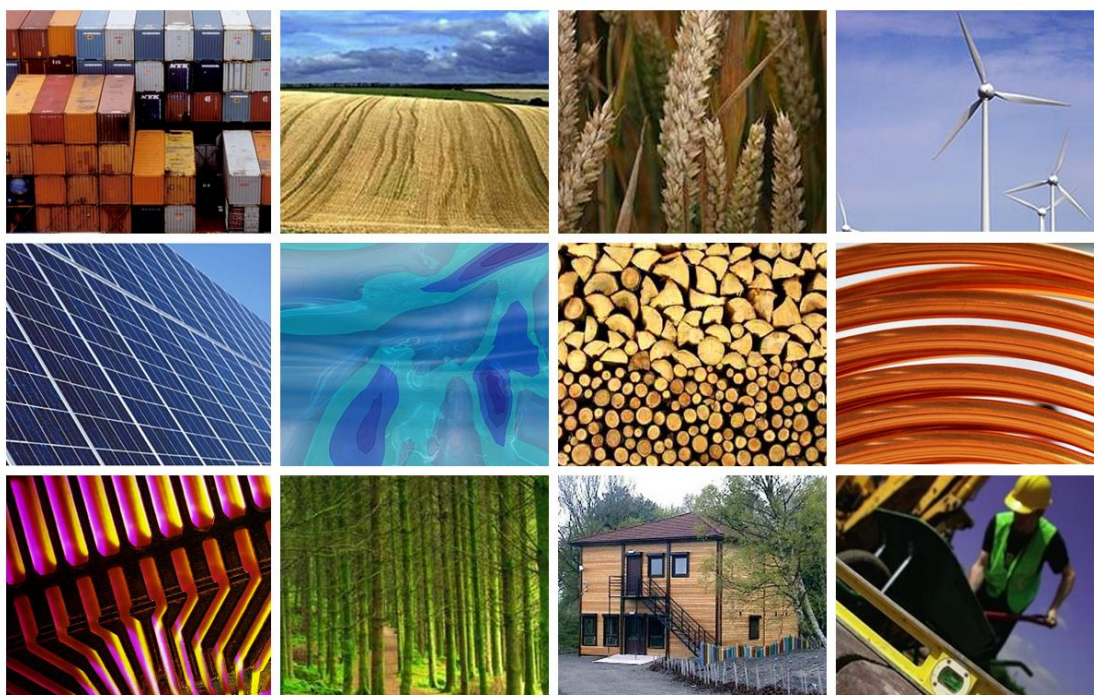


Tamworth Borough Council

Sustainability Appraisal of the Pre-Submission Tamworth Local Plan

Final Report

September 2014



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Authorised by:	Steve Owen
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URSUS CONSULTING LTD
www.ursusconsulting.co.uk

15 St Marks Road
Leamington Spa
CV32 6DL
Tel. 07720 416 356

57 Balfour Road
London
N5 2HD
Tel. 07989 554 504



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1 SUMMARY AND OUTCOMES

1.1 NON-TECHNICAL SUMMARY

1.1.1 Outline of Tamworth pre-submission Local Plan

The Tamworth pre-submission Local Plan sets out the spatial planning strategy for the Borough over the period 2006-2031 in terms of the type of development required to meet local community and business needs, its scale and location as well as the policies that will apply to ensure that development is sustainable. It contains a vision and a series of strategic spatial objectives. It also includes policies to ensure that appropriate supporting infrastructure is delivered and the area's built and natural environment is protected and enhanced.

The Tamworth pre-submission Local Plan has been prepared in compliance with the National Planning Policy Framework (NPPF).

Where considered relevant, working in partnership with neighbouring authorities to discharge the duty to co-operate has resulted in cross-boundary issues being addressed. Both Lichfield District Council and North Warwickshire District Council are also in the process of developing their own Local Plans and these have yet to be adopted.

The Tamworth Local Plan is expected to be adopted by 2015 and will replace the existing Local Plan (Adopted in 2006/07)¹. Further detailed guidance will be included in a limited number of Supplementary Planning Documents which will support the implementation of the Plan. Once it is adopted, planning applications will be determined in accordance with the Local Plan unless other material considerations (including the NPPF) indicate otherwise.

1.1.2 Current State of Sustainable Development in Tamworth

The following table describes the current relevant aspects of sustainable development in Tamworth, and predicts how these might evolve without implementation of the Local Plan.

Table 1.1: Summary of baseline data

Issue	Key Findings	Likely Evolution Without the Plan
Population	In 2011 the resident population of Tamworth was recorded as 76,895. It has been estimated that the population of Tamworth will increase to 81,895 by 2021, an increase of 6.5%, with most of the increase occurring among the over 64 age group.	It is uncertain how population might change without implementation of the Local Plan.
Housing	Tamworth has a high housing waiting list and a low level of affordable housing supply that has not met the backlog of housing need. More small homes are needed as are homes for the elderly.	It is less likely that housing of the right type will be delivered, or that enough affordable housing will be provided.

¹ Tamworth Borough Council - Local Plan 2006-2011 (Adopted July 2006 and Policies Saved in July 2011)

Issue	Key Findings	Likely Evolution Without the Plan
Deprivation	There are several small areas that face issues of deprivation in Tamworth.	There may not be delivery of enough employment land to provide sufficient jobs. Employment and community facilities are unlikely to be in the right locations to address deprivation.
Health	Levels of health are similar to the national average. However, there are some small pockets of health deprivation. Adult obesity rates are high and rates of physical activity are low.	Without implementation of the Plan, it is possible that health levels will decline.
Open space	At a Borough wide level there is sufficient open space within the Borough, although certain specific parts of the Borough need better provision.	It is unlikely that additional open space will be provided where it is needed, and it is likely that more open space would be lost.
Economy	Many of Tamworth's traditional firms have closed down over the last 20 years. Still heavily influenced by the manufacturing sector, service industries now also play an important role.	There may not be delivery of enough employment land to provide sufficient jobs, and sites may not be provided in the right locations to meet sectoral needs.
Employment	Tamworth has a low unemployment rate. However, pockets of unemployment are concentrated in certain areas of the town.	There may not be delivery of enough employment land to provide sufficient jobs, and this may not be well-located for areas of higher unemployment.
Education and qualifications	Schools in Tamworth generally perform below the national average, with high levels of people having no qualifications at all and a very low percentage with high-level qualifications.	The level of education and qualifications is likely to remain unchanged. It is possible that insufficient additional school places will be provided.
Historic assets	Tamworth retains a range of important historic buildings, monuments and Conservation Areas, which need to be protected. It has high archaeological potential.	It is more likely that historic assets would be devalued or lost, and more likely that new developments would fail to incorporate measures to enhance the setting of historic assets.
Ecology	Tamworth has two Sites of Special Scientific Interest, mostly in an unfavourable condition, and there are three other SSSIs nearby in Warwickshire. There are five Local Nature Reserves, 16 Sites of Biological Importance and five Biodiversity Alert Sites. There are also three sites of international importance near Tamworth.	It is unlikely that opportunities for creating or enhancing ecological networks will be realised, and action at a landscape scale is unlikely to be taken. Designated sites are likely to come under increasing pressure from development or may be lost or devalued.
Water quality	There are high levels of nutrient pollution in the two rivers downstream of Tamworth.	Water quality is likely to continue to improve.
Water supply and wastewater treatment	There is enough water available to meet annual housing growth of 145 dwellings per annum (dpa) if fitted with water efficiency measures, but there is insufficient resource to meet higher development scenarios, namely 159.5 dpa and 188.5 dpa. Tamworth wastewater treatment works will require	The effect of not having the Local Plan on water supply and wastewater infrastructure is uncertain.

Issue	Key Findings	Likely Evolution Without the Plan
	improvements in order to accommodate the proposed development.	
Air quality	Tamworth has an Air Quality Management Area at the A5 Dosthill Two Gates crossroads, where nitrogen dioxide exceeds air quality standards	The likely future change in air quality without implementation of the Plan is uncertain.
Flood risk	Tamworth has been classified as having a high probability of fluvial flood risk and a medium probability of residual flooding from the overtopping/breaching of flood defences. A significant proportion of Tamworth's land is at risk of flooding.	The likely change in flood risk without implementation of the Plan is uncertain.
Climate change	Emissions of carbon dioxide are fairly low in Tamworth. However, the amount of renewable energy generated in Tamworth is low.	Opportunities to further reduce emissions of greenhouse gases would be lost.
Waste	Tamworth has achieved a moderately high recycling rate due to improvements in recent years.	Recycling rates are likely to rise and the amount of waste landfilled is expected to fall.
Land and soil	There is a shortage of developable open space in Tamworth. There are mineral reserves of potential value. The town is surrounded by agricultural land, much of which is of relatively poor quality but some is higher quality. Tamworth has a Regionally Important Geological/Geomorphological Site.	Without the Plan it is possible that more developments would come forward on greenfield land than on previously developed land within the urban area.
Retail	There are concerns that the town centre's vitality and viability could decline in the short term as it faces strong competition from the retail parks	Without the Plan, it is likely that the town centre's vitality and viability will reduce further, leading to continued decline.
Leisure and culture	Existing leisure provision in Tamworth is generally adequate to meet the needs of local residents. However, there is a need for a new swimming pool and sports hall, and additional cafés and restaurants. Tamworth has a range of cultural/leisure attractions.	It is less likely that the additional sports facilities would be provided and less incentive to improve the café and restaurant provision in the town centre.
Transport	There is a dependence on the car to travel to work and a high level of out-commuting. Tamworth has good connections to the national road and rail transport networks and is well-served by a local bus network. There is congestion at Ventura Retail Park, on Ashby Road, Cumberford Road and on local routes to the A5(T).	Transport infrastructure is likely to improve through measures in the Local Transport Plan.

1.1.3 Characteristics of Areas Likely to be Significantly Affected

Tamworth is a very small borough (approximately 12 square km) compared with boroughs and districts in surrounding areas. The boundaries are fairly tightly drawn around the developed

urban area with only a limited amount of undeveloped green space around the town that sits within the Borough boundary. The draft Local Plan proposes significant amounts of non-urban green space for development, up to the boundary of Tamworth Borough, as well as policies which affect the Borough as a whole and specific parts of the Borough, such as Regeneration Priority Areas. As such, the areas likely to be significantly affected can be considered to be the Borough as a whole. The characteristics of the Borough are set out in detail in Annex B and summarised in Section 5.3. The characteristics of specific allocated sites are set out in Annexes C and D.

1.1.4 Problems Relating to Areas of Particular Environmental Importance

There are three sites of international nature conservation importance within 20km of Tamworth. These sites have been designated as Special Areas of Conservation (SAC) under the Habitats Directive¹ and have problems as follows:

- Ensors Pool SAC: vulnerable to pollution and non-native species;
- River Mease SAC: diffuse pollution, excessive sedimentation, invasive freshwater species and urban discharge;
- Cannock Extension Canal SAC: maintaining a balanced level of boat traffic and surface run-off.

1.1.5 The Appraisal Framework

Various environmental, social and economic issues have been identified through reviewing a wide variety of plans and strategies, collecting baseline information and identifying sustainability issues and problems. These issues have informed the development of the sustainability appraisal framework, which consists of a set of sustainable development policy objectives (sustainability objectives) as set out in **Table 1.2**.

These objectives were identified from a review of plans, strategies and sustainable development objectives established at international, national, regional, sub-regional and local levels. The sustainable development objectives identified in the review are set out in detail in Annex A. Each of these has been considered and it has been ensured that all relevant policy objectives are covered by the objectives in the sustainability appraisal framework. This framework has been used to appraise the various elements of the pre-submission Local Plan, assessing the likely sustainability effects of the pre-submission Local Plan by appraising the extent to which the pre-submission Local Plan is consistent with or supports each policy objective.

Table 1.2: Sustainability Objectives

	Objectives
1.	To meet the housing needs of the whole community, providing affordable, decent, appropriate and sustainably constructed homes in accessible locations.
2.	To encourage the efficient use of land and soil.
3.	To reduce deprivation, including health and income deprivation.
4.	To ensure equal access to community services and facilities.
5.	To encourage equal access to education, jobs and training.

¹ Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora

6.	To encourage active and healthier lifestyles by providing accessible green infrastructure, including networks of paths and open spaces, and formal and informal sport and recreation facilities.
7.	To make communities safer by reducing crime, fear of crime and anti-social behaviour.
8.	To encourage a diverse and competitive economy that will provide sustainable economic growth.
9.	To protect and enhance historic assets.
10.	To encourage high quality and locally distinct places, spaces, buildings and landscapes.
11.	To conserve and enhance biodiversity and geodiversity, sites of nature conservation value and ecological networks.
12.	To minimise flood risk.
13.	To reduce energy consumption by encouraging energy efficiency and use of renewable energy sources.
14.	To encourage the reduction, re-use and recycling of waste and water.
15.	To protect and improve environmental quality including in relation to air, water, land and noise.
16.	To make Tamworth town centre the heart of the borough by creating a vibrant and attractive environment.
17.	To reduce the need to travel, reduce out-commuting and encourage sustainable modes of transport.
18.	To make best use of the existing transport infrastructure and seek improvements to reduce congestion and improve safety.

1.1.6 The Likely Significant Effects of the Pre-Submission Local Plan

The pre-submission Local Plan has a clear and strong focus on meeting the housing needs of all sections of the community. It seeks to provide affordable, high quality homes of a mix of types to meet a range of needs, and requires these to be sustainably designed and constructed in safer communities. The pre-submission Local Plan promotes energy efficiency and the generation of renewable and low carbon energy in new developments. Water efficiency is to be maximised in developments, and development must support the Tamworth Waste Strategy to reduce waste and increase recycling.

A clear aim is to provide homes in accessible locations to minimise the need to travel and maximise the use of sustainable modes of transport. By promoting development in the town centre, the pre-submission Local Plan will help to make use of existing transport infrastructure, and it also seeks improvements to sustainable transport infrastructure which will help to reduce congestion and improve safety. It will also support the accessibility of community facilities and services and supports the creation of a vibrant and attractive town centre.

The pre-submission Local Plan encourages the creation and improvement of green and blue¹ infrastructure links to encourage cycling and walking throughout the Borough, and particularly between the town centre and other neighbourhoods and to the countryside beyond. As well as promoting sustainable transport choices to reduce reliance on the car and promote active and

¹ 'Blue' infrastructure refers to water based assets such as rivers, lakes, ponds, canals, flood plains, drainage systems, important for communities, wildlife, amenity, flood risk management and climate change adaptation.

healthy lifestyles, these networks will also contribute to strengthening a distinct identity for Tamworth, and may help to facilitate the movement of species and assist in reducing flood risk. They will also contribute to creating an attractive urban landscape. Healthy lifestyles will also be encouraged through the provision of new formal and informal recreation facilities and the protection and enhancement of open spaces.

The pre-submission Local Plan affords strong protection to the Borough's historic assets, promotes their enhancement and requires development to be sympathetic to these assets. This will help to create an attractive urban landscape, and support the town's tourism offer, leading to increased job opportunities and a stronger economy.

The pre-submission Local Plan encourages economic growth, which should help to reduce deprivation by increasing job opportunities in Tamworth, particularly if done in conjunction with increasing education and training provision in deprived areas. The improvement of access to community services should assist in this. A direct aim of the pre-submission Local Plan is to reduce out-commuting, although this may be increased by the improvement of links to Birmingham and other inter-urban routes.

By focusing development in the Borough's centres and promoting employment uses on existing employment sites, the pre-submission Local Plan will help to promote the reuse of previously developed land and reduce the use of greenfield land and agricultural land, thereby indirectly helping to protect soils and habitats to support biodiversity. An efficient use of land will be supported by the requirement for medium-high density development. The emphasis in Tamworth has been to bring forward as much brownfield land as possible for development, nevertheless over three quarters of the area of the allocated new employment sites are on greenfield land.

The pre-submission Local Plan explicitly requires the protection of biodiversity and geodiversity, and promotes opportunities to enhance biodiversity through habitat creation and restoration. It also requires development to create and reinforce links between existing biodiversity sites and with semi-natural habitats. By requiring the protection and enhancement of open spaces and green infrastructure including network features, the pre-submission Local Plan may help to conserve and enhance biodiversity and ecological networks, but this is dependent on the quality of the open spaces and the nature of any enhancement work.

The pre-submission Local Plan addresses flood risk by requiring proposals for development in flood risk areas to provide a Flood Risk Assessment and to include mitigation measures. Development will be resisted in these areas where appropriate and necessary and the Plan states that development will be expected to be located outside areas at high risk of flooding. Development must not increase the risk of flooding elsewhere and a policy is included to manage and reduce flood risk. Site allocations require flood risk to be assessed and appropriately managed to reduce risk.

The pre-submission Local Plan explicitly requires the protection of water quality and requires the quality of canals and rivers to be enhanced. The enhancement of blue infrastructure will help to support this policy. Air quality will be protected and enhanced by promotion of sustainable transport infrastructure. Improving junctions on the A5 may help to increase the flow of traffic at these junctions, which may help to reduce air pollution or may increase it if

traffic levels rise as a result. By requiring the protection and enhancement of biodiversity, the pre-submission Local Plan is likely to contribute to the improvement of environmental quality in relation to air, water and land. It may also make a contribution to reducing noise through the protection and enhancement of open spaces and reducing reliance on the private car.

1.1.7 Mitigation Measures

Through the sustainability appraisal process, a number of recommendations for mitigating the predicted significant adverse effects of the pre-submission Local Plan have been implemented. These are set out in the following table. All recommendations have been accepted and there are no residual mitigation recommendations for the vision and policies contained in the Plan.

Table 1.3: Mitigation recommendations

Policy	Recommended mitigation
Vision	Extend the aim to achieve safer living conditions to new housing development. Include a commitment to conserving and enhancing biodiversity and geodiversity in the vision. Include a commitment to reduce flood risk and promote climate change mitigation and adaptation. Include a commitment to promoting the efficient use of resources. Include a clearer commitment to improving the quality of the environment across the Borough. Include a commitment to promoting sustainable modes of transport. Include a commitment to improving infrastructure for sustainable transport modes.
HG2	Include a requirement for sustainable urban extensions to be designed for safety.
SU1	Require developments to incorporate measures to reduce flood risk where there are appropriate opportunities. Promote energy efficiency measures in retro-fitting of existing development. Include supporting text to indicate how the efficient use of land is to be achieved.
SU4	Require developments to capitalise on opportunities for creating/protecting accessible recreational green space. Require developments to capitalise on opportunities for improvement in biodiversity value.
SU7	Include a focus on areas of deprivation to address the needs of deprived areas for access to sport and recreation facilities.
EN3	Include requirements to support informal recreation in open spaces where appropriate. Promote opportunities to increase connectivity of open spaces and secure biodiversity gains. Promote opportunities to use open space provision to reduce flood risk. Require measures to promote walking and cycling in open spaces, through provision of infrastructure, improved connectivity and safety measures.
EN6	Require regard to be had to the findings of the Extensive Urban Survey.

There are a number of residual recommendations for mitigating predicted adverse impacts which have not yet been incorporated within the pre-submission Local Plan. These relate to:

- Site allocations (recommendations set out in Annexes C and D);
- Strategic Spatial Objectives (recommendations set out in Section 8.3).

1.1.8 Alternatives

Alternatives to the proposed pre-submission Local Plan have been developed, for the following policy areas:

- Spatial strategy, or directions of growth;
- Levels of housing growth;
- Amounts of employment land;
- Percentage of affordable housing required;
- Location of a new leisure centre;
- Location of new retail space.

The alternatives, or options/scenarios, which have been developed are set out in the following tables.

Table 1.4: Summary of spatial options

Spatial option	Sites to deliver option	Approximate capacity
1	Urban area and Anker Valley	900
2	Urban area, Anker Valley, golf course	2000
3	Urban area, Anker Valley, green belt sites	1800
4	Urban area, Anker Valley, Dunstall Lane	1600
5	Urban area, Anker Valley, Coton Lane	1090
6	Urban area, Anker Valley, golf course, Dunstall Lane, Coton Lane, green belt sites	3790
7	Urban area, Anker Valley, golf course, Dunstall Lane, Coton Lane	2890

Table 1.5: Housing growth scenarios

Scenario	Dwellings per annum	Growth 2006-2031
A	240	6000
B	260	6500
C	250	6250

Table 1.6: Employment growth scenarios

Scenario	Gross employment land requirements (ha)
1) Experian Baseline	21.02
2) Regeneration/Policy On	32.91
3a) Short Term Past Take Up	48.51
3b) Long Term Completion Rates	66.49
4) Labour Supply (250 dpa)	27.82

5) Labour Supply (latest household projections)	30.16
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Table 1.7: Affordable housing scenarios

Scenario	Level of affordable housing provision
1	20%
2	25%
3	30%

Table 1.8: Leisure centre options

Option	Description
1	Location in the town centre
2	Location in the east of the Borough
3	Location outside of the Borough

Table 1.9: Retail options

Option	Description
1	Town centre first
2	Additional retail space at Ventura Park

The reasons why these options/scenarios were selected are set out in Section 10 of this report.

