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Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) for the North Warwickshire Borough Council Core Strategy

Addendum to the SA and HRA Reports for the Submission Core Strategy

Prepared by LUC
July 2014

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1 Introduction

Introduction and purpose of the Addendum to the SA and HRA Reports

- 1.1 North Warwickshire Borough Council (NWBC) Core Strategy was submitted to the Inspector for public examination in February 2013.
- 1.2 Since Submission, NWBC has updated and enhanced the evidence base supporting the Core Strategy. Of particular note are the three additional examination documents listed in **Table 1.1** which have been published by NWBC on the Core Strategy Examination website¹.

Table 1.1 Key new evidence documents published since Core Strategy submission

Reference number	Document	Issued by	Date
CD9/12	Gypsy and Travellers Accommodation Assessment	University of Salford	August 2013
CD9/13	Employment Land Review	G L Hearn	September 2013
CD9/15	Coventry & Warwickshire Strategic Housing Market Assessment	G L Hearn	November 2013

- 1.3 Based on the new evidence and on suggestions made by the Inspector, NWBC is now proposing to make a number of Main Modifications to the Core Strategy. NWBC has asked LUC to review the implications of these Main Modifications for the SA and HRA that accompanied the Submission Core Strategy.
- 1.4 Consultation on the Core Strategy at this stage is restricted to the proposed Main Modifications. The primary purpose of this Addendum to the Submission stage SA and HRA Reports is therefore to inform the consultation by assessing whether the Main Modifications will result in any changes to the significant sustainability effects identified by the SA Report or to the conclusion of the HRA Screening Report that the Core Strategy will not result in any likely significant effects on a European site.

SA and HRA work to date

- 1.5 LUC was first commissioned by NWBC in 2007 to provide Sustainability Appraisal Critical Friend Advice and Support during development of the Local Development Framework. In January 2009, LUC was commissioned to undertake the Sustainability Appraisal work in-house. The Sustainability Appraisal work in 2009 included an Issues and Options Sustainability Appraisal workshop and preparation of a Sustainability Appraisal report to accompany consultation into the Core Strategy Issues and Options in June 2009.
- 1.6 In June 2011, LUC was re-engaged to undertake SA of the Consultation Draft Core Strategy to accompany consultation during October 2011 to January 2012. The results of earlier consultation and Sustainability Appraisal were taken into account by NWBC in preparing the Draft Pre-

¹ http://www.northwarks.gov.uk/info/200297/forward_planning/872/local_plan_for_north_warwickshire/10

submission Core Strategy which was subject to public consultation during May 2012 to August 2012. A Sustainability Appraisal Report prepared by LUC in July 2012 was also made available to the public to inform their comments on the Draft Pre-submission version of the plan.

- 1.7 Following consideration of representations on the Pre-submission draft, NWBC produced the Proposed Submission version of its Core Strategy for which LUC prepared an SA Report and an HRA Screening Report in October 2012. The Proposed Submission Core Strategy was published for representations on its soundness in line with Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012, alongside the SA and HRA Screening Reports.
- 1.8 The Core Strategy was submitted to the Secretary of State in February 2013, before proceeding to examination. As there were no substantive changes to the Core Strategy between the Proposed Submission and Submission versions, SA and HRA Screening reports prepared by LUC in October 2012 on the Proposed Submission version of the Core Strategy accompanied the Submission version.

Approach to the new SA and HRA work

- 1.9 The SA and HRA reports represented a point in time and these are already submitted so it is not appropriate to prepare new versions of the reports e.g. reflecting revocation of RSSs or changes to other plans and projects which could have in-combination effects on European sites. Instead, we have set out in this report LUC's understanding of the proposed changes to the Core Strategy and our views on the implications of these for the conclusions of the Submission stage SA and HRA Screening reports, taking into account the key new evidence documents listed in **Table 1.1**.
- 1.10 This Addendum is not a standalone document but rather should be read together with the October 2012 SA Report and HRA Screening Report. However, for ease of reference the SA objectives that provide the framework for the both the Submission stage SA and for this SA Addendum are reproduced in **Table 1.2**.

Table 1.2 SA objectives

SA1: Creation of a modern, healthy and diverse economy which is able to adapt to changes in the wider economy while remaining relevant to the needs of local people.
SA2: Maintaining and enhancing employment opportunities and reducing the disparities arising from unequal access to jobs.
SA3: Ensuring that people of all ages are provided with the opportunity to obtain the skills, knowledge, confidence and understanding to achieve their full potential.
SA4: Equal access to services, facilities and opportunities for all, regardless of income, age, health, disability, culture or ethnic origin.
SA5: Developing and supporting vibrant and active communities and voluntary groups, who are able to express their needs and take steps towards meeting them.
SA6: Reducing crime, fear of crime and antisocial behaviour.
SA7: Tackling health inequalities and improve health by supporting local communities and by improving access and raising awareness.
SA8: Provide decent and affordable housing to meet local needs.
SA9: Providing opportunities to participate in recreational and cultural activities.
SA10: Increasing use of public transport, cycling and walking and reducing use of the private car.
SA11: Valuing, enhancing and protecting the assets of the natural environment of North Warwickshire, including landscape character.
SA12: Valuing, enhancing and protecting the quality and distinctiveness of the built environment, including the cultural heritage.
SA13: Valuing, enhancing and protecting the biodiversity of North Warwickshire.
SA14: Ensuring development makes efficient use of previously developed land, buildings and existing physical infrastructure in sustainable locations.
SA15: Maintaining the resources of air, water and productive soil, minimising pollution levels.

SA1: Creation of a modern, healthy and diverse economy which is able to adapt to changes in the wider economy while remaining relevant to the needs of local people.
SA16: Minimising North Warwickshire’s contribution to the causes of climate change whilst implementing a managed response to its unavoidable impacts (Flood risk is addressed as a separate topic).
Flood risk (falls within Sustainability Appraisal Objective 16 but it was considered to be significant enough to warrant separate consideration).
SA17: Reducing overall energy use through sustainable design, increasing energy efficiency and increasing the proportion of energy generated from renewable sources.
SA18: Using natural resources efficiently.
SA19: Encouraging and enabling waste minimisation, reuse, recycling and recovery to divert resources away from the waste stream.

- 1.11 The SA Report accompanying the Submission Core Strategy did not consider the sustainability effects of each policy or proposal in isolation but rather assessed and described the likely effects of the Core Strategy as a whole on each SA objective or set of linked objectives. **Chapter 2** of this Addendum considers whether each proposed Main Modification is likely to have any sustainability effects and if so, the nature of these. Where such effects are identified it then goes on to conclude whether those effects are of a sufficient scale to alter the SA score of the Core Strategy as a whole in respect of any SA objective, as previously reported at Submission stage. If a change in SA score is justified the Addendum also explicitly states whether this represents a change in the significant sustainability effects of the Core Strategy, that is whether any previously identified significant positive or significant negative effect has changed to a minor or negligible effect or whether any previously identified negligible or minor effect has become significant.
- 1.12 Similarly, **Chapter 2** reviews each of the Main Modifications to determine whether the previously reported conclusions of the HRA Screening remain valid, i.e. that likely significant effects on any European site can still be ruled out.
- 1.13 The Sustainability Appraisal has scored the sustainability effects of the Core Strategy using the symbols shown in **Table 1.3**. Unless otherwise stated, all effects identified are direct and long term.

Table 1.3 Key to SA scoring symbols

Symbol	Meaning
++	Significant positive effect on sustainability objective
+	Minor positive effect on sustainability objective
0	Negligible effect on sustainability objective, e.g. because the policy is not relevant to the objective
-	Minor negative effect on sustainability objective
--	Significant negative effect on sustainability objective
/	Policy has more than one score e.g. +/- policy could both support and conflict with the Sustainability Appraisal objective in a minor way.
?	Uncertain effect on sustainability objective

Reasonable alternatives

- 1.14 It is a regulatory requirement that SA considers not only the sustainability effects of a plan but also reasonable alternatives to the plan.² A large number of alternative policies have been considered by the Council during preparation of the Core Strategy. Chapter 5 of the 2012 SA Report for the Proposed Submission Core Strategy traces the evolution of the Core Strategy policies from the Issues and Options stage to the Proposed Submission Core Strategy and

² SEA Directive para. 14: “an environmental report should be prepared containing relevant information as set out in this Directive, identifying, describing and evaluating the likely significant environmental effects of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme;”

summarises the Sustainability Appraisal findings of the earlier work^{3,4} in respect of alternatives considered.

- 1.15 The Modifications which are now proposed seek only to fine tune the Core Strategy in light of the examination and new evidence. There is no overarching issue being addressed by the Modifications, nor any common objective running through them. Rather, each Modification is largely stand-alone. There is no reason to suggest that any one Modification is of particular significance from a sustainability perspective to justify appraisal of new alternatives beyond those already considered during the SA process, with one exception. During the course of the examination, the Inspector asked NWBC to consider the implications of altering the housing provision to 4,100 net additional dwellings over 2011-2029 rather than 3,650 dwellings proposed in the Main Modifications. The figure 4,100 was made up of:
- 200 homes per annum to meet North Warwickshire's housing needs.
 - 500 homes to meet Tamworth's housing needs.
- 1.16 The sustainability implications of this alternative level of provision for the October 2012 SA findings are assessed and described in **Chapter 2** and a conclusion drawn as to whether the alternative performs better or worse in sustainability terms than the proposed Main Modifications.
- 1.17 Finally, it should be noted that a Post-adoption Statement will be published once the Core Strategy has been adopted by the Council which will explain the reasons for choosing the Core Strategy as adopted, in the light of the other reasonable alternatives dealt with.

