

APPENDIX B: The Sustainability Appraisal

The requirement for Sustainability Appraisal

The Planning and Compulsory Purchase Act 2004 requires Development Plan Documents to contribute towards the achievement of more sustainable development. The Sustainability Appraisal process has a key role to play in fulfilling this requirement by ensuring that sustainability issues are given full consideration in the preparation and adoption of plans, particularly when formulating and refining policies.

Stages of the Sustainability Appraisal

The Borough Council has been working on the Core Strategy since 2006 and has produced a number of consultation documents, including the Issues and Options in 2008, an Option report in 2009 and most recently the specific Housing Policy document.

The Core Strategy Issues and Options report included suggestions for core policies and four spatial options to deliver future sustainable growth:

- Option 1: Urban containment and regeneration
- Option 2: Urban containment and Anker Valley intensification
- Option 3: Greenfield urban extensions
- Option 4: Greenfield and Green Belt urban extensions

The report was accompanied by an Initial Sustainability Appraisal, which covered the following tasks:

Task B1	Testing the DPD objectives against the SA framework
Task B2	Developing the DPD options
Task B3	Predicting the effects of the DPD
Task B4	Evaluating the effects of the DPD

The appraisal concluded that Option 1 was the most sustainable because of the minimal urban expansion involved and the ability to use existing services and facilities. Despite Option one scoring the highest through the appraisal process, it was expected that the final spatial option would involve elements of a number of the options.

The Proposed Spatial Strategy was the result of consideration of responses to the Option report consultation, understanding of the emerging evidence base and the Initial Sustainability Appraisal. The sustainability appraisal of the Proposed Spatial Strategy considered all the proposed core policies with the exception of H3 relating to affordable housing. This was because the policy had not been developed at that stage, pending the completion further housing studies.

The Housing Policy chapter of the Core Strategy was revised in 2011 following the completion of the affordable housing viability work, so that it comprised:

H1 – revised policy for housing delivery

- H2 – unchanged policy for Anker Valley site
- H3 – revised policy on affordable housing
- H4 – new policy on housing need
- H5 – new policy on housing density
- H6 – revised policy on Gypsy and Travelling Showpeople accommodation

Public consultation took place between February and April 2011, to which 134 individual comments were received from 34 respondents. The Council is now taking the opportunity to appraise the policies in light of representations received to the consultation. Each policy has been assessed alongside one realistic alternative option using the appraisal framework set out below.

Scoring the Policies

The framework used to assess the policy options was established through the Sustainability Appraisal Scoping Report. The objective of the appraisal is to highlight the different advantages and disadvantages of each option.

The appraisal objectives have been modified since the Proposed Spatial Strategy to take into account the phasing out of the Regional Spatial Strategy (RSS) and the recognition that there is duplication in some of objectives. As a result, Sustainability Appraisal objective SA1 has been amended to remove reference to the RSS, SA7 and SA13 have been combined and SA19 and SA20 have been combined. Appendix 1 contains the revised sustainability appraisal objectives.

The same scoring system has been used throughout the various stages of the Core Strategy, which uses the following symbols to give a score for each option under every objective:

	Symbol	Score
Major Positive	++	+2
Minor Positive	+	+1
Neutral	0	0
Minor Negative	-	-1
Major Negative	--	-2
Uncertain	?	0

Sustainability Appraisal of the Housing Policies

The appraisal of the housing policies is set out in Appendix 2. The sustainability appraisal considers all the revised housing policies, which are H1, H3, H4 and H5. Policy H2 was unchanged and although H6 was amended its intent remained the same. Following the consultation, a decision was taken to introduce a separate policy on flexi-care housing provision, justified on the basis of local circumstances.

All policies were assessed as they were drafted for the consultation and are set out as option 1 in the appraisal framework. In addition, every policy has been assessed alongside one realistic alternative option (option 2). The total scores for each policy show that option 1 has scored highest in every instance, which provides a sound endorsement that the preferred policy approach is the most appropriate for Tamworth.

Next Steps: Moving towards an adopted Core Strategy

The Council is due to consider the consultation responses to the housing policy consultation at Cabinet in August. There will be some re-working of the entire Core Strategy before the Publication Draft is produced for consultation in January 2012 for a period of 6 weeks. Upon publication, the Core Strategy will be accompanied by a sustainability statement which will appraise all the policies contained within the document. Submission is due in early summer 2012.