1.1.9 How the Assessment was Undertaken

The sustainability appraisal determined the likely effects arising from the pre-submission Local Plan. This applied largely to the vision, objectives and policies, to a series of options and to the site allocations. The appraisal was done by assessing each element of the pre-submission Local Plan against the appraisal objectives in turn and making a largely qualitative assessment, with reference also to the baseline data from the Scoping Report.

In reporting the results of the appraisal, the following symbols have been used to indicate the broad nature of the predicted effect:

- + effect likely to be positive
- effect likely to be negative
- 0 no significant effect
- ? effect unknown

If the appraisal objective was not relevant to the element of the pre-submission Local Plan being appraised, no symbol is given.

Multiple symbols have been used (e.g. ++) to indicate a different scale of impact over time, or where the impacts of an option are *substantially* better or worse than others.

The effects were also rated for their significance in terms of the importance for achieving each appraisal objective. Effects were rated as high, medium or low significance, taking account of a number of factors. The factors were:

- the expected scale of the effects or the degree to which the effects are likely to contribute to the achievement of the sustainability objective in the Borough overall;
- the certainty or probability that the effect is likely to occur as a consequence of the Local Plan;
- whether the effects would be permanent or reversible;
- whether the effect will occur as a direct result of the Local Plan or not, in other words whether the Plan is key for achieving or controlling effects;
- whether the effect is more strongly dependent on other interventions or other factors; and
- how important the objective is to the scope of the Plan.

The sustainability appraisal has also assessed the likely significant cumulative effects of the pre-submission Local Plan in its entirety and in combination with other relevant plans and projects, and considered the interrelationship between effects. The conclusions of this are set out in Chapter 10.

A number of difficulties were encountered in undertaking the appraisal:

- *Availability and reliability of data.* It is almost impossible to quantify effects with total certainty, and the quality of available data could in some situations lead to spurious accuracy, which should be avoided.
- *Uncertainty.* A number of assumptions underpin the housing growth and employment scenarios, which introduce an element of uncertainty about their likely effect if implemented.
- *Significance.* There are very few agreed sustainability thresholds or constraints, as little work has been done in the UK on this issue. Because of this, it is not always possible to assess the significance of any impacts with certainty.

Despite these limitations and uncertainties, it is still possible to draw conclusions about the overall effects that will result from the pre-submission Local Plan to 2031.

1.1.10 Mitigation Recommendations

A number of changes have been made to the pre-submission Local Plan as a result of recommendations made for measures to mitigate the adverse effects of the Plan or to capitalise on opportunities for benefits.

1.1.11 Monitoring Recommendations

The sustainability appraisal has developed a set of recommendations for monitoring the predicted and unforeseen impacts of implementation of the pre-submission Local Plan as proposed. These are set out as a series of indicators related to the sustainability appraisal framework based on the likely and possible impacts of the pre-submission Local Plan. The

recommended indicators should be incorporated into the Annual Monitoring Report for the Local Plan and are set out in Chapter 11.

1.2 STATEMENT ON THE DIFFERENCE THE PROCESS HAS MADE

To date, the sustainability appraisal has had a number of inputs into the process of developing the Local Plan. As well as informal discussions with officers of Tamworth Borough Council, the appraisal has made formal inputs into the selection and refinement of sites, development management policy for specific sites and the drafting of policy.

Chapter 7 provides more information on how the appraisal has influenced the selection of sites and drafting of development management policy for specific sites.

The following changes have been made to the vision and policies of the pre-submission Local Plan as a result of the findings and recommendations of the sustainability appraisal.

Table 1.10: Changes to Vision and Policies of the Pre-Submission Local Plan

Vision	<ul style="list-style-type: none"> • Includes a commitment to conserving and enhancing biodiversity and geodiversity. • Includes a commitment to flood risk management and reduction and climate change resilience. • Ensures that all resources are used efficiently. • Seeks to protect and improve the quality of the environment across the Borough. • Seeks to encourage sustainable modes of transport and improve transport infrastructure. • Extends the aim to create safer communities to new housing development as well as existing.
Policy HG2	Include a requirement for sustainable urban extensions to be designed for safety.
Policy SU1	<ul style="list-style-type: none"> • Energy efficiency is to be maximised in new and existing development • Development should reduce flood risk where appropriate
Policy SU4	<ul style="list-style-type: none"> • Requires capitalization of opportunities to provide accessible green space and improve biodiversity in Sustainable Drainage Systems
Policy SU7	<ul style="list-style-type: none"> • Include a focus on need for sport and recreation in areas of deprivation
Policy EN3	<ul style="list-style-type: none"> • Promotes recreation for health improvement through protection and use of open spaces. • Promotes biodiversity improvement, flood risk reduction and walking and cycling in open spaces.
Policy EN6	<ul style="list-style-type: none"> • Developments are required to have regard to the findings of the Extensive Urban Survey

2 INTRODUCTION

2.1 OVERVIEW

This report sets out the findings and conclusions of a Sustainability Appraisal (SA) of the modified Local Plan for Tamworth. Once adopted, the Local Plan will replace the current Tamworth Local Plan 2001-2011 in setting out policies and proposals to guide the future development of the area.

Sustainability Appraisal is a systematic process undertaken during the preparation of the Local Plan. Carrying out a Sustainability Appraisal will help Tamworth Borough Council to assess whether, and to what extent, emerging policies and proposals impact upon environmental, social and economic conditions. It also provides a means of identifying and addressing any adverse effects that draft policies and proposals might have and making recommendations for mitigating potential adverse effects or capitalising on opportunities for benefits.

2.2 BACKGROUND

The Local Plan once adopted will be an important part of the development plan; it sets out the Council's vision, strategic objectives and set out specific land use allocations for future development for Tamworth.

Tamworth Borough Council has been in the process of producing a Local Plan since November 2006. Over the subsequent six years, substantial progress was made in developing the draft Local Plan, culminating in submission of the 2006-2028 Local Plan for examination in November 2012. As an integral part of the development of the Local Plan, Council officers carried out a Sustainability Appraisal (SA) of the emerging Local Plan, beginning with the publication of a Scoping Report in 2007 and followed by various iterations of the appraisal of effects of the Plan and publication of SA Reports at the appropriate stages in the Plan development.

The Planning Inspector appointed for the examination had several areas of concern, notably over the lack of suitable land use allocations for housing, employment and town centre uses. To address these concerns the Council proposed to modify the Local Plan by making additional allocations as well as a series of other amendments to the submission Local Plan. In February 2012 the Inspector called an Exploratory Meeting, following which he issued a note recommending that the Council withdraw the Local Plan from examination due to concerns over the potential lack of soundness. The Inspector also referenced recent legal challenges over the Greater Norwich and Forest Heath adopted development plans in relation to Sustainability Appraisal.

A resolution to withdraw the Tamworth Local Plan was made on the 19th March 2013 by decision of the Full Council. Since then, the Council has worked on a modified Local Plan to address the concerns identified through the examination process. The Council has made modifications to the previous Submission Local Plan, in part to add newly allocated sites for housing and employment development and to make amendments and additions to Plan policies. The Council intends to re-submit the Plan for examination in 2014.

The Council has commissioned URSUS Consulting Ltd to undertake a Sustainability Appraisal of the modified Local Plan, including the appraisal of allocated sites. As part of the process, an updated

Scoping Report was published for consultation in September 2013¹. A number of comments were received on the content of the Scoping Report, as a result of which some additions and amendments have been made to the baseline data, the policy review, the key issues for Tamworth and the SA appraisal objectives.

2.3 SUSTAINABILITY APPRAISAL

The overall aim of the Sustainability Appraisal (SA) process is to help to ensure that the Local Plan makes an effective contribution to the pursuit of 'sustainable development'. The most widely used definition of this concept is "development that meets the needs of the present without compromising the ability of future generations to meet their own needs"².

SA seeks to ensure that the goal of sustainable development, as set out in the 2005 UK Strategy for Sustainable Development³, is achieved. This states that:

"The goal of sustainable development is to enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generations. For the UK Government and the Devolved Administrations, that goal will be pursued in an integrated way through a sustainable, innovative and productive economy that delivers high levels of employment; and a just society that promotes social inclusion, sustainable communities and personal wellbeing. This will be done in ways that protect and enhance the physical and natural environment, and use resources and energy as efficiently as possible.

2.3.1 Links between Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)

In 2001 the EU adopted the Strategic Environmental Assessment Directive (SEA) that made environmental assessment mandatory for certain plans and programmes prepared by public authorities. This Directive applies to plans and programmes that are likely to have a significant effect upon the environment, including issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage and landscape. The provisions of the SEA Directive apply to the Tamworth Local Plan.

The Planning and Compulsory Purchase Act 2004 requires local authorities to carry out an SA of all emerging Local Development Documents. As the guidance⁴ explaining this requirement makes clear, SA and SEA are similar processes that involve a comparable series of steps. The main difference is that SEA focuses on environmental effects, whereas SA is concerned with the full range of environmental, social and economic matters. The SA process takes the SEA Directive and its requirements fully into account.

2.3.2 Preparing the Sustainability Appraisal

SA forms an integral part of the preparation process of Development Plan Documents (DPDs) as the diagram below shows.

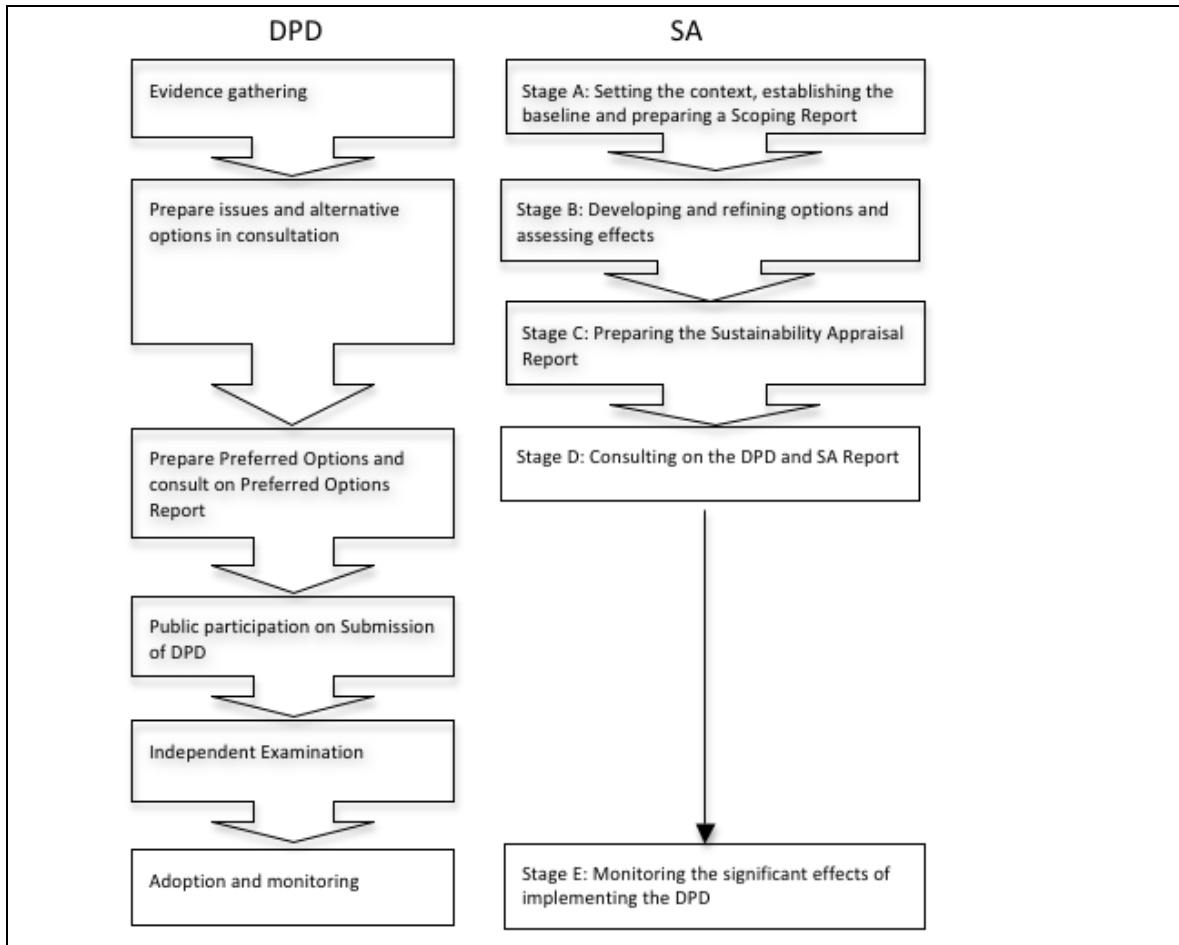
¹ Local Development Framework Sustainability Appraisal Scoping Report, Tamworth Borough Council, April 2007

² Our Common Future (Brundtland Commission, 1987)

³ Securing the Future, Defra, March 2005

⁴ Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (ODPM, 2005)

Figure 2.1: The Development Plan preparation process



The process of preparing an SA is made up of stages and specific tasks as detailed in Government guidance¹. This SA Report covers the second two stages of the process, Stages B and C, which include the following tasks. Stage A was the scoping stage, which was undertaken from August to November 2013 and is covered in a Scoping Report² published in September 2013.

Table 2.1: Stages of SA covered by this report

Stage B	Developing and refining options and assessing effects
Task B1	Testing the Local Plan objectives against the SA framework
Task B2	Developing the Local Plan options
Task B3	Predicting the effects of the Local Plan
Task B4	Evaluating the effects of the Local Plan
Task B5	Considering ways of mitigating adverse effects and maximising beneficial effects
Task B6	Proposing measures to monitor the significant effects of implementing the Local Plan
Stage C	Preparing the Sustainability Appraisal Report

¹ Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (ODPM, 2005)

² Sustainability Appraisal of Local Plan: Scoping Report, URSUS Consulting Ltd, September 2013

Task C1	Preparing the SA Report
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This SA Report sets out the results of stages B and C, which have been carried out between October 2013 and September 2014, and includes an appraisal of the draft policies, proposed development allocations, spatial options, housing growth scenarios, employment land scenarios, affordable housing scenarios, options for the location of a new leisure centre and options for location of new retail space.

2.4 OUTLINE OF CONTENTS OF THE TAMWORTH PRE-SUBMISSION LOCAL PLAN

The Tamworth pre-submission Local Plan sets out the spatial planning strategy for the Borough over the period 2006-2031 in terms of the type of development required to meet local community and business needs, its scale and location as well as the policies that will apply to ensure that development is sustainable. It also includes policies to ensure that appropriate supporting infrastructure is delivered and the area's built and natural environment is protected and enhanced.

The pre-submission Local Plan includes the following:

- A Spatial Portrait, a Vision and Strategic Spatial Priorities
- A Spatial Strategy for Tamworth
- Strategic Policies covering:
 - Town Centre uses including retail, and Employment including office
 - Housing
 - High quality natural and built environment
 - Sustainability
- Land use allocations:
 - Housing
 - Employment
- Proposals for monitoring and implementation

2.5 LINKS TO OTHER PLANS AND POLICIES

The government has published the National Planning Policy Framework (March 2012), which sets out planning policies for achieving sustainable development. Emphasis has been placed on the importance of ensuring that Local Plan policies contribute to achieving sustainable development, in terms of promoting sustainable economic growth. The Tamworth pre-submission Local Plan has been prepared in compliance with the National Planning Policy Framework (NPPF).

It should be noted that, as part of the Government's ongoing reform of the planning system, the West Midlands Regional Spatial Strategy (WMRSS)¹ has been revoked under the Localism Act 2011. The pre-submission Local Plan reflects the NPPF requirement for a locally-derived evidence base, particularly in relation to future housing need. Where considered relevant, working in partnership with neighbouring authorities to discharge the duty to co-operate has resulted in cross-boundary issues being addressed. Both Lichfield District Council and North Warwickshire Borough Council are also in the process of developing their own Local Plans and these have yet to be adopted.

¹ West Midlands Regional Spatial Strategy: Phase Two Revision (2008)

The Tamworth Local Plan is expected to be adopted by 2015 and will replace the existing Local Plan (Adopted in 2006/07)¹. Further detailed guidance will be included in a limited number of Supplementary Planning Documents which will support the implementation of the Plan. Once it is adopted, planning applications will be determined in accordance with the Local Plan unless other material considerations (including the NPPF) indicate otherwise.

¹ Tamworth Borough Council - Local Plan 2006-2011 (Adopted July 2006 and Policies Saved in July 2011)

3 METHODOLOGY

3.1 THE APPRAISAL FRAMEWORK

The SA has tested the pre-submission Local Plan against a framework of objectives that reflect relevant sustainable development policy objectives. This framework was developed in the Scoping Report in September 2013, and was subsequently amended following public consultation. This was informed by a review of policies, plans and programmes relevant to the Tamworth Local Plan and by the collection of baseline data for Tamworth, building on the earlier work undertaken for the previous Scoping Report in 2007. These two activities enabled the identification of key issues for Tamworth, and the drawing up of a series of policy objectives for achieving sustainable development in Tamworth.

The review of policies, plans and programmes is set out in Annex A, and the baseline economic, social and environmental conditions in Tamworth are set out in Annex B.

Table 3.1 sets out the framework of objectives that has been used to appraise the Local Plan.

Table 3.1: Sustainability Objectives

	Objectives	Env.	Soc.	Eco.	SEA topic
1.	To meet the housing needs of the whole community, providing affordable, decent, appropriate and sustainably constructed homes in accessible locations.		✓		
2.	To encourage the efficient use of land and soil.	✓	✓	✓	Material assets
3.	To reduce deprivation, including health and income deprivation.	✓	✓	✓	Population, human health
4.	To ensure equal access to community services and facilities.		✓		
5.	To encourage equal access to education, jobs and training.		✓	✓	
6.	To encourage active and healthier lifestyles by providing accessible green infrastructure, including networks of paths and open spaces, and formal and informal sport and recreation facilities.	✓	✓		Human health, fauna, flora, landscape
7.	To make communities safer by reducing crime, fear of crime and anti-social behaviour.		✓		
8.	To encourage a diverse and competitive economy that will provide sustainable economic growth.			✓	
9.	To protect and enhance historic assets.	✓	✓	✓	Material assets, cultural heritage
10.	To encourage high quality and locally distinct places, spaces, buildings and landscapes.	✓	✓	✓	Material assets, cultural heritage, landscape

	Objectives	Env.	Soc.	Eco.	SEA topic
11.	To conserve and enhance biodiversity and geodiversity, sites of nature conservation value and ecological networks.	✓	✓	✓	Biodiversity, fauna, flora
12.	To minimise flood risk.	✓	✓	✓	Climatic factors, water
13.	To reduce energy consumption by encouraging energy efficiency and use of renewable energy sources.	✓	✓	✓	Climatic factors, material assets
14.	To encourage the reduction, re-use and recycling of waste and water.	✓	✓	✓	Soil, water, landscape
15.	To protect and improve environmental quality including in relation to air, water, land and noise.	✓	✓	✓	Air, water, soil, human health
16.	To make Tamworth town centre the heart of the borough by creating a vibrant and attractive environment.	✓	✓	✓	Material assets, cultural heritage
17.	To reduce the need to travel, reduce out-commuting and encourage sustainable modes of transport.	✓	✓	✓	Climatic factors, air, water, human health
18.	To make best use of the existing transport infrastructure and seek improvements to reduce congestion and improve safety.	✓	✓	✓	Climatic factors, air, water, human health

3.2 APPRAISAL METHODOLOGY

The appraisal determined the likely effects arising from the pre-submission Local Plan. This applied largely to the vision, objectives and policies, to a series of options and to the site allocations. The appraisal was done by assessing each element of the pre-submission Local Plan against the appraisal objectives in turn and making a largely qualitative assessment, with reference also to the baseline data from the Scoping Report.

In reporting the results of the appraisal, the following symbols have been used to indicate the broad nature of the predicted effect:

- + effect likely to be positive
- effect likely to be negative
- 0 no significant effect
- ? effect unknown

If the appraisal objective was not relevant to the element of the Plan being appraised, no symbol is given.

Multiple symbols have been used (e.g. ++) to indicate a different scale of impact over time, or where the impacts of an option are *substantially* better or worse than others.

The effects were also rated for their significance in terms of the importance for achieving each appraisal objective. Effects were rated as high, medium or low significance, taking account of a number of factors. The factors were:

- the expected scale of the effects or the degree to which the effects are likely to contribute to the achievement of the SA objective in the Borough overall;
- the certainty or probability that the effect is likely to occur as a consequence of the Local Plan;
- whether the effects would be permanent or reversible;
- whether the effect will occur as a direct result of the Local Plan or not, in other words whether the Plan is key for achieving or controlling effects;
- whether the effect is more strongly dependent on other interventions or other factors; and
- how important the objective is to the scope of the Plan.

The assessment of significance is indicated in the tables in this report by colour:

	Not relevant
	No significance
	Medium significance
	High significance

The tables make an assessment of effects over short, medium and long-term timeframes. For this purpose, the SA has assumed the short term to be the first five years of implementation of the Plan, the medium term to be the remaining years of the Plan and the long term to be beyond the life of the Plan. The SA has also assessed the likely significant cumulative effects of the Local Plan in its entirety and in combination with other relevant plans and projects, and considered the interrelationship between effects. The conclusions of this are set out in Chapter 10.