Significant changes in policy context since the October 2012 SA Report

- 1.18 A number of changes have occurred in the national planning policy context since the October 2012 SA Report was prepared. Of particular significance is the following:
- Publication of **National Planning Practice Guidance** in April 2014. This clarified a number of issues and informed the Council's Main Modifications.

³ North Warwickshire Core Strategy Issues and Options Sustainability Appraisal Commentary (LUC, 2009)

⁴ North Warwickshire Core Strategy Consultation Draft Sustainability Appraisal (LUC, 2011)

Modification No.	Page No.	Policy / Paragraph	Modification New text: <u>Bold underlined</u> ; Deleted text: Struckthrough	Reason for modification
MM12	To be added after the strategic objectives as the first policy	New Paragraph	Add new Paragraph as explanation to new policy: <u>When considering development proposals that accord with policies in the Core Strategy, the National Planning Policy Framework is also a material consideration. The Council will take a positive approach to the consideration of development proposals, following the presumption in favour of sustainable development. We will always work proactively with applicants and other stakeholders jointly to seek to find solutions which mean that proposals can be approved wherever possible, and to secure development which sustainably that improves the economic, social and environmental conditions in North Warwickshire.</u>	Clarity and effectiveness

- 2.6 This new policy states that where the Core Strategy contains no relevant, up to date policies, the proposal will be judged against national planning policy contained in the National Planning Policy Framework (NPPF). The purpose of the SA is to assess the likely sustainability effects of the Core Strategy relative to the likely evolution of current, baseline conditions in the absence of the Core Strategy, taking into account existing trends and the existing policy framework. Since the NPPF is a key part of this existing policy framework, a Core Strategy policy which effectively restates the existing national policy framework has no sustainability effect relative to the baseline. The new Sustainable Development policy is therefore judged to have **no effect on any SA objective**.

HRA of new Sustainable Development policy

- 2.7 As described in the appraisal of sustainability effects, the new Sustainable Development policy effectively restates existing national policy contained within the NPPF and has negligible additional effects, including on European sites.
- 2.8 HRA Conclusion: The proposed **Main Modification** to the Core **Strategy does not alter the conclusions of the HRA of the submitted Core Strategy** that the Plan will not have a likely significant effect on any European site, either alone or in-combination with other plans and projects.

SA of Gypsy and Traveller policy

- 2.9 The new policy and supporting text are set out in **Table 2.2**.

Table 2.2 New Gypsy and Traveller policy and supporting text

Modification No.	Page No.	Policy / Paragraph	Modification New text: <u>Bold underlined</u> ; Deleted text: Struckthrough	Reason for modification
MM37	42	New criteria based policy justification	<u>In order to provide for a range of small sites outside of the Green Belt, but close to services and facilities, a Gypsy & Traveller Plan will be brought forward and will include pitch allocations and follow the principles of the settlement hierarchy. The allocations will be informed by the Gypsy and Travellers Accommodation Assessment (GTAA) and any subsequent update and review.</u>	Clarity and effectiveness

Modification No.	Page No.	Policy / Paragraph	Modification New text: <u>Bold underlined</u> ; Deleted text: Struckthrough	Reason for modification
MM38	42	Additional paragraphs (to be numbered at document change)	<u>Sites for Travelling Show people will not be allocated specifically as no need has been identified. However appropriate sites would be groups of farms buildings close to main roads throughout the Borough. In addition, there would be a need to meet the criteria reflected in government guidance. If sites arise then they will be treated in accordance with the Policy NW6A below.</u>	Clarity and effectiveness
MM39	42	Additional paragraphs (to be numbered at document change)	<u>A criteria based policy will assist the provision of sites. Where sites fall outside the development boundary preference will be given for them to be located on previously developed land.</u>	Clarity and effectiveness
MM40	42/43	New Paragraph - New criteria based policy justification)	<u>Any permission granted under this Policy will be subject to a condition limiting occupancy to Gypsy and Travellers as defined in Annex 1 to Planning policy for traveller sites March 2012.</u>	To reflect updated evidence
MM41	43	New Policy - NW6A	<u>GYPSY and TRAVELLERS POLICY: Sites will be allocated and/or permissible inside, adjoining or within a reasonable safe walking distance of a settlement development boundary outside of the Green Belt. Site suitability will be assessed against relevant policies in this Core Strategy and other relevant guidance and policy. Sites will also be assessed using the following criteria:</u> <ul style="list-style-type: none"> ● <u>The size of the site and number of pitches is appropriate in scale and size to the nearest settlement in the settlement hierarchy and its range of services and infrastructure, limited to a maximum number of 5 pitches per site;</u> ● <u>The site is suitably located within a safe, reasonable walking distance of a public transport service, with access to a range of services including school and health services;</u> ● <u>The site is suitably located within a safe, reasonable walking distance of a public transport service, with access to a range of services including school and health services;</u> ● <u>Avoiding areas with a high risk of flooding or affected by any other environmental hazards that may affect the residents' health and welfare;</u> ● <u>has access to essential utilities including water supply, sewerage, drainage and waste disposal;</u> ● <u>The site can be assimilated into the surroundings' and landscape without any significant adverse effect.</u> 	Clarity and effectiveness

2.10 The sustainability effects of this new Gypsy and Traveller policy and related supporting text are set out in **Table 2.3**. This table does not assess the effects of providing Gypsy and Traveller sites per se, as this provision is set out in Policy NW6, which has already been subject to appraisal. Instead it assesses the criteria that the new policy will apply during the site selection process.

Table 2.3 SA of new Gypsy and Traveller policy

SA objective	SA score	Justification of score
SA1: Creation of a modern, healthy and diverse economy which is able to adapt to changes in the wider economy while remaining relevant to the needs of local people.	0	Policy not relevant to this SA objective.
SA2: Maintaining and enhancing employment opportunities and reducing the disparities arising from unequal access to jobs.	0	Policy not relevant to this SA objective.
SA3: Ensuring that people of all ages are provided with the opportunity to obtain the skills, knowledge, confidence and understanding to achieve their full potential.	0	Policy not relevant to this SA objective.
SA4: Equal access to services, facilities and opportunities for all, regardless of income, age, health, disability, culture or ethnic origin.	+	Policy will ensure that Gypsy and Traveller sites are within walking distance of existing settlements and the services and facilities they provide and also within walking distance of public transport that can provide access to services and facilities not available in the nearest settlement.
SA5: Developing and supporting vibrant and active communities and voluntary groups, who are able to express their needs and take steps towards meeting them.	0	Negligible effect on this objective.
SA6: Reducing crime, fear of crime and antisocial behaviour.	0	Negligible effect on this objective.
SA7: Tackling health inequalities and improve health by supporting local communities and by improving access and raising awareness.	+	Policy will ensure that Gypsy and Traveller sites are within walking distance of existing settlements and the services and facilities they provide, which may include health services. Access to public transport that can provide access to health services is an explicit requirement in considering suitable development sites.
SA8: Provide decent and affordable housing to meet local needs.	+	Policy NW6 defines the scale of provision for Gypsies and Travellers but this new policy will help to ensure that pitches provide 'decent' accommodation via its requirements for access to services and facilities, access to public transport, avoidance of high flood risk areas, and access to essential utilities.
SA9: Providing opportunities to participate in recreational and cultural activities.	+	Policy will ensure that Gypsy and Traveller sites are within walking distance of existing settlements and the recreational and cultural facilities they provide and also within walking distance of public transport that can provide access to services and facilities not available in the nearest settlement.
SA10: Increasing use of public transport, cycling and walking and reducing use of the private car.	+	Policy will ensure that Gypsy and Traveller sites are within walking distance of an existing settlement which should encourage more journeys on foot or by bike to access facilities within that settlement. Increased use of public transport is supported by requiring sites to be located within walking distance of public transport facilities.
SA11: Valuing, enhancing and protecting the assets of the natural environment of North Warwickshire, including landscape character.	+	Protection for landscape is provided by the requirement that the site can be assimilated into the surroundings and landscape without any significant adverse effect. The requirement for sites to have access to sewerage and waste disposal infrastructure will help to avoid potential adverse effects on the natural environment from pollution and tipping during site occupation. The size limit of five pitches will also help to avoid significant negative landscape effects.
SA12: Valuing, enhancing and protecting the quality and distinctiveness of the built environment, including the cultural	+	The requirement that the site can be assimilated into the surroundings and landscape without any significant adverse effect will help to avoid adverse effects on the setting of heritage buildings, monuments etc. as well as on historic

SA objective	SA score	Justification of score
heritage.		landscapes.
SA13: Valuing, enhancing and protecting the biodiversity of North Warwickshire.	+	The requirement for sites to have access to sewerage and waste disposal infrastructure will help to avoid potential adverse effects on wildlife habitats from pollution and tipping once the site is occupied.
SA14: Ensuring development makes efficient use of previously developed land, buildings and existing physical infrastructure in sustainable locations.	+	The criteria in this policy will ensure that new sites are located where they can make use of existing services, facilities and infrastructure and previously developed land is preferred.
SA15: Maintaining the resources of air, water and productive soil, minimising pollution levels.	+	The requirement for sites to have access to sewerage and waste disposal infrastructure will help to avoid pollution. Minor positive effects on air pollution due to support for travel by sustainable modes, as described under SA objective 4. The preference for previously developed land and the small scale of development proposed by Policy NW6 mean that any loss/sterilisation of productive agricultural land is likely to be negligible.
SA16: Minimising North Warwickshire's contribution to the causes of climate change whilst implementing a managed response to its unavoidable impacts (Flood risk is addressed as a separate topic).	+	Minor positive effects on carbon emissions due to support for travel by sustainable modes, as described under SA objective 4.
Flood risk (falls within Sustainability Appraisal Objective 16 but it was considered to be significant enough to warrant separate consideration).	+	Policy requires that Gypsy and Traveller sites avoid areas with a high risk of flooding.
SA17: Reducing overall energy use through sustainable design, increasing energy efficiency and increasing the proportion of energy generated from renewable sources.	0	Policy not relevant to this SA objective.
SA18: Using natural resources efficiently.	0	Policy not relevant to this SA objective.
SA19: Encouraging and enabling waste minimisation, reuse, recycling and recovery to divert resources away from the waste stream.	-	Policy requires sites to have access to waste disposal facilities but not to recycling facilities, resulting in minor negative effects on this objective.