Appendix 1

Revised Sustainability Appraisal Framework

SA1	To meet national policy in the most appropriate and sustainable way for Tamworth
SA2	To meet the housing needs of the whole community
SA3	To encourage the efficient use of land
SA4	To reduce deprivation
SA5	To ensure equal access to community services and facilities
SA6	To encourage equal access to education, jobs and training
SA7	To encourage active and healthier lifestyles by providing accessible networks of paths, open spaces and formal recreation facilities
SA8	To make communities safer by reducing crime, fear of crime and anti-social behaviour
SA9	To encourage a diverse and competitive economy that will provide sustainable economic growth
SA10	To protect and enhance historic assets
SA11	To encourage high quality and locally distinct places, spaces and buildings
SA12	To protect and enhance biodiversity and sites of nature conservation value
SA13	To minimise flood risk
SA14	To reduce energy consumption by encouraging energy efficiency and use of renewable energy sources
SA15	To encourage the reduction, re-use and recycling of waste and water
SA16	To minimise pollution including air, water, land contamination and noise
SA17	To make Tamworth town centre the heart of the borough by creating a vibrant and attractive environment
SA18	To reduce the need to travel and encourage sustainable modes of transport
SA19	To make best use of the existing transport infrastructure and seek improvements

Appendix 2 Sustainability Appraisal of Revised Housing Policies

H1 Housing Delivery-meeting Tamworth's housing needs in neighbouring authorities

Option 1: Identifying broad locations within neighbouring authorities to meet Tamworth's future housing needs		Option 2: Not Identifying broad locations within neighbouring authorities to meet Tamworth's future housing needs	
Rating	Commentary/Explanation	Rating	Commentary/Explanation
SA1: To meet national policy in the most appropriate and sustainable way for Tamworth			
++	Allocating sites is in accordance with national and regional planning policy as the approach could ensure a flexible, responsive supply of land is delivered for housing which is available, suitable and achievable. It complies with the requirement to illustrate flexibility to deal with changing circumstances Sites identified, particularly within North Warwickshire scored highly against sustainability and viability criteria in the Joint Development & Infrastructure Study.	-	If the requirement for additional housing growth is confirmed, the inability of the Core Strategy to identify sufficient locations to accommodate need would result in the document being found 'unsound'. Subsequently Tamworth would not have an up to date development plan in place resulting in housing sites being allowed on a piecemeal basis through the appeal process and impacting on the ability to deliver sustainability targets which could also place additional pressure on Tamworth's infrastructure. It could also place pressure to release green belt locations, employment sites and/or open space which could fail to deliver sustainable benefits for Tamworth whilst potentially resulting in the loss of important green spaces and natural boundaries to adjoining settlements.
SA2: To meet the housing needs of the whole community			
+	Ensuring adequate large sites to accommodate future housing needs should ensure that economy of scale benefits are realised. This could increase the viability to deliver a mixture of housing types including affordable housing.	-	Not allocating sufficient sites could reduce the ability to deliver an appropriate mixture of housing types and the lack of larger sites could negate the ability to provide a sufficient supply of affordable housing to meet Tamworth's needs.

SA3: To encourage the efficient use of land			
0	Allocating larger sites should enable sites to be planned holistically to encourage the most efficient use of land and incorporate higher densities. However, overall benefits would only arise if all existing brownfield sites had been developed prior to the release of these sites.	0	Tamworth's spatial strategy emphasises the 'brownfield site' first principle which should result in the most efficient use of land and appropriate density levels. If further housing needs are confirmed, not identifying sites could place pressure on greenbelt and Greenfield locations and employment sites therefore reducing the efficient use of land within the borough.
SA4: To reduce deprivation			
0	Will not have any direct impact.	0	Will not have any direct impact on deprivation although the inability to meet housing need could reduce the availability of appropriate number and type of housing therefore increasing the number of people living in inappropriate accommodation.
SA5: To ensure equal access to community services and facilities			
0	Will not have any direct impact.	0	Will not have any direct impact.
SA6: To encourage equal access to education, jobs and training			
0	Will not have any direct impact on ensuring equal access to education, jobs and training although the scale of the sites would result in a contribution towards delivering educational facilities..	0	Will not have any direct impact.
SA7: To encourage active and healthier lifestyles by providing accessible networks of paths, open spaces and formal recreation facilities			
+	Larger sites could be planned to accommodate open spaces, paths and formal recreation facilities and/or offer financial contributions towards improvements to existing provision.	0	Will not have any direct impact on providing accessible networks although these could come under pressure for future housing if a need is confirmed and no locations are identified.
SA8: To make communities safer by reducing crime, fear of crime and anti-social behaviour			
0	Will not have any direct impact on making communities safer. However, the scale of the sites would allow designs to incorporate the majority of designing out crime principles	0	Will not have any direct impact on making communities safer