3.3 DIFFICULTIES ENCOUNTERED

A number of difficulties were encountered in undertaking the appraisal:

- *Data.* A common problem affecting SA is the availability and reliability of data. Although data has been collected to illustrate a number of the conditions and trends relevant to the SA of the Local Plan, some data sets are more useful than others, and some data sets are known to be old, incomplete or unreliable. In some cases, no data is available. It is therefore almost impossible to quantify effects with total certainty, and the quality of available data could in some situations lead to spurious accuracy, which should be avoided.
- *Uncertainty.* A number of assumptions underpin the housing growth and employment scenarios, which introduce an element of uncertainty about their likely effect if implemented. In particular, the type of residents (e.g. age profile) who might occupy new dwellings and the type of employment (e.g. sector) opportunities that might be created both affect the nature of impacts that might result, but are somewhat uncertain. While the Local Plan aims to influence the choices people make about where and how they live and work, ultimately it has little control over behaviours.

- *Significance.* There are very few agreed sustainability thresholds or constraints, as little work has been done in the UK on this issue, although the idea of ‘living within environmental limits’ is increasingly being operationalised. Because of this, it is not always possible to assess the significance of any impacts with certainty.

Despite these limitations and uncertainties, it is still possible to draw conclusions about the overall effects that will result from the Local Plan to 2031.

3.4 COMPLIANCE WITH THE SEA DIRECTIVE AND REGULATIONS

The Local Plan is subject to the requirements of the European Union’s Directive on the Environmental Assessment of Certain Plans & Programmes 2001/42/EC (the SEA Directive) and the domestic legislation through which the Directive has been transposed into law in England and Wales (the Environmental Assessment of Plans & Programmes Regulations 2004 – Statutory Instrument 2004 No. 1633).

The SA of the Local Plan was designed and undertaken so as to meet the legal requirements for the environmental assessment of plans. Throughout the report the term ‘Sustainability Appraisal’ should be interpreted as encompassing the SA process as required under the Planning & Compulsory Purchase Act 2004 and the Strategic environmental assessment process as required under the European Directive and domestic Regulations on the environmental assessment of plans and programmes.

The following table indicates the components of the SA Report that make up the Environmental Report, as required by domestic and European law on the environmental assessment of plans.

Table 3.2 Summary Requirements of SEA Directive and Compliance of SA Report

Requirements for Environmental Report	Component of SA Report
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2.4 and 2.5
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Section 5 and Annex B
c) The environmental characteristics of areas likely to be significantly affected;	Section 5.4 and Annexes B, C and D
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	Section 5.5
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	Chapter 4 and Annex A

Requirements for Environmental Report	Component of SA Report
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Chapter 7, Section 8.2.1, Section 10.2.2, Section 10.3.3, Section 10.4.2, Section 10.6.2, Section 10.7.2, Chapter 10
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Table 8.2, Annexes C and D
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Section 10.2.1, Section 10.3.1, Section 10.4.1, Section 10.5.1, Section 10.6.1, Section 10.7.1, Chapter 3
i) a description of measures envisaged concerning monitoring in accordance with Art. 10;	Chapter 12
j) a non-technical summary of the information provided under the above headings	Section 1.1

Annex A sets out the results of the review of policies, plans and programmes that are relevant to the Tamworth pre-submission Local Plan. This review has identified the environmental, social and economic policy objectives that define sustainable development policy in the context of Tamworth Borough. The findings of the review have been assessed to ensure that all relevant policy objectives are covered by the SA appraisal framework, so that in undertaking the SA, the Local Plan is tested against all relevant policy objectives to appraise whether and to what extent the Local Plan will achieve or support the achievement of those objectives.

The review of the plans and strategies included in Annex A has highlighted the following issues that need to be considered when drawing up the Sustainability Appraisal framework:

- Access to opportunities, services and facilities¹;
- To protect and enhance the natural environment and biodiversity and maintain and improve landscape character;
- To protect and enhance access to open spaces;
- Limiting and adapting to climate change;
- Reduce crime and the fear of crime;
- Tackle deprivation;
- Promote a diverse and competitive economy;
- Create employment opportunities;
- Importance of education, skills and training;
- Health including such diverse issues as promoting healthy lifestyles and reducing health inequalities;
- Promote good design and local distinctiveness;
- Provide affordable, decent and sustainably constructed homes that meet the needs of all sections of the community;
- Ensure that resources including energy, water, land and soil are used efficiently;
- Protect and enhance the historic and cultural environment;
- Transport including such diverse issues as reducing the need to travel, promoting alternative modes of transport, locating development in accessible locations, reducing congestion, improving the transport infrastructure and improving road safety;
- Improve the quality of the environment including in relation to air, water, land and noise;
- Protect the vitality and viability of centres;
- Reduce waste and promote recycling; and
- Reduce flood risk

¹ Defined as services and access to venues for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.

5 STATE OF SUSTAINABLE DEVELOPMENT IN TAMWORTH

5.1 PURPOSE

This section describes the significant features and conditions within Tamworth relevant to sustainable development policy and objectives. It provides an overview of the state of the environment, society and the economy in the Borough in the period preceding the development and publication of the Draft Local Plan. The full baseline information which was used to compile this summary is given in Annex B.

The aim of this section of the report is to highlight any significant issues or problems that are affecting Tamworth's economy, its people, or its environment and to outline the way in which the state of the environment, society and the economy might change in the future. The purpose is to set the context within which activities arising out of the Local Plan will take place, so that the significant sustainability issues and the way that those activities might interact with those issues can be better understood. It also enables the SA and the process of developing the Local Plan to identify and focus on those issues that are significant. Moreover, baseline information provides the benchmark against which the effects of policies can be assessed and monitored.

This section of the report incorporates the environmental baseline information requirements that are specified in Schedule 2(6) of the Environmental Assessment of Plans & Programmes Regulations 2004.

5.2 DIFFICULTIES IN COLLECTING DATA

There are substantial amounts of data available to populate a sustainability baseline for Tamworth. However, in some instances specific data relating to Tamworth was not available. In such cases, where possible, data for the West Midlands region or the country as a whole have been used to indicate the likely situation in Tamworth. In some cases, no data could be found to describe the baseline situation. In particular, there is little data on likely future trends for many issues.

5.3 SUMMARY OF SIGNIFICANT ISSUES AND PROBLEMS IDENTIFIED

The significant issues that have been identified from a review of the baseline are summarised in the following table. The table also sets out an assessment of how these aspects are likely to evolve in the future without implementation of the Local Plan.

Table 5.1: Summary of baseline data

Issue	Key Findings	Likely Evolution
Population	In 2011 the resident population of Tamworth was recorded as 76,895. It has been estimated that the population of Tamworth will increase to 81,895 by 2021, an increase of 6.5%, with most of the increase occurring	It is uncertain how population might change without implementation of the Local Plan. Without a 5-year supply of land for housing, fewer homes might be built in Tamworth, but it is also

Issue	Key Findings	Likely Evolution
	among the over 64 age group.	possible that developments will still come forward to meet the need for new housing.
Housing	The housing waiting list in Tamworth has been consistently high since 1996/97, albeit with a decline over the past few years. A generally low level of affordable housing supply that has not been sufficient to address the backlog of need has accompanied this. More small homes are required in the future and consideration needs to be given to the needs of an ageing population.	It is uncertain how the provision of housing might change without implementation of the Local Plan. Without a 5-year supply of land for housing, fewer homes might be built in Tamworth, but it is also possible that developments will still come forward to meet the need for new housing. Without the Plan it is less likely that housing of the right type will be delivered, or that enough affordable housing will be provided.
Deprivation	There are several small areas that face issues of deprivation in Tamworth. A number of these areas are concentrated in the Glascote ward. Low income, education and training, lack of employment opportunities and high crime rates are the main problems.	Without implementation of the Local Plan, there may not be delivery of enough employment land to increase job opportunities in Tamworth sufficiently. It is also unlikely that employment opportunities and community facilities will be developed in locations to meet the needs of deprived communities.
Health	Levels of health are similar to the national average. However, there are some small pockets of health deprivation. Obesity rates amongst adults are estimated to be the highest in England, and rates of physical activity are lower than the national average.	Without implementation of the Plan, it is possible that health levels will fall even lower as opportunities to promote cycling and walking will be lost, and it is less likely that new recreational facilities will be delivered to support more active lifestyles.
Open space	A review of open space provision in 2011 showed that at a Borough wide level there is sufficient open space within the Borough, although certain specific parts of the Borough need better provision.	It is unlikely that additional open space will be provided where it is needed, and it is likely that more open space would be lost without the protection afforded by the Plan.
Economy	Many of Tamworth's traditional firms have closed down over the last 20 years. However, while Tamworth remains heavily influenced by the manufacturing sector, service industries such as transport, communication and distribution now also play an important role.	Without implementation of the Local Plan, there may not be delivery of enough employment land to increase job opportunities in Tamworth sufficiently. It is also less likely that the sites would be in the right place to meet the needs of certain sectors (e.g. offices, logistics)
Employment	Tamworth has a low unemployment rate. However, pockets of unemployment are concentrated in certain areas of the town which also experience other forms of deprivation, particularly Glascote and Amington.	Without implementation of the Local Plan, there may not be delivery of enough employment land to increase job opportunities in Tamworth sufficiently. It is also unlikely that employment opportunities will be

Issue	Key Findings	Likely Evolution
		developed in locations to meet the needs of communities with higher unemployment.
Education and qualifications	Schools in Tamworth generally perform below the national average, with high levels of people having no qualifications at all and a very low percentage with high-level qualifications.	The level of education and qualifications is likely to remain unchanged without implementation of the Plan. However, it is possible that insufficient additional school places will be provided, and the opportunity to take a strategic approach to the provision of new school places will be lost.
Historic assets	Tamworth has grown rapidly since the 1960s and is now characterised by modern development. However, it is also an historic town that was once the capital of the Kingdom of Mercia. Tamworth still retains a range of important historic buildings and monuments, which need to be protected. There is also high potential for below-ground archaeological deposits to survive as well as for the extant historic buildings to retain earlier fabric. There are seven Conservation Areas within Tamworth	Without implementation of the Plan, it is more likely that historic assets would be devalued or lost, and the historic character in the Borough eroded. It is more likely that new developments would fail to incorporate measures to enhance the setting of historic assets.
Ecology	Tamworth has two Sites of Special Scientific Interest (SSSI) at Alvecote Pools and Meadows, and there are three others nearby in Warwickshire. Most of the Alvecote Pools SSSI is categorised as having an unfavourable but recovering status. The Borough has five Local Nature Reserves 16 Sites of Biological Importance and five Biodiversity Alert Sites (BAS). There are also sites of international importance near Tamworth: Ensors Pool SAC, River Mease SAC, Cannock Extension Canal SAC.	Without the Plan, it is unlikely that opportunities for creating or enhancing ecological networks will be realised, and action at a landscape scale is unlikely to be taken. Designated sites are likely to come under increasing pressure from development or may be lost or devalued.
Water quality	Two rivers, the Tame and the Anker, flow through the borough. Within and downstream of the borough, levels of nitrates are classed as 'very high' and phosphates are 'excessively high'. There is therefore a need to improve the nutrient status of surface waters through the Borough.	Water quality is likely to continue to improve without implementation of the Plan as a result of other positive policies on water quality, most notably the Water Framework Directive.
Water supply and wastewater treatment	According to South Staffordshire Water's Final Water Resource Management Plan, there is enough water available to meet annual housing growth of 145 dwellings per annum (dpa) with efficiency measures, but there is insufficient resource within the supply area to meet the higher scenarios for development considered, namely 159.5 dpa and 188.5 dpa, especially the higher of these two scenarios. Tamworth wastewater treatment works will require quality	The effect of not having the Local Plan on water supply and wastewater infrastructure is uncertain. The most likely effect is that development will not be well-planned or well-timed, which could make it difficult to meet the infrastructure needs of new development. It is also likely that developments would come forward on sites that are not well-suited to making the best use of existing infrastructure

Issue	Key Findings	Likely Evolution
	improvements in order to accommodate the proposed development.	or place additional strains on networks.
Air quality	Although Tamworth currently has no Air Quality Management Areas, nitrogen dioxide might exceed the standards at the A5 Dosthill, Two Gates Crossroads.	The likely future change in air quality without implementation of the Plan is uncertain. The likely location of development is unknown and therefore future travel patterns are uncertain. Improvements to sustainable transport infrastructure may still be delivered through other plans and programmes and therefore car travel may still reduce.
Flood risk	Tamworth has been classified as having a high probability of fluvial flood risk and a high consequence of fluvial flooding. The Borough is also identified as having a medium probability of residual flooding from the overtopping/breaching of flood defences, with a high predicted consequence. A significant proportion of Tamworth's land is at risk of flooding.	The likely change in flood risk without implementation of the Plan is uncertain. The NPPF contains policy guidance on managing flood risk in relation to development, although with climate change the risk of flooding is likely to increase nevertheless.
Climate change	Emissions of carbon dioxide are fairly low in Tamworth compared with the rest of Staffordshire and England as a whole, and have declined in recent years. However, the level of renewable energy generated in Tamworth is low compared to Staffordshire as a whole.	Without implementation of the Plan, opportunities to further reduce emissions of greenhouse gases will be lost, such as the creation of accessible green infrastructure networks, creation of sustainable transport infrastructure and generation of renewable energy within development.
Waste	Tamworth has achieved a moderately high recycling rate due to improvements in recent years. In 2011/12 49% of waste collected by Tamworth Borough Council was sent for recycling, compared to an average of 42% for England as a whole.	Waste management is likely to continue to improve in Tamworth, through the implementation of the Waste Strategy. Recycling rates are likely to rise and the amount of waste landfilled should fall.
Land and soil	A significant part of Tamworth Borough is already urbanised, and there is a shortage of developable open space. Tamworth has in the past been an important area for mineral extraction, and still contains mineral reserves of potential value. The town is surrounded by agricultural land, much of which is of relatively poor quality but some is higher quality. Tamworth has a Regionally Important Geological/Geomorphological Site at Dosthill Church Quarry.	It is uncertain how land use might change without implementation of the Local Plan. Without a 5-year supply of land for housing, fewer homes might be built in Tamworth, but it is also possible that developments will still come forward to meet the need for new housing. Without the Plan it is possible that more developments would come forward on greenfield land than on previously developed land within the urban area.
Retail	Tamworth town centre consists of a large number of small retail units, which are largely	Without the Plan, it is likely that the town centre's vitality and viability will

Issue	Key Findings	Likely Evolution
	occupied by small independent or specialist retailers rather than large national multiple chain retailers. A number of out of town centre retail parks are situated close to the town centre and occupy a larger retail floor space than the town centre. There are concerns that the town centre's vitality and viability could decline in the short term as it faces strong competition from the retail parks	reduce still further, leading to continued decline.
Leisure and culture	Existing leisure provision in Tamworth is generally adequate to meet the needs of local residents. However, there is an identified requirement for a new swimming pool and sports hall. There is also a need for additional café and restaurant provision in the town centre. Tamworth has a range of attractions including the Snowdome, Tamworth Castle, the Assembly Rooms and Arts Centre and Arts Centre, and shops in the town centre and at Ventura Retail Park.	Without implementation of the Plan, it is less likely that the additional sports facilities would be provided and less incentive to improve the café and restaurant provision in the town centre.
Transport	There is a dependence on the car to travel to work. A large proportion of the workforce out-commute from Tamworth to their employment. Tamworth has good connections to the national road and rail transport networks and is well-served by a local bus network. There is congestion at Ventura Retail Park, Ashby Road, Comberford Road and on local routes to the A5(T).	Transport infrastructure is likely to improve without the Local Plan through measures in the Local Transport Plan and the Town Centre Masterplan. Walking and cycling is likely to increase, and safety will improve. Schemes will encourage commuting by public transport rather than car, and the highway network will be managed to reduce congestion.

The baseline information has been analysed in order to identify a number of key sustainability issues affecting Tamworth. This has then been compared with the outcomes identified through the policy review, to ensure that the appraisal framework also covers the key sustainability issues arising from the policy review.

Table 5.2 lists the key sustainability issues that have been identified.

Table 5.2: Sustainability issues for Tamworth

1.	A growing and ageing population
2.	Lack of affordable and specialist housing
3.	Limited supply of land and buildings for future development
4.	Deprivation hotspots
5.	Inequalities including health and employment
6.	Health problems associated with obesity and low levels of physical activity
7.	Need to protect and enhance parks and open/green spaces
8.	Need to support diverse and competitive economy
9.	Below average qualifications
10.	An historic environment that needs protecting

11.	Important natural habitats and open spaces that need conserving and enhancing
12.	High flood risk in parts of the borough
13.	Need to tackle pollution, especially water quality
14.	Low levels of renewable energy generation
15.	A town centre in need of improvement
16.	Meeting the leisure, cultural, community and recreational needs of Tamworth, especially those of children and young people
17.	A high proportion of local people travel to work by car
18.	A high proportion of local people out-commute for work
19.	Localised traffic congestion
20.	Accessibility and availability of sustainable modes of transport
21.	Maintaining and enhancing landscape and townscape character

5.4 CHARACTERISTICS OF AREAS LIKELY TO BE SIGNIFICANTLY AFFECTED

Tamworth is a very small borough. The boundaries are fairly tightly drawn around the developed urban area with only a limited amount of undeveloped green space around the town that sits within the Borough boundary. The draft Local Plan proposes significant amounts of non-urban green space for development, up to the boundary of Tamworth Borough, as well as policies which affect the Borough as a whole and specific parts of the Borough such as Regeneration Priority Areas. As such, the areas likely to be significantly affected can be considered to be the Borough as a whole. The characteristics of the Borough are set out in detail in Annex B and summarised in Section 5.3. The characteristics of specific allocated sites are set out in Annexes C and D.

5.5 AREAS OF PARTICULAR ENVIRONMENTAL IMPORTANCE

There are three sites of international nature conservation importance within 20km of Tamworth. These sites have been designated as Special Areas of Conservation (SAC) under the Habitats Directive¹ and are as follows:

- Ensors Pool SAC, which is 19.5km away from the centre of Tamworth;
- River Mease SAC, which is 4.5km from the nearest part of Tamworth Borough and 8km from the centre of Tamworth;
- Cannock Extension Canal SAC, which is 19km away from the centre of Tamworth.²

Cannock Chase SAC is over 20km from Tamworth.

5.5.1 River Mease SAC

The River Mease is an unusually semi-natural system in a largely rural landscape dominated by intensive agriculture. Water quality and quantity are vital to the European interests, whilst competition for water resources is high. Diffuse pollution and excessive sedimentation are catchment-wide issues which have the potential to affect the site. The SSSI assessment report undertaken in 2007 notes the site's adverse condition and identifies the following issues: drainage, invasive freshwater species, water pollution – agriculture/run-off, water pollution –

¹ Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora

² MAGIC Interactive Mapping, <http://magic.defra.gov.uk/>

discharge. Significant new development could take place within the catchment as a result of new housing and employment development in North-West Leicestershire, South Derbyshire and East Staffs which may impact upon water quality and quantity. The continuing creation of the National Forest will lead to further catchment wide changes in land use.

The quality and importance of the SAC is based on the following species and habitats:

- Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitriche-Batrachion* vegetation for which the area is considered to support a significant presence
- *Austropotamobius pallipes* for which the area is considered to support a significant presence.
- *Cobitis taenia* for which this is one of only four known outstanding localities in the United Kingdom.
- *Cottus gobio* for which this is considered to be one of the best areas in the United Kingdom.
- *Lutra lutra* for which the area is considered to support a significant presence.

5.5.2 Cannock Extension Canal SAC

The population of *Luronium natans* in this cul-de-sac canal is dependent upon a balanced level of boat traffic. If the canal is not used, the abundant growth of other aquatic macrophytes may shade-out the *Luronium natans* unless routinely controlled by cutting. An increase in recreational activity would be to the detriment of *Luronium natans*. Existing discharges of surface water run-off, principally from roads, cause some reduction in water quality.

The quality and importance of the SAC is based on the following species:

- *Luronium natans* for which this is considered to be one of the best areas in the United Kingdom.

5.5.3 Ensor's Pool SAC

The crayfish population has developed in a flooded brick-pit that has been abandoned for fifty years. The area was unmanaged and was used as *de facto* public open space. The crayfish would be vulnerable to pollution and introduction of non-native crayfish, through uncontrolled access. To address this, since 1995 the area has been leased by Nuneaton and Bedworth Borough Council and is managed as a Local Nature Reserve.

The quality and importance of the SAC is based on the following species:

- *Austropotamobius pallipes* for which this is considered to be one of the best areas in the United Kingdom.