Changes to existing SA scores for Core Strategy as a whole

- 2.11 These potential effects of the new Gypsy and Traveller policy are judged not to be significant in the context of the sustainability performance of the Core Strategy as a whole, hence **no change** is warranted to the original SA scores.

Implications for significant effects identified by the SA

- 2.12 No previously identified significant effects become insignificant. No new significant effects are identified.

HRA of new Gypsy and Traveller Policy

- 2.13 This new criteria based policy will indirectly provide protection for the natural environment, including biodiversity, and is not capable of adverse effects on any European site. For example, the requirement for sites to have access to sewerage and waste disposal infrastructure will help to avoid potential adverse effects on the wildlife habitats from pollution and dumping during site occupation; the size limit of five pitches means that a development is unlikely to be capable of

significant effects; and the preference for development outside of existing settlements to be on previously developed land reduces the potential for loss of or damage to habitats.

- 2.14 HRA Conclusion: The proposed **Main Modification** to the Core **Strategy does not alter the conclusions of the HRA of the submitted Core Strategy** that the Plan will not have a likely significant effect on any European site, either alone or in-combination with other plans and projects.

Assessment of Main Modifications to existing policies

- 2.15 **Table 2.4** sets out the sustainability effects of each of the proposed Main Modifications to the Core Strategy's existing policies. Firstly, the sustainability implications of each modification are assessed in isolation. The assessment then considers whether any identified sustainability effects are sufficiently great to alter the SA score in the October 2012 SA Report for the Core Strategy as a whole, against any individual SA objective. In the event that the modification justifies changing a previously awarded SA score for the Core Strategy as a whole, the assessment explicitly states whether the significant sustainability effects of the Core Strategy have changed, that is whether any previously identified significant positive or significant negative effect has changed to a minor or negligible effect or whether any previously identified negligible or minor effect has become significant.
- 2.16 This section also considers whether each of the Main Modifications could give rise to a likely significant effect on a European site and hence alter the conclusions of the October 2012 HRA Screening Report, as set out in the final column of **Table 2.4**.

Table 2.4 SA of modifications to existing policies

Ref.	Page no.	Policy / paragraph	Main Modification New text: <u>Bold underlined</u> ; Deleted text: Struckthrough	Reason for modification	Sustainability effects of Main Modification	HRA implications of Main Modification
MM1	Throughout document	Date of Plan period	To start from <u>2011 and end at 2029</u>	To ensure a 15 year plan period and to reflect updated evidence	None from the change of plan period per se. Related changes to, for example, total housing to be delivered within the revised plan period are separately assessed.	None – see sustainability effects column for justification.
MM2	4, 5 & 6	Paragraphs 1.3, 1.4, 1.6 & 1.11	Delete paragraphs 1.3, 1.4, 1.6 and 1.11	To reflect the status of the plan on adoption.	None. Factual change that does not alter the Core Strategy's proposals for the development and use of land.	None – see sustainability effects column for justification.
MM3	5	Paragraph 1.8	Reword last sentence to read " <u>Before the Borough Council supports a scheme, it should be satisfied that</u> Development proposals within the North Warwickshire coalfield will therefore only be accommodated where there is evidence to prove that the potential impact has been addressed and there are no viable, accessible reserves that may be sterilised or trigger the need to surface mine.	Clarity and effectiveness	None. Minor clarification that does not materially alter the Core Strategy's proposals for the development and use of land.	None – see sustainability effects column for justification.
MM4	4	Paragraph 1.13	Delete last two sentences and add: The National Planning Policy Framework (NPPF) was published on 27 March 2012. Local planning authorities must prepare a Local Plan which sets planning policies in a local authority area. These are very important when deciding planning applications. Independent planning inspectors must look at all local plan documents that local authorities in England prepare for an examination. The examination is the last stage of the process for producing a local plan. Local plans must be positively prepared, justified, effective and consistent with national policy in accordance with section 20 of the Planning and Compulsory Purchase Act 2004 (as amended) and the National Planning Policy Framework. The framework gives guidance to local councils in drawing up local plans and on making decisions on planning applications. The corner stone of the NPPF is that there is a presumption in favour of sustainable development. This Core Strategy follows these principles. <u>This Council has a proven track record in cooperating with neighbouring authorities in strategic planning matters. It commits to working collaboratively with other authorities, and in particular Birmingham and</u>	Clarity and effectiveness and updated evidence	None. Description of joint working approach that does not alter the Core Strategy's proposals for the development and use of land.	None – see sustainability effects column for justification.

Ref.	Page no.	Policy / paragraph	Main Modification	Reason for modification	Sustainability effects of Main Modification	HRA implications of Main Modification
			New text: <u>Tamworth, to objectively establish the scale and distribution of any emerging housing and employment shortfalls. In the event that work identifies a change in provision is needed in the Borough of North Warwickshire an early review of the North Warwickshire Local Plan will be brought forward to address this</u> ; Deleted text: Struckthrough			
MM5	8	Paragraph 2.9	Reword to read "In January 2012 the Secretary of State announced the route for the first phase of HS2 (High Speed Rail) between London and the West Midlands. This travels through the Borough northwards from the NEC along the Tame Valley up to Middleton and then on to Bassett's Pole. A route also comes out of and goes in to Birmingham to the south of Water Orton. When an official announcement is made on the area to be formally The safeguarded this route will be shown on the Proposals Map. Also The next phase of the route to Leeds via the East Midlands and to Manchester is expected to be published in January 2013 late 2012. The second phase and possible "Y" option may follow the M42 but the exact route will not be known until the Secretary of State makes the formal announcement. The Leeds leg follows the route of the M42 from a junction near Lea Marston, past Polesworth and then heads towards Ashby. The full impact of the proposals will not be known for some time, but increased traffic, especially through the rural countryside close to the new railway station and monorail depot to the east of the M42 near to the NEC, is likely. Improved public transport connections will be extremely important to mitigate this impact as well as substantial landscaping and absorptive noise barriers along its route. Other mitigation measures, including community benefits will be needed and will be progressed through discussions with HS2 Ltd and the Department of Transport. Pressure for development around the new HS2 railway station at the NEC will be resisted.	Clarity and effectiveness and reflects updated evidence	None. Change describes HS2, a project which is not provided for by the scope of the Core Strategy and which is subject to separate permitting and environmental assessment processes.	None – see sustainability effects column for justification.
MM6	8	New Paragraph	<u>The Borough Council recognises that when HS2 takes place, it will impact on a number of properties. The Council will work with owners to mitigate the loss of properties wherever possible.</u>	Clarity and effectiveness	None. Change describes Council's approach to mitigating the effects of HS2, a project which is not provided for by the Core Strategy and which is subject to separate permitting and environmental assessment processes.	None – see sustainability effects column for justification.
MM7	10	New Paragraph	Insert new paragraph after 2.13 to read:	Clarity and effectiveness	None. Descriptive information that does not alter the Core Strategy's proposals for the development and	None – see sustainability effects column for justification.

Ref.	Page no.	Policy / paragraph	Main Modification New text: <u>Bold underlined</u> ; Deleted text: Struckthrough	Reason for modification	Sustainability effects of Main Modification	HRA implications of Main Modification
			<p><u>"The borough has a special and important natural environment shaped by its landscape and mining legacy. It has four major river corridors – the Tame, Blythe, Cole and Anker – and holds the largest and most important area of inter-connected wetlands in the sub-region along the Tame Valley. Cumulatively this area forms a migratory bird route of regional significance. The borough also has notable concentrations of heathland, ancient woodlands and acid grasslands associated with post-industrial habitats, which are otherwise scarce within the county. The natural environment provides many vital ecosystem services to the borough, such as natural flood defence, carbon sequestration and the maintenance of biodiversity and air quality. These services help to underpin the local economy and make a valuable contribution to the quality of life of its residents."</u></p>		use of land.	
MM8	11 to 23	2.17 to 2.74	<p>Delete paragraphs: 2.17 – 2.20, 2.22 to 2.25. 2.27, 2.30 to 2.41, 2.45 to 2.55, 2.56 to 2.60, 2.63 to 2.70</p> <p>Move paragraphs 2.21 to after 6.88. Delete last sentence of 2.26 and then move to between 6.88 and 6.89. Move 2.28 after 6.37. Delete first and last sentence of 2.29 and then move remainder to 6.78. Move 2.42 up to the final sentence of 2.43 to after para 6.36. Move final sentence in 2.43 to after 6.80. Move 2.44 to after 6.82. Move 2.56 to after 6.86. Move 2.61 and 2.62 to NW16 justification before 6.80. Delete last sentence in 2.71</p>	Effectiveness	None. Descriptive information that does not alter the Core Strategy's proposals for the development and use of land.	None – see sustainability effects column for justification.
MM9	26	Spatial Vision	<p>In 3rd bullet delete "In the next 15 years to 20 years"</p> <p>Change 4th to read: New homes, and new employment proposals, together with local services and community facilities will be integrated carefully respecting local distinctiveness into the Borough's existing areas respecting local distinctiveness. and this The majority of the development will be focused the majority of the development to on the Market Towns and Local Service Centres.</p>	Clarity and effectiveness	None. Minor re-wording for clarity that does not materially alter the Core Strategy's proposals for the development and use of land.	None – see sustainability effects column for justification.
MM10	28	Objective 7	Amend Strategic Objective 7 to read;	Clarity and effectiveness	None. Minor re-wording for clarity that does not materially alter the	None – see sustainability effects column for

