Statement on behalf of Project Fields to Birmingham City Council (BCC) response to Project Fields Matter E hearing statement

The comments are in the order of the BCC response to the Project Fields Matter E Hearing Statement.

1.1 It remains the view of Project Fields that whilst the Council has met regulatory requirements there was no real intent to engage effectively with the local community. A plan of the scale and size of the BDP a more detailed and interactive consultation was warranted. This view is reiterated in many of the written Matter E statements for examination.

There is a real need to ensure that the consultation process and techniques used by local councils are proportionate to the scope and scale of a plan. There is also a need to ensure that a plan for twenty years of growth is based on reasonable discussion with the community to form those assumptions. The scale, significance and impact of a combined 400 hectare Sustainable Urban Extension and employment zone is not that of a large housing development but a development that is equal in size to that of Walmley or in fact any ward in Sutton Coldfield. The consultation on such a matter clearly justified more than the minimum requirements.

1.2 Appendices 1, 2 and 3 confirm that pages of complicated evidence have been added to the evidence database after consultation close.

Please note that the purpose of the "Exam" is clear and I have not been referring to these documents.

Documents within the "History" section of the evidence database were also not available; however some of the documents are familiar due to being part of previous consultations.

Appendix 1 – This is a screen shot of the evidence database during consultation.

Appendix 2 – This is a screen shot taken in August.

Appendix 3 – This contains the list of the names of the documents which were not present during consultation.

Please note in the Suzanne Webb consultation representation (March 2014) comment's in answer to Q-64 that during the actual consultation that documents were still being uploaded despite consultation having started.

This is also commented in the Project Fields representation and that the link to the BDP evidence database was not always apparent as one of the links took you straight to the pan itself and one link to the evidence. (Q-2)

Please also refer to my comments in 1.3.

1.3 In response to the Council comments that some of the documents I reference "are updates to existing evidence and further detailed assessments which were made as soon as practicable." Using TA23 to TA29 as an example these are not updates or detailed assessments but key inputs into the evidence for the BDP for transport and connectivity. This is verified by the Councils own process as follows:

Using document TA8 Transport and Infrastructure Evidence Base and Strategy 2014 the process on page 6, Figure 1.2 "Evidence Collection Process" describes the intended stages evidence is required for input into the draft BDP and then public examination.

In Table 3.1 "Modelling Approach" - this confirms what process formed part of Stage 3 and when this occurred. The table below is an extract from 3.1.

Stage 3a	Transport Modelling Assessment	May 2014
Stage 3b	Junction Modelling	Between January and April 2014
Stage 4	Green Belt Development Movement Infrastructure Plan	January 2014

TA23-29 are documents which if they had been available during consultation would have given the local community and businesses more insight into how the SUE and Peddimore development would be served in terms of transport and connectivity. It is also unclear why the Council started at Stage 4 and worked backwards.

The documents are highly technical so it would be even more important to publish these during the consultation process when (at least in theory) it would be possible to engage with the Council to find out more information and make representations.

1.3.1 It is also noted that the IMP1 – Infrastructure Delivery Plan June 2014 presented for examination supersedes the October 2013 document used for consultation. This is starting to render the consultation a pointless exercise if documents are to be superseded and new information presented during examination.

1.3.2 During consultation residents could only comment on the documents TA2-TA7 alongside the previous version of IMP1. Had we been privy to the additional documentation this would have created the opportunity to have made more detailed representation on the overall viability of Peddimore in relation to the SUE.

1.3.3 In September 2014 I asked a question on the matter of the consultation via the public gallery at a Birmingham Council Meeting. I was assured that all background evidence and supporting information were publicly available from 21 October 2013 (see Appendix 4).

1.3.4 Using the Councils own words used on the Birmingham Development Plan Evidence Base they state very clearly:

"In order to <u>pull together the policies contained in the Birmingham Development</u> <u>Plan (BDP)</u>, a number of studies were undertaken to establish currently levels and provision of various uses across the city. Below are the documents which form the 'evidence base' for the BDP and links to other associated documents referred to in the plan" Reference: Project Fields/Suzanne Webb Document SJW2

1.4 My comment is referring more to the substantial difference in the evidence data base (since consultation close as per 1.2) and that the audit trail of documents is not as it was presented during consultation. Therefore it has proved challenging to keep track of documents and their content and location when preparing for public examination.

