North Worcestershire Golf Course – Review of Harris Lamb Sustainability Appraisal

SA Objective	Guide Questions	Site Appraisal Criteria	H-L Score	Harris Lamb Commentary	AMEC Score	AMEC Observations/Revised Comment
Resource Use: Use natural resources such as water and minerals efficiently.	 Incorporate energy efficiency measures into new land use and developments, redevelopment and refurbishment? Promote and support resource efficient technologies? Reward efficient resource use? Reduce water consumption? 	Assumed to be part of good design	+	The redevelopment of the NWGC for housing will result in the redevelopment of an urban greenfield site. The NWGC will soon close meaning that an alternative use is required to be found. Redevelopment of the site for housing will reduce the pressure for residential development on greenfield and Green Belt land outside of the built up boundary of the City.	+	Redevelopment of the site for housing will reduce the pressure for residential development on greenfield and Green Belt land outside of the built up boundary of the City.
7. Waste Reduction and Minimisation: Encourage and enable waste minimisation, reuse, recycling and recovery.	Divert resources away from the waste stream, including the use of recycled materials where possible?	Are there opportunities to contribute to waste recycling either on- or off- site?	0	(No comment provided)	0	A development of this scale could provide for some innovation in waste recycling.
8. Efficient use of land: Encourage land use and development that optimises the use of previously developed land and buildings.	Encourage the efficient use of land and minimise the loss of greenfield land? Value and protect the biodiversity/geodiversity (of previously developed land and buildings?	Is the site located on greenfield land?	++	The proposed development will deliver in the region of 800 dwellings on a site within the built up area of the City. Due to financial difficulties the Golf Club will close in the near future and an alternative use of the site is required. Redevelopment of the site for residential development will help the City meet its significant housing requirement in a highly sustainable location within the City's administrative boundary.	0	The development will result in the loss of greenfield land, although there should be opportunities to mitigate this loss to some degree through green infrastructure provision across the site.
2. Sustainable design, construction and maintenance: Promote and ensure high standards of sustainable resource-efficient design, construction and maintenance of buildings, where possible exceeding the requirements of the Building Regulations.	Reduce dependence on fossil fuels? Increase the number of buildings which meet recognised standards for sustainability?	Assumed to be part of good design	++	The redevelopment of the site for residential development will deliver a high quality residential development within the urban area. It will incorporate sustainable transport links and the location site means that it will have easy access to a range of services and facilities.	+?	There are opportunities to incorporate innovative design and energy generation on a development of this scale, although these are untested in respect of site viability.
3. Renewable Energy: Encourage development of alternative and renewable resources.	Reduce dependence on fossil fuels? Promote and support the development of new high value and low impact technologies, especially resource efficient technologies and environmental technology initiatives? Increase the proportion of energy generated from renewable and low carbon sources, including micro generation, CHP, district heating and transportation?	Are there opportunities to contribute to the use of renewable energy generation either on- or off-site?	++	The redevelopment of the site provides the opportunity for renewable technologies to be incorporated in the development.	+?	There are opportunities to incorporate innovative design and energy generation on a development of this scale, although these are untested in respect of site viability.
4. Energy Efficiency : Reduce overall energy use through energy efficiency.	Reduce energy consumption?	Assumed to be part of good design	++	The proposed development provides the opportunity for energy efficient materials to be used in the construction of the development	+?	There are opportunities to incorporate innovative design and energy generation on a development of this scale, although these are untested in respect of site viability.
5. Sustainable Transport : Increase use of public transport, cycling and walking as a proportion of total travel and ensure development is primarily focused in the major urban areas, making efficient use of existing physical transport infrastructure.	 Reduce road traffic congestion, pollution and accidents? Encourage walking and cycling? Reduce travel by private car? Promote accessibility for disabled people? 	 Is the site within walking distance (800 metres) of an existing public transport node? Is the site likely to require/include new infrastructure to support the use of sustainable methods of travel? 	++	The NWGC is in close proximity to Northfield Centre and the wide range of services, facilities and job opportunities it provides. There are a range of shopping opportunities in easy walking distance of the site, including a Sainsbury's superstore. Furthermore sustainable transport methods, including public footpaths and cycle ways, can be incorporated into the redevelopment of the site.	++	Agree with commentary
6. Reduce the need to travel : Ensure development reduces the need to travel.	Reduce traffic volumes? Reduce average journey length?		++	The site has excellent access to a range of services, facilities and public transport opportunities using sustainable transport modes. As referred to above Northfield centre, and the range of services and facilities it provides, is in close proximity to the NWGC.	++	Agree with commentary
9. Reduce climate change : Minimise Birmingham's contribution to the causes of climate change by reducing emissions of greenhouse gases from transport, domestic,	Reduce emissions of greenhouse gases by reducing energy consumption?		+	The proposed development will result in new houses being created on a greenfield site within the urban area. The site does, however, have excellent access to a range of services and facilities by sustainable transport modes	0	The location of the site with ready access to services means that increased emissions as a result of car-use are likely to significance, but can to some degree be off-set through sustainable transport provision and the