Ref.	Page no.	Policy / paragraph	Main Modification	Reason for modification	Sustainability effects of Main Modification	HRA implications of Main Modification
			New text: <u>Bold underlined</u> ; Deleted text: Struckthrough To protect and enhance the quality of the natural environment and conserve and enhance the historic environment across the borough	s	Core Strategy's proposals for the development and use of land.	justification.
MM11-MM12	See above in main body of Section 2 .					
MM13	31	NW1	First paragraph to be reworded to read "Development within the Borough will relate to the settlement hierarchy at a scale proportionate to its position in the will be distributed in accordance with the Borough's settlement hierarchy as given in Appendix C. Where necessary, changes to development boundaries will be made in the appropriate Development Plan Document, or once development has taken place, whichever is the earlier"	Clarity and effectiveness	None. Minor re-wording for clarity that does not materially alter the Core Strategy's proposals for the development and use of land.	None – see sustainability effects column for justification.
MM14	32	NW1 (Category 5)	First paragraph be amended to read " Development in settlements without a development boundary Outside development boundaries and except where other policies of the Plan expressly provide, development will be limited to that requisite necessary for agriculture, forestry or other uses that can be shown to require a rural location.	Clarity and effectiveness	None. Minor re-wording for clarity that does not materially alter the Core Strategy's proposals for the development and use of land.	None – see sustainability effects column for justification.
MM15	33	NW2 (2)	Delete 2nd bullet point of policy - " No changes to the Green belt boundary will be made. "	Clarity and effectiveness	None , since the Core Strategy clearly states at para. 6.2 that " <i>development can be catered for outside of the Green Belt, without the need to consider any reviews of the Green Belt boundaries</i> " and no such changes are proposed in other Core Strategy modifications.	None – see sustainability effects column for justification.
MM16	33	NW2 (4)	Bullet point 4 changed to read: " Green Belt villages washed over by the designation will be required to have an infill boundary to define areas Infill boundaries in the Green Belt will be brought forward to indicate where limited infill and redevelopment would be permitted."	Clarity and effectiveness	None. Minor re-wording for clarity that does not materially alter the Core Strategy's proposals for the development and use of land.	None – see sustainability effects column for justification.
MM17	35	New paragraph between 6.8 and 6.9	The Borough Council is seeking to provide a variety of types and tenures of housing throughout the Borough, but will specifically seek the type and tenure to reflect the local settlement. Information for this can be found in a variety of sources including the SHMA and Local Housing Needs Studies	Clarity and effectiveness	None. Policy NW3 already states that " <i>There should be a variety of types and tenures that reflect settlement needs</i> " thus modification adds no new proposals.	None – changes to type and tenure of housing development are not capable of effects on European sites.

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MM18	36	Table 1	<p>New text: <u>Bold underlined</u>; Deleted text: Struckthrough</p> <p><u>Delete current table 1 and replace with the following to reflect new plan period and numbers</u></p> <p><i>Local Requirement</i></p> <table border="1"> <thead> <tr> <th></th> <th></th> <th>Dwellings Net</th> <th>Average Dwellings per annum</th> </tr> </thead> <tbody> <tr> <td>a)</td> <td>Housing requirement 2011-2029 (3150 ÷ 18yrs=)</td> <td>3150</td> <td>175</td> </tr> <tr> <td>b)</td> <td>Net additions to stock 1/4/11 – 31/10/13 (2 years 7 months) - Completions that have already taken place.</td> <td>151</td> <td></td> </tr> <tr> <td></td> <td>Total Residual requirement</td> <td>2999</td> <td></td> </tr> </tbody> </table> <p><i>Amount of Housing Land left to find for remaining Plan period</i></p> <table border="1"> <thead> <tr> <th></th> <th></th> </tr> </thead> <tbody> <tr> <td>Housing in the Pipeline (sites already with planning permission or allocated 919 plus 131 from LIP =)</td> <td>1050</td> </tr> <tr> <td>Land to be found in remaining Plan period (2999 – 1050)</td> <td>1949</td> </tr> <tr> <td>Number of Units to be Delivered for Tamworth</td> <td>500 units</td> </tr> </tbody> </table> <p><i>Total land to be found in remaining plan period including land for Tamworth</i></p> <table border="1"> <tbody> <tr> <td>TOTAL Requirement Left to Find</td> <td>2449 units</td> </tr> </tbody> </table>			Dwellings Net	Average Dwellings per annum	a)	Housing requirement 2011-2029 (3150 ÷ 18yrs=)	3150	175	b)	Net additions to stock 1/4/11 – 31/10/13 (2 years 7 months) - Completions that have already taken place.	151			Total Residual requirement	2999				Housing in the Pipeline (sites already with planning permission or allocated 919 plus 131 from LIP =)	1050	Land to be found in remaining Plan period (2999 – 1050)	1949	Number of Units to be Delivered for Tamworth	500 units	TOTAL Requirement Left to Find	2449 units	Clarity and effectiveness	<p>The submitted Core Strategy based on the period 2006–2028 provides for a minimum of 3,300 homes within that period to meet the needs of North Warwickshire (150 per annum) plus 500 to meet the needs of Tamworth. Actual net additions during the first five years of the Core Strategy period (2006-2011) were 681, leaving 3,119 dwellings to be delivered from 2011 to the end of the Core Strategy period (2011-2028).</p> <p>The SHMA, which has been updated since the Core Strategy was submitted, assesses housing need at 175 per homes per annum during 2011-2031. This annual rate of housing delivery is provided for in full by MM18 and equates to 3,150 homes in the revised Core Strategy period 2011-2029. Adding a further 500 to meet the needs of Tamworth gives total housing provision for 2011-2029 of 3,650 homes. Thus, 531 (3650-3119 i.e. takes account of actual net additions 2006-2011) more homes will be provided for from 2011 onwards under the modified Core Strategy, relative to the submitted Core Strategy, these being delivered over 18 years rather than 17 years from 2011.</p> <p><u>Changes to existing SA scores for Core Strategy as a whole</u></p> <p>Since assessed housing need will continue to be met, no change is warranted to the existing ‘++’ (significant positive) score vs. SA objective 8 (Provide decent and affordable housing to meet local needs) in relation to total amount of housing delivery. The</p>	<p>The proposed changes to the Core Strategy will increase the total housing provided during 2011-2029 by 531 homes. The HRA Screening of the Submission Core Strategy showed that there are no European sites within the Borough boundary and that the main potential for likely significant effects is from indirect effects such as water pollution or recreation, in-combination with other plans and projects. The proposed increase in the number of homes to be provided is judged to be insignificant in the context of these indirect, in-combination effects which are largely dependent on growth within nearby Birmingham and Coventry. The mitigation provided by other policies within the Core Strategy and by the Environment Agency’s permitting regimes for water abstraction and wastewater discharges remains capable of managing residual risks.</p> <p><u>HRA Conclusion</u></p> <p>The proposed Main Modification to the Core Strategy does not alter the conclusions of the HRA of the submitted Core Strategy that the Plan will not have a likely</p>
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			(1949 + 500 =)		implications for performance against other sustainability objectives which are only partly dependent on housing need being met (e.g. SA7 Health & Wellbeing) are judged to be insignificant due to the large number of other relevant factors contributing to their achievement. <i>N.B. The effect of the modified total housing provision on the number of affordable homes to be provided is assessed under MM30, the modification to the Affordable Housing policy.</i>	significant effect on any European site, either alone or in-combination with other plans and projects.
MM19	37	NW3(2)	Delete second bullet point	To reflect the evidence	Deletion of this bullet point may increase the likelihood that development of 500 homes to meet the need of Tamworth could take place in North Warwickshire earlier in the Core Strategy period and before potential sites in Tamworth have been fully explored. The modification therefore makes it more likely that these 500 dwellings will be developed in North Warwickshire rather than in Tamworth. However, delivery of this scale of housing to meet the needs of Tamworth has already been appraised by the SA of the Submission Core Strategy, as part of the wider assessment of housing growth in the Borough. Therefore no change is warranted to the existing SA scores.	The potential for these 500 homes to have likely significant effects on a European site has already been fully assessed within the HRA Screening Report for the Submission Core Strategy. <u>HRA Conclusion</u> The proposed Main Modification to the Core Strategy does not alter the conclusions of the HRA of the submitted Core Strategy that the Plan will not have a likely significant effect on any European site, either alone or in-combination with other plans and projects.
MM20	37	NW3(3)	Delete text in bullet point 3 "All housing sites will be allocated in accordance with this Core Strategy and in particular, respect the rural character of North Warwickshire"	Clarity and effectiveness	Deletion of this text has the potential for negative effects on rural character in the Borough and related sustainability objectives 11 (natural environment, including landscape), 12 (built environment & cultural	Deletion of this text has the potential for negative effects on rural character in the Borough and biodiversity is a component of rural