With regards to the change from 3,500 to 5,000 in policy GA5 this was brought to the attention of the Council immediately following consultation during a meeting I had with council officials. Market Capacity was stated as 3,500 in the plan.

1.5 As per my comment six in the Project Fields Matter E Hearing Statement.

1.6 The Councils state that the omission of the CCG was an admin error only and that the Trust was consulted. However it does not explain why if this is the case relevant policies within the BDP do not explain how they will mitigate the impact of the Heart of England Foundation Trust reconfiguring the services between three centres of excellences (COE). Two of the COE's are in fact outside of the boundaries of Sutton Coldfield which will therefore impact any sustainable urban extension. This would have been a key output of any meeting and key input into the plans policies.

- **1.7** As per my comment six in the Project Fields Matter E Hearing Statement.
- **1.8** As per my comment six in the Project Fields Matter E Hearing Statement.
- **1.9** As per my comment two in the Project Fields Matter E Hearing Statement.
- **1.10** As per my comment two in the Project Fields Matter E Hearing Statement.
- **1.11** As per my comment four in the Project Fields Matter E Hearing Statement.

1.12 At no point following consultation close and a review of my comments made during the consultation did the Council seek to clarify or arrange a meeting with me.

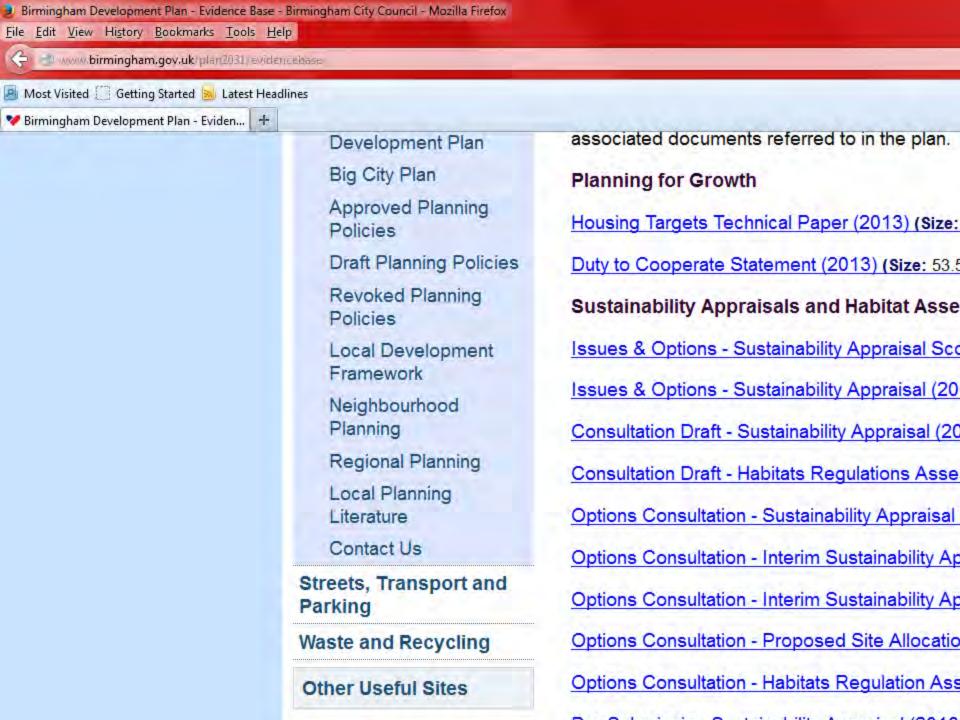
Appendix 1 and 2 – As per attached documents

