

Birmingham City Council – response to Turley letter 28th October 2015

Response in relation to comments on RSA2

RSA2 identified a range of reasons that support the conclusion that a development of around 5,000 dwellings is more sustainable than the other SUE scenarios. Table 5.1 on p80 summarises these reasons. As noted in the assessment, a larger development will take more sensitive land with cumulative impacts on landscape, biodiversity and the historic environment. A larger development also performs more poorly in relation to the efficient use of land. These conclusions draw on the evidence available on an equal basis and reflect the fact that a larger development will inevitably involve more than one site which will impact on more sensitive land.

The assessment criterion in relation to transport is based on the SA theme of Co2 emissions and the SA objectives of 'sustainable transport' and 'reduce climate change'. The evidence used to undertake the assessment is principally the Phil Jones Associates 'Transport Analysis of Green Belt Options' (September 2013) and the Peter Brett Associates (PBA) 'Sutton Coldfield Green Belt sites Phase 2 report' (June 2014). The Phil Jones Study considered the impact of development of up to 10,000 homes and the PBA report considered the housing delivery rates and the phasing of infrastructure provision. All SUE scenarios have been assessed in the RSA on the same evidence and, therefore, provide a comparative assessment of all the SUE options.

The assessment of the SUE scenarios in relation to the sustainable transport objective (within the CO2 emissions theme) reflects a range of different criteria relating to provision for public transport, cycling and walking as a proportion of total travel as well as impact on the highway network and traffic, with a key appraisal criteria being: is the site likely to require/include new infrastructure to support the use of sustainable methods of travel? (see page B2 of the RSA).

The assessment is a minus score for the 500 to 3,000 development as it was judged to fail in delivering the critical mass required for a step change in public transport provision, reflecting the conclusions of the Phil Jones Study. A smaller development was considered insufficient in scale to deliver key infrastructure, notably education and public transport, which would contribute to them being relatively self-contained.

In relation to a 5,000 dwelling development, the assessment produces a positive score against the sustainable transport objective. For the 7,500 development a positive/? score is given due to the degree of uncertainty which exists, as a 7,500 dwelling development is likely to be fragmented and not a contiguous development area. This reflects the fact that it is not possible to accommodate 7,500 dwellings on any single site. For a 10,000 dwelling development, the assessment in relation to sustainable transport is neutral/? noting the risk of non-delivery of a critical mass of housing that would trigger the required level of infrastructure (with reference to the Peter Brett Sutton Coldfield Green Belt sites Phase 2 report) and that the design, costing and impacts of additional infrastructure are unknown at this stage, creating further uncertainty.

In relation to the reducing climate change objective, the assessment comments that a smaller development would be dominated by off-site travel and is therefore given a minus/? score. The impact of a 5,000 unit development is scored neutral and a 7,500 unit development neutral/? with

impacts being minimised through design and function although car based travel could contribute to emissions. The neutral/? score for 7,500 reflects the likelihood of a fragmented development. A 10,000 dwelling development scores minus/? due to the fact that a larger development will lead to higher CO2 emissions, and that the design costing and impacts of additional transport infrastructure are unknown at this stage. It is noted that the proximity of some of the areas such as C and B could have a cumulative effect on highway infrastructure and necessitate a greater range of interventions reflecting comments in the PBA study.

The RSA does not prejudicially 'score down' area B on the lack of a transport solution for a larger development. On the sustainable transport objective a 7,500 development scored positive/? and on the reduce climate change objective it scored neutral/? As stated above the "?" is given due to the fact that, at a scale of 7,500, development would have to be fragmented or non-contiguous because a single site would not be able to accommodate 7,500. Otherwise, it scores similarly to a 5,000 development. The statement in the RSA that: "there is no evidence which shows how the traffic impacts from a larger development could be accommodated on the current road network. No agreement with the Highways Agency has been reached in respect of a larger scheme creating considerable uncertainty over the traffic impacts of a larger development" – is a purely a factual statement to reflect the evidence available at the time.

It is also clear from RSA2 that there are a number of other reasons why a larger scale development option has been rejected. Mr Best may disagree with these reasons and the scoring but that is a matter of professional judgement.

Comments in relation to PRISM

The Policy Responsive Integrated Strategy Model (PRISM) is a multi-modal transport model funded and owned by the 7 Local Authorities, CENTRO and Highways England. It is run by Mott MacDonald on behalf of the PRISM Management Group. The PRISM Management Group (PMG) meet bi-monthly to agree the work load and programme for the model.

All modelling requests need go to the PMG for discussion before being added to the Programme. External consultants need to contact the relevant local authority for data requests and modelling work.

Mr Best's comments that "BCC and Mott MacDonald control the use of the PRISM model which was used for the purposes of carrying out the BDP transport assessments" and that "other parties are therefore entirely dependent on BCC granting access to the use of the model" are therefore factually incorrect.

In terms of the specific request from WSP, the City Council received a request to use the model on 8th September 2015. After receiving the request and liaising with the PRISM team, BCC arranged a meeting involving all three parties. At this meeting there was a discussion in respect of whether the PRISM model used for the BDP could be used to test additional development scenarios as opposed to the current version.

During the meeting with PRISM team, WSP proposed sharing resource (sending their own modeller to Motts office to work with the team) to save time and cost and Motts would consider this option.

Following the meeting, WSP revised the scoping note which has been forwarded to the PRISM team. The City Council is now awaiting a response from the PRISM team for a fee proposal and programme.

The PRISM team have therefore responded to the WSP request in an open and fair way but it should be noted that WSP gave the PRISM team only 5 weeks to complete the modelling before the end of the consultation period on the BDP modifications and Revised SA. This was an unrealistic timescale as there is a significant call on the use of the PRISM model and the current list of major project schemes has first call in terms of priority.

The City Council would also like to point out that Mr Best and his team have had many months since the close of the hearing sessions to request access to the model. The revised SA itself has been publicly available since the end of June 2015. He also had the opportunity as part of the BDP examination over a year ago to submit detailed transport evidence to support his case but chose not to do so.