



**Tamworth Borough Council
– Sustainability Appraisal
Addendum Consultation
Summary June 2015**

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1. Purpose of Document

The Sustainability Appraisal Addendum Consultation Summary describes how Tamworth Borough Council consulted on the SA addendum and summarises the comments received.

The Tamworth Local Plan¹ and accompanying Sustainability Appraisal (SA) Report² were submitted to The Planning Inspectorate on 6 February 2015. As required by legislation, the SA Report appraised the impacts of the Local Plan and also of “reasonable alternatives” to what is proposed by the Plan, also known as options.

Following submission, Tamworth Borough Council (TBC) received a letter from the Inspector on 12 February 2015 setting out some of his concerns, including a concern about the SA. The appointed Inspector, Mr Mike Fox BA (Hons) DipTP MRTPI, requested TBC to include an additional option in the SA for housing delivery, that of meeting all of Tamworth’s objectively assessed housing need (OAHN).

Subsequent requests from TBC for clarification of the Inspector’s concerns were made, and further emails were received from the Inspector on 25 February 2015, 4 March 2015 and 30 March 2015. These clarifications explained that the Inspector considered that:

“One of the realistic options needs to be the full OAHN to meet the housing needs of the Borough. The evidence clearly points to a proportion of the OAHN having to be met on sites outside the Borough. It would be inappropriate for this Plan to assess individual housing sites outside the Borough, but what the SA needs to do is assess the impact of these sites – or the quantum of housing from the sites – on the sustainability of the Borough. It would be admissible in my view to make some broad assumptions on the indicative locations of the bulk of the housing provision within the neighbouring LPAs [Local Planning Authorities], so as to get an idea on which would be the principal roads which would be affected. Therefore I am looking for the sum of these impacts, for example on the highway network, demand for community services, retail provision, and any environmental impact.”

The Inspector also advised that an Addendum to the SA Report needed to be prepared, to examine the option whereby the full OAHN would be met.

The SA Addendum explains why it is considered that the information requested by the Inspector has already been provided in the Tamworth SA Report, and where relevant strategic environmental assessment has already been undertaken through the Lichfield SA Report and the North Warwickshire SA Report, both of which have been the subject of examination and Inspector’s Reports within the last 12 months. The Tamworth SA Report has considered both North Warwickshire’s and Lichfield’s Local Plans (as relevant plans or strategies as directed by the regulations), including development within them to meet Tamworth’s needs. The likely significant effects of the quantum of development they are bringing forward to assist in meeting the needs

¹ Tamworth Local Plan 2006-2031, Tamworth Borough Council, February 2015

² Sustainability Appraisal of the Submission Tamworth Local Plan, URSUS Consulting Ltd, January 2015

arising from Tamworth have been assessed and therefore there is no need to undertake new appraisal work to cover an SA of a new option.

2. Summary of consultation undertaken

The Council prepared the SA Addendum and carried out a public consultation from 13 April to 25 May 2015. The SA addendum was made available on the Council's website, offices and libraries around the Borough. The consultation was advertised on the Council's website, a notice placed in the local paper and those on the consultation database were contacted by letter or e-mail.

Preceding the SA Addendum consultation and Local Plan submission a total of eight distinct periods of consultation and engagement took place as follows:

1. Early involvement on identifying issues and a vision for the Core Strategy: 2006/07
2. Issues and Options: March 2008
3. Refined Options Document: March 2009
4. Participation on Preferred Spatial Strategy Document: October 2009
5. Housing Policy Consultation March 2011
6. Tamworth Local Plan Pre-Submission: June to July 2012
7. Draft Tamworth Local Plan: March to May 2014
8. Pre-submission Local Plan: October to December 2014

The Local Plan Consultation Statement has further information on these consultations.

3. Summary of comments received

A total of four comments were received during the consultation period, from developers, local authorities and members of the public. In addition to these comments, Natural England and Historic England stated that they had no further comments on the Sustainability Appraisal or this Addendum.

Representation SA001

St Modwen Developments Ltd (SMDL) have interest in two sites immediately adjacent to the Borough boundary, both in North Warwickshire:

- i. SMDL secured outline planning permission for the development of 8.5ha of land immediately to the south west of Junction 10 of the M42, for B1c, B2 and B8 uses.
- ii. SMDL have applied for outline planning permission for the development of 25.4ha of land immediately to the south east of Junction 10 of the M42, for B1c, B2 and B8 uses. Tamworth have an identified need to meet 14ha of their employment requirement on sites outside the Borough.