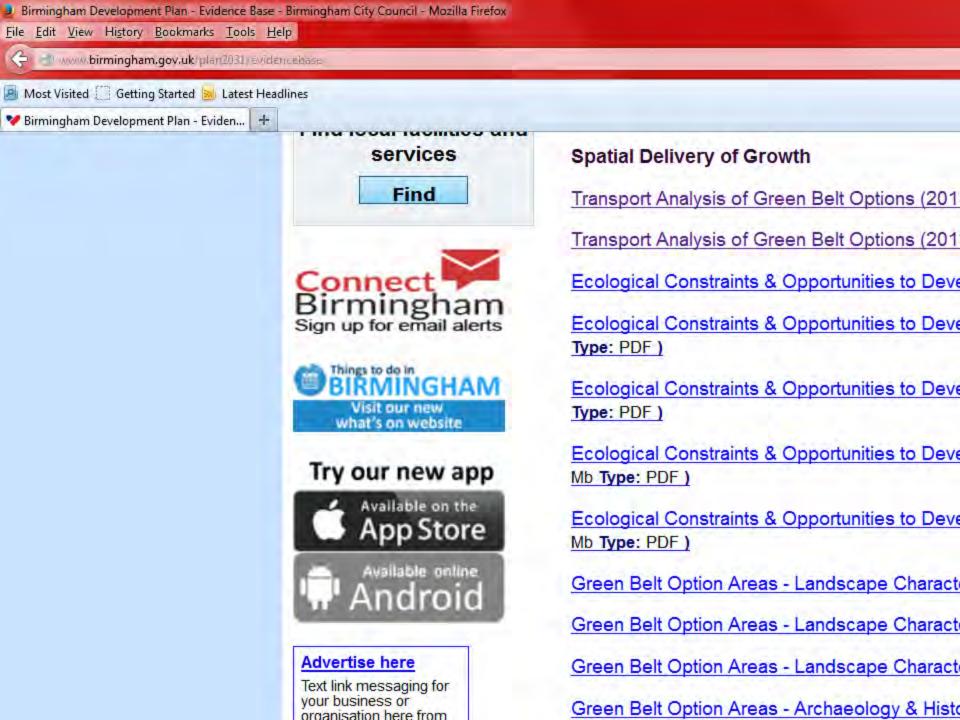
Document	Document Name	
Reference		
Sub -03	Submission Sustainability Appraisal	
Sub -06	Pre submission habitat regulation's assessment	
Sub- 08	Evolution of Sustainability Appraisal	
PG2	Green Belt Assessment Addendum	
PG3	Version during consultation was 2012	
PG4	Sutton Coldfield Green Belt Site Phase 2	
DC2		
202	Duty to Cooperate Statement (2014)	
	Duty to Cooperate Appendices 1-6 (2014)	
	Duty to Cooperate Appendices 7-12 (2014)	
	Duty to Cooperate Appendices 13-17 (2014)	
	Duty to Cooperate Appendices 18-20 (2014	
	Duty to Cooperate Appendices 21-27 (2014)	
	Duty to Cooperate Appendices 28-31 (2014)	
G6	Draft Greater Icknield Master Plan	
ES6	Update to Waste Capacity Study	
ES9	Strategic Flood Level Assessment Level 2	
ES20	Technical Paper 2 (Unsure if this is the same document as was there in	
	March)	
EMP2	Employment Land Review	
EMP3	Employment Land Study for Economic Zones and Key Sectors 2012	
EMP4	Employment Land and Office Targets	
EMP5	Retail Needs Assessment	
EMP6	Retail Needs Assessment Update	
EMP7	City Centre Retail Assessment	
EMP8	Local Centres Strategy 2006	
EMP9	Shopping and Local Centres SPD 2012	
EMP10	Birmingham City Centre Enterprise Zone Investment Plan 2012	
H5	Gypsy, Traveller and Travelling Show people Accommodation 2014	
H8	Education Development Plan 2014	
H9	Private Sector Empty Property Strategy	
H10	5 Year Land Supply	
H11	SCHLAA 2013	
TA1	Birmingham Mobility Action Plan	
TA8	Transport and Infrastructure Evidence Base and Strategy 2014	
TA18	Birmingham City Centre Vision for Movement 2010	
TA19	Intelligent Transport Strategy	
TA20	Creating Growth, Cutting Carbon	
TA21	Birmingham Eastern Fringe Bus Study 2014	
TA22	Birmingham Eastern Fringe Rail Study 2014	
TA23	Minworth Roundabout Option Development and Appraisal Report Part 1	
TA23	Minworth Roundabout Option Development and Appraisal Report Part 2	
TA23	Minworth Roundabout Option Development and Appraisal Report Part 3	
TA23	Minworth Roundabout Option Development and Appraisal Report Part 4	
TA24	Tyburn Roundabout Option Development and Appraisal Report Part 1	
TA24	Tyburn Roundabout Option Development and Appraisal Report Part 2	

