



BIRMINGHAM DEVELOPMENT PLAN EXAMINATION

EXAM 146: REVISED SUSTAINABILITY REPORT

INITIAL REPRESENTATIONS ON BEHALF OF THE LANGLEY SUE CONSORTIUM

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 the Langley SUE Consortium to submit further representations with respect to the BDP Examination document EXAM 146, the Revised Sustainability Report (March 2015), produced by Amec Foster Wheeler.
2. The Langley SUE Consortium, referred to hereafter as “the Consortium” comprises a collection of landowners, national and regional housebuilders and development companies who together control the majority of the land within the SUE. The Consortium Members are working together to actively promote the SUE and ensure that the SUE can be delivered in a timely fashion, including through a decision to enter into a Collaboration Agreement and the joint commissioning of additional baseline technical studies to support the masterplanning of the site.
3. The Langley SUE Consortium 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.
4. 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

5. The Consortium notes that the matrix scoring system set out in Table 5.1 of the Revised Sustainability Report, and expanded upon within the table and explanation set out at Appendix B of the Revised Sustainability Report, 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.
6. The Consortium supports the delivery of 6,000 dwellings at the Langley SUE, in line with the provisions of BDP Policy GA5, and as set out in previous representations, and considers that this is broadly in accordance with the delivery of an urban extension of 'around' 5,000 dwellings within the Plan period and therefore justified by the Revised Sustainability Report.
7. The Consortium notes that the matrix scoring system set out in Table 5.2 of the Revised Sustainability Report and reproduced on page A9 of Appendix A of the Revised Sustainability Report makes it apparent that, out of four 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). 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.
8. The Consortium wishes to highlight that the assessment of Area C set out in the Revised Sustainability Report is in accordance with the other Birmingham City Council technical evidence base studies and the initial findings of baseline studies procured by the Langley SUE Consortium.

9. The Revised Sustainability Report does therefore now provide a detailed matrix-based and descriptive review of all the alternative Option Area sites at the same level, as well as an assessment and evaluation of reasonable alternatives for an urban extension within BCC's own administrative area. 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. It is therefore considered to provide the form of information requested by the Inspector in his Interim Findings (EXAM 131).

10. The Consortium therefore considers that the overall analysis set out in the Revised Sustainability Report provides 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).