The approach set out in the SAA - which is essentially to examine pre-existing analysis and codify it in a manner addressing the Inspector's concerns - is a sound one. The consideration of cumulative impacts (section 3.6 of the SAA) and the difficulties encountered in the process (section 3.7 of the SAA) is noted and again appears reasonable. The SAA notes (section 7.1) that given the very close proximity of employment land within North Warwickshire on Junction 10 of the M42, and the large employment area at Birch Coppice a short distance along the A5, "it has been assumed that these would be the likely broad locations within North Warwickshire." It also notes that, "There are no new or expanding employment areas within Lichfield with a similar proximity to Tamworth." We would agree with this assessment - land in North Warwickshire immediately to the east of Tamworth, around Junction 10, is the most appropriate location to accommodate the requirement for employment development exported from Tamworth. It is therefore appropriate for the SAA to consider the effects of employment growth in this broad location. The SAA refers to the SA of North Warwickshire Borough Council's Draft Pre-Submission Site Allocation Plan (Draft SAP) to examine the impact of growth in this broad location. In this way it considers two proposed allocations in the Draft SAP, namely DOR11 (land at Birch Coppice, marked "3" on the plan at Appendix 1) and DOR24 (the land south west of Junction 10 of the M42), referred to at i above, and marked "1" on the plan at Appendix 1). The positive and negative impacts of these allocations as set out in the SA of the Draft SAP are summarised. As such an understanding can be reached in terms of the impacts of growth at this location.

However, this approach does not assess the impacts of the provisions of the 14ha of employment land required to meet Tamworth's needs outside the Borough boundary. Neither DOR11 nor DOR24 are available to meet Tamworth's need. In this context, whilst the general question of growth in the preferred broad location for employment is addressed by the SAA, the impact of an additional 14ha is not. However, the planning application being advanced by SMDL on land to the south east of Junction 10 of the M42, referred to at ii above, would provide 14ha (net) of employment land very well related to Tamworth and hence meet the exported need. The SMDL application was accompanied by a robust Transport Assessment (TA), which concluded that the development would not adversely impact the operation of the A5 and the M42 Junction 10. The application was also supported by a full

Environmental Statement (ES). This considered the effects of the proposed development and also a cumulative assessment with other committed schemes in the vicinity. The negative impacts of the scheme are generally limited, and capable of mitigation. Notwithstanding the gap in the SAA, it is considered that employment growth of the scale required, in the preferred location, has been robustly assessed and can be regarded as an acceptable option.

SA Response

It is noted that the approach taken in the SA Addendum is a sound one.

The SA Addendum has not assumed that DOR11 and DOR24 would be available to meet Tamworth's employment needs. It has assumed only that additional employment land to meet Tamworth's needs would be located within these broad areas. In order to understand the impacts that may arise from employment land provided in these broad areas, the SA Addendum has looked at the SA of sites in these broad areas (DOR11 and DOR24) in the SA of North Warwickshire's Draft Pre-Submission Site Allocation Plan and assumed that sites to meet Tamworth's needs would have similar impacts.

Representation SA002

The SA indicates that the spatial options for the Borough have been appraised and that one of these included looking at green belt sites. This option was not taken forward on the basis that it raised SA concerns relating to landscape biodiversity, air quality, sewerage capacity and traffic implications. Unfortunately what does not appear in this analysis is any comparative of the effect of displacing 1000 homes to adjoining areas and the impact that this may have, so there is no way of knowing if the solution arrived at is better as it cannot be tested as part of this Plan. If such a scenario was to take place then it would have to have been tested as part of the SA of the two adjoining plans at a strategic level. It does not seem to be the right approach to try and displace 1000 homes with no knowledge of where they are going and what the impact will be, given that they are homes for the needs of Tamworth population.

The SA still does not deal with an option that meets all of the OAHN within the Borough, which is some 4,352 dwellings [taking into account the commitments at 31st March 2014]. On this basis it is difficult to reconcile why only a discounted number of the OAHN is being accommodated if the impact of accommodating the whole amount is not known. This must be a fundamental failing of the SA and the addendum does nothing to remedy that matter. The Inspector's note is further asking for an analysis of the impact on, for example, highways, services, environment etc of the displaced dwellings which are part of the Tamworth OAN.

The recently approved Lichfield and North Warks Plans only consider the impacts of providing for the 500 dwellings in each of their Districts. There is nothing in these plans that deals with the further requirement for another 500 dwellings in each district. The impact therefore of the further 500 is not dealt with either in those plans and their respective SAs or within this SA or the new addendum. It is not dealt with anywhere. The matters dealt with in part 4 and 5 of the addendum only deal with the impacts of the 500 dwellings in each adjoining district and not the additional numbers proposed to be displaced.

The SA is part of the evidence base to the Plan and is supposed to be transparent and legible to all parties. The SA addendum is not such a document as it is unclear

how the impacts of the displaced growth have been properly assessed. On this basis this document does not properly support the plan and the strategy.

It is not considered to be reasonable that a reader of the SA addendum should have to access all of the documents of other districts as noted in Appendix A. The document should be capable of being read and understood on its own. The document has failed to deal with the matter at issue which is an appraisal of the impacts of the displaced growth of the Borough or indeed the appraisal of the location of all of the OAN being met within the Borough.

SA Response

The SA does not deal with an option which meets all of Tamworth's OAHN because there are insufficient sites within the Tamworth Borough Council boundary to meet all of Tamworth's OAHN.