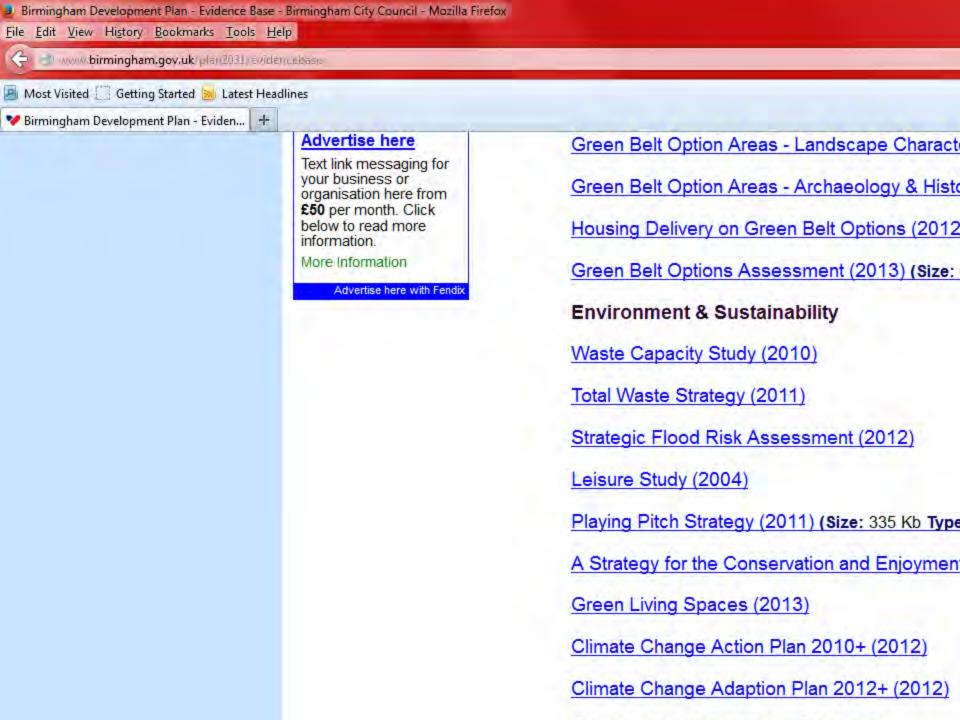
Appendix 3 - These are a list of the documents not present during consultation:

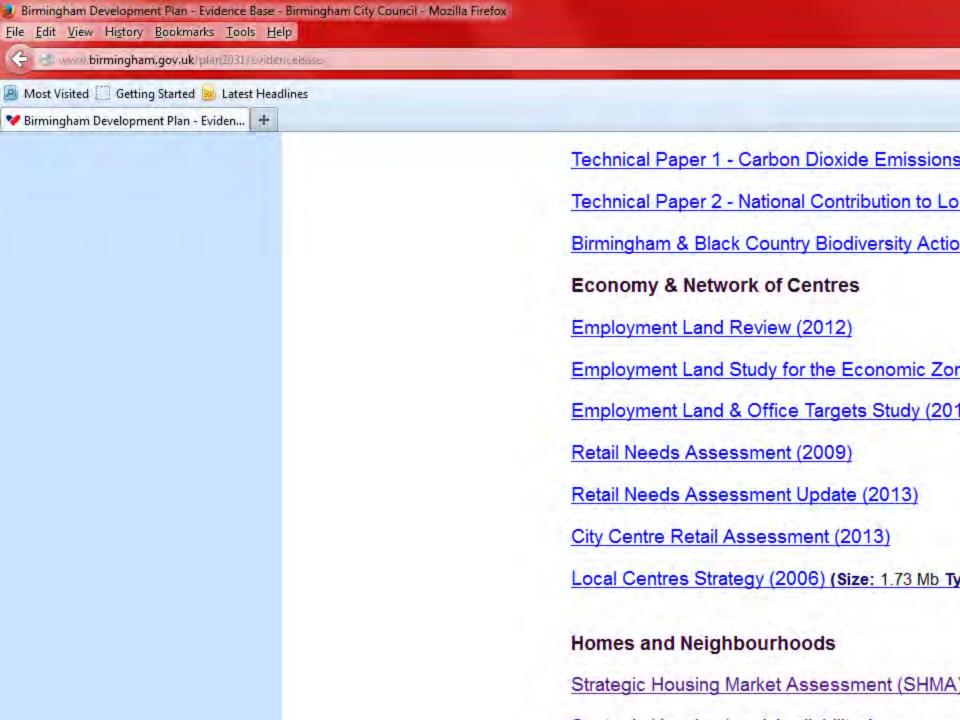
Reference: Project Fields/Suzanne Webb Document SJW2