5.5.4 Cannock Chase SAC

Much of Cannock Chase falls within a popular and well-used Country Park. Visitor pressures include dog walking, horse riding, mountain biking and off-track activities such as orienteering, all of which cause disturbance and result in erosion, new track creation and vegetation damage. Bracken invasion is significant, but is being controlled. Birch and pine scrub, much of the latter from surrounding commercial plantations, is continually invading the site and has to be controlled. High visitor usage and the fact that a significant proportion of the site is Common Land, requiring Secretary of State approval before fencing can take place, means that the reintroduction of sustainable management in the form of livestock grazing has many problems. Cannock Chase overlies coal measures which have been deep-mined. Mining fissures continue

to appear across the site even though mining has ceased and this is thought to detrimentally affect site hydrology. Furthermore the underlying Sherwood Sandstone is a major aquifer with water abstracted for public and industrial uses and the effects of this on the wetland features of the Chase are not fully understood.

The quality and importance of the SAC is based on the following species and habitats:

- Northern Atlantic wet heaths with *Erica tetralix* for which the area is considered to support a significant presence.
- European dry heaths for which this is considered to be one of the best areas in the United

5.5.5 Habitats Regulations Assessment

A Habitats Regulations Assessment was carried out in 2012¹ to investigate the potential impacts of development arising from the emerging Lichfield and Tamworth Local Plans. This concluded that no significant impacts were likely on the River Mease SAC, the Cannock Extension Canal SAC or Ensor's Pool SAC from the development of 2900 homes within Tamworth. However, it did conclude that there may be effects on the Cannock Chase SAC arising from strategic allocations within Tamworth i.e those of over 100 dwellings, and advised that these will need to incorporate a visitor impact strategy.

An email communication from Natural England to Tamworth Borough Council on 10th January 2014 advised that the updated Local plan is outside the zone of influence (15km) for Cannock Chase SAC and concluded that mitigation for recreational pressure will not be required and hence alternative recreational green space will not be necessary. It further advised that it could not be concluded that no likely significant effects will occur to the River Mease SAC and asked for a Habitats Regulations Assessment to be carried out.

The Southern Staffordshire Water Cycle Study has identified issues relating to the wastewater treatment works where the Mease is the receiving watercourse. However, the Mease is not the receiving watercourse for the Tamworth Wastewater Treatment Works, which discharges into the Tame. The River Tame then flows north to join the Trent about 500m upstream of where the Mease joins the Trent. An email from Severn Trent Water on 30 January 2014 confirms that the area within Tamworth Borough does not interact with the River Mease.

The HRA has been updated by Tamworth Borough Council to reflect the changes from the withdrawn Local Plan and also the recent information and positions from Natural England and Severn Trent Water. The updated version of the HRA can be found within the Council's evidence base for the Local Plan.

¹ Habitat Regulations Assessment: Lichfield District & Tamworth Borough, May 2012

6 APPRAISAL FRAMEWORK

6.1 INTRODUCTION

The purpose of developing the SA framework is to provide a means by which the sustainability of policies or proposals contained in the pre-submission Local Plan can be appraised in a formal and systematic manner. The SA framework consists of a set of sustainability objectives with which the Local Plan should comply or which it should support where possible. The framework is thereby used as a tool with which assesses the likely sustainability effects of the pre-submission Local Plan, by appraising the extent to which it complies with or supports each policy objective.

6.2 METHODOLOGY

Various environmental, social and economic issues have been identified through reviewing a wide variety of plans and strategies (Task A1), collecting baseline information (Task A2) and identifying sustainability issues and problems (Task A3). These issues have informed the development of the sustainability objectives.

6.3 OUTCOMES

The sustainability objectives are listed in **Table 6.1** below. The purpose of the Sustainability Appraisal is to ensure that the policies and proposals contained in a Local Development Document contribute to the pursuit of sustainable development. To achieve this, the sustainability objectives need to deal with environmental, social and economic issues and problems. To ensure that the sustainability objectives cover environmental, social and economic issues, they have been categorised into these three strands of sustainable development. However, many (if not most) of these objectives do not fit neatly into one category, but straddle two or all three. Each objective has also been assessed against the SEA Directive to ensure that all environmental topics referred to in the SEA Directive are covered.

Table 6.1: Sustainability Objectives

	Objectives	Env.	Soc.	Eco.	SEA topic
1.	To meet the housing needs of the whole community, providing affordable, decent, appropriate and sustainably constructed homes in accessible locations.		✓		
2.	To encourage the efficient use of land and soil.	✓	✓	✓	Material assets
3.	To reduce deprivation, including health and income deprivation.	✓	✓	✓	Population, human health
4.	To ensure equal access to community services and facilities.		✓		
5.	To encourage equal access to education, jobs and training.		✓	✓	

6.	To encourage active and healthier lifestyles by providing accessible green infrastructure, including networks of paths and open spaces, and formal and informal sport and recreation facilities.	✓	✓		Human health, fauna, flora, landscape
7.	To make communities safer by reducing crime, fear of crime and anti-social behaviour.		✓		
8.	To encourage a diverse and competitive economy that will provide sustainable economic growth.			✓	
9.	To protect and enhance historic assets.	✓	✓	✓	Material assets, cultural heritage
10.	To encourage high quality and locally distinct places, spaces, buildings and landscapes.	✓	✓	✓	Material assets, cultural heritage, landscape
11.	To conserve and enhance biodiversity and geodiversity, sites of nature conservation value and ecological networks.	✓	✓	✓	Biodiversity, fauna, flora
12.	To minimise flood risk.	✓	✓	✓	Climatic factors, water
13.	To reduce energy consumption by encouraging energy efficiency and use of renewable energy sources.	✓	✓	✓	Climatic factors, material assets
14.	To encourage the reduction, re-use and recycling of waste and water.	✓	✓	✓	Soil, water, landscape
15.	To protect and improve environmental quality including in relation to air, water, land and noise.	✓	✓	✓	Air, water, soil, human health
16.	To make Tamworth town centre the heart of the borough by creating a vibrant and attractive environment.	✓	✓	✓	Material assets, cultural heritage
17.	To reduce the need to travel, reduce out-commuting and encourage sustainable modes of transport.	✓	✓	✓	Climatic factors, air, water, human health
18.	To make best use of the existing transport infrastructure and seek improvements to reduce congestion and improve safety.	✓	✓	✓	Climatic factors, air, water, human health

7 APPRAISAL OF SITES

7.1 METHODOLOGY

The housing and employment sites that have been identified and allocated in the pre-submission Local Plan have been subject to SA. The sites have been appraised against the SA objectives in the appraisal framework and an assessment made of the likely significant effects of development at each site. Recommendations have been made for ways in which the predicted negative effects could be mitigated and for capitalising on opportunities for benefits.

The SA of sites has been an iterative process. Tamworth Borough Council officers provided a long list of potential sites in August 2013 and these were appraised against the appraisal framework. A paper was prepared in October 2013 setting out the results of the appraisal and making mitigation recommendations where possible. Following this, the list of sites was refined and some sites were dropped from further consideration, either because of likely deliverability or because the SA had identified some issues which were either insurmountable or sufficiently negative as to not justify allocation of the site.

In undertaking the SA of sites, reference has been made to publicly available data on local conditions in the vicinity of sites. The SA has also drawn on representations received by Tamworth Borough Council in the recent consultation on sites with selected stakeholders including Environment Agency, Staffordshire County Council (Environmental Specialists, Education, Highways, Flood Drainage), Highways Agency, Natural England, Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP) and adjoining local authorities.

The remaining sites have been allocated in the pre-submission Local Plan and policy has been drafted for each site to address the predicted effects. The sites have then been subject to further SA in late 2013 and early 2014 to take into account the effect that the mitigation contained within the development control policies would have on the likely significant effects to improve the impact of development. The findings of this second SA of sites are set out in detail in Annex C, and summarised **Table 7.1** and **Table 7.2** below.

Annex C also shows the results of the SA of the sites which have been dropped from further consideration, including the green belt sites. It should be noted that in Annex C, the sites which have been dropped from further consideration do not generally perform as well in the appraisal as the sites which have been allocated. There are two reasons for this. Firstly, in many cases the sites have been rejected in part precisely because they do not perform as well in sustainability terms and generally have more significant constraints on them. Secondly, development management policy has been drafted for the allocated sites to address the predicted effects and therefore mitigation has been built into the policy. No mitigation has been developed for the sites which have been rejected.

The main issues that have arisen are in relation to the historic environment, flood risk, biodiversity, water supply, loss of greenfield land and sports provision.

For almost all the allocated sites, some residual recommendations are made for mitigating adverse effects, addressing uncertainties or for capitalising on opportunities for benefits. Details of these are given in Annex C.

Colour has been used in **Table 7.1** and **Table 7.2** and in the tables in Annexes C and D. This has the following meaning:






Colour	Meaning
	Development likely to result in major positive impacts.
	Development likely to result in minor positive impacts.
	No impacts or neutral impacts
	Development could result in minor adverse impacts, or mitigation could be possible to allow development to proceed.
	Development could result in major adverse impacts and mitigation may not be possible.

Table 7.1: Summary of Sustainability Appraisal of housing sites

Site ID	341	343	344	347	348	349	357	358	387	390	399	406	462	488	496	504	507	508	509	521	541	550	591	593	DL	GC	AV	
Housing	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++
Land use	++	-	++	++	++	++	++	--	--	--	++	--	++	++	+/-	++	++		++	-	++	+/-	++	--	--	--	--	
Deprivation																									-			
Access to services and facilities																												
Access to education, jobs and training																--								--	--			
Active lifestyles																											-	
Crime																												
Diverse and competitive economy																												
Historic assets		-	-	+	+	-	-	-	-	-			?	?									-	?	?	-	-	-
High quality places						+			-	-	-	-												-	-	-	-	
Biodiversity								-	-	-	+	-											-	--	--	-	--	-
Flood risk				-		-		-	-	--	-					-	--				-			-	--	--		-
Energy																												
RRR waste and water																											--	
Air, water, land, noise	?	?	?	?	?	?	?	?	?		?		?								?		?			?	?	--
Town centre																												

Travel		++	++	++		++	++		-	-		-					++	++	++	++								
Transport infrastructure								?																				-

Table 7.2: Summary of SA of employment sites

SA objective	Site ID	EMP1	EMP2	EMP7	EMP8	EMP9	EMP10	EMP26	EMP30	EMP33	EMP34
Housing											
Land use		--	--	-	--	++	-		=	--	++
Deprivation											
Access to services and facilities											
Access to education, jobs and training							+		+		+
Active lifestyles											-
Crime											
Diverse and competitive economy		++	+	+	+	+	+	+	+	+	+
Historic assets		+									
High quality places											
Biodiversity		?	?	?	+	+	+	+	+	?	-/+
Flood risk											
Energy											
RRR waste and water											
Air, water, land, noise		?	?	?	?	?	?	?	?	?	?
Town centre											
Travel											
Transport infrastructure		?			?	?					

A number of cumulative impacts have been identified where development at two or more sites could have impacts which when acting together are likely to be significant. These are described in the following table.

Table 7.3: Cumulative impacts arising from allocated sites

Issue	Sites	Likely significant impacts
Sewage treatment capacity	All	Whilst comparison of current measured dry weather flow against the consented dry weather flow indicates that there is significant hydraulic capacity this sewage works there is some concern regarding the capacity of the filter process. However should additional treatment capacity be required to accommodate the significant levels of development being proposed to the north of Tamworth then no issues are envisaged in dealing with future growth demand.
Air quality	341, 343, 344, 357, 504, 521	Could reduce air quality at Two Gates crossroads.
Sewerage infrastructure capacity	343, 399, 344, 341, 357, 496, 507, 508, 509, 521	May have an impact on the current capacity of the sewer network. Hydraulic modelling will be required to assess the impacts of proposed developments.
	347, 348, 349, 358	May affect known sewer flooding problems downstream.
Biodiversity	DL, GC, AV, 387, 390, 406, EMP1, EMP2, EM7, EMP33	Surveys should be carried out to determine whether water voles or otters are present.
Flood risk	DL, GC, AV, 387, 390, 406	Could collectively have an impact on flood risk through loss of large amounts of permeable land. However, there is no evidence to indicate how much greenfield land could be lost without any adverse effects on flood risk.

8 APPRAISAL OF POLICY

8.1 METHODOLOGY

The appraisal determined the likely effects arising from the pre-submission Local Plan. This applied largely to the vision, objectives and policies and to a series of options. This was done by assessing each element of the pre-submission Local Plan against the appraisal objectives in turn and making a largely qualitative assessment, with reference also to the baseline data from the Scoping Report.

In reporting the results of the appraisal, the following symbols have been used to indicate the broad nature of the predicted effect:

+	effect likely to be positive
-	effect likely to be negative
0	no significant effect
?	effect unknown

If the appraisal objective was not relevant to the element of the Plan being appraised, no symbol is given.

Multiple symbols have been used (e.g. ++) to indicate a different scale of impact over time, or where the impacts of an option are *substantially* better or worse than others.

The effects were also rated for their significance in terms of the importance for achieving each appraisal objective. Effects were rated as high, medium or low significance, taking account of a number of factors. The factors were:

- the expected scale of the effects or the degree to which the effects are likely to contribute to the achievement of the SA objective in the Borough overall;
- the certainty or probability that the effect is likely to occur as a consequence of the Local Plan;
- whether the effects would be permanent or reversible;
- whether the effect will occur as a direct result of the Local Plan or not, in other words whether the Plan is key for achieving or controlling effects;
- whether the effect is more strongly dependent on other interventions or other factors; and
- how important the objective is to the scope of the Plan.

The assessment of significance is indicated in the tables in this report by colour:

	Not relevant
	No significance
	Medium significance
	High significance

The findings of the appraisal are set out in detail in Annex E. The table below summarises those findings for the pre-submission Local Plan's vision and policies.

Table 8.1: Summary of appraisal of vision and policies

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
V	+	0	+	+	+	+	+/0	+	+	+	+	+	?	+	+	+	?/+	+
SP1	+	+	+	+	+	+	+	+	+	+	+		?	?	+	+	+/?	+
NP1	+	+	?	+	+/0	+	+	+	+	+	+	+	+	0	+	+	+	+/0
EC2	+	+	+	+	+	+	+	+	+	+	?	0	0	0	+/?	+	+/?	+/?
EC3				+			+	+								+	+/?	+
EC4	+	+	+	+	+	+	+	+		+	?				+		+	+
EC1	+	+	+	+	+		+	+	0	+	0				+	+	+	+
EC6		+/-	+		+	+		+	0		+	+			+	+	+/-	+
EC7	+	+	+		0	+		+	+		+	+			+		+/?	+
EC5		+		+	+	+	+	+	+	+	+	0			+	+	+	+
HG1	+	+	+	+			+			+							+	
HG2	+		+	+	+	+	0		0	+	+	+			+		+	
HG3	+	+	+	+	+	+	+	+		+	?		+		+/?		+	+
HG4	+									+								
HG5	+																	
HG6	+	+							+	+								
HG7	+			+		+				0					0		+	+
EN1										+								
EN2		+				+				+	0							
EN3		+				+				+	+	+			+		+	
SU7		+	+	+		+												
EN5	+						+	+	+	+					+		+	+
EN6								+	+	+						+		
EN4						+				+	+	+			+			
SU1	+					+		+							+/?	+	+/-	+
SU2	+					+	+	+		0					+	+	+/0	+
SU3	+	+				+					+		+	+	+	+	+	
SU4		+				+		+			+	+			+	+	+	+
SU5								+							+			
SU6			+	+	+			+									+	
SU7			+	+	+	+		+					+	+		+	+	+

8.2.1 Description of Effects

The pre-submission Local Plan has a clear and strong focus on meeting the housing needs of all sections of the community. It seeks to provide affordable, high quality homes of a mix of types to meet a range of needs, and requires these to be sustainably designed and constructed. The Plan promotes energy efficiency and the generation of renewable and low carbon energy in new developments. Water efficiency is to be maximised, and development must support the Tamworth Waste Strategy to reduce waste and increase recycling. Developments must be designed to create safer communities, which should help to support a reduction in crime and

may go a little way to reduce anti-social behaviour although this is also driven by a range of other factors.

A clear aim is to provide homes in accessible locations to minimise the need to travel and maximise the use of sustainable modes of transport. By promoting development in the town centre, the pre-submission Local Plan will help to make use of existing transport infrastructure, and it also seeks improvements to sustainable transport infrastructure which will help to reduce congestion and improve safety. It will also support the accessibility of community facilities and services through promoting development in the town centre, and supports the creation of a vibrant and attractive town centre. The provision of sustainable transport choices is also promoted in the Sustainable Urban Extensions, as is the provision of community facilities and services to ensure accessibility and reduce the need to travel.

In supporting sustainable transport improvements, the pre-submission Local Plan encourages the creation and improvement of green and blue infrastructure links to encourage cycling and walking throughout the Borough, and particularly between the town centre and other neighbourhoods and to the countryside beyond. Such links are also required within new developments. As well as promoting sustainable transport choices to reduce reliance on the car and promote active and healthy lifestyles, these networks will also contribute to strengthening a distinct identity for Tamworth, and may help to facilitate the movement of species and assist in reducing flood risk. They will also contribute to creating an attractive urban landscape. Healthy lifestyles will also be encouraged through the provision of new formal and informal recreation facilities and the protection and enhancement of open spaces.

The second aspect of Tamworth's distinct identity is its historic environment. The pre-submission Local Plan affords strong protection to its historic assets and promotes their enhancement, and requires development to be sympathetic to those assets. This again will help to create an attractive urban landscape, and will support the town's tourism offer, leading to increased job opportunities and a stronger economy.

The pre-submission Local Plan encourages economic growth by protecting the Strategic Employment Areas and allocating new areas for economic development that are accessible by sustainable modes of transport. This should help to reduce deprivation by increasing job opportunities in Tamworth, particularly if done in conjunction with increasing education and training provision in deprived areas. This will help to reduce income deprivation and should also indirectly support a reduction in health deprivation. The improvement of access to community services should assist in this. By targeting regeneration areas for housing and economic development, the pre-submission Local Plan will directly address deprivation and help to improve the urban environment. A direct aim of the Plan is to reduce out-commuting, although this may be increased by the improvement of links to Birmingham and other inter-urban routes.

The pre-submission Local Plan explicitly requires development to make an efficient use of land. By focusing development in the Borough's centres and promoting employment uses on existing employment sites, the pre-submission Local Plan will help to promote the reuse of previously developed land and reduce the use of greenfield land and agricultural land, thereby indirectly helping to protect soils. An efficient use of land will be supported by the requirement for medium-high density development. The emphasis in Tamworth has been to bring forward as

much brownfield land as possible for development, nevertheless over three quarters of the area of the allocated new employment sites are on greenfield land.

The pre-submission Local Plan explicitly requires the protection of biodiversity and geodiversity, and promotes opportunities to enhance biodiversity through habitat creation and restoration. It also requires development to create and reinforce links between existing biodiversity sites and with semi-natural habitats. By requiring the protection and enhancement of open spaces and green infrastructure including network features, the pre-submission Local Plan may help to conserve and enhance biodiversity and ecological networks, but this is dependent on the quality of the open spaces and the nature of any enhancement work.

The pre-submission Local Plan addresses flood risk by requiring proposals for development in flood risk areas to provide a Flood Risk Assessment and to include mitigation measures. Development will be resisted in these areas where appropriate and necessary and the Plan states that development will be expected to be located outside areas at high risk of flooding. Development must not increase the risk of flooding elsewhere and policy is included to manage and reduce flood risk. Site allocations require flood risk to be assessed and appropriately managed to reduce risk.

The pre-submission Local Plan explicitly requires the protection of water quality and requires the quality of canals and rivers to be enhanced. The enhancement of blue infrastructure will help to support this policy. Air quality will be protected and enhanced by promotion of sustainable transport infrastructure. Improving junctions on the A5 may help to increase the flow of traffic at these junctions, which may help to reduce air pollution or may increase it if traffic levels rise as a result. By requiring the protection and enhancement of biodiversity, the pre-submission Local Plan is likely to contribute to the improvement of environmental quality in relation to air, water and land. It may also make a contribution to reducing noise through the protection and enhancement of open spaces and reducing reliance on the private car.

8.2.2 Mitigation

The following recommendations have been made for changes to the vision and policies in order to mitigate predicted adverse effects of the pre-submission Local Plan, or to capitalise on opportunities for benefits. All these recommendations have been taken on board and incorporated into the pre-submission Local Plan.

Table 8.2: Mitigation recommendations

Policy	Recommended mitigation
Vision	Extend the aim to achieve safer living conditions to new housing development. Include a commitment to conserving and enhancing biodiversity and geodiversity in the vision. Include a commitment to reduce flood risk and promote climate change mitigation and adaptation. Include a commitment to promoting the efficient use of resources. Include a clearer commitment to improving the quality of the environment across the Borough. Include a commitment to promoting sustainable modes of transport. Include a commitment to improving infrastructure for sustainable transport modes.
HG2	Include a requirement for sustainable urban extensions to be designed for safety.

- SU1 Require developments to incorporate measures to reduce flood risk where there are appropriate opportunities.
 Promote energy efficiency measures in retro-fitting of existing development.
 Include supporting text to indicate how the efficient use of land is to be achieved.
- SU4 Require developments to capitalise on opportunities for creating/protecting accessible recreational green space.
 Require developments to capitalise on opportunities for improvement in biodiversity value.
- SU7 Include a focus on areas of deprivation to address the needs of deprived areas for access to sport and recreation facilities.
- EN3 Include requirements to support informal recreation in open spaces where appropriate.
 Promote opportunities to increase connectivity of open spaces and secure biodiversity gains.
 Promote opportunities to use open space provision to reduce flood risk.
 Require measures to promote walking and cycling in open spaces, through provision of infrastructure, improved connectivity and safety measures.
- EN6 Require regard to be had to the findings of the Extensive Urban Survey.

