

Revised Sustainability Report for the Birmingham Development Plan Proposed Method and Report Structure to Address Compliance Issues

Inspector's Requirements

In light of the interim report into the Examination of the BDP (December 2014), amongst other matters, BCC has been asked to produce an amended Sustainability Report of the BDP. The specific requirements of the Inspector were as follows:

- 54. Further SA work needs to be carried out in order to ensure that all reasonable alternatives have been assessed at the same level of detail as the option taken forward in the submitted Local Plan [paras 49-50].
- 55. A review of the relevant material prepared previously for the Council and for those promoting alternative sites should form an input to this work, and any errors should be corrected [paras 43-46 & 51].
- 56. A report of the further SA work, meeting all relevant statutory requirements, should then be prepared and submitted to me, and consideration given as to whether or not the further SA work indicates the need for modifications to the BDP [paras 52-53].
- 57. Arrangements for public consultation on the SA report and any modifications to the BDP should be discussed once the timescale for the further SA work has been agreed [para 53].

Appraisal of Reasonable Alternatives

The principle of developing a Sustainable Urban Extension (SUE) of approximately 5,000 to 10,000 dwellings was first appraised in 2012 in response to the need to accommodate additional development. The Interim SA (HTY14) concluded that a SUE to the north east of Birmingham was a reasonable option to take forward, against the alternatives ('do nothing' and 'accommodate development within the built-up area'). Subsequent iterations of the SA appraised the sustainability performance of individual sites (i.e. parcels A1, A2, B1, B2, C1, C2 and D) but not areas A, B, C and D, as identified in HTY11.

Following the Inspector's requirements set out above, there are the following reasonable alternatives for consideration: a 5,000 dwelling extension and a 10,000 dwelling extension, and accommodation of these (singly and/or in combination) on areas A, B, C and D (being land to the north and east of Sutton Coldfield as the only realistic area for development of such a scale, as demonstrated by the Green Belt analysis in PG1). It is therefore proposed that:

- First, the sustainability performance of the options of a 5,000 (approx) and 10,000 (approx) dwelling extensions are appraised to determine the likely significant effects of such developments in this general location.
- Second, in light of the outcome of this appraisal determine what reasonable alternatives should be taken forward for detailed site appraisal. If a 5,000 dwelling extension is determined to be on balance more sustainable then the merits of the whole of areas A, B, C and D, and sub-options A2, B2 and C2 which could individually accommodate 5,000 dwellings, will be appraised as reasonable alternatives. If a 10,000 dwelling extension is determined to be on balance more sustainable, then the relative merits of different delivery combinations which together could deliver 10,000 dwellings (namely areas A&C vs A&B vs B&C vs C&D) will be appraised as reasonable alternatives.
- Third, the significant effects of a strategic employment site of approx 80 ha at this location appraised, using the reasonable alternatives of sites C and D.

The analyses of alternatives will use the same matrix of eight Sustainability Themes and 28 Sustainability Objectives as were used in each of the previous SA documents (HTY14, HTY17, SUB3 & SUB5), in order to ensure a consistency of approach.

Amended Sustainability Report

The Sustainability Report will be amended to incorporate the analysis of reasonable alternatives (and the consequent effects on the conclusions of the Appraisal), as well as taking the opportunity to incorporate the appraisal of strategic sites (currently a separate volume) into an Appendix. The overall structure of the Sustainability Report will be as follows:

Non-Technical Summary

- Outline of the Plan and the SA
- Sustainability characteristics of the plan area
- Reasonable alternatives considered
- Likely significant effects of the Plan
- Mitigation
- Consultation
- Monitoring
- Post Adoption Statement

Introduction

- Requirement for SA/SEA
- Purpose of the Report and Background to the Appraisal
- The Birmingham Plan
- Consultation
- Compliance with SEA Directive
- Structure of the SA Report

Appraisal Methodology

- Approach to Assessment
- Geographic and temporal scope
- HRA
- Review of PPP
- Baseline Review and its Evolution Without the Plan
- Development of the Sustainability Objectives and Framework
- Key sustainability issues and opportunities

The Local Plan

- Vision, Objectives and Spatial Strategy
- Evolution of the Plan and its Appraisal (incl. detailed commentary of options and reasons for rejection of alternatives)

SA of the Local Plan

- Compatibility of Objectives
- Local Plan Strategy – sustainability analysis
- Local Plan Policies – sustainability analysis (incl. cumulative, secondary and synergistic effects)

Overall Effects of the Local Plan and Proposed Mitigation and Monitoring

- Effects and Uncertainties
- Influence of the SA on the Local Plan
- Mitigation and Monitoring

Submission of the Local Plan and Next Steps

- Submission and Examination of the Local Plan
- Finalising the SA Report and Post Adoption Statement
- Quality Assurance Checklist

Appendices (policy and site appraisal)