SA9: To encourage a diverse and competitive economy that will provide sustainable economic growth			
0	Would not have any direct impact.	0	Would not have any direct impact.
SA10: To protect and enhance historic assets			
0	None of the sites contain or are adjacent to historic assets so no direct impact.	0	No direct impact on historic assets.
SA11: To encourage high quality and locally distinct places, spaces and buildings			
+	Larger sites may offer an opportunity to create diverse range of buildings and spaces which in turn may deliver locally distinct places, spaces and buildings. The economy of scale benefits may increase the viability of larger sites therefore resulting in higher design standards.	0	Relying on smaller sites may be able to deliver high quality and locally distinct places, spaces and buildings but reduced economies of scale may reduce site viability and less contributions and may impact on achieving higher standards.
SA12: To protect and enhance biodiversity and sites of nature conservation value			
0	Several sites are located close to sites of nature conservation value but no direct impacts are likely given the distance to the designations.	0	No direct impact on protecting sites of nature conservation and the protection of biodiversity.
SA13: To minimise flood risk			
+	Several locations are sited outside of flood risk areas.	0	Existing housing sites have been identified on the basis of them having a low risk of flooding and individual applications may require a flood risk assessment to assess the risk which would have to be either mediated or the proposal refused.
SA14: To reduce energy consumption by encouraging energy efficiency and use of renewable energy sources			
+	The scale of the locations offers the potential for the incorporation of renewable and low carbon forms of energy supply.	0	Reliance on smaller sites may reduce the viability of delivering higher standards but all would be expected to incorporate a minimum level of energy efficiency measures.
SA15: To encourage the reduction, re-use and recycling of waste and water			
+	The scale of new and enhanced infrastructure required	0	Reliance on smaller sites may reduce the viability of delivering higher

	to service the locations would result in greater efficiency measures being incorporated so contributing towards potentially increased reductions.		reductions but all would be expected to incorporate a minimum level of forms of measures to reduce water use and increase recycling.
SA16: To minimise pollution including air, water, land contamination and noise			
0	No direct impact	0	No direct impact
SA17: To make Tamworth town centre the heart of the borough by creating a vibrant and attractive environment			
0	No direct impact	0	No direct impact
SA18: To reduce the need to travel and encourage sustainable modes of transport			
0	No direct impact	0	No direct impact
SA19: To make best use of the existing transport infrastructure and seek improvements			
0	No direct impact	0	No direct impact
Final Sustainability Appraisal Scores for Options			
Option 1	8	Option 2	-2

Policy H3 Affordable Housing

Option 1: Seek to provide a target of 43 affordable housing units pa with banded delivery thresholds based on site size (number of dwellings)		Option 2: Seek to provide a target of 43 affordable housing units pa but no specific site based thresholds	
Rating	Commentary/Explanation	Rating	Commentary/Explanation
SA1: To meet national policy in the most appropriate and sustainable way for Tamworth			
++	Setting an overall target and range of circumstances including minimum site size thresholds is compliant with PPS3 and is based on a robust local assessment of need.	+	Whilst setting an overall target partly complies with PPS3 guidance, the lack of site threshold may impact on delivery particularly on smaller sites.
SA2: To meet the housing needs of the whole community			
++	The overall target and thresholds should enable adequate level of affordable housing to be delivered across Tamworth to meet local needs.	+	Whilst the overall target should assist the delivery of affordable housing not having thresholds could potentially result in provision being on a less structured basis with an over reliance on individual negotiation.
SA3: To encourage the efficient use of land			
0	No impact on ensuring the efficient use of land has been identified.	0	No impact on ensuring the efficient use of land has been identified
SA4: To reduce deprivation			
+	Ensuring that adequate numbers of affordable housing is provided to meet local needs should ensure that communities have access to appropriate housing which is affordable thus reducing deprivation created by inappropriate housing provision.	+	The affordable housing target should ensure that needs are addressed therefore impacting positively on reducing deprivation caused by inadequate access to housing.
SA5: To ensure equal access to community services and facilities			
0	No direct impact has been identified.	0	No direct impact has been identified.