Ref.	Page no.	Policy / paragraph	Main Modification New text: <u>Bold underlined</u> ; Deleted text: Struckthrough	Reason for modification	Sustainability effects of Main Modification	HRA implications of Main Modification
					<p>heritage) and 13 (biodiversity).</p> <p><u>Changes to existing SA scores for Core Strategy as a whole</u></p> <p>No change is warranted to the existing SA score for related SA objective 11 (valuing, enhancing and protecting the assets of the natural environment of North Warwickshire, including landscape character) because uncertain significant negative effects (--?) are already recognised as part of a mixed SA score in respect of the potential effect of development beyond the boundaries of the Market Towns and Local Service Centres.</p> <p>More effective rural character protection is, in any case, provided by more specific Core Strategy policy provisions on the location and design of housing, notably within:</p> <ul style="list-style-type: none"> - NW1 Settlement Hierarchy; - NW2 Green Belt; - NW4 Split of Housing Numbers; - NW8 Sustainable Development; - NW10 Quality of Development; - NW11 Natural and Historic Environment. 	<p>character. However, more specific and effective protection for biodiversity is provided by Core Strategy policy provisions on the location and design of housing, notably within:</p> <ul style="list-style-type: none"> - NW1 Settlement Hierarchy; - NW2 Green Belt; - NW4 Split of Housing Numbers; - NW8 Sustainable Development; - NW10 Quality of Development; - NW11 Natural and Historic Environment. <p>The Main Modification does not, therefore, significantly alter Core Strategy protection for biodiversity and is therefore not capable of altering the previous conclusions of the HRA.</p> <p><u>HRA Conclusion</u></p> <p>The proposed Main Modification to the Core Strategy does not alter the conclusions of the HRA of the submitted Core Strategy that the Plan will not have a likely significant effect on any European site, either alone or in-combination with other plans and</p>

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						projects.
MM21	37	NW3(5)	Delete text in bullet point 5 "Development will take place in locations having regard to the needs of each location" and their capacity to support additional development.	Clarity and effectiveness	<p>The capacity of a location to support development is difficult to define and potentially encompasses a very wide range of factors such as the ability of the natural environment to accommodate development without significant harm, infrastructure constraints such as wastewater treatment capacity, and community factors such as the weakening of social links that might arise from a rapid and proportionately large increase in the size of a settlement.</p> <p><u>Changes to existing SA scores for Core Strategy as a whole</u></p> <p>The potential for such effects on capacity issues, such as those described above and assessed under the various SA objectives of the original SA Report is judged not to increase as a result of deletion of this generic protective text in Policy NW3. Also, as already described under MM20, more specific and more effective Core Strategy provisions on the location and design of housing exist within other policies. As such, no change is warranted to the existing SA scores from MM21.</p>	None – see sustainability effects column for justification.
MM22	37	NW3(6)	Reword bullet point 6 to read "Development will only occur if the appropriate infrastructure is available <u>or can be made available</u> and sites will be released in order to ensure a consistent delivery of housing for the Borough."	Clarity and effectiveness	None. Minor re-wording for clarity that does not materially alter the Core Strategy's proposals for the development and use of land.	None – see sustainability effects column for justification.
MM23	38	NW4 (Category 4)	Reword Paragraph to read "The following settlements will cater for the following amount of development <u>usually</u> on sites of no more than 10 units and at any one time <u>depending on viability. A</u> Neighbourhood Plan <u>may</u> allocates more"	Clarity and effectiveness	None. Minor re-wording for clarity that does not materially alter the Core Strategy's proposals for the development and use of land.	None – see sustainability effects column for justification.
MM24	38	NW4	Amend as follows:	To be	None. Minor re-wording for	None – see sustainability

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		(Category 5)	New text: <u>and development necessary for agriculture, forestry or other uses that can be shown to require a rural location</u> ; Deleted text: Struckthrough	consistent with NW1	consistency that does not alter the proposals of the Core Strategy as a whole for the development and use of land.	effects column for justification.
MM25	39	Paragraph 6.17	Paragraph needs to be updated to reflect new SHMA (2013): "The Council undertook a Housing Market Assessment in 2008 2013 to provide up to date evidence and information for the Core Strategy. Affordable housing needs still remain high with a need of 286 112 units per annum. The need for affordable housing as identified by this assessment exceeds, on an annualised basis, housing requirement for the Borough, of 150 175 units per annum. This causes a particular difficulty in North Warwickshire because the analysis further shows that the ratio of income to house prices/market rental in the Borough is such that the greatest amount of need is for socially rented accommodation. Since the adoption of the 2006 Local Plan therefore "local affordable housing" for North Warwickshire has related to the provision of socially rented housing provided by a Registered Social Landlord, or housing of a similar standard that is available at an equivalent or lower cost (in terms of weekly or monthly repayments or rent). Socially rented accommodation is not the only provision of local affordable housing but it is a means of comparison to ensure that the housing that is provided is affordable for those in housing need in North Warwickshire."	To reflect updated evidence	None. This change describes the new evidence on housing need and affordable housing need from the update of the SHMA in 2013. This new evidence is taken into account in the re-appraisal of policies for housing provision (e.g. MM18, MM30) and does not require appraisal in its own right.	None – see sustainability effects column for justification.
MM26	39	Paragraph 6.18	Delete whole paragraph - " Increasingly however, it is clear that the viability of these schemes is coming in to question as sources of external funding, such as from the Homes and Communities Agency, is increasingly difficult to access. This means that the Borough Council will have to look at other forms of provisions that clearly deliver aspirations for affordable quality homes. Intermediate housing, such as shared ownership or discounted market housing (in perpetuity), whether provided by a Registered Social Landlord (RSL) or by a private developer is acceptable. But it will only be able to satisfy a very small proportion of the local housing need (some 3.8%). This is because such housing will only be affordable in North Warwickshire if it compares in terms of standard (size/ security of tenure/facilities) and monthly outgoings for rent/mortgage to the rent paid in the socially rented sector. "	To reflect updated evidence	None. Background information that does not alter the proposals of the Core Strategy as a whole for the development and use of land.	None – see sustainability effects column for justification.

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MM27	40	6.22	Change the first part of paragraph to read: Each housing site will be expected to provide for housing in order to meet the target of <u>20, 30 or</u> 40% of housing to be affordable <u>depending on the type and size of site</u> over the plan period. This provision will be provided through on-site provision, off-site financial contributions and/ or land. <u>The methodology in the Affordable Housing Viability Report will be used to calculate the financial contribution.</u>	To reflect updated evidence	See appraisal of amended Policy NW5 under MM30.	See appraisal of amended Policy NW5 under MM30.
MM28	40	Paragraph 6.23	Delete "A monitoring target has been set to ensure that during the period 2006 – 2028 40% of the dwellings completed are affordable."	Clarity and effectiveness	See appraisal of amended Policy NW5 under MM30.	See appraisal of amended Policy NW5 under MM30.
MM29	40	Paragraph 6.24	Delete "Rural Affordable Sites will be included in future Development Plan or Neighbourhood Documents"	To reflect updated evidence	None. Deleted text relates to future Local Plan documents and does not change the proposals of the Core Strategy for the development and use of land.	None – see sustainability effects column for justification.
MM30	40	NW5	Delete policy NW5 and replace with: <u>Affordable Housing Provision</u> <u>Schemes of 15 or more dwellings</u> <u>1. 30% of housing provided on-site will be affordable</u> <u>2. Except in the case of Greenfield (previously agricultural use) sites where 40% on-site provision will be required.</u> <u>Schemes of between 1 and 14 inclusive units</u> <u>20% affordable housing provision will be provided. This will be achieved through on site provision or through a financial contribution in lieu of providing affordable housing on-site. This will be calculated using the methodology outlined in the Affordable Housing Viability report or subsequent updated document and is broadly equivalent to on-site provision.</u> <u>The Council and other partners will continue to maximise numbers of affordable housing on other sites.</u>	To reflect updated evidence	This modification is relevant to SA objective 8 'Provide decent and affordable housing to meet local needs'. The Submission Core Strategy provided for 150 new homes per annum, of which 40% (60 per annum) were required to be affordable. The SA judged the effect of that level of affordable housing provision to have a significant adverse (--) effect on SA objective 8 as it fell so far short of the affordable housing need of 286 dwellings per annum identified at the time of Core Strategy submission. Policy NW3, as modified, will provide for 175 new homes per annum, and Policy NW5, as modified, requires 20%-40% (35-70) of these to be affordable. <u>Changes to existing SA scores for Core Strategy as a whole</u>	None – changes to type and tenure of housing development are not capable of effects on European sites.

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			<p>New text: <u>Bold underlined</u>; Deleted text: Struckthrough</p> <p><u>Proposals to provide less than the targets set out above should be supported by a viability appraisal to verify that the targets cannot be met and the maximum level that can be provided without threatening the delivery of the scheme.</u></p> <p><u>Affordable Housing Mix</u></p> <p><u>A target affordable housing tenure mix of 85% affordable rent and 15% suitable intermediate tenure will be provided wherever practicable.</u></p>		<p>Based on the fact that the updated SHMA now identifies affordable housing need at the much lower level of 112 units per annum, the modified policy makes a more significant contribution to identified need. The modified policy also provides more certainty in delivery of affordable housing by providing more detail about how viability and deliverability issues will be taken into account. Recognising that there will remain a shortfall in supply of affordable housing vs. identified need, the Core Strategy is now judged to have a minor negative (-) effect rather than significant negative (--) effect on the affordable housing aspect of SA objective 8.</p> <p><u>Implications for significant effects identified by the SA</u></p> <p>The Significant negative (--) effect of the Core Strategy as a whole on the affordable housing aspect of SA objective 8 is now reduced to a minor negative (-) effect.</p>	
MM31	41-42	6.25	<p>Rewording required reflecting the updated GTAA and the new criteria based policy</p> <p>"The Government's key objective for planning for housing is to ensure that everyone has the opportunity of living in a decent home. <u>The Planning Policy for Travellers Sites, which relates to Gypsies, Travellers and Travelling Show people was published in March 2012. This document should be read in conjunction with the NPPF</u> This includes a commitment to ensuring that the housing needs of members of the gypsy and traveller community and the travelling show people's community are met. The Southern Staffordshire and Northern Warwickshire Gypsy and Traveller Accommodation Assessment (GTAA) published in February 2008 examined the necessity for further sites in the region. <u>The Gypsy Traveller and Travelling Show people Accommodation Assessment: North Warwickshire and Nuneaton and Bedworth,</u></p>	Clarity and effectiveness	<p>None. This change describes the new evidence on gypsy, traveller and travelling showpeople accommodation needs published in June 2013. This new evidence is taken into account in the re-appraisal of the Core Strategy's accommodation provision (e.g. MM33, MM36) and does not require appraisal in its own right.</p>	None – see sustainability effects column for justification.