8.3 **COMPATIBILITY CHECK OF OBJECTIVES**

Government guidance recommends that the SA should undertake a compatibility analysis between the objectives of the pre-submission Local Plan and the SA appraisal objectives. This has been done and the results are set out in Table 8.4 below.

The purpose of this exercise is to determine whether the objectives of the pre-submission Local Plan will contribute to sustainable development, and to identify any potential incompatibilities between the objectives of the Plan and sustainable development policy objectives. To do this, the Plan objectives have been compared with each of the SA appraisal objectives and an assessment made of the likelihood that the pre-submission Local Plan will contribute to the achievement of each objective for sustainable development.

Table 8.3: Strategic spatial objectives of pre-submission Local Plan

SP1	Making the most efficient and sustainable use of the Borough’s limited supply of land and recognising that an element of future development will be provided by neighbouring authorities.
SP2	To make Tamworth Town Centre a priority for regeneration to create a safe and attractive place for residents, businesses and visitors by strengthening and diversifying the town centre offer, optimising retail, leisure and housing development opportunities and increasing its liveability and by making the most of the town’s tourism and cultural offer, thus creating a positive image for the borough.
SP3	Working in partnership with economic stakeholders to create a diverse local economy, including regeneration of employment areas and provide appropriate education and training that will provide local job opportunities that will reduce the need for residents to travel outside of the Borough.
SP4	To facilitate the provision of convenient and accessible services and community infrastructure across the Borough, particularly in the most deprived neighbourhoods where initiatives that provide additional support, information and services to residents will be encouraged and supported.
SP5	To provide a range of affordable, adaptable and high quality housing that meets the needs of

	Tamworth residents.
SP6	To ensure that appropriate infrastructure, including ICT, is in place to support the delivery of development across the borough.
SP7	To encourage active and healthier lifestyles by providing a network of high quality, accessible green and blue linkages and open spaces and formal indoor and outdoor recreation facilities that meet identified need and link neighbourhoods to each other and the wider countryside.
SP8	To protect and enhance statutory and non-statutory areas of nature conservation, ecological networks and landscape value on the doorstep of Tamworth residents, for their biodiversity, geological, historical and visual value and for the opportunities they provide for education and leisure.
SP9	To protect and enhance historic assets by ensuring that proposals for change respect the historic character of the borough including street layout, surviving historic buildings, street furniture, archaeology and open spaces.
SP10	To create safe, high quality places that deliver sustainable neighbourhoods and reflect Tamworth's small-scale and domestic character using a blend of traditional and innovative design techniques.
SP11	To minimise the causes and adapt to the effects of climate change by encouraging high standards of energy efficiency, sustainable use of resources and use of low carbon/renewable energy technologies.
SP12	To promote sustainable transport modes for all journeys by improving walking, cycling and public transport facilities throughout the Borough and to neighbouring areas and beyond.

Table 8.4: Compatibility of strategic spatial objectives with SA objectives

SA Objective	Strategic Spatial Priorities											
	SP1	SP2	SP3	SP4	SP5	SP6	SP7	SP8	SP9	SP10	SP11	SP12
1.					✓					✓	✓	
2.	✓	✓										
3.			✓	✓								
4.				✓								
5.			✓	✓								
6.							✓	✓				✓
7.		✓								✓		
8.		✓	✓									✓
9.									✓			
10.		✓			✓		✓	✓	✓	✓		✓
11.							✓	✓			✓	
12.							?	?			?	
13.											✓	
14.					?					?	✓	
15.							?	✓		?		✓
16.		✓							✓			✓
17.	✓	✓	✓	✓		✓	✓			✓		✓
18.		✓	✓			✓	✓					✓

No incompatibilities between SA objectives and the Strategic Spatial Objectives were found. Almost all the SA objectives were addressed in the Strategic Spatial Objectives, ensuring that the pre-submission Local Plan will support the SA objectives. Only in the case of the objective to minimise flood risk was there no clear indication that this would be a priority for the Local Plan. Strategic Spatial Objectives SP7, SP8 and SP11 may indirectly contribute to reducing flood risk, but there is no explicit objective to do so. Objective SP11 seeks to minimise the causes and adapt to the effects of climate change, and this could be enhanced by including a reference to the need to minimise flood risk, particularly as it is a significant issue for Tamworth.

9 HISTORY OF THE SELECTION AND EVOLUTION OF OPTIONS

9.1 INTRODUCTION

Tamworth Borough Council has been in the process of developing its Local Plan since 2008. Over the intervening time, a number of stages have been carried out, beginning with the identification of spatial options in 2008, the selection of preferred options in 2009, development of a proposed spatial strategy later in 2009, the identification of options for delivering housing growth in 2011 and a pre-submission publication of the Local Plan in 2012. Then in 2013 the Council withdrew its draft Local Plan on the recommendations of an Inspector.

Following this withdrawal, the Council has been developing a new Local Plan with new sets of options. These are described in Section 10 of this report. The remainder of this section describes the earlier development and evolution of options under the withdrawn Local Plan.

9.2 ISSUES AND OPTIONS REPORT 2008

In March 2008, Tamworth Borough Council produced an Issues and Options Report¹⁶ which set out four spatial options for delivering future development. The Council also conducted an Initial Sustainability Appraisal of the four spatial options, the report of which was made available alongside the Issues and Options Report. The Initial Sustainability Appraisal assessed the social, economic and environmental impacts of the spatial options, and helped to compare the relative strengths and weaknesses of each option.

Option 1: Urban Containment & Regeneration

Within the urban area there are a range of sites that are considered to be potentially suitable for housing and employment development. Selective redevelopment and office provision would be the focus of town centre renewal. This option assumed that Anker Valley can deliver 800 units.

Option 2: Urban Containment and Anker Valley Intensification

The Housing Land Availability Assessment identified that by taking the existing Anker Valley Local Plan allocation, densities could be increased to fully accommodate the remaining requirement. Employment requirements would be met on a mixture of sites within the urban area following the outcome of further work. Selective redevelopment and office provision would be the focus of town centre renewal.

Option 3: Greenfield Urban Extensions

This option sought to locate housing on a greenfield site to the north of the town by extending the existing Anker Valley Local Plan allocation. Employment would be located on greenfield sites in and adjacent to existing employment areas close to the A5. Selective redevelopment and office provision will be the focus of town centre renewal.

Option 4: Greenfield and Green Belt Urban Extensions

This option sought to locate housing on green belt sites to the south of the town in the Dosthill

¹⁶ Tamworth Core Strategy Development Plan Document 2006-2026 Issues and Options Report, Tamworth Borough Council, March 2008

and Hockley areas. This option assumed that the existing 800 units allocated at Anker Valley could be delivered. Employment would be located on greenfield sites in and adjacent to existing employment areas close to the A5. Selective redevelopment and office provision would be the focus of town centre renewal. The option assumed that green belt release may be appropriate in exceptional circumstances.

Table 9.1: Reason for selection of options

Option	Reason for selection of option	Sustainability Appraisal comments
Option 1: Urban Containment & Regeneration	This option had the most potential for the urban area to remain compact. It could deliver growth in areas that need regeneration, and housing and employment would be provided in accessible locations. The town centre would be improved through selective redevelopment and increased business confidence. However this option may lead to a loss of green spaces, reducing biodiversity and limiting opportunities for healthy living. Residential amenity could be reduced and congestion could get worse, particularly around Ventura as people try to access retail facilities.	Positive impacts include minimal urban expansion and ability to utilise existing and planned services and facilities. Development would assist in reducing deprivation and would minimise flood risk by not significantly adding to the amount of impermeable surfaces. Town centre renewal would be achieved and it would reduce the need to travel and utilise existing transport infrastructure. The main negative impact was the limited ability to provide housing needs and to provide a range of employment sites due to constraints on the size and shape of some brownfield sites. There could also be greater pressure to develop urban green spaces and a similar negative impact on the historic environment.
Option 2: Urban Containment and Anker Valley Intensification	This option has the potential for the town to remain compact. Whilst this option would involve the loss of greenfield land, it would prevent further greenfield release and sought to efficiently develop an existing site. It can deliver growth in areas that need regeneration. Housing, employment and town centre facilities would be provided in accessible locations. The scale of the development would ensure the incorporation of appropriate facilities and a mix of housing. The proximity of the development to the open countryside would provide opportunities for communities to be fit and healthy. There is potential to improve public transport to reduce car commuting to and from Tamworth.	Positive impacts include minimising urban expansion and making efficient use of available land. Some urban development would help to tackle deprivation, whilst more development in the Anker Valley would help to meet housing needs. The option should enable equal access to community services and facilities and achieve town centre renewal. Retaining a compact urban form would reduce the need to travel and would utilise existing infrastructure. Increased development at Anker Valley should enable consideration of energy efficient design at the outset. Negative impacts include increased flood risk in the Anker valley floodplain and limited scope to provide a range of employment sites.
Option 3: Greenfield Urban Extensions	This option is not about containment because it would lead to Tamworth spreading up to its boundary on greenfield sites. It would, however, deliver well-designed new communities with good access to facilities, the town centre and the countryside. It would do little to regenerate deprived parts of Tamworth and there would be issues surrounding infrastructure, particularly highways into and out of Tamworth from the north. There is	Option 3 offers greater scope to meet housing needs and to create a diverse and competitive economy. Town centre renewal would be achieved and there would be less pressure to develop urban green spaces. It would also ensure energy efficient design because of increased accommodation for development at Anker Valley. The negative impacts relate to additional greenfield land take and extending development further into the open

	potential to improve public transport to reduce car commuting to and from Tamworth.	countryside. It does not represent such an efficient use of land and may increase flood risk in the Anker Valley floodplain. More development taking place away from the town centre and main urban area will increase the need to travel. There may be pressure on existing nature conservation sites and the character and setting of the Amington Hall conservation area and the listed buildings.
Option 4: Greenfield and Green Belt Urban Extensions	This option is not about containment because it would lead to Tamworth spreading into adjoining districts. It would, however, deliver well designed new communities with good access to facilities and the countryside. It would do little to regenerate deprived parts of Tamworth and there would be issues surrounding infrastructure, particularly highways in the Dosthill area and routes to and from the trunk roads and the town centre. There is potential to improve public transport to reduce car commuting to and from Tamworth.	Option 4 offers greater scope to meet housing needs, particularly in the south of the Borough and to create a diverse and competitive economy. Linked to this is the opportunity to improve services, facilities and infrastructure in the Dosthill, Wilnecote and Hockley areas, including bus services and rail improvements at Wilnecote Station. Town centre renewal will be achieved and there will be less pressure to develop on urban green spaces. The negative impacts of this option relate to additional greenfield land take and extending development further into the open countryside. A significant point is that the land outside the urban area in the south of the Borough is also in the green belt. Housing sites would be located further from the town centre, which implies additional travel needs, particularly with regards to increased car use.

9.3 OPTIONS REPORT 2009

Following consultation on the Issues and Options Report, the Council produced an Options Report¹⁷ in February 2009 which identified the preferred spatial option for locating future development. The options which had been identified in the Issues and Options Report to facilitate growth brought a mixed response, from a range of representations such that no consensus was evident for any one option. The Options Report stated that, from a pragmatic point of view and having regard to the fact that it is generally accepted that Tamworth has limited opportunities to meet all new development requirements, there appeared to be only one common sense approach, and that was that considerations relating to development opportunities should be based on a sequential approach, having regard to viability and delivery issues.

The reasons for this preferred spatial option were given as follows. It was still government and regional policy that wherever possible previously used land should be brought into active use. Therefore consideration should first be given to urban containment. If this cannot be shown to deliver the growth requirements, then greenfield urban extensions should be considered. If there still remains a shortfall then the only other option within the Borough would be Green Belt. However, having regard to the status of the Green Belt at national and regional level, a robust case would have to be made to release Green Belt land within the Borough for development. If this could not be sustained and there was still a shortfall then the only option would be that the required development would have to be provided outside of the Borough.

The Options Report set out scenarios for the distribution of development as shown in the following table.

Table 9.2: The sequential approach to housing delivery

Option	Number of dwellings			Employment (ha)	Retail and offices (m ²)
	Anker Valley land is deliverable	Anker Valley is not deliverable	Green Belt land is not viable		
Urban containment	1950	1950	1950	33	65,000
Greenfield	950	0	0	9	0
Green belt	0	950	0	0	0
Outside Borough	0	0	950	0	0

The advantages of this approach were identified in the Options Report as:

- It focuses development in the established urban fabric of the Borough;
- It maximises the use of existing infrastructure;
- It supports regeneration opportunities; and

¹⁷ Tamworth Core Strategy Development Plan Document Options Report, Tamworth Borough Council, February 2009

- It accords with national and regional guidance in containing development in the urban area.

9.4 PROPOSED SPATIAL STRATEGY 2009

In October 2009, the Council published its proposed spatial strategy¹⁸. This stated that requirements for housing, employment and office development would be accommodated within the Borough boundary, through a combination of sensitive urban containment and greenfield extension, which take account of the best aspects of the Borough's heritage and biodiversity assets. As the heart of the Borough, the town centre would be the focus of mixed use regeneration and economic development. New retail growth would be accommodated through two strategic allocations. Office growth would also be accommodated and improvements made to the public realm in order to improve the quality of the visitor experience. There would be improved linkages to the out of town retail parks so that the two shopping areas are complementary to each other. Improvements would also be made to key gateways into the town centre. New housing to meet the needs of Tamworth residents in the short and medium term would be provided within the existing urban area, primarily on previously developed land and in the form of a sustainable urban extension in the Anker Valley as a strategic site. This development would deliver access improvements to the train station, town centre and the new Academy on the QEMS site and rest of the Learning Zone via the Anker Valley Link Road. In the longer term, sustainable sites outside the Borough boundary would be considered to meet Tamworth's needs.

9.4.1 Options for Housing Delivery

A Strategic Housing Land Availability Assessment identified a significant amount of land suitable for housing development. However, further work on availability and achievability was undertaken in the Tamworth Future Development and Infrastructure Study that identified capacity within the urban area for at least a further 400 dwellings that were confirmed as available and deliverable within the first 10 years of the plan. This left a residual requirement of a minimum of 918 units to be found from outside the urban area. The proposed spatial strategy was to seek between 900 and 1150 dwellings in the Anker Valley.

The preferred approach of Anker Valley and brownfield development would assist in regenerating the urban areas and was best placed to deliver the Vision. The Anker Valley proposal would internalise trips, provide services and facilities on site and improve accessibility to town centre as a key public transport node. The Anker Valley site has sustainability advantages due to its location close to key trip destinations, including Tamworth railway station. It is also within close proximity to local education facilities that are proposed for improvement through Staffordshire County Council's Building Schools for the Future programme. This preferred approach has been carried forward to the development of spatial housing options for the current version of the Local Plan (see section 10.2 of this report).

The reason other options were rejected were as follows:

- Contain development within the existing urban area. Whilst this could deliver positive

¹⁸ Tamworth Core Strategy Development Plan Document 2006-2026 Proposed Spatial Strategy, Tamworth Borough Council, October 2009

impacts such as utilising existing and planned services and facilities, it was considered that not enough deliverable sites had been identified to accommodate all of the required housing numbers. It would struggle to deliver the strategy of transport improvements including additional parking for station, public transport access to station for east of town and public transport access to Academy.

- Locate development to the South of the town on green belt. This scored less well in the Tamworth Future Development and Infrastructure Study appraisal of sustainability than the Anker Valley option. This area is furthest from the town centre, and there are fewer opportunities for accessing the town centre by sustainable modes of travel. It would be unlikely to have a significant positive impact on regeneration of the town centre. It would struggle to deliver the strategy of transport improvements including additional parking for the station, public transport access to station for east of the town and public transport access to the Academy.

9.4.2 Options for Employment Land Delivery

The Proposed Spatial Strategy also identified a preferred option for the location of employment sites. The Council would provide 42 ha of new employment land through new sites and redevelopment of existing employment areas to meet its requirement. New employment land would be provided at the following locations:

- Bitterscote North (6.35 ha)
- Bitterscote South (9.7 ha)
- M42 Junction (3.34 ha)
- Amington Employment Area (0.6 ha)
- Tame Valley Employment Area (0.4 ha)

The remaining requirement would be met on redevelopment of existing employment areas.

The preferred approach will provide opportunities for employment growth and strengthening the local economy. It will also provide a balance of using previously developed land. The preferred option has informed the redrafted policy on Sustainable Economic Growth, although the amount of land required has been updated by a later Stage 2 Employment Land Review (see Section 9.4 of this report), and the list of identified sites has also been updated to reflect the changing availability of sites.

The reason other options were rejected were as follows:

- 1. All new employment development on new sites. This could have a negative impact on existing estates as there would be no focus to redevelop land that is performing poorly. This could lead to an unsustainable form of development which would require significant investment in new infrastructure.
- 2. All new employment development on existing employment sites. Whilst this would make best use of previously developed land, it is unlikely to be deliverable over the plan period. In some cases it may not be viable at present to redevelop smaller parcels of land and land assembly may be required which would take time.

9.4.3 Policy options

The Proposed Spatial Strategy also identified a number of options for approaches to the policies within the Plan.

Table 9.3: Reasons for selecting or rejecting policy options

Policy area	Preferred and rejected options	Reason for selecting or rejecting option
Local centres	<i>Preferred option</i> The Council will protect the network of existing local centres from changes of use that would result in the loss of A1 convenience retail units.	Local centres play a vital role, not only as places to shop but because they provide the opportunity for a wide range of services to be delivered locally in places that are accessible by a choice of means of transport. They are particularly important in deprived neighbourhoods and areas with low levels of car ownership as residents can access basic services within walking or cycling distance or by public transport.
	<i>Rejected option</i> Provide no protection to local and neighbourhood centres.	This would not provide support for retaining services and facilities for neighbourhoods and could lead to a loss of services and facilities.
Green space	<i>Preferred option</i> The Council will protect and support a diverse and multi-functional network of green space and waterscape	There are widespread local deficiencies in all types of open space and therefore the Council must protect as much existing provision as possible. Furthermore the evidence suggests that accessibility to existing open space requires improving, including better signage to raise public awareness.
	<i>Rejected option</i> Provide no protection for green space, sport and recreation.	This could lead to a reduction in the quality and quantity of green space, sport and recreation which could impact on healthy and active communities.
Sport and recreation	<i>Preferred option</i> The Council will promote and provide an appropriate network of high quality accessible sport and recreation facilities that meet the needs of Tamworth's current and future population. This would be achieved in part by: <ul style="list-style-type: none"> • Allocating a site for a new multi-purpose community sports centre available at an accessible location towards the east of the Borough in close proximity to deprived neighbourhoods. • Safeguarding all existing sport and recreational facilities, including playing pitches, from loss or displacement to other uses where there is a proven and existing need. 	This will help to improve and enhance open space, sport and recreation facilities and biodiversity, and support the provision of convenient and accessible services and facilities.
	<i>Rejected option</i> An alternative location for a new community leisure centre.	This could lead to a less sustainable form of development as it could be less accessible to a greater number of people.
Design	<i>Preferred option</i>	The policy aims to raise the standard of new development by ensuring that