SA6: To encourage equal access to education, jobs and training			
0	No direct impact has been identified.	0	No direct impact has been identified.
SA7: To encourage active and healthier lifestyles by providing accessible networks of paths, open spaces and formal recreation facilities			
0	No direct impact has been identified.	0	No direct impact has been identified.
SA8: To make communities safer by reducing crime, fear of crime and anti-social behaviour			
0	No direct impact has been identified.	0	No direct impact has been identified.
SA9: To encourage a diverse and competitive economy that will provide sustainable economic growth			
0	No direct impact has been identified.	0	No direct impact has been identified.
SA10: To protect and enhance historic assets			
0	No direct impact has been identified.	0	No direct impact has been identified.
SA11: To encourage high quality and locally distinct places, spaces and buildings			
0	No direct impact has been identified.	0	No direct impact has been identified.
SA12: To protect and enhance biodiversity and sites of nature conservation value			
0	No direct impact has been identified.	0	No direct impact has been identified.
SA13: To minimise flood risk			
0	No direct impact has been identified.	0	No direct impact has been identified.
SA14: To reduce energy consumption by encouraging energy efficiency and use of renewable energy sources			
+	Affordable housing provided by Registered Social Landlords tend to achieve higher energy efficiency standards.	+	Affordable housing provided by Registered Social Landlords tend to achieve higher energy efficiency standards.
SA15: To encourage the reduction, re-use and recycling of waste and water			
+	Affordable housing provided by Registered Social Landlords tend to achieve higher standards	+	Affordable housing provided by Registered Social Landlords tend to achieve higher standards

SA16: To minimise pollution including air, water, land contamination and noise			
0	No direct impact has been identified	0	No direct impact has been identified
SA17: To make Tamworth town centre the heart of the borough by creating a vibrant and attractive environment			
+	The spatial strategy will encourage the provision of new housing, which in accordance with the site threshold approach will deliver affordable housing in and around the town centre. This, in turn, will increase the town centre population therefore increasing demand for town centre services and contributing to its economy.	+	The spatial strategy will encourage the provision of new housing, which in accordance with affordable housing target may deliver affordable housing in and around the town centre. This, in turn, will increase the town centre population therefore increasing demand for town centre services and contributing to its economy
SA18: To reduce the need to travel and encourage sustainable modes of transport			
0	No direct impact has been identified	0	No direct impact has been identified
SA19: To make best use of the existing transport infrastructure and seek improvements			
0	No direct impact has been identified	0	No direct impact has been identified
Final Sustainability Appraisal Scores for Options			
Option 1	8	Option 2	6

Policy H4 Housing needs

Option 1: Provide a range of housing types and sizes and address local needs by setting proportional targets for dwelling size, with an emphasis on smaller dwellings		Option 2: Provide a range of housing types and sizes but do not specify targets for dwelling size or type	
Rating	Commentary/Explanation	Rating	Commentary/Explanation
SA1: To meet national policy in the most appropriate and sustainable way for Tamworth			
+	Providing a range of dwelling types in order to build mixed communities is in line with PPS3.	+	Providing a range of dwelling types in order to build mixed communities is in line with PPS3.
SA2: To meet the housing needs of the whole community			
++	Using evidence specific to Tamworth to set targets for dwelling size will address local housing needs.	+	Whilst a range of housing types and sizes will address some local needs, a lack of targets means that Tamworth's specific housing needs are not addressed.
SA3: To encourage the efficient use of land			
+	Smaller dwellings should occupy less land, enabling higher densities to be achieved.	0	No impact.
SA4: To reduce deprivation			
+	Providing a larger proportion of smaller dwellings will help address issues of affordability.	+	Providing a range of housing types should address issues of affordability.
SA5: To ensure equal access to community services and facilities			
0	No impact.	0	No impact.
SA6: To encourage equal access to education, jobs and training			
0	No impact.	0	No impact.