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commercial and industrial sources.				reducing the need to travel and assisting reducing climate change. Given that the plan is seeking to put in place proposals to meet the objectively assessed housing need new development is inevitable and the NWGC site is one of the most sustainable and accessible options for development available.		proximity of the development to local services which can be accessed through cycling and walking.
10. Manage Climate Change: Implement a managed response to the unavoidable impacts of climate change, ensuring that the design and planning process takes into account predicted changes in Birmingham's climate including flood risk.	 Minimise the risk of flooding from rivers and watercourses to people and property? Reduce the risk of damage to property from storm events? Protect, enhance and extend green infrastructure resources? Address climate change adaptation for biodiversity fragmentation? 	 Is the site within flood risk zone 2, 3a / b? Is the site likely to increase flood risk elsewhere? Is the site at risk of flooding from other sources? Is there capacity on site for mitigation measures e.g. green infrastructure? 	+	The SA confirms that managing climate change is linked to sustainable transport, reducing the need to travel, air quality, bio-diversity health and natural landscape. The proposed redevelopment of the NWGC will not adversely impact upon any of these factors. However, new residential development is required in and around Birmingham to meet the housing requirement. Directing development to the NWGC will ensure that housing is delivered in a highly sustainable location helping to reduce any climate change impacts compared to less significant sites.	+	The site is within Flood Zone 1 and masterplanning of green infrastructure should enable the effects of increased run-off associated with urbanisation to be adequately mitigated.
12. Built and Historic Environment : Value, protect, enhance and restore Birmingham's built and historic environment and landscape.	Protect and enhance features of built and historic environment and landscape?	Is the site in proximity to (including its setting): Scheduled Monument, Listed Building, Conservation Area, Historic Park or Garden, or other historic or cultural feature?	+	The redevelopment of the NWGC will result in the redevelopment of a greenfield site. However, at the moment the NWGC is inaccessible to members of the public. The redevelopment of the site will provide new areas of open space available to all. It will help to create a sense of place locally and provide much needed houses on a sustainable site.	0?	The site is not designated as of cultural heritage value, although detailed evaluation would be required to determine the effect of such a large development on local townscape character.
13. Natural Landscape: Value, protect, enhance and restore Birmingham's natural landscape.	 Safeguard and enhance the character of the local landscape and local distinctiveness? Improve the landscape quality and character of the countryside? 	Is the site in proximity to designated landscape areas?	+	The SA advises that the natural landscape is linked to issues relating to bio-diversity, health, soil quality, sense of place, culture, sports and recreation, climate change, mitigation and adaption. The development will create new areas of open space for sports and recreation purposes alongside new residential development. At the moment the NWGC plays a limited sports and recreational role as it is only available to its members. The development will also help to create a sense of place through the delivery of a high quality sustainable residential scheme.	0?	The site is not designated as of landscape or townscape value, although detailed evaluation would be required to determine the effect of such a large development on local distinctiveness.
14. Biodiversity : Value, protect, maintain, restore and recreate local biodiversity and geodiversity.	Use approaches that improve the resilience of natural systems such as linking fragmented habitats where possible? Conserve and enhance natural/semi-natural habitats and conserve and enhance species diversity? Lead to habitat creation delivering BAP priorities?	Is the site in proximity to SSSI, NNR, LNR, Ancient Woodland, or other sensitive designated or non- designated receptors?	+	The development will not impact upon any areas of bio- diversity or geo-diversity of note. Whilst the site is currently greenfield it is subject to a vigorous management regime as part of its use as a golf course limiting its ecological value. The redevelopment of the site will create new areas of open space, including balancing ponds that will provide a bio- diversity resource. It will also reduce pressure to develop greenfield sites outside of the City's built up boundary.	0	The site has no formal biodiversity designation, but is identified as part of the semi-natural habitat network in the BCC Green Living Spaces Plan (2013). The masterplan will need to demonstrate how biodiversity might be enhanced through green infrastructure provision, and how this connects with existing provision in the locality.
15. Air Quality : Minimise air pollution levels and create good quality air.	Improve air quality?Reduce CO2 emissions?	Will the local road networks experience a significant increase in traffic or emissions or congestion as a result of the new development?	0	The emerging BDP plans for significant amounts of new residential development. This development, along with the associated vehicle movements, will have some impact upon air quality. However, the NWGC is located in an area with excellent access to a range of services, facilities and public transport opportunities helping to minimise vehicle movement and air quality impact.	0	Agree with commentary
16. Water Quality : Minimise water pollution levels and create good quality water.	Improve water quality?	 Are any vulnerable water bodies within the proximity of the site? Is the site within a ground water protection zone? 	+	The development will not adversely impact upon water quality. Through the use of SUDS the water quality leaving the site will be better than it currently is providing the opportunity to help solve off-site drainage issues that have arisen nearby through the development of drainage infrastructure.	+	Agree with commentary
17. Soil Quality : Minimise soil pollution levels and create good quality soil.	Maintain and enhance soil quality?Minimise the loss of soils to development?	Will the development lead to the loss, or compromise the quality, of soil?	#	The site is not used for, and is not suitable to be used for, any agricultural or associated activities.	#	Agree with commentary
18. Noise: Minimise noise pollution levels.	 Cause noise pollution? Propose mitigation measures to minimise noise 	Is development of the site likely to significantly increase ambient noise	0	The NWGC currently produces a highly limited amount of noise. It is surrounded by residential development on all	0	An Increase in noise pollution is likely to arise from increased traffic in the locality although in the context