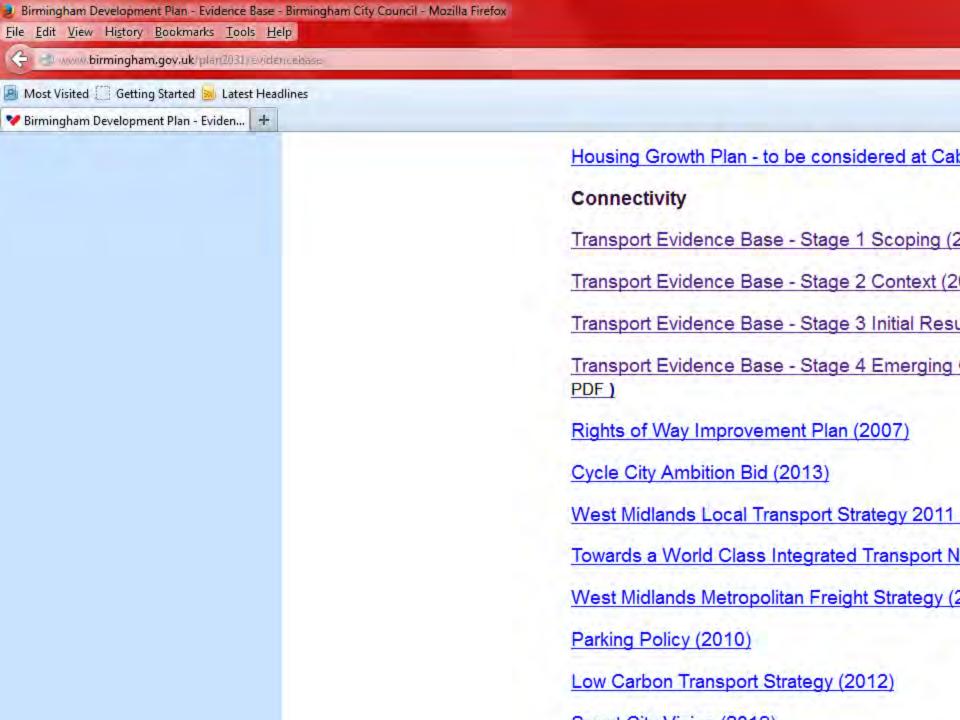
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Tyburn Roundabout Option Development and Appraisal Report Part 4
Peddimore Access Modelling Final Report Part 1
Peddimore Access Modelling Final Report Part 2
Peddimore Access Modelling Final Report Part 3
Peddimore Access Modelling Final Report Part 4
Peddimore Access Modelling Access Option 2 Part 1
Peddimore Access Modelling Access Option 2 Part 2
M42 Junction 9 Base Model
M42 Junction 9 Initial Appraisal
Green Belt Travel Demand Model Report Part 1
Green Belt Travel Demand Model Report Part 2
Green Belt Travel Demand Model Report Part 3
Infrastructure Development Plan June 2014 Version
CIL Prelim Draft Charging Schedule
CIL Economic Viability Assessment