SA7: To encourage active and healthier lifestyles by providing accessible networks of paths, open spaces and formal recreation facilities			
0	No impact.	0	No impact.
SA8: To make communities safer by reducing crime, fear of crime and anti-social behaviour			
0	No impact.	0	No impact.
SA9: To encourage a diverse and competitive economy that will provide sustainable economic growth			
0	No impact.	0	No impact.
SA10: To protect and enhance historic assets			
0	No impact.	0	No impact.
SA11: To encourage high quality and locally distinct places, spaces and buildings			
0	No impact.	0	No impact.
SA12: To protect and enhance biodiversity and sites of nature conservation value			
0	No impact.	0	No impact.
SA13: To minimise flood risk			
0	No impact.	0	No impact.
SA14: To reduce energy consumption by encouraging energy efficiency and use of renewable energy sources			
+	Smaller dwellings will be more efficient to run.	0	No impact.
SA15: To encourage the reduction, re-use and recycling of waste and water			
+	Smaller dwellings should reduce the amount of waste produced and water used.	0	No impact.
SA16: To minimise pollution including air, water, land contamination and noise			
0	No impact.	0	No impact.

SA17: To make Tamworth town centre the heart of the borough by creating a vibrant and attractive environment			
+	Additional small dwellings built in the town centre will increase the population in this part of the town and create a market for a more diverse range of activities and services.	+	Additional dwellings built in the town centre will increase the population in this part of the town and create a market for a more diverse range of activities and services.
SA18: To reduce the need to travel and encourage sustainable modes of transport			
0	No impact.	0	No impact.
SA19: To make best use of the existing transport infrastructure and seek improvements			
0	No impact.	0	No impact.

Final Sustainability Appraisal Scores for Options			
Option 1	8	Option 2	4

Policy H4(a) Flexicare housing provision (new separate policy, currently part of H4)

Option 1: Targets for flexi care accommodation by tenure.		Option 2: No targets	
Rating	Commentary/Explanation	Rating	Commentary/Explanation
SA1: To meet national policy in the most appropriate and sustainable way for Tamworth			
+	Providing housing specifically for older people is in line with PPS3 because it adds to the range of housing types and addresses known local need.	-	Not setting targets will mean that the needs of a whole sector of the community will not be addressed, which is contrary to PPS3.
SA2: To meet the housing needs of the whole community			
+	There is a demonstrated need for specialist housing for the growing elderly population in Tamworth, as an alternative to residential care.	-	Not setting targets will mean that the needs of a whole sector of the community will not be addressed.
SA3: To encourage the efficient use of land			
0	No impact.	0	No impact.
SA4: To reduce deprivation			
+	Providing care for elderly people in their own homes will help to reduce deprivation, particularly in terms of mental and physical health and living conditions.	-	Not providing specialist housing for the elderly could lead to an increase in deprivation amongst this population.
SA5: To ensure equal access to community services and facilities			
+	Flexi-care schemes will by definition incorporate some on-site services and facilities, which will be easy to access.	0	No impact.
SA6: To encourage equal access to education, jobs and training			
0	No impact.	0	No impact.

SA7: To encourage active and healthier lifestyles by providing accessible networks of paths, open spaces and formal recreation facilities			
0	No impact.	0	No impact.
SA8: To make communities safer by reducing crime, fear of crime and anti-social behaviour			
0	No impact.	0	No impact.
SA9: To encourage a diverse and competitive economy that will provide sustainable economic growth			
0	No impact.	0	No impact.
SA10: To protect and enhance historic assets			
0	No impact.	0	No impact.
SA11: To encourage high quality and locally distinct places, spaces and buildings			
0	No impact.	0	No impact.
SA12: To protect and enhance biodiversity and sites of nature conservation value			
0	No impact.	0	No impact.
SA13: To minimise flood risk			
0	No impact.	0	No impact.
SA14: To reduce energy consumption by encouraging energy efficiency and use of renewable energy sources			
0	No impact.	0	No impact.
SA15: To encourage the reduction, re-use and recycling of waste and water			
0	No impact.	0	No impact.
SA16: To minimise pollution including air, water, land contamination and noise			
0	No impact.	0	No impact.

