage, and which will enhance the GI connections with the city centre in the west, and the River Cole linear open space to the east. The key development opportunities within the area at the Wheels site, Cherrywood Road, Adderley Park will result in no significant biodiversity loss, and due to the plan emphasising expanding and improving the areas green infrastructure network there is considered to be a net gain.</p>

SA Issue	BCC Response
<p>area. Care should be taken to improve the water quality of all watercourses in the AAP area. This could be done through a reduction in pollution, Sustainable Drainage Systems (SuDS) and general</p>	<p>Where development proposals effect the River Rea the AAP also encourages measures that will enhance the ecological value of marginal aquatic habitat banks and the riparian zone. It also states specifically that new and existing development will encourage new opportunities for wildlife and biodiversity in line with the Birmingham and Black Country Nature Improvement Area. The Improvement area that covers the area in the AAP, requires that ecological linking areas be enhanced by restoring habitats and improving existing sites, and this is exactly what the AAP has committed to do.</p> <p>Again, under the “Development Vision and Principles” chapter the APP supports the enhancement of the Grand Union Canal, to capitalise upon the canals potential as a linkage, a leisure area, and a conservation asset. Under the Natural Environment section of this chapter the importance of enhancing the ecological value of the canal corridors is emphasised, and that developments adjacent to the River Corridors such as the River Rea and Cole should rectify historical foul and surface water misconnections, introduce sustainable drainage systems and work towards being compliant with the Water Framework Directive, in order to improve water quality.</p>



Habitat Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Ecological Impact Assessments

Habitat and Ecology Surveys



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