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			New text: <u>published in June 2013 examined the necessity for further pitches in the study area. The study was conducted by a team of researchers from the Salford Housing and Urban Studies Unit (SHUSU) at the University of Salford. The study was greatly aided by research support and expertise provided by members of the Gypsy and Traveller communities</u> Deleted text: Struckthrough			
MM32	41-42	6.26	Delete Paragraph	Clarity and effectiveness	None. Information on evidence base for gypsy, traveller and travelling has been replaced by new text in MM31.	None – see sustainability effects column for justification.
MM33	41-42	6.27	For North Warwickshire this assessment, which took in to account the 17 pitches at the Warwickshire County Council rented site at Alvecote, indicated there is a need for an additional 27 9 residential pitches (12 2 up to 2012, 53 up to 2017, 22 5 up to 2022 and 5 4 up to 2027 8) and up to 5 transit caravan pitches up to 2027. As the GTTA becomes less reliable the longer the timeframe, due to the nomadic nature of Gypsy and Travellers. This figure will be updated on a regular basis. The end target date is thus 2027 8 and not 2028 9 as in the case of the housing and employment targets. There was no evidence of any requirement to provide pitches for travelling show people.	Clarity and effectiveness	See appraisal of MM36.	See appraisal of MM36.
MM34	41-42	6.28	Delete Paragraph	Clarity and effectiveness	None. Deletion of outdated information on evidence base and policy context for Policy NW6.	None – see sustainability effects column for justification.
MM35	41-42	6.29	Delete Paragraph	Clarity and effectiveness	None. Deletion of outdated information on evidence base and policy context for Policy NW6.	None – see sustainability effects column for justification.
MM36	42	NW6	Reword to “ 27 9 residential and 5 transit Gypsy and Traveller pitches will be provided between 2006 2011 and 2027 2028 ”	To reflect updated evidence	<u>Changes to existing SA scores for Core Strategy as a whole</u> In line with the new Gypsy, Traveller and Travelling Showpeople Accommodation Assessment, published in 2013 after Core Strategy submission, the accommodation provision in the Core Strategy will be reduced from the current level of 27 pitches to 9 pitches. The Core Strategy already provides for the	The Main Modification reduces the number of sites provided for gypsy and traveller accommodation. <u>HRA Conclusion</u> The proposed Main Modification to the Core Strategy does not alter the conclusions of the HRA of the submitted

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					level of assessed need for transit pitches (five) so no change is required to that provision. No change is required to the previous significant positive (++) score against SA objective 8 'Provide decent and affordable housing to meet local needs' in relation to provision of sufficient gypsy and traveller pitches since NWBC's suggested changes to Policy NW6 continue to ensure that assessed needs are met in full.	Core Strategy that the Plan will not have a likely significant effect on any European site, either alone or in-combination with other plans and projects.
MM37-MM41	<i>See above in main body of Section 2.</i>					
MM42	43	6.36	Add wording - " <u>Work is being carried out at both the sub-regional and regional level to consider employment needs on a wider than local level. As and when these reports become available considerations will be given as to the implications on the Borough and, if necessary trigger a review of the relevant Core Strategy policies</u> "	Clarity and effectiveness	None. Information on forthcoming evidence that does not alter the Core Strategy's proposals for the development and use of land.	None – see sustainability effects column for justification.
MM43	43	6.37	Remove the wording in the last sentence ""Another legacy from the Regional Spatial Strategy is a further 20 hectares specifically for logistics use. However a number of circumstances have changed. Birch Coppice Phase 2 is under construction. Hams Hall has not come forward – a former power station site in the Green Belt. In addition, MIRA Technology Park, an Enterprise Zone, south along the A5 will be coming on stream within the next year or so. With the development of this site this changes the local market and provides opportunities to diversify the local economy for different types of employment growth. The Borough Council is keen to exploit these opportunities and so will allocate the 20 hectares of land originally earmarked purely for logistics use to high density uses on land outside of the Green Belt falling with Use Classes B1 (b & c), B2 and B8;"	Clarity and effectiveness	See appraisal of MM45 in light of updated evidence from Employment Land Review 2013.	See appraisal of MM45 in light of updated evidence from Employment Land Review 2013.
MM44	44	6.39	Add to the end of the paragraph: <u>It is important therefore to protect employment land from alternative uses. However the Borough Council recognises that this cannot always be the case. Proposals for a change of use from employment uses (Class B) to non employment uses should be supported by evidence to show that the</u>	Clarity and effectiveness	See appraisal of MM48.	See appraisal of MM48.

Ref.	Page no.	Policy / paragraph	Main Modification	Reason for modification	Sustainability effects of Main Modification	HRA implications of Main Modification
			New text: <u>existing buildings and land are not suitable or cannot be viably re used for another employment use. Evidence should include details of the marketing of the site for employment use for 12 months.</u> Deleted text: Struckthrough			
MM45	44	Table 3	<p>Employment Land 2011 - 29</p> <p>A Total Employment Land Requirement, 2011-29 58 ha</p> <p>B Replacement Provision for Unsuitable Land 2 ha</p> <p>Total Employment Land Required to Meet Local Needs 60 ha</p> <p>C Completions in ha from 2011 to 2012 (non RLS) - 0.56 ha</p> <p>D Extant Permissions/ Allocations - 30.8 ha</p> <p>E Total Supply 31 ha (31.36 ha)</p> <p>F Remaining Employment Land Requirement 29 ha</p>	To reflect up to date evidence	<p>In the Proposed Submission Core Strategy, Policy NW7 provided for 68.5 ha of employment land to be developed over the lifetime of the Core Strategy, based on evidence of an 11.0 ha local requirement per 5 years ($22/5 \times 11 = 48.5$) plus 20.0 ha (originally targeted for logistics use in the Regional Strategy) for high density employment uses (B1b, B1c, B2, B8) outside the Green Belt.</p> <p>A new Employment Land Review was published in September 2013, subsequent to submission of the Core Strategy. An addendum to this was produced in January 2014 to clarify the employment land requirement for the period 2011-2029 in response to a query from the Inspector. The addendum sets out a local employment land requirement of 58.0 ha for 2011-2029. It recommends that this total provision be broken down into 13.0 ha for office and R&D uses (B1a/b), 12.0 ha for industrial uses (B1c/B2), and 33.0 ha for warehouse and distribution uses (B8).</p> <p><u>Changes to existing SA scores for Core Strategy as a whole</u></p> <p>The new evidence and suggested policy change will have no change on sustainability scores vs. SA objectives 1 and 2 in relation to economic growth and job creation respectively as the Core Strategy employment land provision has been modified in line with the requirement</p>	<p>NWBC has calculated that the total amount of employment land that will be provided during 2006-2029 under the modified Policy NW7 is only 1.2 ha more than that provided during 2006-2028 under the submitted Core Strategy. The risks to European sites of this marginal increase in employment land provision are similar to those described for the increase in housing provision described above and are judged not to alter the previous HRA conclusions.</p> <p><u>HRA Conclusion</u></p> <p>The proposed Main Modification to the Core Strategy does not alter the conclusions of the HRA of the submitted Core Strategy that the Plan will not have a likely significant effect on any European site, either alone or in-combination with other plans and projects.</p>

Ref.	Page no.	Policy / paragraph	Main Modification New text: <u>Bold underlined</u> ; Deleted text: Struckthrough	Reason for modification	Sustainability effects of Main Modification	HRA implications of Main Modification
					identified by updated evidence.	
MM46	45	NW7	Reword to reflect plan period " Between 2006 2011 and 2028 2029 a minimum of 68.5 60 hectares of local employment land will be provided of which 20 hectares will be specifically for high density employment creating uses falling with Use Class B1 (b & c), B2 and B8;"	To ensure a 15 year plan period	See appraisal of MM45 in light of updated evidence from Employment Land Review 2013.	See appraisal of MM45 in light of updated evidence from Employment Land Review 2013.
MM47	45	NW7(3)	Delete bullet point In Category 4 settlements sites will be no greater than 0.2 hectares; and, replace with " <u>Development will be appropriate to the scale and size of the settlement</u> "	Clarity and effectiveness	This modification broadens the scope of Policy NW7 so that the criterion applies to all settlements, not just Category 4 settlements. In so doing it may increase protection for the character and environment of the Borough's Category 1, 2 and 3 settlements and adjacent countryside with positive effects on related SA objectives 11 (natural environment, including landscape), 12 (built environment & cultural heritage) and 13 (biodiversity) . However, it may also prevent employment development coming forwards that might otherwise have been permitted in these settlements with negative effects on SA objectives 1 (economy) and 2 (employment) . For Category 4 settlements, the replacement of a quantified size limit with a qualitative test increases uncertainty around the scale of employment development that will be permitted in these smaller settlements, with uncertain effects on SA objectives 11 (natural environment, including landscape), 12 (built environment & cultural heritage) and 13 (biodiversity) . <u>Changes to existing SA scores for Core Strategy as a whole</u> These potential effects are judged not to be significant in the context of	As described in the sustainability effects column, this Main Modification increases protection for the environment around larger settlements but introduces some uncertainty as to the scale of employment development at Category 4 settlements. As the HRA Screening Report showed, direct impacts on European sites from development at these settlements are unlikely to have significant, direct impacts on European sites as the settlements are generally some distance from the European sites. Other safeguards are judged capable of managing potential indirect impacts. The Main Modification does not significantly alter this situation. <u>HRA Conclusion</u> The proposed Main Modification to the Core Strategy does not alter the conclusions of the HRA of the submitted Core Strategy that the