SA17: To make Tamworth town centre the heart of the borough by creating a vibrant and attractive environment			
0	No impact.	0	No impact.
SA18: To reduce the need to travel and encourage sustainable modes of transport			
0	No impact.	0	No impact.
SA19: To make best use of the existing transport infrastructure and seek improvements			
0	No impact.	0	No impact.
Final Sustainability Appraisal Scores for Options			
Option 1	4	Option 2	-3

Policy H5 Density

Option 1: Average density of 40 dph, higher in intensive locations, but no specific targets		Option 2: Banded density targets for different parts of borough	
Rating	Commentary/Explanation	Rating	Commentary/Explanation
SA1: To meet national policy in the most appropriate and sustainable way for Tamworth			
++	Setting local density targets is in line with PPS3 and is based on a robust local assessment of need.	++	Setting local density targets is in line with PPS3. Providing evidence supports it, specifying a range of densities may be appropriate to reflect local circumstances.
SA2: To meet the housing needs of the whole community			
0	Setting density targets does not guarantee that housing needs will be met.	0	Setting density targets does not guarantee that housing needs will be met.
SA3: To encourage the efficient use of land			
++	Relatively high densities will make efficient use of land.	++	Relatively high densities will make efficient use of land.
SA4: To reduce deprivation			
0	Will not have any impact on deprivation.	0	Will not have any impact on deprivation.
SA5: To ensure equal access to community services and facilities			
+	Locating higher density housing close to existing facility hubs in the town centre and other centres will make use of those facilities and services. It could also put pressure on them but should help to sustain and encourage new services.	+	Locating higher density housing close to existing facility hubs in the town centre and other centres will make use of those facilities and services. It could also put pressure on them but should help to sustain and encourage new services.
SA6: To encourage equal access to education, jobs and training			
+	Locating higher density housing close to existing facility and employment hubs in the town centre and other	0	No impact.

	centres will improve access to jobs.		
SA7: To encourage active and healthier lifestyles by providing accessible networks of paths, open spaces and formal recreation facilities			
0	No impact.	0	No impact.
SA8: To make communities safer by reducing crime, fear of crime and anti-social behaviour			
0	No impact.	0	No impact.
SA9: To encourage a diverse and competitive economy that will provide sustainable economic growth			
0	No impact.	0	No impact.
SA10: To protect and enhance historic assets			
0	High density development in the town centre could have a negative impact on the historic character. However, design policies will ensure new development in sensitive locations is appropriate in scale and appearance.	0	High density development in the town centre could have a negative impact on the historic character. However, design policies will ensure new development in sensitive locations is appropriate in scale and appearance.
SA11: To encourage high quality and locally distinct places, spaces and buildings			
0	No impact.	0	No impact.
SA12: To protect and enhance biodiversity and sites of nature conservation value			
0	No impact.	0	No impact.
SA13: To minimise flood risk			
0	No impact.	0	No impact.
SA14: To reduce energy consumption by encouraging energy efficiency and use of renewable energy sources			
0	No impact.	0	No impact.
SA15: To encourage the reduction, re-use and recycling of waste and water			
0	No impact.	0	No impact.

SA16: To minimise pollution including air, water, land contamination and noise			
0	No impact.	0	No impact.
SA17: To make Tamworth town centre the heart of the borough by creating a vibrant and attractive environment			
++	Building high density dwellings in the town centre will increase the population in this part of the town and create a market for a more diverse range of activities and services.	++	Building high density dwellings in the town centre will increase the population in this part of the town and create a market for a more diverse range of activities and services. Being more prescriptive about density targets will not make any difference.
SA18: To reduce the need to travel and encourage sustainable modes of transport			
+	Requiring higher densities around intensive locations and transport routes will reduce the need to travel and encourage the use of public transport, walking and cycling.	+	Requiring higher densities around intensive locations and transport routes will reduce the need to travel and encourage the use of public transport, walking and cycling. Being more prescriptive about density targets will not make any difference.
SA19: To make best use of the existing transport infrastructure and seek improvements			
+	Requiring higher densities around intensive locations and transport routes will make use of the existing infrastructure. It is likely that improvements will be required, which will be predominantly developer funded.	+	Requiring higher densities around intensive locations and transport routes will make use of the existing infrastructure. It is likely that improvements will be required, which will be predominantly developer funded. Being more prescriptive about density targets will not make any difference.

Final Sustainability Appraisal Scores for Options			
Option 1	10	Option 2	9