	New development should be designed to a high standard and contribute to the creation of a high quality sustainable environment that will improve the image of the Borough.	developers take into consideration the principles of sustainable design. In doing so, Tamworth will become a town that is recognised for its high quality town centre and surrounding neighbourhoods. High quality sustainable design will attract investment and visitors and create a satisfying place to live.
	<i>Rejected option 1</i> Rely on national policy and best practice, do not have a local policy	National policy provides excellent key principles but does not allow for local circumstances. In order to provide meaningful policies it is essential to base policy on local characteristics.
	<i>Rejected option 2</i> Set specific design standards including Building for Life and Lifetime Homes	These schemes present criteria for new development that take into account physical, social and environmental considerations. It is not considered necessary to require adherence to the schemes themselves, and the principles can be conveyed in broader policy criteria. They only apply to housing.
Heritage	<i>Preferred option</i> The Council will safeguard and promote enhancement of historic assets and the character and setting of areas of acknowledged importance, including statutorily and locally listed buildings, conservation areas, scheduled ancient monuments and archaeological remains.	This policy seeks to ensure that sites and areas of significant heritage value are safeguarded for the future and where possible enhanced, as part of wider regeneration proposals. Conservation areas, statutorily listed buildings and scheduled monuments are already protected by legislation and there is therefore only a need to introduce policy for issues that are not covered by legislation or higher level policy that have been identified as locally important.
	<i>Rejected option</i> Rely on national policy, do not have a local policy	National policy can only provide very broad guiding principles and requires local planning authorities to draft local policies to deal with local circumstances.
Conservation areas	<i>Preferred option</i> Development within or affecting the setting of a conservation area will only be permitted where it preserves or enhances the special character and appearance of the Borough's conservation areas, as defined in the conservation area character appraisals.	This policy seeks to preserve and enhance the special character as defined in the character appraisals, through sensitive development, enhancement projects and appropriate management. The Council is committed to preparing a management plan for each conservation area to identify the best way of preserving and enhancing their special character.
	<i>Rejected option 1</i> Rely on national policy, do not have a local policy	National policy can only provide very broad guiding principles. If the Council anticipates a need to act in a specific way to respond to local circumstances national policy would not provide sufficient detail to guide this in a meaningful way. Local policies would enable this local interpretation to be provided.
	<i>Rejected option 2</i> Have the same policy for all conservation areas	The conservation area character appraisals have defined what is special and locally distinctive about Tamworth's conservation areas. Each conservation area is distinctly different in origin, character, appearance and current use and the application of a standard policy for all of them would be inappropriate. It would not enable the Council to use a different approach to development or management if a conservation

		area demanded it. The town centre conservation areas in particular are subject to most pressure for change and would benefit from specific guiding principles.
Sustainable resource management and climate change	<p><i>Preferred option</i></p> <p>The Council will actively promote development which utilises resources in an efficient and sustainable way. New development will need to demonstrate:</p> <ul style="list-style-type: none"> • Efficient use of land and buildings; • High standards of energy efficiency; • High water efficiency standards and conservation by requiring new homes to meet or exceed the Code for Sustainable Homes and offices to meet the BREEAM offices scale. • Reduces the consumption and use of energy, particularly from non-renewable resources by ensuring that all new homes meet at least the national and regional targets set out in the Code for Sustainable Homes for 2010, 2013 and 2016; • Considers opportunities to incorporate renewable energy sources appropriate to the Borough; • Minimises impact on drainage systems, using appropriate SUDS where practical. <p>In addition, development will be required to contribute towards the Tamworth Waste Strategy through maximising sustainable and renewable resources providing site waste management plans as appropriate and incorporating suitably located on site facilities.</p>	This will have a positive impact on the local economy by promoting the use of local labour. It will reduce impact of development by promoting energy efficient buildings and a sustainable living environment. It will preserve valuable biodiversity and heritage assets. Reducing the amount of waste will help to minimise the impact of new development on the environment and will safeguard the Borough's natural, built and historic assets.
	<p><i>Rejected option 1</i></p> <p>Set specific standards</p>	No evidence to support this.
	<p><i>Rejected option 2</i></p> <p>Rely on national policy, do not have a local policy</p>	National policy states that design and layout of new development should support sustainable waste management. The Core Strategy is well placed to do this at a local level.
Minerals safeguarding	<p><i>Preferred option</i></p> <p>When considering proposals for non-mineral development, the Council will have regard to strategic mineral</p>	Local mineral resources are important to the local economy and safeguarding mineral reserves will contribute towards maintaining construction materials and jobs.

	allocations, mineral safeguarding areas and mineral consultation areas in order to avoid sterilisation of these resources. Consideration will also be given to mineral resources with cross boundary implications.	
	<i>Rejected option</i> Rely on national policy and Staffordshire Minerals Core Strategy, do not have a local policy.	This would be contrary to national policy as districts need to make reference to mineral safeguarding areas and should include mineral safeguarding policies in their development plan documents.
Sustainable transport	<i>Preferred option</i> The Borough Council will seek to improve the sustainability of Tamworth, improve accessibility to and between communities, services, facilities and employment opportunities through working in partnership to encourage sustainable development and promoting 'Smarter Travel Choices' including: <ul style="list-style-type: none"> • Ensuring the construction of the Anker Valley Link Road and the Amington Link Road; • Ensuring the construction of a park and ride facility as part of the Anker Valley development • Seek to reduce congestion around the town centre and the Ventura and Jolly Sailor Retail Parks by promoting and encouraging use of improved sustainable transport links between them and to the wider town • Promote integrated, safe, secure and convenient transport networks including cycleway and footways • Promote measures that make best of use of the existing transport network • Secure highway improvements to accommodate residual traffic • Require new developments to produce travel plans • Improving sustainable transport choices from Tamworth to Drayton Manor Park through joint working 	The policy will assist in reducing congestion and increasing the level of use of more sustainable forms of travel. It will assist in making local neighbourhoods more attractive and safe.
	<i>Rejected option</i>	Whilst it would be desirable to make improvements to rail and bus services and to

	A public transport only strategy	encourage cycling and walking, the high level of investment required and the lack of public funding makes delivery difficult.
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In all policy areas in the above table except two, the preferred option has been carried forward into the development of policy in the current Local Plan. The two preferred options which have changed slightly are in the areas of sport and recreation and sustainable transport, as follows:

- The current policy on sport and recreation does not specify that the new community sports centre should be provided in the east of the Borough. The reason for this is that the Council seeks to deliver a sports centre in a location accessible for all, not just for those in the east of the Borough. There are no sites currently available and therefore the policy is not specific about the exact location.
- The policy on sustainable transport does not require the construction of the Anker Valley Link Road, the Amington Link Road, a park and ride facility as part of the Anker Valley development, nor does it seek to reduce congestion around the town centre and the Ventura and Jolly Sailor Retail Parks. The reasons for this are a) the Anker Valley Link Road would not be viable for the amount of housing that could be delivered; b) work has already been carried out by Staffordshire County Council to address congestion around the retail parks; and c) Anker Valley development would include measures to alleviate congestion in the town centre.

9.5 FURTHER HOUSING OPTIONS 2011

In February 2011, the Council produced a consultation paper on housing policy¹⁹. This set out a policy for housing delivery which stated that a minimum of 900 dwellings will be provided as a sustainable urban neighbourhood to the north east of the town centre in the Anker Valley. The remaining will be provided within the existing urban area. In addition, the policy proposed that the Council would work closely with neighbouring authorities to ensure if further housing is required to meet Tamworth's needs that this is planned in the most sustainable location and that the infrastructure needs arising from that development within Tamworth are identified and provided for. Development to meet Tamworth's needs in neighbouring authorities could be met in identified broad locations to the east of the town or to the north of the town as part of the sustainable urban neighbourhood in the Anker Valley.

The Tamworth Future Development and Infrastructure Study²⁰, carried out jointly with Lichfield District and North Warwickshire Borough Councils, examined options for delivering a further 900 dwellings outside the urban area. In identifying options, the Study also took into account the need to provide for a further 600 dwellings which represented a 20% flexibility allowance.

In order to define potential growth options, the following considerations have been taken into account:

- The amount of land required to accommodate identifiable future dwelling requirements;
- The sequential approach to the location of strategic growth defined in Tamworth Borough Council's draft Core Strategy Options Document;
- The existence of key environmental constraints to provide an initial sieve of potential site

¹⁹ Tamworth Core Strategy Development Plan Document 2006-2026 Housing Policy Consultation, Tamworth Borough Council, February 2011

²⁰ Tamworth Future Development and Infrastructure Study, Drivers Jonas, July 2009

- options; and
- Sites identified in existing / emerging SHLAAs relating to the study area.

Based on the above, a total of seven potential growth options were identified, two in Tamworth and the remainder in Lichfield and North Warwickshire. For the purposes of the study, the consultants sought to identify options which reflect the range of potential strategic approaches to the location of development outside of the urban area of Tamworth put forward in the Core Strategy Option Document.

The following options were identified by the study:

- Growth Option A – Land North of Tamworth Urban Area (Anker Valley) (in Tamworth)
- Growth Option B - Land South of Tamworth Urban Area (Green Belt) (in Tamworth)
- Growth Option C - Land North of Anker Valley (in Lichfield)
- Growth Option D- Land West of Polesworth (in North Warwickshire)
- Growth Option E - Land Between Stoneydelph and M42 (in North Warwickshire)
- Growth Option F- Land at Mile Oak (in Lichfield)
- Growth Option G: Land North of Perrycrofts (in Lichfield)

When assessed against both the current situation and that which could exist following the provision of appropriate physical and community infrastructure improvements, Option E performed the best, followed by Option F. Sites to the north of the Tamworth Urban Area generally performed less well by comparison, particularly against highways capacity and impact criteria. The poorest performing option was that to the south of the urban area (comprising of land west of Tamworth Road and land South of Hockley). The weaker performance of this option is largely driven by its relatively low performance against environmental protection and deliverability considerations.

It was considered that the Anker Valley option was the most sustainable option within the Borough boundary to deliver the Spatial Objectives for the town, providing that the necessary infrastructure and linkages are delivered. These are required to ensure the necessary infrastructure is in place to serve the development as a whole and that the development contributes to creating sustainable inclusive communities. Development in this location will enable the provision of a park and ride facility which is accessible for a significant part of the town and provides a sustainable link to the Learning Zone and town centre. This will reduce congestion to the north of the town centre. A sustainable urban neighbourhood that seeks to maximise internal trips by providing services and facilities, and by having a high degree of public transport accessibility will minimise travel by the private car and minimise congestion.

Of the other options identified in the Joint Study, land to the east of the Tamworth urban area and west of the M42 was considered to be the most sustainable location to meet Tamworth's needs. Land east of the M42 was also considered to have sustainability benefits as was land at Mile Oak and land North of the Anker Valley which all performed similarly. However, land at Mile Oak is within the green belt and Lichfield District Council indicated that this would not be a preferred option. Lichfield District Council indicated that 400 houses could be built in Fazeley, which is part of the Tamworth Housing Market Area and could further meet Tamworth's needs. If further land is required to meet Tamworth's needs, the most appropriate locations would either be to the east of Tamworth or to the north, particularly if the appropriate links to Anker

Valley were made. The 2010 Annual Monitoring Report identified a housing supply in excess of 9 years within Tamworth and therefore future growth in neighbouring authorities is not expected to be required until after 2020.

The preferred option is to prioritise development within Tamworth urban area and the on the Anker Valley allocation, and to pursue discussions with neighbouring authorities subsequently to deliver housing to meet Tamworth's needs in Lichfield and North Warwickshire at a later date. This option has been carried forward to the current version of the Local Plan, and has informed the development of the spatial housing options described in Section 9.2 of this SA Report.

However, the spatial housing options in the current Local Plan progressed the options from the Transport and Infrastructure Study and developed them to reflect changing circumstances. In particular, it did not consider sites outside of the Borough, and it included some additional sites within the Borough that have since been proposed for development. This is because the pressure for new housing development has increased. Furthermore, the National Planning Policy Framework (NPPF) requires the Council to maximise opportunities within its own boundary, while balancing policy considerations and the objectives of the NPPF. The reasons for consideration of these additional sites within the spatial options are described in Section 9.2.1 of this report.

9.6 PRE-SUBMISSION LOCAL PLAN 2012

In June 2012, the Council published the Pre-Submission version of the Local Plan 2008-2028. The preferred options set out in this document were:

- To seek delivery of 5500 new dwellings, of which 4500 would be delivered in the urban area and Anker Valley, and 1000 would be sought outside of the Borough;
- To seek a minimum of 36 hectares of additional employment land
- The Strategic Employment Areas comprised the following;
 - Bitterscote (Bonehill Road, CardinalPoint, BitterscoteSouth)
 - Tame Valley Employment Area (Hedging Lane, Two Gates, Tame Valley Industrial Estate)
 - Amington Employment Area
 - Lichfield Road Employment Area
 - Centurion Park Employment Area
 - Relay Park Employment Area

The reduction in the amount of employment land sought and the sites identified were in response to the Employment Land Review published by the Council in January 2012.

9.7 SUMMARY OF EVOLUTION OF HOUSING REQUIREMENT

From the Issues and Options stage in 2008 through to the Housing Policy Consultation in 2011, each stage of the development of the Local Plan has identified a housing requirement of 2900 new dwellings to be provided within the Borough. This figure was taken from the (now withdrawn) Regional Spatial Strategy, although the Issues and Options Report in 2008 noted that there may be a need to accommodate higher levels of growth and predicted that there may be a need to accommodate 5500 new homes.

The 2900 target for new dwellings within the Borough was carried through from the Issues and Options Report, to the Proposed Spatial Strategy in 2009, and to the Housing Options Consultation in 2011.

The Pre-Submission Local Plan published in 2012 identified a housing requirement of 5500 new homes, of which 4500 would be delivered within the Borough and 1000 would be sought outside of the Borough. The reason for this was in response to the Southern Staffordshire Districts Housing Needs Study published in 2012, which concluded that the dwellings requirements for Tamworth range between 5,280 and 5,830 dwellings. The Pre-Submission Local Plan took a mid-point of these figures annualised over the course of the plan period which equated to an overall need of 5,500 dwellings.

The current (2014) version of the Local Plan retains this assessment of the housing requirement as 5500 new dwellings, but as the Plan period has now been extended to 2031 the objectively assessed need is therefore 6,250 dwellings.

Table 9.4: Summary of Evolution of Housing Requirement and Spatial Strategy

Stage in Local Plan process	Housing requirement and strategy	Reason for choice of housing requirement and strategy
Issues and Options Paper 2008	Plan for 2900 new dwellings	Figure taken from Regional Spatial Strategy
Options Report 2009	Plan for 2900 new dwellings, with a sequential approach to locating housing: urban containment followed by greenfield development.	It was still government and regional policy that wherever possible previously used land should be brought into active use. Therefore consideration should first be given to urban containment. If this cannot be shown to deliver the growth requirements, then greenfield urban extensions should be considered. If there still remains a shortfall then the only other option within the Borough would be Green Belt. To meet any remaining shortfall, the only option would be that development would have to be provided outside of the Borough.
Proposed Spatial Strategy	Plan for at least 2900 new dwellings, with brownfield development within the town and greenfield development at Anker Valley.	This would assist in regenerating the urban areas and was best placed to deliver the Vision. The Anker Valley proposal would internalise trips, provide services and facilities on site, improve accessibility to the town centre, is close to key trip destinations, is close to proposed local education facilities.
Further Housing Options 2011	Plan for at least 2900 new dwellings, providing a minimum of 900 at Anker Valley and the remainder within the urban area. Any further required housing will be provided	The Anker Valley site was the most sustainable option within the Borough boundary, providing that the necessary infrastructure and linkages are delivered. It would enable the provision of a Park and Ride facility, would

Stage in Local Plan process	Housing requirement and strategy	Reason for choice of housing requirement and strategy
	outside the Borough.	maximise internal trips and would reduce congestion.
Pre-Submission Local Plan 2012	Seek delivery of 5500 new dwellings, of which 4500 would be delivered in the urban area and Anker Valley and 1000 would be sought outside the Borough.	Increase of housing requirement was in response to the Southern Staffordshire District Housing Needs Study published in 2012, taking the mid-point of a range recommended by the study.

10 APPRAISAL OF OPTIONS

10.1 INTRODUCTION

The SA is required to appraise the impacts of the pre-submission Local Plan and of reasonable alternatives to it. In developing the Local Plan, a number of different types of options have been considered. These fall into the following categories:

- Spatial options;
- Housing growth options;
- Employment scenarios;
- Affordable housing scenarios;
- Leisure centre options;
- Retail options.

Within each group of options or scenarios, several different options/scenarios have been developed. Each of these has been appraised against the SA objectives of the appraisal framework. A description of the options/scenarios, the reasons for selecting the alternatives dealt with and the findings of the appraisal are set out in the following sections.

10.2 SPATIAL OPTIONS

10.2.1 Description of Spatial Options

The following options have been developed as alternatives to the proposed spatial strategy. These spatial options select different combinations of sites to deliver the new housing development, resulting in different approaches to locating development around the Borough.

Option 1: Urban area and Anker Valley

This option was chosen as it was the proposed strategy within the withdrawn Local Plan and was in line with the adopted Local Plan. This option is the 'baseline' and subsequent options for appraisal are built on this.

Option 2: Urban area, Anker Valley and the Golf Course

This builds on option 1 and is seen as expanding the borough to the east. It was agreed at a Cabinet meeting of the Council in May 2013 to look at options of disposal for the Golf Course, one option being for housing development. Therefore this is a reasonable option to consider. The Golf Course is close to existing employment areas. It is removed from the Town Centre, but sustainable transport linkages have the potential to be improved.

Option 3: Urban area, Anker Valley and green belt locations

This is seen as expanding the borough to the south. Green belt has been considered as there is active promotion of some sites from landowners. The sites are detached from the town centre and no large employment areas are close by. There are biodiversity and geodiversity sites within the Green Belt, as well as landfill and mineral safeguarding sites and in many areas the

topography of the land would be very challenging to develop. A separate Green Belt review²¹ has been carried out which assesses the Tamworth Green Belt against the five purposes defined in the NPPF.

Option 4: Urban area, Anker Valley and Dunstall Lane

This is seen as expanding the borough to the west. Dunstall Lane has historic planning permission for employment use that was implemented but never completed. The NPPF states that employment land not coming forward should be considered for future housing options. This area is close to existing employment areas, retail destination and the town centre. Sustainable transport linkages have the potential to be improved by utilising existing public rights of way, cycle ways and making best use of the bus service serving the nearby retail parks.

Option 5: Urban area, Anker Valley and Coton Lane

This is seen as expanding the borough to the north west. Coton Lane is a site actively promoted and would fill the urban area to the Borough boundary. It would allow for housing development which is close to existing employment areas and also close to the town centre.

Option 6: Urban area, Anker Valley, Golf Course, green belt site, Dunstall Lane and Coton Lane

This is seen as expanding the borough in all directions.

Option 7: Urban area, Anker Valley, Golf Course, Dunstall Lane and Coton Lane

This option would retain the green belt. The Green Belt Review (2014) showed that there were no exceptional circumstances to release the Green Belt for development. The Site Selection technical paper showed that the infrastructure requirements on green belt sites are high. In addition to this other sites are better located in relation to employment areas and the town centre. The green belt sites generally performed relatively poorly in the appraisal of sites.

The options are summarised in the following table.

Table 10.1: Summary of spatial options

Spatial option	Sites to deliver option	Approximate capacity
1	Urban area and Anker Valley	900
2	Urban area, Anker Valley, golf course	2000
3	Urban area, Anker Valley, green belt sites	1800
4	Urban area, Anker Valley, Dunstall Lane	1600
5	Urban area, Anker Valley, Coton Lane	1090
6	Urban area, Anker Valley, golf course, Dunstall Lane, Coton Lane, green belt sites	3790
7	Urban area, Anker Valley, golf course, Dunstall Lane, Coton Lane	2890

The SA has not assessed the likely impact of providing housing to meet Tamworth’s needs on sites outside of the Borough. The consideration and appraisal of sites to meet Tamworth’s needs outside of the Borough is the responsibility of neighbouring local authorities and any identified sites should be allocated and appraised within the neighbouring Local Plans. This has

²¹ Green Belt Review 2014, Tamworth Borough Council

happened in Lichfield (see section 10.1.2 of this report). North Warwickshire has, to date, not identified or allocated any site to meet Tamworth's needs. However, through the SA of their respective Local Plans the requirement to meet housing needs arising from Tamworth has been assessed.

10.2.2 Description of Effects of Spatial Options

All options will result in the permanent loss of greenfield agricultural land, and some will mean the loss of green belt land, both of which are likely to affect the setting of Tamworth. Options 1, 4 and 5 would minimise the impact on landscapes.

Biodiversity is likely to be adversely affected by development. The greater the land-take, the greater the pressure on biodiversity, both through habitat loss and through the effects of human activity on habitats that are not lost. All the SUE sites have constraints and have the potential for adverse impacts on biodiversity. The green belt sites have particularly significant biodiversity constraints, therefore options 3 and 6 perform particularly poorly on biodiversity.

Loss of greenfield land could also contribute to adverse effects on flood risk, by reducing the area of permeable land in Tamworth and increasing the rate of run-off from the land. With increasing land-take, it is possible that with development of more sites, adverse effects on flood risk could be experienced, but there is no data to judge this with any degree of certainty.

The development of the golf course site would involve the loss of formal recreational facilities, which does not support the objective of promoting active lifestyles. However as the decision to close and dispose of the golf course has been made, this loss is inevitable and the facilities will be lost regardless.

The higher the housing numbers, the more possible it becomes that adverse impacts will be seen on historic assets, particularly the setting of assets if not the assets themselves. There are opportunities to enhance historic assets in the urban area, but the Dunstall Lane site has the potential for adverse impacts on designated and undesignated historic assets, and the golf course has the potential for adverse impacts on undesignated industrial period assets (the Amington Colliery complex, a disused brick works site, the line of the Amington and Glascoate Colliery Railway and the line of the Coventry Canal). Options 1, 3 and 5 minimise the risk to historic assets.

Developing the green belt sites may risk further deterioration of air quality at the Dosthill Road/Watling Street junction because of the increased traffic using Dosthill Road. In addition, several of the SUE sites have the potential to affect known sewer flooding problems, and the green belt sites risk problems with capacity and pumping. For the green belt sites, major investment in water infrastructure is likely to be required. Options 1 and 5 present least risk of adverse environmental impacts while options 3 and 6 present the greatest.

The more sites that are allocated on the edge of Tamworth, the more this would lead to increased travel distances to access town centre facilities and services. Delivery of high levels of housing growth is also likely to increase the need for out-commuting. Option 6 performs least well in terms of reducing the need to travel. The green belt sites are likely to increase congestion on the A51 and a new road may be required to address this.

