

**BIRMINGHAM DEVELOPMENT PLAN EXAMINATION**

**EXAM 146: REVISED SUSTAINABILITY REPORT**

**INITIAL REPRESENTATIONS ON BEHALF OF TAYLOR WIMPEY**

**APRIL 2015**

**Introduction**

1. Savills submitted representations previously with respect to Matter E of the Birmingham Development Plan (BDP) Examination. Savills has been instructed by Taylor Wimpey to submit further representations with respect to the BDP Examination document EXAM 146, the Revised Sustainability Report (March 2015), produced by Amec Foster Wheeler. Taylor Wimpey is a national housebuilder with significant experience in delivering large-scale residential development and has an interest in the southern area of the Langley SUE proposed strategic residential allocation (BDP Policy GA5). This submission provides comments on the Revised Sustainability Report, in the context of the representations made previously.
2. Taylor Wimpey understands that the Revised Sustainability Report has been undertaken 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; set out why a single urban extension is being sought for 'around' 5,000 dwellings rather than site(s) for a range of between 5,000 to 10,000 dwellings; and to correct any errors made in the previous sustainability reports.
3. In accordance with the advice from the Programme Officer in his invitation to Savills to submit comments on the Revised Sustainability Report in advance of the commencement of the formal consultation process, the scope of these representations is limited to the following areas of the Revised Sustainability Report: Section 5 (pages 75-86), Appendix A (pages A8 & A9 only), Appendix B (pages B1-B10), Appendix C (pages C6-C28), Appendix D (pages D14 – D16) and the Non-Technical Summary (pages vii – ix).

## Comments

### Testing the Scale of a Sustainable Urban Extension

4. The matrix scoring system set out in Table 5.1 shows that an urban extension of 'around' 5,000 dwellings scores more favourably, on an overall basis, against the identified sustainability objectives than the alternative scenario of 'up to' 10,000 dwellings.
5. The key areas of difference appear to be focussed on the issue that an urban extension of 'up to' 10,000 dwellings in the Birmingham Green Belt would take more sensitive land than a urban extension of 'around' 5,000 dwellings (greenfield land with cumulative impacts on landscape, biodiversity and historic environment resources) and that there is an absence of any evidence showing how the traffic impacts from an urban extension of 'up to' 10,000 dwellings could be accommodated on the network.
6. The table and explanation in Appendix B expands upon the matrix set out in Table 5.1, notably identifying concerns with the alternative urban extension option of 'around' 10,000 dwellings based on uncertainties relating to the delivery of, and impact on, the necessary transport infrastructure, as well as additional impact through a requirement to use landscape areas with higher value assets.
7. Whilst Taylor Wimpey notes that the analysis of the 'up to' 10,000 dwelling option does not on its own *per-se* conclude that an urban extension of 'up to' 10,000 dwellings has a significantly adverse sustainability performance, the appraisal does show that an urban extension of 'up to' 10,000 dwellings would be less sustainable than an urban extension of 'around' 5,000 dwellings.
8. The Revised Sustainability Report considers the two urban extension options of 'around' 5,000 and 'up to' 10,000 dwellings. Taylor Wimpey considers that the Langley SUE has the capacity to deliver 6,000 dwellings, in line with the provisions of BDP Policy GA5, as set out in previous representations. However this is considered to be broadly in accordance with the consideration of the delivery of an urban extension of 'around' 5,000 dwellings within the plan period and therefore justified by the Revised Sustainability Report.

9. The overall outcome of the option appraisal therefore provides credibility to BCC's decision to allocate the Langley SUE for development at a capacity at the lower end of the 5,000-10,000 dwelling range.

#### Assessment of Strategic Housing Sites

10. The matrix scoring system set out in Table 5.2 and reproduced on page A9 of Appendix A makes it apparent that, out of Green Belt Option Areas A, B, C and D, Area C scores the most favourably against the sustainability objectives on an overall basis for an urban extension of 'around' 5,000 dwellings. In fact none of the other three Areas are shown to achieve better performance than Area C under any of the 27 sustainability objectives with the exception of Area D, with respect to sustainability objective 13 (natural landscape).
11. Appendix C notably shows that the only negatively rated sustainability performance score for Area C is in relation to sustainability objective 8 (efficient use of land), based on the requirement to build on greenfield land. However this is a necessary function of the expansion of Birmingham through the use of sustainable urban extensions and is common to all of the four Option Areas. Furthermore there is no differential shown between the assessment results for Area C (on an overall basis) and the two sub-areas of Area C (Area C1 and Area C2), therefore reinforcing the decision to allocate the whole of Area C for an urban extension in the BDP.
12. Particular strengths of Area C are shown to be with respect to sustainability objectives 5 (sustainable transport), 11 (sense of place) and 19 (social and environmental responsibility). With respect to sustainability objective 5, both the stated accessibility score of 67% (by all modes of transport) and sustainability score of 58% (with respect to accessibility to facilities only by walking, cycling and public transport) are the highest out of all four Option Areas.
13. Taylor Wimpey commissioned and submitted baseline work to support earlier representations to the BDP with respect to their interest in the Langley SUE. The assessment of Area C set out in the Revised Sustainability Report is not contradicted by the findings from either this baseline work, or any of the initial findings of baseline studies procured by the Langley SUE

Consortium with respect to the Langley SUE, or Birmingham City Council's (BCC's) own technical evidence base studies.

14. The Revised Sustainability Report does now provide a detailed matrix-based and descriptive review of all the alternative Option Area sites at the same level. It is therefore considered to provide the form of information required to address the breach of the European Directive 2001/42/EC and the *Environmental Assessment of Plans and Programmes Regulations 2004* identified by the Inspector<sup>1</sup>.
15. The Revised Sustainability Report also provides an assessment of reasonable alternatives for an urban extension within BCC's own administrative area to assist the emerging BDP in achieving relevant social and economic objectives, as sought by the requirements of Planning Practice Guidance (PPG) para 11-001-20140306.
16. In addition, the Revised Sustainability Report also evaluates the preferred approach and reasonable alternatives, identifies positive and negative effects of each alternative at the same level of detail as the preferred approach, gives reasoning for why alternatives were selected and rejected and identified benefits for the preferred approach, as sought by the requirements of PPG para 11-018-2014306.
17. For the reasons given in this representation, the overall analysis set out in the Revised Sustainability Report is therefore considered to provide justification to support the allocation of the whole of Area C (the Langley SUE) within the BDP for a housing-based urban extension (Policy GA5).

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<sup>1</sup> EXAM 131 - Inspector's Interim Findings following the hearing sessions (5 January 2015), para 39.