

**COMMENTS ON THE REVISED S.A : SUTTON COLDFIELD SITE OPTIONS
SUBMITTED ON BEHALF OF SUTTON COLDFIELD CIVIC SOCIETY
10.04.15**

SECTION 5

TABLE 5.1 – Testing the scale of a SUE

- The table indicates that a SUE would have a positive effect on reducing poverty. It is unclear how this would be achieved in a relatively affluent area such as Sutton Coldfield unless developers are given a clear requirement to include affordable housing.
- We agree with PBA that a larger SUE (10k houses) could not be delivered within the anticipated timescale.
- “A larger development will yield greater economic benefits to Birmingham through ... household expenditure ...” We consider that a large SUE on the outskirts of Sutton would in fact encourage its residents to travel for their major shopping to Lichfield or Tamworth, rather than face the already congested roads into Sutton and on to Birmingham. Both Lichfield and Tamworth offer a very competitive retail experience.
- {NB – Part of the text on page 78 is overlaid by a map}.

TABLE 5.2 – Assessment of Strategic Housing Sites

- We suggest that Areas A, B, A2 and B2 should be shown as having a negative impact on transport. Movement into Sutton from the Lichfield and Tamworth directions is often heavily congested.
- “Reduce the need to travel” should also be shown as a negative impact. Where are the thousands of new residents supposed to work and how will they get there?
- Area D is rated as + effect on the natural landscape- How can that be, if the natural landscape is built over?
- Biodiversity – all areas should in our opinion be marked as Negative impact because of habitat obliteration.
- All areas are rated + for impact on poverty. It is unclear how this would be achieved.
- Page 80 – The Green Belt offers valued recreational use in the form of public footpaths (please see note on final page of this submission).

TABLE 5.3 – Reasons for deciding against the Reasonable Alternatives considered

- We agree with the reasons given for deciding against the alternatives, though this should be seen in the context of our opposition to all building in the Green Belt.
- Page 85: “The allocations seek to reduce out-commuting”. This is a good argument against locating housing on the outskirts of the conurbation, where relatively easy access to Lichfield and Tamworth would encourage out-commuting as well as creating urban sprawl.
- Page 86: What is meant by “the incorporation of green infrastructure which serves multiple purposes”?

APPENDIX A

- Impact on Natural Landscape and Biodiversity (p8) is only rated as Neutral. In reality it would not be possible to build over open fields and have only neutral impact.
- The impact on reducing the need to travel (p9) is also rated as Neutral. Are only very local residents expected to work there? The impact on the Built and Historic Environment (including the historic site and setting of Peddimore) is also rated Neutral. We disagree.
- Impact on the Natural Landscape (p9) is rated as a Positive – we fail to see the logic in that.
- Impact on the Sense of Place rated as Positive on p9 – we think the opposite might well be the case as it will have a major impact on the Walmley context.
- Impact on Poverty is rated as Positive (p9). Walmley is not noted as an area of deprivation, so this impact would depend on workers travelling to the site from elsewhere.

APPENDIX B – Appraisals of scenarios for a 5K and 10K SUE

- SA Theme 1 poses the question : Will the BDP help to minimise the loss of greenfield land? Yes – but only by resisting calls from interested parties to build on wider greenbelt areas than BCC recommends.
- SA Theme 5 on Public Transport : building in Sites A and B in particular would add to road traffic congestion (definitely not reducing it) nor would it reduce traffic volume or journey lengths.
- SA Objectives 12 and 13: none of the housing or employment areas proposed would make a positive contribution to the Historic Environment or the landscape.
- SA Objective 20: Economy and Equality. Peddimore would *either* (a) NOT help to materially reduce unemployment amongst disadvantaged groups *or* (b) reduce unemployment by creating more daily commuting from inner city areas of unemployment.
- SA Objective 11: Improve the sense of place and satisfaction with it – This could only happen if infrastructure amenities within a SUE are synchronised with residential development.
- Page B6: SA Theme 1: Reference to the “advantage of on-site mineral extraction if viable”. Which minerals are referred to here?
- Objective 8: We agree that a 10K home SUE would definitely be an adverse use of land.
- Objective 5: The suggestion is made by BCC that a 5K homes SUE would encourage “sustainable transport modes such as Light Rapid Transport”. At present none of Birmingham’s LRT comes within miles of Sutton Coldfield, so this suggestion is surprising and would certainly involve large-scale additional land take.
- We share the concerns re possible “Non-delivery of a critical mass of housing that would trigger the required level of infrastructure”. We think this should be graded as a Negative rather than O? at present.
- pB8, Objective 20: “Achieve a strong, stable and sustainable economy for the benefit of all Birmingham’s inhabitants”. Construction jobs will only be temporary and it is

not clear what other adequate local employment opportunities would exist within a SUE, especially one of 10K houses.