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	pollution?	levels?		sides. Redevelopment of the site for residential use will be compatible to the surrounding area in the noise perspective.		of Birmingham this is unlikely to represent a significant change.
20. Economy and Equality : Achieve a strong, stable and sustainable economy and prosperity for the benefit of all of Birmingham's inhabitants.	 Encourage and support a culture of enterprise and innovation, including social enterprise? Improve business development and enhance competitiveness? Promote growth in key sectors? Reduce unemployment, especially amongst disadvantaged groups? 	 For major developments, will the development provide opportunities for job creation? Will the development encourage retail and business diversity? Does the site allow for mixed use development and multiple use spaces? 	++	Jobs will be created in the construction industry through the development of the houses. The number of jobs is likely to be significant given the scale of the development. An apprentice scheme and local labour will be used where possible.	+	Site development will generate construction jobs in the short term, whilst there are likely to be longer term benefits to local services as a result of an increased catchment population.
21. Learning and Skills: Promote investment in future prosperity, including ongoing investment and engagement in learning and skills development.	Ensure that Birmingham's workforce is equipped with the skills to access high quality employment opportunities suited to the changing needs of Birmingham's economy whilst recognising the value and contribution of unpaid work?		+	We have been advised by the LPA that they require provision to be made for a school on the site. This school will not only serve the residents of the redevelopment but also the wider area generally.	+	Agree with commentary
11. Sense of Place: Encourage land use and development that creates and sustains well-designed, high quality built environments that incorporate green space, encourage biodiversity, and promote local distinctiveness and sense of place.	Improve the satisfaction of a diverse range people with the neighbourhoods where they live?	Will new development require infrastructure improvements (utilities, roads, schools, greenspace) to support it? Is development on the site likely to contribute to sense of place?	++	The scale of the development provides the opportunity to create a high quality residential scheme with its own sense of place. Furthermore, as the site is surrounded by residential development on all sides it will integrate into the wider residential area.	+	Agree with commentary
19. Social and Environmental Responsibility: Encourage corporate social and environmental responsibility, with local organisations and agencies leading by example.	Encourage local stewardship of local environments, for example enabling communities to improve their neighbourhoods? Encourage good employee relations and management practices? Encourage ethical trading?	Assumed to be part of good design	+	The SA advises that social and environmental responsibility is linked to quality, community involvement, learning skills, economy and equality, waste reduction and minimisation. The proposed development will not adversely affect any of these topics. It has the potential to create jobs, a sense of community and the provision of a new school.	+	Agree with commentary
22. Community Involvement: Enable communities to influence the decisions that affect their neighbourhoods and quality of life.	Encourage local stewardship of local environments, for example enabling communities to improve their neighbourhoods? Encourage engagement in community activities for example through the establishment of social and cultural facilities that address the needs of equalities groups? Increase the ability of people to influence decisions?	Assumed to be part of good design	++	Bloor Homes have actively sought to engage the local community in the future of the NWGC. A series of consultation events have been undertaken and a working group has been established. The local community will be involved as far as possible in the redevelopment of the NWGC.	+	The extent of opportunities for existing and new residents to participate in local stewardship of the environment, for example, will depend on masterplan proposals, but these should exist in a development of this scale
23. Equality: Ensure easy and equitable access to services, facilities and opportunities, including jobs and learning.	Promote environmental justice, recognising that deprived areas and disadvantaged communities are more likely to be affected by environmental damage and degradation? Ensure that people are not disadvantaged with regard to ethnicity, gender, age, disability, faith, sexuality, background or location?	Is the site located within an area of high deprivation? Does the site provide for mixed use development? Will the site be located within 800 metres of a primary school / within 4.8km of a secondary school? Does the size of the development	+	The SA advises that there are inequalities relating to access to services, such as jobs and health services, which are partly to do with the geographical location, but partly to do with the social and economic disadvantage. The NWGC is located close to Northfield centre and the range of services and facilities it provides. It is, therefore, well placed geographically to provide access to the services and facilities.	+	Agree with commentary
24. Poverty: Address poverty and disadvantage, taking into account the particular difficulties of those facing multiple disadvantage.	Promote environmental justice, recognising that deprived areas and disadvantaged communities are more likely to be affected by environmental damage and degradation? Reduce household poverty, especially the proportion of children living in poor households?	trigger the need for additional places in post-sixteen education? Does the site include, where required, provision for new educational facilities? Will the site be located within 800 metres of healthcare facilities?	+	The SA advises that a significant proportion of Birmingham's residents live in areas that are some of the most deprived in England. Unemployment rates are above national average. Poverty is linked to, amongst other things, learning and skills. The redevelopment of the NWGC will provide affordable housing. Jobs will be created through the construction process and a school will be provided on the site.	+	Agree with commentary
25. Health : Improve health and reduce health inequalities by encouraging and enabling healthy active lifestyles and	Help provide equitable access to health services?	Will the site be within walking and cycling distance of natural greenspace?	+	As part of the development of the NWGC new areas of open space will be provided on the site. This will improve the opportunities for health and recreation. Discussions were	-	Loss of this area of greenfield land is likely to have a detrimental effect on the health of current and potential users of the site from the locality and further afield