None of the options would deliver Tamworth's identified need for affordable housing. There is a slight difference between the options in that the higher the overall level of housing growth the more affordable housing would be provided, but the difference between the options is minimal and none of the options is significantly better than any others. The higher the overall level of housing growth, the more progress would be made towards meeting Tamworth's overall level of housing need.

10.3 HOUSING GROWTH OPTIONS

10.3.1 Description of Housing Growth Options

Consultancy firm Nathaniel Lichfield & Partners (NLP) was appointed by the three southern Staffordshire Councils of Cannock Chase District, Lichfield District and Tamworth Borough to undertake a study into the future population, household projections and housing needs of the area.

The purpose of the study was to set out the potential scale of future housing requirements in the three local authorities, based upon a range of housing, economic and demographic factors, trends and forecasts. This sought to provide the Councils with evidence on the future housing requirements of their districts to help them plan for future growth and make informed policy choices through the development plan preparation process. NLP produced a report²² setting out the findings of the study in May 2012.

NLP developed a number of scenarios for future housing requirements according to three factors, which were agreed with the three Councils as follows:

- Demographic factors (Scenarios A-E) – what projections of natural change, migration and headship rates will mean for future levels of household growth;
- Employment-led factors (Scenarios F-H) – what levels of housing are needed to sustain different estimates of employment change; and,
- Policy/supply-led factors (Scenarios I-J) – how past trends of delivery are likely to be reflected in future household growth.

The report advised that the projected housing need for Tamworth fell within a range of 240 to 265 dwellings per annum.

In May 2013, NLP produced an update to the assessment of housing need for South Staffordshire²³. This tested the ongoing validity of the housing requirements identified in the original Southern Staffordshire Housing Needs study in the light of recently released demographic data and population projections. Having modelled the latest CLG household projections and related statistics on vacancy rates, unemployment and commuting, it considered that the original ranges of between 240-265 dwellings per annum for Tamworth remained within an acceptable margin of tolerance despite changes to the growth forecasts.

²² Southern Staffordshire Districts Housing Needs Study and SHMA Update Final Report, Nathaniel Lichfield and Partners, May 2012

²³ Implications of the 2011-based CLG Household Projections: Lichfield, Tamworth and Cannock Chase Housing Requirement Update, Nathaniel Lichfield and Partners, May 2013

The previous SA Report of February 2014 assessed the various housing growth scenarios which had been developed by NLP and set out in their report of May 2012.

New data was published by ONS in May 2014. This includes the 2012-based Sub-National Population projections, which replaces the 2011-based (interim) SNPP equivalents (published in September 2013). The latest projections are based on the 2012 mid-year population estimates published in June 2013 (which are themselves rolled forward from the 2011 mid-year population estimates and ultimately the 2011 Census) and a set of underlying demographic assumptions regarding fertility, mortality and migration, based on local trends. In response to the new data and the publication of the National Planning Practice Guidance on assessing housing need, NLP produced a further update to the assessment of housing need for South Staffordshire in July 2014²⁴. This updated the modelled housing growth scenarios and assessed their validity and robustness. Several of the scenarios were discounted in the analysis. The report concluded that the objectively assessed need for Tamworth falls within the range of 240 to 260 dwellings per annum.

The preferred option for the Tamworth pre-submission Local Plan is 6250 new dwellings over 25 years or 250 dwellings per annum. This represents the total housing need for Tamworth, not the target for the pre-submission Local Plan which is 4250 new dwellings within Tamworth Borough. The additional 2000 dwellings are to be sought outside the Borough.

The pre-submission Local Plan indicates that since 2006, there have been a total of 1,435 (net) new homes delivered, an additional 53 dwellings were under construction and there is a further 410 with planning permission as of 1 April 2013. This reduces the number of homes to be delivered by 2031 by 1,898.

In order to derive options to appraise, the SA has taken the top and bottom of the range recommended by NLP for Tamworth's objectively assessed need and also the preferred option in the Local Plan, which is also a mid-point between the top and bottom. It is not considered appropriate for the SA to continue to consider the updated housing growth scenarios set out by NLP in the July 2014 report as several of the scenarios have been discounted on the basis of validity or robustness. However these past assessments have been carried out and are available in the previous version of the Sustainability Appraisal. The options for housing growth taken forward for appraisal are therefore as follows.

Table 10.2: Housing growth options

Scenario	Dwellings per annum	Growth 2006-2031	Minus 1898	Difference from draft Plan
A	240	6000	4102	-250
B	260	6500	4602	+250
C	250	6250	4352	0

²⁴ South-east Staffordshire Housing Needs Study HEaDROOM Update Report, Nathaniel Lichfield and Partners, July 2014

10.3.2 Assumptions

The pre-submission Local Plan identifies a need for 2000 additional dwellings to be provided outside of Tamworth Borough to meet Tamworth's needs. According to the Lichfield Plan, 1000 dwellings are to be provided to the north of Tamworth, of which 500 are to meet Tamworth's needs. North Warwickshire's Local Plan states that 500 dwellings to meet Tamworth's needs will be provided within North Warwickshire, distributed across the borough. Both local plans are currently in examination and therefore these figures and locates are subject to possible change. It is therefore hoped that the further 1,000 dwellings to meet Tamworth's needs will be provided within either North Warwickshire, Lichfield or within the wider Greater Birmingham and Solihull Local Economic Partnership area (GBSLEP).

At this stage it is not known where any development over and above the target of 4,250 might be located within Tamworth. To meet additional housing needs above the pre-submission Local Plan's target for 4,250 dwellings, further land for development will need to be allocated. It is possible that the Dunstall Lane site might be extended or that the capacity of Anker Valley increased if a suitable transport package is proposed; a significantly less sustainable option would be to release land from the green belt. Therefore no assumptions can be made about the likely location of additional growth and the likely spatial impacts are uncertain.

It is further assumed that to meet a target set by option A which is lower than that in the pre-submission Local Plan, all sites will still be developed and the same quantity of housing would be sought in neighbouring authorities.

The following capacities have been assumed.

Table 10.3: Site capacities

Sites	Approximate capacities
Urban area	400
Anker Valley	500
Golf course sites	1100
Dunstall Lane sites	700
Green belt sites	900 – split between several sites

10.3.3 Summary of Findings

All the housing growth options would result in the permanent loss of greenfield and agricultural land. The higher the housing numbers the greater the area of greenfield land that will be lost. Delivering a higher target than in the pre-submission Local Plan may result in the loss of green belt land, which would affect the setting of Tamworth. There would be the same loss of accessible green space under each of the housing growth scenarios.

Loss of greenfield land could contribute to adverse effects on flood risk, by reducing the area of permeable land in Tamworth, Lichfield and North Warwickshire and increasing the rate of run-off from the land. However, the likelihood and significance of effects are uncertain. There are

various policies in the pre-submission Local Plan to mitigate flood risk, which will help to reduce the likelihood of any adverse effects.

Biodiversity is likely to be adversely affected by development. The higher the housing target, the greater the pressure on biodiversity, both through habitat loss and through the effects of human activity on habitats that are not lost. All the Sustainable Urban Extension sites have constraints and have the potential for adverse impacts on biodiversity. The green belt sites have particularly significant biodiversity constraints. There are various policies within the pre-submission Local Plan that address biodiversity impacts and promote enhancements where possible, which will help to reduce the likelihood of adverse effects.

The higher the housing numbers, the more possible it becomes that adverse impacts will be seen on historic assets, particularly the setting of assets if not the assets themselves. Historic landscapes may come under pressure for development with higher housing numbers, including one of the green belt sites.

With the highest housing growth option, it becomes more likely that major investment in water infrastructure will be required, and there is greater potential for adverse impacts on air quality.

Higher housing targets are likely to increase the need to travel because the additional growth could not be accommodated within the urban area. A higher housing target is also likely to increase the level of out-commuting.

None of the options would deliver Tamworth's identified need for affordable housing.

10.4 ECONOMIC SCENARIOS

10.4.1 Description of Economic Scenarios

Tamworth Borough Council commissioned Nathaniel Lichfield and Partners to undertake stage 2 of their Employment Land Review for the Borough. Stage 2 specifically looks at demand for new employment land. This Employment Land Review²⁵ developed a number of scenarios for demand, based on baseline data for Tamworth, local planning policy, past trends and economic aspirations. The following scenarios were developed.

- **Scenario 1) Experian Econometric Model Job Growth: Baseline**

The latest local area based econometric job forecasts were obtained for Tamworth Borough from Experian Business Strategies in September 2013. These are widely recognised as a valuable input and can indicate the broad scale and direction of economic growth in different sectors to help assess future employment space requirements. Experian's sub-regional economic model takes account of the existing economic structure of each Local Authority (broken down by economic sector) and the historical relationship between the regional performance of an industry and the performance observed at the Local Authority level. The forecasts of job growth by sector reflect recent trends and economic growth projections at national and regional level, and how economic sectors in Tamworth have fared relative to the West Midlands region's growth in the past. These forecasts also reflect

²⁵ Employment Land Review – Stage 2, Nathaniel Lichfield and Partners, December 2013

the current post-recession economic climate. They are not constrained by either labour supply or land availability.

- **Scenario 2) Job Growth: Regeneration/Policy On**

An alternative, job-based estimate of future needs was compiled which was termed the Regeneration, or 'Policy-On', scenario. Tamworth Borough Council has formed an alliance with the Greater Birmingham and Solihull LEP. The priorities of Tamworth Borough Council reflect those of both LEPs in that there is a focus on a growth in business and professional services, environmental and building technologies and general manufacturing in order to build upon the town's employment strengths and to minimise outward commuting.

- **3a) Short Term Past Take Up Continues**

This scenario simply assumes that future development rates of employment space up to 2030 will be similar to those that have occurred in Tamworth over the last 11 years (the period for which a more detailed breakdown of B-class uses is available). As this period covered both strong economic growth and recession, it could provide a reasonable basis for future planning.

- **Scenario 3b) Long Term Completion Rates**

This demand estimate is also based broadly on past completion rates in the Borough, but with adjustments to reflect the potential for higher growth based on longer term past trends, stretching back to 1997/1998.

- **Scenario 4) Draft Local Plan Housing Target (250 dpa)**

This scenario estimates the employment space requirement that would result from anticipated housing and hence population growth in Tamworth, since this could impact upon the Borough's ability to attract businesses and future job growth.

- **Scenario 5) Labour Supply Based on CLG 2011-based (interim) household projections**

In May 2013 NLP undertook a partial update²⁶ to the 2012 Housing Needs Study discussed above to model the implications of the latest 2011-based (interim) CLG household projections. The baseline scenario incorporated updated Sub-National Population Projections data alongside revised data on commuting, headship rates and unemployment. The revised baseline projection indicated population growth of 7,685 over the period of 2011-30; associated household growth of 4,665 and a housing requirement of 255 dpa (259 dpa 2011-28). The number of jobs associated with this growth equalled 520, or 27 per annum.

The preferred option for the pre-submission Local Plan for employment land requirements is 32 hectares, of which 18 hectares would be sought within the Borough boundary and 14 hectares would be sought outside the Borough. This was chosen because it was felt to provide enough employment land to be in balance with the housing growth target. Furthermore it provides a good fit with regeneration policy and allows a proactive approach to bringing new business into the Borough. This amount of employment land is considered to be sufficiently close to scenario 2 (regeneration/policy on) not to merit separate appraisal as an option.

²⁶ NLP (May 2012): Implications of the 2011-based CLG Household Projections – Lichfield, Tamworth and Cannock Chase Housing Requirement Update

NLP estimated gross employment land requirements for offices, industry and logistics associated with each of these scenarios, and this is set out in the following table.

Table 10.4: Employment scenarios

Scenario	Gross employment land requirements (ha)
1) Experian Baseline	21.02
2) Regeneration/Policy On	32.91
3a) Short Term Past Take Up	48.51
3b) Long Term Completion Rates	66.49
4) Labour Supply (250 dpa)	27.82
5) Labour Supply (latest household projections)	30.16

10.4.2 Overall Findings of Appraisal of Employment Scenarios

By seeking higher amounts of employment land, scenario 3b, and to a lesser extent scenario 3a, will indirectly provide the greatest potential for economic growth, although achieving economic growth is also dependent on a range of other factors.

However, seeking to provide a high amount of employment land is likely to have a range of negative effects. All scenarios will result in the permanent loss of greenfield land on the allocated sites. It is likely that with a higher employment land requirement, additional sites will be needed beyond the Borough boundary. Although the location of such sites is unknown, it is possible that additional greenfield land will be lost within other local authorities. The loss of greenfield land has uncertain implications for flood risk, by reducing the amount of permeable land and increasing run-off rates. The higher the employment land requirement, the greater the pressure on biodiversity, both directly through habitat loss and indirectly through the effects of human activity on habitats that are not lost.

Scenario 2 seeks to minimise outward commuting from Tamworth, thereby reducing the need to travel. Provision of a lower employment land requirement than scenario 2 could therefore increase outward commuting. A higher employment land requirement than scenario 2 is likely to promote outward commuting as the pre-submission Local Plan indicates that it is unrealistic that additional sites could be found within the Borough. The contribution to climate change and poor air quality will therefore be minimised with scenario 2.

10.5 AFFORDABLE HOUSING SCENARIOS

10.5.1 Description of Scenarios

Tamworth Borough Council has developed nine different scenarios for affordable housing. These were drawn up in a client-side workshop on 20th February 2014 and are set out in a report²⁷ of a viability assessment for Tamworth including housing viability assessment. Three different levels of affordable housing are proposed, and within each of those three levels are three different proposals for the type of affordable housing to be provided. The three levels of

²⁷ Tamworth Borough Council Whole Plan Viability Assessment, February 2014

affordable housing are 20%, 25% and 30%. The three types of affordable housing are social rented, intermediate and shared ownership. The reason these scenarios were chosen is because they represent a range of viable and practical approaches to affordable housing provision.

The SA has appraised the three different scenarios of levels of affordable housing provision, but not the different types of affordable housing because this will not produce any different results when examined against the appraisal framework. The options for affordable housing appraised in the SA are therefore as set out in the following table.

Table 10.5: Affordable housing scenarios

Scenario	Level of affordable housing provision
1	20%
2	25%
3	30%

10.5.2 Overall Findings of Appraisal of Affordable Housing Scenarios

None of the scenarios would meet the identified need for 183 affordable homes per annum. Scenario 3 would provide the highest level of affordable homes per annum (83 dpa) and therefore is the best performing scenario. This will help to improve access to housing for poorer members of the community and may indirectly help to improve equality of access to employment.

10.6 LEISURE CENTRE OPTIONS

10.6.1 Description of Leisure Centre Options

The pre-submission Local Plan has not allocated a site for a new leisure centre as no suitable site has been identified. However, it was thought to be useful if the SA developed and appraised some options for a leisure centre location. The following three options were drawn up as the most suitable areas to assess the location of a new leisure centre, on the advice of TBC officers. Option 1 would be the most accessible location for residents within Tamworth, option 2 is the recommendation from the Sports Strategy and option 3 has been assessed because of the lack of available sites within Tamworth.

Table 10.6: Leisure centre options

Option	Description
1	Location in the town centre
2	Location in the east of the Borough
3	Location outside of the Borough

10.6.2 Overall Findings of Appraisal of Leisure Centre Options

All options will increase formal sport and recreation facilities and will encourage active and healthier lifestyles and help to reduce health deprivation.

A location in the town centre would be most accessible to the greatest number of residents and will increase activity in the town centre and contribute to its vitality. It is also likely to maximise the use of sustainable modes of travel into the town centre and make the best use of existing transport infrastructure. The impact of a location in the east of the Borough will require new transport infrastructure to be provided, and how sustainable this is will depend on what infrastructure is provided as part of the development. The impact of a location outside of the Borough would depend on where the centre would be provided which is unknown.

There are historic assets and areas of biodiversity value in the east of the Borough and therefore adverse impacts are possible. However, the likelihood and significance of any impacts will depend where the leisure centre would be located, which is not known. Large parts of the Golf Course site are affected by flood risk and therefore adverse effects are possible if this was the chosen location. A town centre location is likely to be unaffected by flood risk or biodiversity constraints, but may have adverse impacts on historic assets, although this is dependent on the specific location which is unknown. The impact of a location outside of the Borough on historic assets, biodiversity and flood risk will depend on the specific location which is unknown.

10.7 RETAIL OPTIONS

10.7.1 Description of Retail Options

The pre-submission Local Plan proposes focusing retail development in the town centre before any additional out-of-town retail provision. However, it is inferred through the Local Plan consultations that there is a desire among some stakeholders to increase the retail floorspace at the existing out-of-centre retail parks. Therefore the SA has developed two options for additional retail provision to reflect these two positions.

Table 10.7: Retail options

Option	Description
1	Town centre first
2	Additional retail space at Ventura Park

No assumptions have been made about how additional retail space might be delivered at Ventura Park. This could be done by intensifying provision on the existing site, or it might be delivered by extending and enlarging the existing site.

10.7.2 Overall Findings of Appraisal of Retail Options

Both options will support the creation of additional retail employment which will contribute to economic growth.

Prioritising retail provision in the town centre will support economic activity there and will enhance the vitality of the town centre. It will also provide the greatest access to services and facilities for the greatest number of residents, particularly for those without access to a car. Providing additional retail space at Ventura Park is likely to reduce the vibrancy of the town centre and access to services and facilities if town centre shops are lost.

Prioritising retail provision in the town centre will reduce the need to travel by supporting multi-purpose trips to town centre facilities, and will maximise the use of sustainable modes of transport into the town centre. Providing additional retail space at Ventura Park will increase the need to travel, particularly if town centre shops are lost. Although accessible by foot and bus, the retail parks are likely mainly to encourage use of the private car. Both options will support the use of existing transport infrastructure. Providing additional retail space at Ventura Park may create congestion on roads in the area, although the significance of any impacts will depend on any mitigation which is put in place.

Prioritising retail provision in the town centre will help to encourage the use of previously developed land. Providing additional retail space at Ventura Park may or may not involve the use of greenfield land, depending on how the additional space would be provided. If greenfield land were to be used to provide the additional retail space, adverse impacts on flood risk are possible as large parts of the retail parks are within flood zone 3. The town centre is much less constrained by flood risk and therefore adverse effects are unlikely.

11 CUMULATIVE EFFECTS AND INTERRELATIONSHIP BETWEEN EFFECTS

11.1 CUMULATIVE EFFECTS

The SEA Directive requires assessment of an additional level of impacts in addition to straightforward direct impacts. These are specified as “secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative”. The following approach has been taken to identifying such impacts.

A number of different types of impact are set out in European Commission guidance:

- separate developments causing the same impact – cumulative;
- different impacts acting together on a receptor e.g. air pollution and land take – cumulative;
- plan impacts which give rise to other indirect impacts – secondary; and
- different impacts which together give rise to yet another impact – cumulative and secondary.

There is therefore a need to consider both secondary and cumulative impacts in the appraisal. Secondary impacts were considered as an integral part of the main appraisal work, and this is indicated in the appraisal matrices in Annexes C to F where impacts are either direct or indirect i.e. secondary. Certain other attributes are common to all types of impact: these are timescales (i.e. short, medium and long-term impacts), reversibility (i.e. permanent or temporary impacts) and whether the impacts are positive or negative. These attributes were also all considered as integral aspects of impact assessment, and this is similarly indicated in the appraisal matrices in Annexes C to F. Cumulative impacts are discussed in this section of the SA Report.

There are two types of situation that could give rise to cumulative impacts:

- the same effect arising from two or more different sources; and
- different effects where there is a relationship between the effects and potentially an interaction.

Synergistic effects are a type of cumulative impact. These are effects where the cumulative impact may be greater or smaller than the sum of the separate effects.

Cumulative impacts were considered in the appraisal in two ways:

- the potential for different developments to give rise to the same type of effect; and
- the potential for interaction between different types of effect.

In order to assess the cumulative impacts arising from all potential developments under the Local Plan, the appraisal considered the overall effect of the pre-submission Local Plan as a whole on each of the SA objectives. The results of this are set out above in Chapter 8.

The appraisal then considered the potential for effects arising from other plans and programmes which in combination with effects arising from the pre-submission Local Plan may give rise to

significant impacts. The results of the review of other plans and programmes and their potential to give rise to cumulative effects is set out below.

The six key plans/projects that could give rise to significant cumulative impacts together with the Tamworth Local Plan are:

- North Warwickshire Core Strategy
- Lichfield District Local Plan: Strategy
- Local Enterprise Partnership Strategy for Growth
- High Speed Rail
- A Strategy for the A5
- Staffordshire Local Transport Plan

Each of these is summarised below, and an assessment made of the potential contribution to significant cumulative effects in combination with the Tamworth pre-submission Local Plan.

11.1.1 North Warwickshire Core Strategy

The Core Strategy²⁸ seeks to develop a broad distribution pattern for development, with the majority of development being directed to the Main Towns, in order to achieve vibrant sustainable communities within a sustainable pattern of development. The result is that, Atherstone with Mancetter and Polesworth with Dordon, are the Market Towns where the majority of development will be directed.