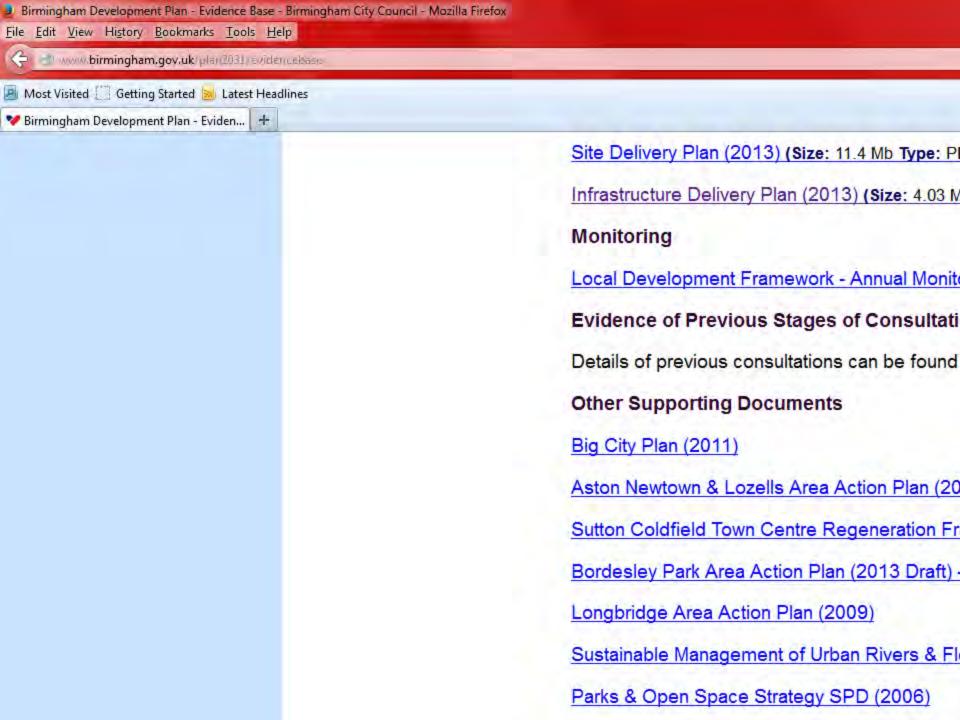


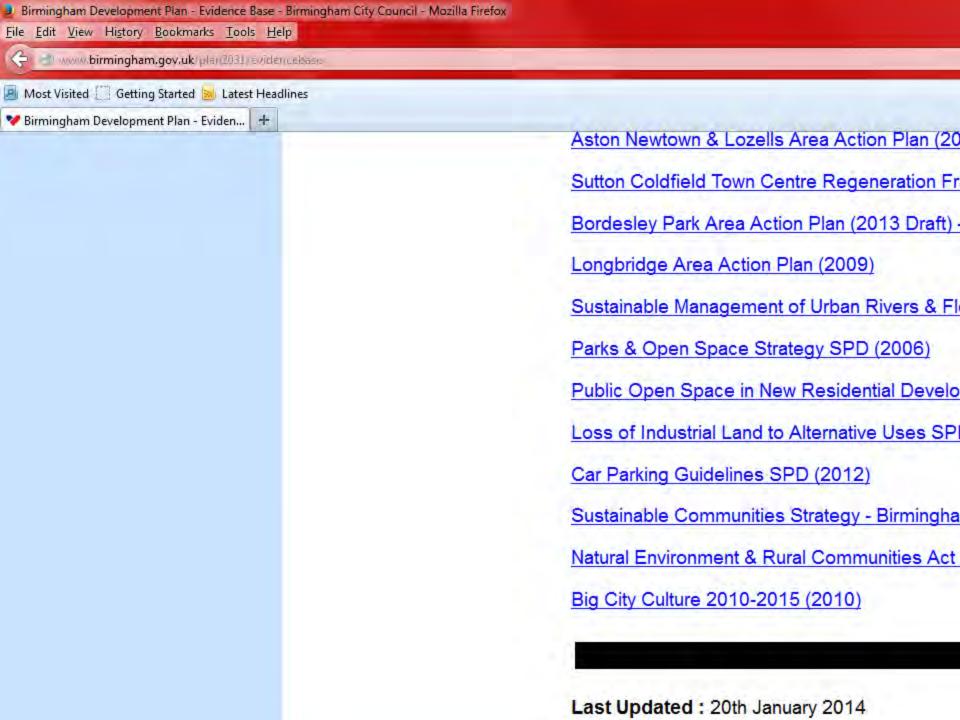


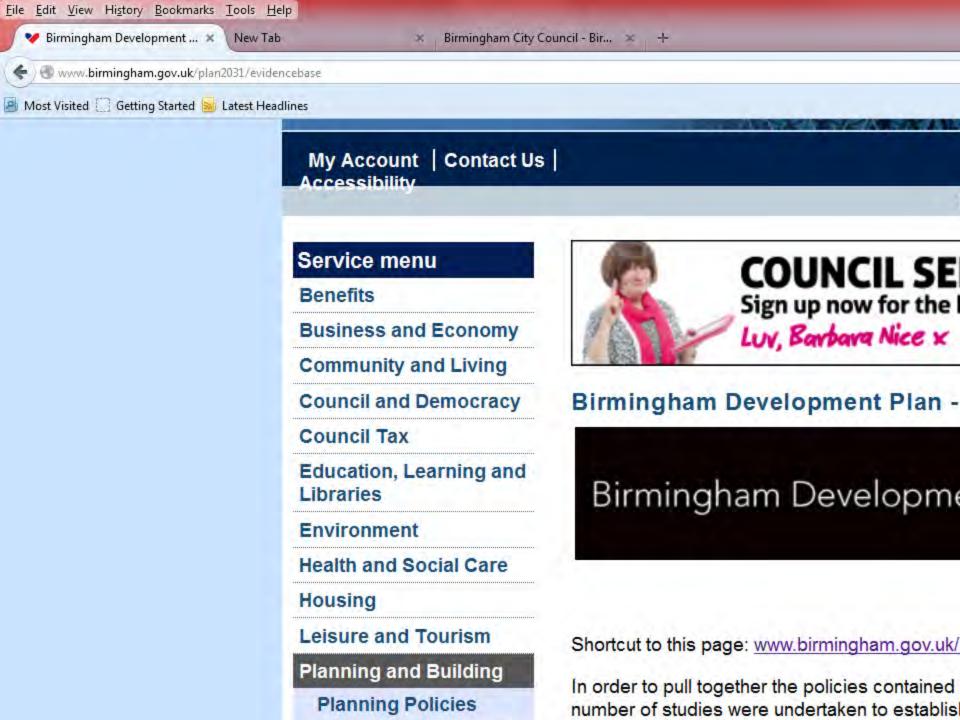




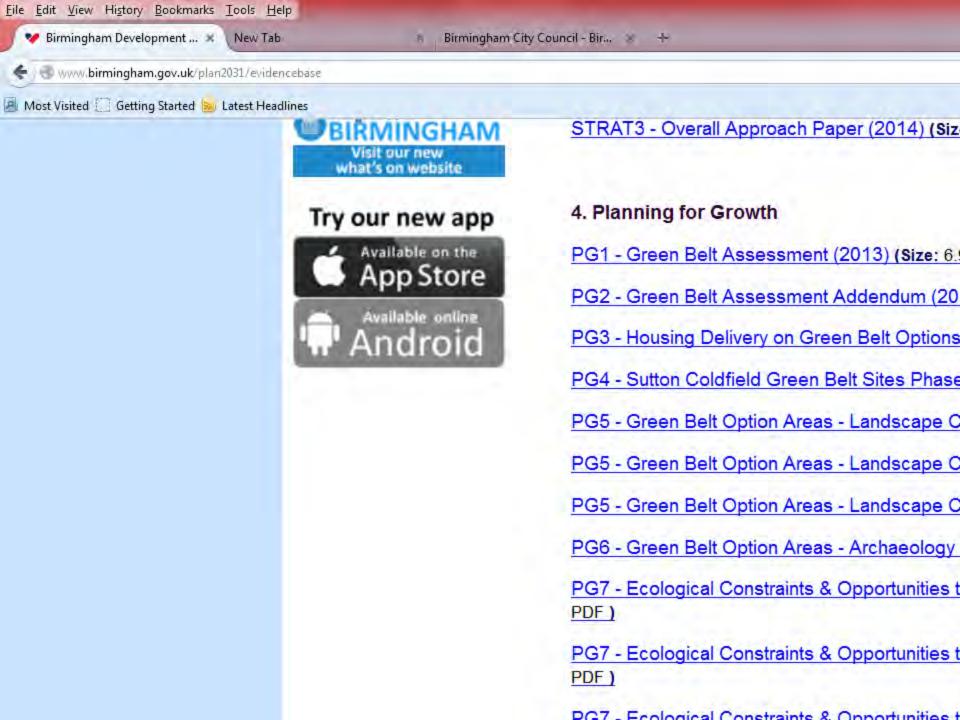








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	Neighbourhood Planning	SUB1 - Pre-Submission Document - Part 2 (20
	Regional Planning	SUB1 - Pre-Submission Document - Part 3 (20
	Local Planning Literature	SUB2 - Modifications Following Pre-Submission
	Contact Us	SUB3 - Submission Plan Sustainability Apprais
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	6. Spatial Delivery of Growth
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	ES4 - Natural Environment & Rural Communitie
	ES5 - Waste Capacity Study (2010)
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	ES7 - Total Waste Strategy (2011)
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	ES10 - Leisure in Birmingham (2004)
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	ES17 - Green Commission Vision Statement (
	ES18 - Carbon Plan Analysis (2013)
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	ES20 - Technical Paper 2 – Impact of National (2013)
	ES21 - Birmingham & Black Country Biodivers
	8. Economy & Network of Centres
	EMP1 - Loss of Industrial Land to Alternative U
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	H7 - Housing Growth Plan (2013)
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	10. Connectivity
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	TA2 - Car Parking Guidelines SPD (2012)
	TA3 - Transport Analysis of Green Belt Options
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	11. Implementation
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	HTY7 - Core Strategy 2026 Consultation Draft
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	HTY18 - Unused
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	HTY20 - Pre-Submission Policies Map (2013)
	HTY21- Local Development Scheme (2014)
	HTY22 - The Birmingham Plan - Unitary Develo
	14. Examination Documents
	EXAM1 - Inspector's Procedural Corresponde
	EXAM2 - Councils respose to the Inspectors F
	EXAM2A - BDP Proposed Main Modifications
	EXAM2B - BDP Proposed Additional Modifica