- B10: “A larger development will yield greater economic benefits to Birmingham through a larger workforce and household expenditure” – As stated above, it seems likely that a large new population on the outskirts of the conurbation would find it easier to travel to Lichfield or Tamworth than to Sutton / Birmingham. Additional council tax benefits would have to be balanced against the need for very extensive new infrastructure provision.

SECTION C

- Footnote on pC6: Low Landscape Sensitivity is defined here as “of low importance, abundant around its location or easily replaced. Poor condition and/or low tranquillity”. This begs various questions: Who decides on importance? What is wrong with being “abundant” in its location? “Low tranquillity” could be applied to Tamworth Road, because of the traffic, but in fact the views from the road are a tonic. “Easily replaced” – not if it’s being built over. The whole definition overlooks the fact that Green Belt does not have to be especially attractive in order to meet its purpose of preventing urban sprawl.
- {NB: Maps on C7, C8, C9, C10 – text on these maps is very indistinct and becomes even less clear at higher magnification}.
- pC11, Objective 5. We agreed that Area A would present considerable problems of transport congestion. As stated above, we think that residents in a SUE situated in that area might find access to Lichfield easier than to Sutton (certainly than to central Birmingham) and that Lichfield would profit from increased retail spend.
- pC12, Objectives 6 and 9, as above. We think a Negative score would be appropriate on these objectives.
- C13, Objective 15. We agree that air pollution would be likely to increase as a result of car-based transport. The impression given (whether intentionally or not) by some developers at the Hearing in Public was that they were interested in “up-market” housing for families who would be accustomed to car travel.
- Objectives 20 and 21: Has sufficient evidence been presented to justify the claim of “Potential employment opportunities through mixed use development”? What employment opportunities would realistically be produced in a mainly residential area? We think that the “a +” grading is over-optimistic.
- C14 Objective 5: Four Oaks and Sutton Coldfield stations would both be approached via routes which are heavily congested, especially at peak times, and car parking at both stations is already at capacity. A projected improvement at Four Oaks will probably just about cope with existing demand. Parking in nearby residential streets is already a contentious issue. We think that a Negative grade would be appropriate here.
- C16 Objective 12: “Various Listed buildings and high potential for archaeological remains”. We think this should justify a Negative rating.
- Objective 13: We welcome the Negative rating on the matter of Landscape sensitivity. The commentary here seems quite correct.
- C17: Objectives 20 and 21. Please see our comments above re Objectives 20 and 21 on C16.

- C18: Overall Commentary. We agree strongly with the negative impacts identified. We query the inclusion of “employment provision” as a likely positive impact.
- C19 Objective 5: “Limited access to the strategic road network would discourage car use”. Experience suggests that people will continue to use their cars whatever the difficulties, for instance that car parking near Sutton Coldfield station is already at a premium, made worse by the sale for development of previously publicly owned car parks in the area.
- C20, Objective 20: “Some Listed Buildings and historic landscape features” deserve a Negative rating.
- Objective 13: Landscape should be valued for its amenity value as well as its “landscape sensitivity”.
- C21 Objective 23: Access to higher order services in Sutton Coldfield will depend on good public transport links being developed alongside, or ahead of, housing.
- C22 Objective 27: Would there be a requirement for some affordable housing?
- C25: We agree with the Overall Commentary on Area D and are pleased to see that the presence of a SAM is given due note.

Section D (re Peddimore)

- D14, Objective 5, Sustainable Transport. “Poor access to rail station (Sutton Coldfield 5km) but good access to the strategic road network (A38) which would encourage car travel”. We believe that employment areas (especially manufacturing areas) should be located where they can take advantage of rail links and not rely on HGVs adding to road congestion and emissions. Also, the hope that access to the A38 “could encourage car travel” is clearly contrary to all BCC’s aspirations to reduce car travel. This aspect should definitely be given a Negative rating.
- D15, Objective 15. “Opportunities for walking and cycling links to Sutton”. This appears to contradict Objective 5, pD14, where the distance of 5km to Sutton train station (close to other town centre amenities) is regarded as “poor access”.
- Objective 11: How can creating a large industrial area on greenfield land encourage “local distinctiveness and sense of place”? This seems like mere verbiage.
- D16 Objective 22: The struggle to save the Peddimore site might be remembered as a classic example of a local community ultimately unable to influence decisions.

Non-Technical Summary, table pp viii – ix

We remain opposed to the principle of building on Green Belt land but, within that context, we agree with BCC in their “Reasons for rejecting reasonable alternatives”.

Please note: The Revised SA makes no reference to the public footpaths that exist within Sutton’s Green Belt and which provide evidence of the area’s recreational value. It was noted some years ago by the Civic Society that they collectively formed a route around the town’s outskirts and this was promoted by BCC through a leaflet entitled “The Sutton Coldfield By-Ways Walk”.

Elizabeth Allison MA BEM

On behalf of Sutton Coldfield Civic Society