The North of Tamworth Broad Development Location in the Lichfield Local Plan: Strategy provides for 1000 dwellings, 500 of which are to meet Tamworth's needs. The North Warwickshire Core Strategy provides for 500 dwellings to meet Tamworth's needs distributed throughout the Borough.

The SA Addendum has summarised the relevant findings of the documents in Lichfield and North Warwickshire so that all the necessary information is contained within the SA Addendum and the reader is not required to read these other documents. The web links to the other referenced documents have been provided in Annex A to be helpful to the reader should they still wish to do so.

Representation SA003

In terms of the Addendum: Para 4.1: The Broad Development Location does also extend slightly east of the railway line. Para 4.2 For the purposes of clarification: Table 17.1 of the LDC SA (Modifications version published in February 2014) is the SA of the Broad Location policy, and Table 17.2 is the SA of the alternative options for delivering the Broad Location and these options are shown on page 194 para 17.7 of the SA.

SA Response

Clarifications are noted.

Representation SA004

If Anker Valley SUE and The Broad Development Location (BDL) in Lichfield District (LD) are to be aligned and complement each other, although in different authority administrative areas, and as they will jointly have significant impacts on Tamworth, it would have been appropriate and prudent to have carried out a joint SA on the likely impacts, with both authorities having equal input to eventual concluding SA. A joint SA should have been carried out with North Warwickshire Borough Council (NWBC) as one of their preferred options is to allocate land south of Tamworth for housing along the B5000 between the boundary with Tamworth and the M42 without impacting on the village of Birchmoor. Joint SAs with LDC and NWBC would have ensured accountability towards Tamworth.

The reliance on services in Tamworth by the developments on the boundary with Tamworth such as GP surgeries is of great concern to the residents of Tamworth.

The LDC SA 17 North of Tamworth makes reference to GP surgeries in the BDL to improve health outcomes. Planning application 14/00516/OUTMI submitted to LDC for outline planning consent includes a local centre, but does make reference to a GP surgery. When the concept of the Anker Valley SUE in the 2001-2011 Tamworth Local Plan comes forward a GP surgery was to be included. In the development of the Anker Valley SUE within the 2006-2031 Tamworth Local Plan a GP surgery has not been included. A joint SA with LDC could have identified how a GP surgery could be included to serve both the Anker Valley SUE and the BDL in LD.

On the 9th October 2014 at the final hearing session North of Tamworth of the 2008-2029 Lichfield Local Plan examination both Staffordshire County Council (SCC) and TBC announced that the Anker Valley Link Road (AVLR) was being withdrawn from the 2006-2031 Tamworth Local Plan as there was no prospect of the necessary public or private funding coming forward, and requested that part of the BDL in LD North of Ashby Rd. known as Arkall Farm be removed from the plan as the Gungate Corridor would not have the headroom for the increase in traffic without the inclusion of the AVLR. This was resisted by LDC, stating in their opinion Arkall Farm was still sustainable. The LDC Local Plan examining inspector Robert Yuille in his Final Report favoured a "monitor and manage" to enable Arkall Farm to come forward. There is no reference to the removal of the AVLR, or the comments by LDC and Robert Yuille in the Sustainability Appraisal Addendum or the 2008-2019 Lichfield Local Plan "Sustainability Appraisal Adoption Statement". Should not a part Sustainability Appraisal be carried out to look at the effects of removing the AVLR. For instance, if it would be prudent for the portion of the AVLR between the Ashby Rd. and the River Anker be built within the Anker Valley SUE, so if in the future the AVLR is considered necessary and the funding becomes available, it can be completed.

Finally, although I am sure URSUS Consulting Ltd. is competent and has developed a very comprehensive and robust SA for TBC, I think it would have been appropriate for an independent eye to evaluate if any areas of the TBC Local Plan SA could have been improved.

SA Response

There is no requirement to carry out joint SAs with adjoining local authorities. However, cumulative impacts with development outside of Tamworth's boundaries have been considered by the SA, as explained in the SA Addendum.

Policy HG1 of the Plan requires developments to reduce health inequalities and ensure the infrastructure is provided to meet community needs. Development within the Anker Valley SUE is unlikely to be permitted if it does not ensure and demonstrate that the need for health facilities will be met.

The SA Addendum explains in section 3.6 "Cumulative Impacts" on page 7 that the likely significant impacts of the Lichfield Local Plan have been taken into account by the SA (section 11.1.2 on pages 77 and 78 of the January 2015 SA Report). This took account of Policy: North of Tamworth on pages 115 and 116 of the Lichfield Local Plan, which requires adherence to all other policies in the Plan including Core Policy 5: Sustainable Transport (pages 45 and 46) and Policy ST1: Sustainable Transport (page 48). Policy ST1 states that "The District Council will seek to secure more sustainable transport patterns by ... only permitting traffic generating development where it is, or can be made compatible with the transport infrastructure in the area and takes account of: Number and nature of additional traffic movements, including servicing needs; Capacity of the local transport network; Cumulative impact

including other proposed development; Access and egress to the public highway; and Highway safety.”

The final paragraph of the representation is noted.