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protecting health.	Provide sufficient areas of accessible natural greenspace?			also taking place regarding the possibility of a doctor's surgery being located on the site.		because of the loss of greenspace for current users of the golf course and as part of the urban fabric (albeit not publicly accessible).
26. Crime: Reduce crime, fear of crime and antisocial behaviour.	 Reduce crime? Reduce the fear of crime amongst all social and cultural groups? 	Assumed to be part of good design	0	There will be no impact on crime as a consequence of the development. The scheme will use good urban design techniques to minimise the risk of crime	0	Agree with commentary.
28. Culture/Sport/Recreation: Improve opportunities to participate in diverse cultural, sporting and recreational activities.	Encourage participation in sport and cultural activities for all the diverse communities in Birmingham?	Is there convenient access to sport, recreation and cultural facilities?	+	The redevelopment of the NWGC will result in the loss of the Golf Club. However, the Golf Club is not accessible to members of the public. New sports and recreational facilities will be provided on the site that are accessible to all.	-	Loss of this recreational facility could deprive residents of Birmingham of a valued resource which would be very difficult to re-provide once lost. Detailed analysis of recreational provision for golf and sports facilities generally in this area would be required to determine the precise impact. Further evidence of the role that any proposed replacement facilities would play in meeting recreational needs would have to be provided.
27. Housing : Provide decent and affordable housing for all, of the right quantity, type, tenure and affordability to meet local needs.	 Reduce homelessness? Increase the range and affordability of housing for all social and cultural I groups? Reduce the number of unfit homes? 	Is the site/proposal of adequate size to trigger delivery of affordable housing? Will housing be supported by key services, employment, open space and/or other facilities on site?	++	The proposed redevelopment of the Club will deliver much needed new housing in a highly sustainable location.	++	The provision and proportion of affordable housing will reflect BDP policy. The scale and location of the development will ensure basic service provision for those on low incomes.

Overall AMEC Comment

It is our opinion that the Harris Lamb commentary is misplaced in some important respects, notably in relation to the loss of a recreational facility which is very difficult to re-provide and associated impacts on the health of existing and potential users of the site. This is clearly a site where ready advantage could be taken of opportunities for integration into the existing pattern of service provision and provide for a range of measures which contribute to its sustainable credentials. Although they have used what is no doubt a well-developed masterplan to help inform how certain issues can be mitigated, the fundamental qualities of the site and its location are strong, and there is no suggestion of likely negative effects. The re-analysis by AMEC, without the benefit of a masterplan, generally re-iterates some of the scores given although these are tempered for some criteria either by dropping a grade or the introduction of a question mark to indicate some uncertainty (typically related to the precise masterplan proposals). The most significant concerns relate to the impacts on health and loss of a recreational facility which is difficult to re-provide and the likely cumulative effects which are likely to arise from the development over the short, medium and longer term. The overall scale of the development is of greatest significance with the consequent effects on traffic generation (with consequences for air quality, noise and congestion), CO2 emissions, pressure on local services and alteration of the urban 'grain' through loss of a large area of green space (albeit with no current public access). The extent of the change in the suburban character of this locality would need to be the subject of detailed study in the light of a firm masterplan, particularly the influence of such a large development on local urban form. In addition, detailed traffic modelling would be needed to determine the likely impacts of the loss of this facility.

19th March 2015