Development for employment, housing (including affordable housing), services and other facilities will be permitted within the development boundaries of the Market Towns of Atherstone with Mancetter and Polesworth with Dordon. It is expected that over the plan period, more than 50% of the housing and employment requirements will be provided in or adjacent to the Market Towns and their associated settlements.

Between 2006 and 2028 at least 3,800 dwellings (net) will be developed. The delivery of 500 units to meet Tamworth's needs from the total can commence at any time.

Polesworth & Dordon will deliver 440 new dwellings over the Plan period. The broad location of growth will be to the south and east of the settlements subject to there being no unacceptable environmental impacts from surface mining and that viable and practicable coal reserves are safeguarded. Land to the west of Polesworth & Dordon shall remain essentially undeveloped in order to maintain the separation between Tamworth and the settlements of Polesworth & Dordon. Any proposals will be expected to be limited in size and maintain the separation between the urban area of Tamworth and the settlements of Polesworth and Dordon.

The Core Strategy also makes reference to Birch Coppice Business Park, on the site of the former Birch Coppice Colliery to the south of Dordon, which is a large logistics site. Birch Coppice Phase 2 is under construction, located south of the A5 near Dordon. In addition, MIRA Technology Park, an Enterprise Zone, south along the A5 will be coming on stream within the next year or so with a number of associated junction improvements on the A5. This is north of Nuneaton on the

²⁸ Core Strategy Submission Version, North Warwickshire Borough Council, February 2013

A5. There is also the Birmingham Intermodal Freight Terminal (BIFT) at Birch Coppice. It will also have a waste transfer recycling centre run by Warwickshire County Council, catering for wider than local needs.

Contribution to cumulative effects

It is likely that all the developments identified above will contribute to an increase in traffic on the A5 and using junction 10 of the M42. However, this is not predicted to give rise to cumulative effects in combination with the Tamworth Local Plan, particularly in view of the commitments in A Strategy for the A5 (see below).

11.1.2 Lichfield District Local Plan

The Local Plan: Strategy²⁹ identifies a Broad Development Location to the north of the Anker Valley allocation, north of the B5493 and east of the railway line linking Tamworth with Burton-on-Trent. In the Broad Development Location identified to the north of Tamworth, a sustainable, safe, well designed mixed use development of approximately 1,000 dwellings will be delivered by 2029 including:

1. A range of housing in accordance with development management policies and having regards to needs arising within Tamworth Borough;
2. Provision for open space, sport and recreation facilities and incorporating playing pitches, amenity green space, equipped play, allotments;
3. Landscaping and green infrastructure provision including the retention of quality hedgerows and significant trees, and their incorporation into the landscape, and the allowance for significant tree canopy cover;
4. A clear strategy for delivering links to Tamworth, and showing how these will be incorporated into an integrated open space and green infrastructure network;
5. Protection of local areas and habitats of biological interest;
6. The provision of public transport to serve the site: all development should be within 350m of a bus stop;
7. The provision of pedestrian and cycling routes throughout the site, linking to the green infrastructure network and to settlements, services and facilities beyond the site boundaries including safe crossing points;
8. Vehicular access that is integrated with the Anker Valley and Amington links proposed within Tamworth Borough;
9. The provision and maintenance of sustainable drainage systems and flood mitigation measures;
10. Adherence to all other policies in the Local Plan.

The development shall cause no coalescence with Wigginton village and shall not commence prior to essential infrastructure being delivered at an appropriate stage.

Further consideration of land to the North of Tamworth Borough will be considered through the Local Plan Allocations document.

²⁹ Lichfield District Local Plan: Strategy (EIP Changes), Lichfield District Council, January 2014

Contribution to cumulative effects

The Sustainability Appraisal of the Lichfield District Local Plan: Strategy predicts a range of effects for the development north of Tamworth which could make a contribution to cumulative effects in combination with development at Anker Valley. There will be a negative impact upon maintaining a diverse and attractive landscape with development north of Tamworth, although the policy requires the retention of significant trees and an allowance for significant tree canopy cover, and so effects should be mitigated to an extent. It is recommended that the Anker Valley site takes a similar approach to be compatible with surrounding countryside.

There is potential to positively increase the number and diversity of biodiversity habitats. However there is greater potential for harm to the watercourse. Development of the Anker Valley site is likely to result in adverse impacts on biodiversity, including on waterways. It is recommended that the policy on Strategic Urban Extensions be amended to require development at this site to protect and enhance biodiversity.

11.1.3 Local Enterprise Partnership Strategy for Growth

The Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP) produced a Strategy for Growth³⁰ in May 2013. The strategy indicates that GBSLEP wants to significantly improve the quality and reliability of connectivity both within the LEP, and from the LEP to the region/nation/world. Road, rail, air and digital connectivity are seen as being key components of the mix and there is a belief that they need to work effectively together better to connect people to jobs and businesses to markets. The strategy aims to cut congestion and uncertainty over travel times, and reduce the average time taken for people to get to their place of work, or to visit for business or leisure tourism.

To achieve this, the GBSLEP will commit to the creation of a new Strategic Alliance of local LEPs to ensure the wider travel to work area is supported by strong transport governance. Working with Birmingham Airport they will increase route development east and west. They will develop the means to ensure improved digital connectivity is available for urban and rural locations, and focus on reducing journey times for employees and businesses. Championing HS2, they will ensure a complementary package of investments to ensure the wider LEP geography will be connected to this key development.

The focus will be around targeting areas of greatest potential economic benefit, and accelerating development within them aligned to sector and skills plans; the flagship programmes being the City Centre Enterprise Zone (EZ) and Enterprise Belt (EB) with the M42 Economic Gateway (junction 6 of the M42) at its heart. EB aims to create the framework for the creation of over 25,000 jobs through the lifetime of the EB. Action for the M42 Economic Gateway include:

- Early and bold investment in local connectivity, including new modes of rapid transit to create a genuinely connected network
- Investing in green infrastructure as a vital economic asset
- Targeting investment in Junction Six of the M42 to facilitate the growth of Birmingham Airport, the NEC and Birmingham Business Park.

³⁰ Delivering Growth, Greater Birmingham and Solihull Local Enterprise Partnership, May 2013

- Delivering managed growth around four key locations, namely North Solihull, Solihull Town Centre, Blythe Valley Business Park and the Hub which includes the NEC, airport, Birmingham Business Park and the proposed High Speed Rail station.

GBSLEP will prioritise raising the quality of life for all the LEP's residents, with access to high quality and locally responsive cultural programmes, recognising and enhancing the LEP's considerable and varied natural assets and different local centres. Through the Creative City Partnership GBSLEP will encourage participation in the full breadth of the LEP's cultural offer, building a strong shared sense of identity and purpose and increasing engagement in civic life.

Contribution to cumulative effects

The improvement of transport infrastructure combined with investment enterprise in Birmingham and Solihull is likely to increase the level of out-commuting from Tamworth in combination with the Local Plan's aim to improve transport links to Birmingham. The emphasis on the difference of local centres and encouraging cultural participation will add to efforts in Tamworth to create a strong local identity and vibrant and attractive town centre.

11.1.4 High Speed Rail

The UK Government's preferred route for HS2 comes close to Tamworth on two stretches of rail. The first (Phase One) runs from near junction 9 of the M42 and travels north near Middleton, passes about 2km west of Hopwas and skirts the eastern edge of Lichfield. The second (Phase 2) broadly follows the line of the M42 from the M6 Toll towards Ashby de la Zouch, largely within a cutting. The second branches off this. The nearest stations will be at Birmingham and Birmingham Interchange.

HS2 Ltd have produced a fact sheet³¹ for the Birmingham area, which projects travel times at 49 minutes to London, 49 minutes to Manchester and 57 minutes to Leeds. It also predicts the creation of 40,400 jobs in Phase One construction, operation and maintenance and in station development. The fact sheet predicts that HS2 will make cities like Birmingham even more attractive places to locate, with people able to live there and work in the East Midlands, Sheffield, Manchester or Leeds, or to commute to Birmingham from further away. HS2 is predicted to free up capacity on the West Coast Main Line, providing the opportunity to operate more frequent local services through Tamworth.

HS2 Ltd are working with Birmingham to ensure that HS2 generates more opportunities for people and businesses in the Midlands.

The Environmental Statement for Phase 1 of HS2³² predicts a variety of impacts for the section through Drayton Bassett, Hints and Weeford. Construction and operation of the project in this area are not likely to result in any adverse residual effects on air quality, socio- economics, land quality or water resources and flood risk. Similarly, no likely adverse residual effects have been identified as arising during operation for agriculture, forestry and soils, community or ecology. However, there will be agricultural land lost, including high quality agricultural land. Thirteen

³¹ Birmingham and Interchange: Connections to London, Manchester, Leeds and Beyond, HS2 Ltd, July 2013

³² London-West Midlands Environmental Statement, HS2 Ltd, November 2013

residential properties will be demolished, and some residents will experience amenity effects during construction and operation, due to noise and visual effects. Users of the Heart of England Way, which passes through Drayton Bassett will be affected as a result of noise and visual effects and increased traffic associated with construction. In the Hints area, residents of Brockhurst Lane will be subject to an isolation effect during the construction period due to the temporary closure of the road connecting the area to the rest of the Hints community and to schools at Whittington and Lichfield. In the Weeford area, construction works at Watling Street will give rise to a temporary amenity effect on the residents of five properties, as a result of increases in construction traffic and views of construction activities. During operation, noise and visual effects will affect the setting of Hints Village, Horsley Brook Farm, Buck's Head Farm, Inglehill Farm, Roundhill Wood.

Archaeological assets will be permanently removed and non-designated built heritage assets will be demolished. Some historic landscape features will be severed and permanently removed including hedgerows at the Middleton Estate boundary and ancient woodland lost, primarily at the Rookery and Roundhill Wood.

The temporary presence of construction works and changes to the existing landform and vegetation patterns will significantly affect the character and appearance of the local landscape. During operation, the effect of the project on the character and appearance of the local landscape will substantially reduce over time as mitigation planting matures. Significant effects will remain in some parts of the local landscape due to the presence of engineered landforms, infrastructure and overhead line equipment. During operation the Hints cutting, Milditch Wood embankment and the Gallows Brook and Black Brook viaducts will continue to affect views in the local area. The visual effects of the project will reduce over time as planting matures.

An increase in traffic during construction will lead to additional congestion and delays at the junctions of the A38 London Road/A453 Tamworth Road/A446 London Road, the A38/A5148/A5206 London Road and the A5/A5127 Birmingham Road/A5148.

During construction, increases in traffic will affect pedestrians, cyclists and horse riders using some local roads including Drayton Lane, Watling Street, the A453 and Flats Lane. Two public rights of way will be temporarily diverted. Construction vehicles will operate alongside four public rights of way which will affect the enjoyment of these routes. Nine public rights of way will be permanently realigned, causing increases in journey times.

The Sustainability Statement for HS2 Phase 2³³ predicts that noise impacts are likely to affect residents at villages along the route including Kingsbury, while an estimated six dwellings would need to be demolished at Whateley. River crossings would require an elevated alignment, and at these locations impacts would be more likely. For example, the crossing of the Tame Valley near Kingsbury and of the Anker Valley near Polesworth would result in some visual impacts at country parks in these locations, although the route was aligned here to ensure that direct impacts on Alvecote Pools SSSI would be avoided.

Contribution to cumulative effects

³³ Sustainability Statement, Temple-ERM, July 2013

Although there will be noise, disturbance, loss of amenity, congestion, adverse impacts on historic assets and adverse impacts on landscapes and views from HS2, there is no indication that this will give rise to cumulative effects in conjunction with the Local Plan. However, by freeing up capacity on local railways, HS2 will have positive cumulative effects with the Tamworth Local Plan by making it easier to support a shift to sustainable modes of transport.

11.1.5 A Strategy for the A5

Existing levels of traffic along certain parts of the route are heavy throughout the day, particularly around Cannock, Lichfield, Tamworth, Nuneaton/Hinckley and Magna Park. Without suitable investment, planned housing and employment growth along this section of the A5 will exacerbate these congestion issues, as well as creating new pressure points.

The objectives of the strategy³⁴ are therefore:

- To ensure that the A5 is fit for purpose in terms of its capacity and safety, both now and in the future.
- To allow the A5 to play its full and proper role in supporting and facilitating economic activity and growth at a local and national level.
- To promote and facilitate access to leisure and tourism within the area covered by the strategy.
- To assist in identifying priority improvements along the A5 corridor that are needed to facilitate and enable growth, reduce congestion, improve safety, improve air quality and deliver a sustainable transport system.
- To reduce, where possible, the impact of traffic on communities along the A5.

There are known capacity issues at the Muckley Corner and Wall Island junctions to the south east of Lichfield, and in the Dordon/Grendon area between Tamworth and Atherstone. The traffic flow on the A5 to the west of junction 10 of the M42, there are in excess of 22,000 vehicles per day.

Contribution to cumulative effects

When implemented, the strategy is likely to give rise to improvements in congestion on the A5, which will support the housing and employment growth proposed in the Tamworth Local Plan, although this is not expected to lead to cumulative effects with the Local Plan.

11.1.6 Staffordshire Local Transport Plan

The Staffordshire Local Transport Plan³⁵ (LTP) has a range of objectives:

- Supporting growth and regeneration
- Maintaining the highway network
- Making transport easier to use and places easier to get to
- Improving safety and security
- Reducing road transport emissions and their effects on the highway network

³⁴ A Strategy for the A5 2011-2026, A5 Transport Liaison Group, February 2012

³⁵ Staffordshire Local Transport Plan 2011, Staffordshire County Council, March 2011

- Respecting the environment

It also identifies a number of challenges to achieving these objectives which the LTP seeks to address:

- Provide opportunities for residents to access jobs, training and education.
- Help businesses access suppliers, markets and a workforce.
- Enable economic growth without causing congestion.
- Maintain the current condition of the highway network and its infrastructure.
- Keep the highway safe and serviceable whilst achieving value for money.
- Reduce social exclusion faced by residents.
- Make 'access for all' a key consideration when planning new housing and employment sites, services and facilities.
- Improve the skills of all road users.
- Improve the current road safety record.
- Tackle crime, fear of crime, and anti-social behaviour on the highway network.
- Improve the resilience of the highway network to events that pose safety threats to highway users.
- Reduce emissions from road transport.
- Respond to current and future climatic conditions.
- Improving health and quality of life
- Encourage active travel.
- Maximise opportunities for transport to positively contribute towards people's quality of life.
- Minimise the impact of transport on the environment.
- Enhance the environment through the management and maintenance of the highway network.

Contribution to cumulative effects

In combination with the Tamworth Local Plan, the LTP will help to improve access to education, training and jobs, will reduce congestion and improve air quality, encourage a shift to more sustainable forms of transport and support improvements to transport infrastructure, tackle deprivation and enable economic growth.

11.2 INTERRELATIONSHIP BETWEEN EFFECTS

The SEA Directive requires the appraisal to consider the interrelationship between the significant effects of the pre-submission Local Plan. This has been done as an integral part of the appraisal of the policies and options, and examples of this can be found throughout chapters 7, 8 and 10 and Annexes C to F of this report. The main interrelationships found through the appraisal are highlighted below.

Protection and enhancement of green spaces and connectivity will be of benefit to human health and quality of life, encouraging active lifestyles and helping to promote sustainable travel by encouraging people to walk or cycle rather than using the car. It can also help to support biodiversity protection and improvement by ensuring connectivity and protection of green and blue infrastructure. This will also help to protect landscape quality and the setting of Tamworth.

Protection and enhancement of historic features and assets will contribute to maintaining landscape quality in Tamworth, contributing to preserving its distinctive quality and supporting tourism and the visitor economy.

Reducing the amount of waste needing treatment and disposal will help to reduce air emissions from the transport and management of waste, including greenhouse gas emissions, although it may reduce the amount of renewable energy generated from waste. It may also encourage more prudent use of natural resources by reusing waste as a resource and reducing the amount of virgin resources consumed.

Changes in air quality can have significant consequences for human health and biodiversity, and improvements in air quality arising from more sustainable transport patterns will benefit human health and vulnerable species and ecosystems. Changes in water quality also have the potential to significantly affect species and ecosystems. By promoting water efficiency, the pre-submission Local Plan will help to ensure prudent use of natural resources and help to safeguard water quality, with benefits for ecosystems. It will also benefit the economy by reducing the cost of water treatment.

Flood risk reduction will help to protect and enhance water quality by reducing the risk of overload of the sewerage system. It will also have economic benefits by protecting homes and businesses from having to deal with the financial consequences of flooding.

By locating most new development near to the urban area, the pre-submission Local Plan will promote the use of sustainable modes of travel, which will reduce the reliance on the private car. This in turn will have benefits in terms of improved air quality and reduced congestion, which will lead to improved health and road safety. It will also help to promote more active lifestyles with the associated health benefits, and support accessibility to services and facilities.

12.1 PROPOSALS FOR MONITORING

As required by the SEA Directive, a number of recommendations are made for indicators to monitor the likely significant impacts of the Local Plan. These are set out in Table 12.1 corresponding to the relevant impacts identified and summarised in the preceding chapters of this report.

One of the aims of monitoring as specified by the SEA Directive is to identify unforeseen adverse effects in order to be able to take appropriate remedial action. To enable this to be done, recommendations are also made in Table 12.1 for monitoring potential sustainability impacts that are not expected to occur as foreseen by the appraisal.

An Annual Monitoring Report will be produced to monitor the implementation of the Local Plan, and the recommendations given below for monitoring should be incorporated within this.

Table 12.1: Monitoring Recommendations

Sustainability Objectives	Recommended indicators
1. To meet the housing needs of the whole community, providing affordable, decent, appropriate and sustainably constructed homes in accessible locations.	Housing completions Number of affordable homes completed Building for Life assessments Net additional Gypsy and Traveller pitches Number of new dwellings suitable for elderly people
2. To encourage the efficient use of land and soil.	Total amount of additional employment land on previously developed land Housing completions on previously developed land Hectares of open space lost
3. To reduce deprivation, including health and income deprivation.	Number of people in Super Output Areas in the lowest 20% ranked in health sub-domain Number of people in Super Output Areas in the lowest 20% ranked in material well-being sub-domain
4. To ensure equal access to community services and facilities.	Number of people not within 1km of: <ul style="list-style-type: none"> • GP • Post office • Supermarket
5. To encourage equal access to education, jobs and training.	Unemployment rate Number of people in Super Output Areas in the lowest 20% ranked in education sub-domain
6. To encourage active and healthier lifestyles by providing accessible green infrastructure, including networks of paths and open spaces, and formal and informal sport and recreation facilities.	Length of new cycle paths Length of new public footpaths Number and type of new sport facilities Loss of playing pitches Loss of accessible open space

Sustainability Objectives	Recommended indicators
7. To make communities safer by reducing crime, fear of crime and anti-social behaviour.	Number of crimes, by category
8. To encourage a diverse and competitive economy that will provide sustainable economic growth.	New employment floorspace Number of visitors to town centre attractions
9. To protect and enhance historic assets.	Number of listed building and conservation area consent applications and outcome
10. To encourage high quality and locally distinct places, spaces, buildings and landscapes.	Number of planning applications in the Green Belt
11. To conserve and enhance biodiversity and geodiversity, sites of nature conservation value and ecological networks.	Change in areas of biodiversity importance, including on Alvecote Pools SSSI Length of new green/blue infrastructure networks
12. To minimise flood risk.	Number of planning permissions granted contrary to Environment Agency advice on flooding Number of properties flooded per annum
13. To reduce energy consumption by encouraging energy efficiency and use of renewable energy sources.	MW of new renewable energy generating capacity Electricity and gas consumption per capita
14. To encourage the reduction, re-use and recycling of waste and water.	Amount of waste generated by waste stream % of municipal waste recycled Per capita water consumption
15. To protect and improve environmental quality including in relation to air, water, land and noise.	Number of AQMAs Number of planning permissions granted contrary to Environment Agency advice on water quality Hectares of agricultural land lost, by grade
16. To make Tamworth town centre the heart of the borough by creating a vibrant and attractive environment.	Total amount of completed floorspace for town centre uses in the town centre Total amount of completed floorspace for town centre uses outside the town centre Vacant retail floorspace in the town centre
17. To reduce the need to travel, reduce out-commuting and encourage sustainable modes of transport.	Number of bus routes Length of new cycle paths Length of new public footpaths Number of out-commuters Number of people travelling more than 5km to work Travel to work by mode
18. To make best use of the existing transport infrastructure and seek improvements to reduce congestion and improve safety.	Number of new bus services Number of road traffic accidents Normalised delay on key roads

13 NEXT STEPS

13.1 OVERVIEW OF PROCESS

The next stages of the process are outlined in Figure 2.1 in Section 2.3.2.

The SA forms an integral part of the preparation of the Local Plan. It will continue to be prepared alongside the Local Plan and consultation on the SA will be part of the wider consultation on the Local Plan itself.

Following receipt of consultation comments on the pre-submission Local Plan and the SA, any necessary amendments will be made to either document, and the Local Plan will be submitted to the Secretary of State for examination by the Planning Inspectorate. It is currently expected that the Local Plan will be submitted late 2014/early 2015 subject to the consultation.

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