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					the sustainability performance of the Core Strategy as a whole, hence no change is warranted to the original SA scores.	Plan will not have a likely significant effect on any European site, either alone or in-combination with other plans and projects.
MM48	45	NW7	Additional bullet point to be added to safeguard employment land. " <u>All employment land will be protected unless it can be demonstrated that there is no realistic prospect of the site being used for employment purposes. Evidence would need to demonstrate that:</u> <ul style="list-style-type: none"> • <u>the site is no longer commercially viable; and,</u> • <u>it has been marketed for an appropriate period of time, usually no less than 12 months; and,</u> • <u>there are no alternative employment uses that could use the site.</u> 	Clarity and effectiveness	This additional bullet point to Policy NW7 increases certainty in relation to the protection of existing employment sites implied by Core Strategy para. 6.39. This change is judged likely to have positive effects on SA objectives 1 (economy), 2 (employment) and 14 (previously developed land) . <u>Changes to existing SA scores for Core Strategy as a whole</u> These potential effects are judged not to be significant in the context of the sustainability performance of the Core Strategy as a whole, hence no change is warranted to the original SA scores.	By safeguarding existing employment land this Main Modification reduces the likelihood that employment development will be necessary on new sites where its potential for adverse effects on biodiversity will generally be greater. <u>HRA Conclusion</u> The proposed Main Modification to the Core Strategy does not alter the conclusions of the HRA of the submitted Core Strategy that the Plan will not have a likely significant effect on any European site, either alone or in-combination with other plans and projects.
MM49	45	NW7	Additional bullet point to be added to reflect paragraph 6.40 " <u>Support and encouragement will be given to small scale rural businesses to expand where this does not impact detrimentally on the countryside character in environmental or sustainable terms</u> "	Clarity and effectiveness	None. Modification gives greater prominence to the support for rural businesses that is already stated in para. 6.40 of the Core Strategy but no new proposals for the development and use of land are introduced.	None – see sustainability effects column for justification.
MM50	45	6.42	2 nd sentence in paragraph 6.42 to be amended to read: In this respect, all development should demonstrate that it is sustainable. with built development, <u>This will be achieved by being well</u> designed, laid out and constructed in a manner to	Clarity and effectiveness	None. Minor re-wording for clarity that does not materially alter the Core Strategy's proposals for the development and use of land.	None – see sustainability effects column for justification.

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			New text: underlined ; Deleted text: Struckthrough ensure the long term retention, adaptation and re-use of premises ; that where services and facilities that link and support development they must be protected and improved where necessary; and that promotion of sustainable transport is prioritised, since as within rural areas there is a reliance on private vehicular transport.			
MM51	47	NW8	Reword bullet point 1 to read "Be targeted at using brownfield land in appropriate locations reflecting the settlement hierarchy and subject to maintaining a five year housing supply;" Add and to the end of each criterion. Delete criterion 5 and 6. Insert new criteria: 5 encourage sustainable forms of transport focussing on pedestrian access and provision of bike facilities; and 6 provide for proper vehicular access, sufficient parking and manoeuvring for vehicles in accordance with adopted standards; and.. Change criterion 7 into two parts a and b. Add to 7a add Playing Pitch Strategies before will be supported.	Clarity and effectiveness	None. Modifications serve to clarify existing requirements in relation to the meaning of appropriate locations for development, encouragement of sustainable travel and provision of open space.	None – see sustainability effects column for justification.
MM52	48	Paragraph 6.52	Reword second sentence to read "Wind turbines are a means of providing renewable energy. A key factor of their development will be where there is an the impact on the landscape and the local community. Other alternatives will be investigated and the appropriate measure pursued.	Clarity and effectiveness	None. Minor re-wording for clarity that does not materially alter the Core Strategy's proposals for the development and use of land.	None – see sustainability effects column for justification.
MM53	48	NW9	Reword "Renewable energy projects will be supported where they provide a local energy benefit and they respect the capacity and sensitivity of the landscape and communities to accommodate them. In particular, they will `be assessed-on their individual and cumulative impact on landscape quality, sites or features of natural importance, sites or buildings of historic or cultural importance, residential amenity and the local economy.	Clarity and effectiveness	None. The benefits of renewable energy generation are recognised by support for it in the NPPF and the deleted Core Strategy criterion on 'local energy benefit' therefore has little effect.	None. Main Modification has negligible effect on the likelihood of renewable energy development for the reasons explained in the sustainability effects column.
MM54	48	NW9	New development will be expected to be energy efficient in terms of its fabric and use. Major development will be required to provide a minimum of 10% of its operational energy requirements from a renewable energy source subject to viability . Smaller schemes will be encouraged to seek the introduction of renewable energy and energy efficiency schemes at the outset to avoid costly retrofit.	Clarity and effectiveness	Introduction of this viability caveat is likely to a) reduce the amount of renewable energy generation provided by new development, and b) increase the certainty that the proposed level of housing development proposals will come forwards from developers. The modification is therefore judged likely to have negative effects on SA	Likelihood of renewable energy development is reduced. Development of the scale of housing provided for by the Core Strategy has already been assessed in full in the HRA Screening Report. <u>HRA Conclusion</u>

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					<p>objectives 16 (climate change mitigation) and 17 (renewable energy generation) and positive effects on SA objective 8 (housing provision).</p> <p><u>Changes to existing SA scores for Core Strategy as a whole</u></p> <p>These potential effects are judged not to be significant in the context of the sustainability performance of the Core Strategy as a whole, hence no change is warranted to the original SA scores.</p>	The proposed Main Modification to the Core Strategy does not alter the conclusions of the HRA of the submitted Core Strategy that the Plan will not have a likely significant effect on any European site, either alone or in-combination with other plans and projects.
MM55		New Paragraph	<p>Insert new paragraph before 6.54 in the Quality of Development section to read:</p> <p><u>“The quality of development is important and can be helped through early consideration of the development. This is particularly the case in considering the natural and historic environment and how this will be dealt with. Considering biodiversity at an early stage of the planning process will assist in building in beneficial features to aid biodiversity.”</u></p>	Clarity and effectiveness	The part of the modification expands on existing requirements in Policy NW10 in respect of biodiversity rather than introducing any new requirement. The part relating to the historic environment is for consistency with the new bullet point in Policy NW10 which is assessed under MM56.	None – see sustainability effects column for justification.
MM56	50	NW10	<p>Amend NW10 to add the following bullet point after “deter crime” and before “provide, conserve and enhance biodiversity”:</p> <p><u>“• sustain, conserve and enhance the historic environment</u></p>	Clarity and effectiveness	<p>This modification will help to ensure that the requirements of Policy NW11 for protection and enhancement of the historic environment on SA objective 12 (built environment, including cultural heritage) are met with positive effects on that SA objective.</p> <p><u>Changes to existing SA scores for Core Strategy as a whole</u></p> <p>See assessment of MM57.</p>	None. Main Modification relates to the historic environment.
MM57	52	NW11	<p>Split NW11 so that one part deals with the Historic Environment and the other part deals with the Natural Environment. Therefore amend NW11 to read:</p>	Clarity and Effectiveness	Additional detail provided by new text in Policy NW11A provides additional clarity in relation to	None. Main Modification relates to the historic environment.

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			<p><u>NW11A– Historic Environment</u></p> <p><u>The Council recognises the importance of the historic environment to the Borough’s local character, identity and distinctiveness, its cultural, social, environmental and economic benefits”</u></p> <p>Retain “The quality, character, diversity and local distinctiveness of the historic environment will be conserved and enhanced. In particular:</p> <ul style="list-style-type: none"> • Within identified historic landscape character areas development will conserve, enhance and where appropriate, restore landscape character as well as promote a resilient, functional landscape able to adapt to climate change. Specific historic features which contribute to local character will be protected and enhanced; and,” <p>Delete 2nd paragraph and replace with the following:</p> <ul style="list-style-type: none"> • <u>The quality of the historic environment, including archaeological features, Listed Buildings, Scheduled Ancient Monuments, Registered Parks and Gardens, Conservation Areas and any non-designated assets; buildings, monuments, archaeological sites, places, areas or landscapes positively identified in North Warwickshire’s Historic Environment Record as having a degree of significance meriting consideration in planning decisions, will be protected and enhanced, and;</u> • <u>Wherever possible, a sustainable reuse of redundant historic buildings will be sought, seeking opportunities to address those heritage assets identified as most at risk.</u> 		<p>requirements for protection and enhancement of the historic environment, with positive effects on SA objective 12 (built environment, including cultural heritage).</p> <p><u>Changes to existing SA scores for Core Strategy as a whole</u></p> <p>The SA of the Submission Core Strategy identified minor, mixed (+/-) effects on the SA objective 12. Minor positive effects related to the provisions for protection and enhancement of Cultural Heritage contained in policies NW10, NW11 and NW15 and to the potential offered by locating the majority of development in the main settlements for bringing derelict historic buildings back into appropriate use and for providing high quality new buildings that improve the built environment. Minor negative effects related to the fact that focussing development in the main settlements may also lead to further development pressure on listed buildings and conservation areas and their settings.</p> <p>The new bullet point on the historic environment in Policy NW10 together with the strengthening of the policy provisions on the historic environment in Policy NW11A (as modified), and related supporting text changes, are together judged to improve the SA score for the Core Strategy as a whole. The revised score is a significant positive effect but with uncertainty relating to the potential for additional development pressure on listed buildings, conservation areas and their</p>	

