

### City Council response to comments on the Revised SA of the BDP and Main Modifications

Issue	Respondents	Comment ID	Response
Underestimation of OAHN and consequent effects on the SA.	Turley (2.8.2), RPS (p.2)	BDPSA344, BDPSA196, 197	The finalisation of the OAHN and its wider implications is a separate matter to be dealt with via other components of the evidence base. In addition, changes to the quantum of development need (within reasonable limits) would have no material effect on the judgements made within, and outcomes of, the Sustainability Appraisal which concludes that the proposed strategy for accommodating growth is a relatively sustainable one.
No SA of overspill.	Turley (2.44), RPS (pp.2-5), Paul Gilmour (p.3)	BDPSA344, BDPSA407	It is unreasonable to expect that this SA should try and appraise the significant effects of a quantum of 'overspill' development which is yet to be agreed and distributed and which in any case will be appraised through individual development plans where the effects can be fully considered. It is understood that a Sustainability Appraisal of the HMA housing distribution has been commissioned to address this issue.
The SA seeks to justify existing strategy.	JVH (para 1, para 6), PG (p.3); PG (p.3)	BDPSA341	<p>The Sustainability Appraisal has been undertaken by consultants on behalf of BCC and the outputs reflect their professional judgement. It is the role of the SA is to appraise the proposed Plan strategy and site allocations (including reasonable alternatives). In doing so, the appraisal does not seek to justify the proposed strategy <i>per se</i>, but report on the likely significant effects against reasonable alternatives. This has been done in a logical sequence of steps. The acceptability of the outcomes for those with specific site interests may not be the 'answer' that they hoped for, but the appraisal in testing their <u>relative</u> performance (as summarised in Table 5.1 p.80), does not dismiss any of the 'competing' sites as unsustainable but seeks to highlight their respective merits and drawbacks.</p> <p>At no point has anyone criticizing the BDP strategy and its SA suggested that competing sites should be developed <u>instead</u> of those proposed (for example area B instead of area C as the site for a SUE). The argument of those with development interests to promote appears to be solely for additional development on the basis of overall housing need and market deliverability, either through a much larger development or some combination of smaller sites. This begs the question of why the SA is the focus of criticism when it demonstrates quite plainly that the proposed strategy on balance represents the most sustainable solution in the current circumstances and that changes to those circumstances, notably future reviews of development need and capacity, are likely to prompt further site evaluation. There appears to be confusion in the mind of objectors to the SA over the issue of site suitability and development timing. Conversely objectors to the principle of any Green Belt release appear not to have traced the evolution of the BDP and its SA which explored the issues associated with further intensification of development in the existing urban area and the balance to be struck between this, greenfield land release and seeking the accommodation of development need beyond the City's boundaries.</p>

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<p>Scale of appraisal is too broad brush, with smaller options dismissed without justification.</p> <p>Smaller options need to be justified as reasonable alternatives which can be appraised to the same level of detail as the 5k and 10k scenarios.</p>	<p>JVH (para 3, para 4); Turley (2.8.5) CBRE (passim)</p>	<p>BDPSA341, BDPSA344, BDPSA158</p>	<p>See above. In addition, the Sustainability Appraisal is proportionate to the strategic nature of the Plan and the reasonable alternatives are appraised on that basis. The selection of the range of alternatives appraised in RSA2, including their wording (for example “around 5,000 dwellings” and “up to 10,000 dwellings”) reflects this strategic approach. Appendix B sets out the evaluation of different scales of development, and as part of this exercise smaller options were clearly identified as placing additional pressure on existing infrastructure and services and being too small to accommodate a SUE. All site options have therefore been appraised to the same level of detail, using the same evidence base. Again, whilst those with specific site interests might wish to challenge the various professional judgements made against the available evidence, all sites have been afforded equal treatment.</p>
<p>Reasonable alternatives not specified and appraised, including a proposed new sub-area ‘B3’.</p>	<p>RPS (passim)</p>	<p>BDPSA196, BDPSA197</p>	<p>Reasonable alternatives have been assessed on an equivalent basis. The introduction of sub-area ‘B3’ is unacceptable at this very late stage and in any case is simply a smaller parcel which would not be able to accommodate a SUE of around 5,000 units and would therefore be sieved out.</p>
<p>No links to updated historic environment evidence.</p>	<p>Turley (2.8.3)</p>	<p>BDPSA344</p>	<p>New evidence presented in respect of the historic environment was considered and scores adjusted accordingly.</p>
<p>Landscape, biodiversity and historic environment impacts not supported by existing evidence.</p>	<p>Turley (2.10)</p>	<p>BDPSA344</p>	<p>Disagree – there are degrees of judgement associated with the interpretation of the evidence and the scores reflect the evidence available. In the case of biodiversity and landscape, there is a clear difference between options B and C, with the latter performing marginally better than the former. At no point does the Appraisal state that, for example, Option B is unsustainable <i>per se</i>, but only that it performs <u>relatively</u> poorly in respect of key criteria such as landscape, biodiversity and transport, which in light of housing market delivery constraints make it less preferable than Option C.</p>
<p>Scoring errors in respect of biodiversity, landscape and transport.</p>	<p>Turley (2.38, 2.10.2)</p>	<p>BDPSA344</p>	<p>Disagree - degrees of judgement associated with the interpretation of evidence and the scores reflect the evidence available. There was no admission by BCC at the EIP that there was no difference between B and C from a landscape and ecology perspective, and the report authors stand by their judgements on these matters.</p>

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No comparative assessment on transportation issues.	Turley (2.14)	BDPSA344	This issue has been addressed in the Council's response to the letter sent to the inspector by Turley which clearly sets out why a development of around 5,000 units on one location represents the most efficient and effective solution in respect of efforts to deliver sustainable transport in this locality. The heart of the argument rests with the failure of a smaller development to deliver a critical mass required for a step-change in provision; uncertainty associated with larger developments because of site fragmentation and market delivery uncertainties; and poorer environmental performance of smaller options (dominated by off-site travel) and larger options (higher emissions and uncertainties over scheme design costing and delivery).
Reasons and evidence for A1 and B1 not being capable of accommodating 5,000 units not given, and by contrast that A2, B2 and C2 could accommodate such a scale of development.	Turley (2.35)	BDPSA344	There is a clear statement at section 5.2 that areas A1, B1 and C1 are not large enough to accommodate a SUE of around 5,000 units (which is the fundamental delivery principle defining reasonable alternatives) and should therefore not be considered in detail.
Lack of evidence/no additional evidence presented on which to properly base decisions, particularly newly introduced options.	Paul Gilmour (p.2), Turley (2.14)	BDPSA407, BDPSA344	Disagree – evidence is clear and proportionate (as identified in NPPF para 58 and PPG para 009) and has been applied on an equivalent basis to all reasonable alternatives. It is not reasonable to assemble evidence <i>ad infinitum</i> and thereby fail to make judgements on <u>relative</u> sustainability performance.
Factual error in respect of canal length.	IWACC	BDPSA8	Can be amended though inclusion of an erratum sheet.
The concept of a SUE and its supporting infrastructure (particularly the proposed Sprint service) is fundamentally flawed.	Nigel Tabbernor (passim)	BDP314	The rationale for a SUE in this location is set out in the BDP and is based on practice around the country. The City Council is content that taking all the evidence in the round, a SUE is the most sustainable option for accommodating significant peripheral growth for Birmingham, as demonstrated through the SA in its early stages. Detailed work on infrastructure development such as Sprint to support this type of development has been undertaken, and BCC are content that the proposals are a feasible solution to infrastructure provision.