Appendix 3 is contained within Project Fields Matter E Statement

From: Baljinder.Chauhan@birmingham.gov.uk To: suzanne.webb_projectfields@hotmail.co.uk CC: Phil.Wright@birmingham.gov.uk Subject: Written Response to your Question at City Council on 16 September 2014 Date: Fri, 26 Sep 2014 15:00:19 +0000

Dear Ms Webb

Please find below your Question and Response at the City Council Meeting on 16 September 2014.

A Questions from Members of the Public to any Cabinet Member or District Committee Chairman

7 <u>Ms Suzanne Webb to the Cabinet Member for Development, Transport and the</u> <u>Economy, Councillor Tahir Ali</u>

"Hello, good afternoon, the consultation process used for the Birmingham Development plan is considered:

- Woefully inadequate and restricted in its duration.

The consultation was not about a planning application, but 80,000 dwellings, which included an urban extension the size of any Ward in Birmingham. The scale of the proposals therefore warranted a more detailed and effective consultation.

Why no comments were taken on board is also unclear;

- Most were articulate and considered.
- Explaining that Sutton is already at saturation point and its infrastructure at capacity.
- That the proposal for 400 hectares of development was not sustainable.

Since 2012 communities are supposed to be allowed back into planning and not excluded as this process has done.

I can assure you that the proposed housing development for Sutton is too significant for residents to accept the weaknesses of this consultation process.

To this end I would like to ask Sir Albert Bore to explain why only the bare minimum consultation techniques were used and that despite the volume of public comments little or no changes were made to the plan?"

Councillor Tahir Ali in reply

"Thank you Lord Mayor, and I would like to thank Suzanne Webb for asking the question. As it falls within my portfolio, I will be answering the question today. The consultation

undertaken on the Birmingham Development Plan has far exceeded the statutory minimum requirements as set out by the present Government. The most recent formal consultation process began on 6 January and ended on 3 March 2014, a period of 8 weeks. However, the pre-submission plan and all background evidence and supporting information were publicly available from 21 October 2013. The Cabinet meeting approving the document, for consideration by full Council over 2 months before the start of the formal consultation. A letter was also sent out to all those on the consultation database including all those who had previously commented on the core strategy. Officers also presented the proposals in advance of the consultation at a very well attended meeting of the Sutton Coldfield New Hall Ward Committee on 29 November 2013. The formal consultation process included formal letters being sent out to all those on the consultation database and all those who had commented on the previous stages. The draft plan document was available at libraries and neighbourhood offices and notice was placed in the Birmingham Mail. An article was included in 'The Forward' the Council's own newspaper which is delivered to all homes across the City. All the documentation was provided on the Council's website. Sessions were held on several occasions including weekends in Walmley and Sutton Coldfield libraries to provide advice and assistance to people wishing to respond. Similar sessions were also held in a number of libraries elsewhere in the City and there were representations to District Committees and Ward Committees on request. This included meetings on all Ward Committees in the Sutton Coldfield area. Officers also attended other meetings organised locally, a total of 1,524 people and organisations responded to the consultation. It was possible to comment on more than one section or policy of the plan making the total number of responses to 5,863. Comments were received on all aspects of the plan but the largest number relate to the proposals for the green belt development. The Council has considered all of these responses and has concluded no major modification to the plan are required. The Plan has now been submitted to the Secretary of State for consideration an examination in public is scheduled to commence on 21 October where those who are objecting to the proposals in the Birmingham Development Plan will have the opportunity to make their case to the inspector. Thank you Lord Mayor."

Kind Regards

Baljinder Chauhan Committee Services 0121 675 5853

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