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			<p>New text: <u>Bold underlined</u>; Deleted text: Struckthrough</p> <p><u>NW11B - Natural Environment</u></p> <p>The quality, character, diversity and local distinctiveness of the natural environment and historic environment will be protected and enhanced. In particular within identified landscape character areas development will conserve, enhance and where appropriate, restore landscape character as well as promote a resilient, functional landscape able to adapt to climate change. Specific landscape, geo-diversity, wildlife and historic features which contribute to local character will be protected and enhanced. The quality of the historic environment including archaeological features, will be protected and enhanced, and wherever possible, a sustainable reuse of the historic building will be sought.</p>		<p>settings.</p> <p><u>Implications for significant effects identified by the SA</u></p> <p>The mixed, minor (+/-) effect of the Core Strategy as a whole SA objective 12 is now improve to a significant positive effect with uncertainty (++)?</p>	
MM58	52	6.69 and 6.70	<p>Amended paragraphs 6.69 and 6.70 to read as follows:</p> <p>6.69 The Historic Environment is a finite and non-renewable resource. 14 designated assets were identified by English Heritage as being 'at risk', mainly from disuse or neglect, in 2011. Kingsbury Hall and Astley Castle are undergoing major work. The Borough Council will continue to work with owners to seek ways of securing their future. <u>The Borough Council has an ongoing programme for updating Conservation Area Appraisals and will undertake management plans where appropriate. It will seek opportunities for enhancement through development and links with other projects and partnerships.</u></p> <p>6.70 The Borough recognises the role of the Historic Environment in shaping the distinctiveness of the Borough and in contributing to quality of life and quality of place. It is committed to protecting and where possible enhancing its historic assets including identification of areas where development might need to be limited in order to conserve heritage assets or would be inappropriate due to its impact upon the historic environment. Proposals for new development should reflect this commitment, with design that reflects local distinctiveness and adds value to it. <u>The re-use and restoration/conservation of historic buildings can be a</u></p>	Clarity and Effectiveness	<p>Additional detail provided by new supporting text to Policy NW11A provides additional clarity in relation to requirements for protection and enhancement of the historic environment, with positive effects on SA objective 12 (built environment, including cultural heritage).</p> <p><u>Changes to existing SA scores for Core Strategy as a whole</u></p> <p>See assessment of MM57.</p>	None. Main Modification relates to the historic environment.

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			New text: <u>catalyst for regeneration. The Council have successfully implemented a Conservation Area Partnership Scheme in Atherstone and will seek ways of building on this success including the use of Neighbourhood Plans in the promotion of positive improvements to the Borough's historic environment.</u> Deleted text: Struckthrough Proposals which may have an impact upon the Historic Environment will be assessed in accordance with local and national policy and guidance."			
MM59	52	New paragraph	Insert new paragraph after 6.71 - <u>All of these make a substantial contribution to the Borough's natural environment. The network however is not restricted to these sites but other features of biodiversity that add, buffer and link to the wider countryside, providing connectivity and facilitating species movement in response to climate change.</u>	Clarity and Effectiveness	Additional detail provided by new paragraph provides additional clarity in relation to requirements for protection and enhancement of wider biodiversity assets outside of designated sites with positive effects on SA objective 13 (biodiversity). <u>Changes to existing SA scores for Core Strategy as a whole</u> These potential effects are judged not to be significant in the context of the sustainability performance of the Core Strategy as a whole, hence no change is warranted to the original SA scores.	Main Modification provides for additional protection and enhancement of biodiversity, particularly outside of designated sites. This is likely to have neutral or positive effects on European sites. <u>HRA Conclusion</u> The proposed Main Modification to the Core Strategy does not alter the conclusions of the HRA of the submitted Core Strategy that the Plan will not have a likely significant effect on any European site, either alone or in-combination with other plans and projects.
MM60	53	New paragraph	A new section before policy NW12 on Nature Conservation to read: New para - <u>The Borough Council recognises the need to establish a coherent and resilient ecological network in order to contribute towards the Government's target of halting the loss of biodiversity by 2020. The Core Strategy aims to achieve this by providing robust</u>	Clarity and Effectiveness	Additional detail provided by new paragraph provides additional clarity in relation to requirements for protection and enhancement of wider biodiversity assets outside of designated sites with positive effects on SA objective 13 (biodiversity). <u>Changes to existing SA scores for Core Strategy as a whole</u>	Main Modification provides for additional protection and enhancement of biodiversity, particularly outside of designated sites. This is likely to have neutral or positive effects on European sites. <u>HRA Conclusion</u> The proposed Main

Ref.	Page no.	Policy / paragraph	Main Modification	Reason for modification	Sustainability effects of Main Modification	HRA implications of Main Modification
			New text: <u>protection for these biodiversity assets that have a significant role and function in the Borough's existing ecological network and by seeking enhancements and gains where deficiencies are identified.</u> Deleted text: Struckthrough		These potential effects are judged not to be significant in the context of the sustainability performance of the Core Strategy as a whole, hence no change is warranted to the original SA scores.	Modification to the Core Strategy does not alter the conclusions of the HRA of the submitted Core Strategy that the Plan will not have a likely significant effect on any European site, either alone or in-combination with other plans and projects.
MM61	52	NW11	Split bullet 2 "The quality of the historic environment, including archaeological features, will be protected and enhanced, and wherever possible, a sustainable reuse of the historic building will be sought". and reword to read: <u>The quality of the historic environment, including archaeological features, Listed Buildings, Scheduled Ancient Monuments, Registered Parks and Gardens, Conservation Areas will be protected and enhanced; Any non-designated assets; buildings, monuments, archaeological sites, places, areas or landscapes positively identified in North Warwickshire's Historic Environment Record as having a degree of significance meriting consideration in planning decisions, will be protected and enhanced commensurate to the significance of the asset.</u>	Clarity and effectiveness	Additional detail provided by reworded supporting text to Policy NW11A provides additional clarity in relation to requirements for protection and enhancement of the historic environment, with positive effects on SA objective 12 (built environment, including cultural heritage). <u>Changes to existing SA scores for Core Strategy as a whole</u> See assessment of MM57.	None. Main Modification relates to the historic environment.
MM62	53	NW12	NW12 amend first clause of policy to delete ancient woodlands and add to the end of the third paragraph the following: <u>"Development will be resisted where it leads to the loss of irreplaceable habitats and features, such as ancient woodland or veteran trees unless it can be demonstrated there are overriding reasons and benefits that outweigh the loss."</u> Insert at the end of the first sentence in the fourth paragraph of policy NW12 the following: <u>"And finally seeking positive enhancements wherever possible."</u>	Clarity and effectiveness	Reworded first clause of Policy NW12 provides additional clarity in relation to requirements for protection of irreplaceable biodiversity assets. New sentence in fourth paragraph makes it clear that enhancements will also be sought wherever possible. Both of these changes have positive effects on SA objective 13 (biodiversity). <u>Changes to existing SA scores for Core Strategy as a whole</u> These effects are judged insufficient to alter the SA scores for the Core Strategy as a whole, hence no change is warranted to the original SA scores.	Main Modification provides for additional protection and enhancement of biodiversity which is likely to have neutral or positive effects on European sites. <u>HRA Conclusion</u> The proposed Main Modification to the Core Strategy does not alter the conclusions of the HRA of the submitted Core Strategy that the Plan will not have a likely significant effect on any European site, either alone or in-combination

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						with other plans and projects.
MM63	53	NW12	Amend fourth paragraph of policy NW12 to be " <u>net gain</u> " of biodiversity and delete "net loss".	Clarity and effectiveness	NWBC has confirmed that the new wording "net gain" should replace " no net loss " and that it will send a representation to the Inspector proposing this as a clarification. On this basis, the modification improves consistency with the requirements of the NPPF and has a positive effect on SA objective 13 (biodiversity). <u>Changes to existing SA scores for Core Strategy as a whole</u> These potential effects are judged not to be significant in the context of the sustainability performance of the Core Strategy as a whole, hence no change is warranted to the original SA scores.	Main Modification provides for additional enhancement of biodiversity which is likely to have neutral or positive effects on European sites. <u>HRA Conclusion</u> The proposed Main Modification to the Core Strategy does not alter the conclusions of the HRA of the submitted Core Strategy that the Plan will not have a likely significant effect on any European site, either alone or in-combination with other plans and projects.
MM64	53	6.73	Amend second sentence in paragraph 6.73 to insert " Coventry and Solihull " after Warwickshire.	Clarity and effectiveness	None. Minor factual correction that does not materially alter the Core Strategy's proposals for the development and use of land.	None – see sustainability effects column for justification.
MM65	54	NW13	Amend Policy NW13 to read: Throughout the Borough a comprehensive network of high quality, multi functional, green spaces, corridors and other historic and natural environmental features will be maintained, enhanced and created for flora, fauna and humans, which link into the sub regional green infrastructure networks. Development proposals must demonstrate how they contribute to maintaining and enhancing a comprehensive and strategically planned green infrastructure network, where appropriate. With reference to the sub-regional Strategy for Green Infrastructure and the local Green Infrastructure resource development	Clarity and effectiveness	None. The deleted first paragraph is a strategic objective rather than a policy proposal; the remaining text setting out requirements for development is unchanged.	None – see sustainability effects column for justification.

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			<p>New text: Underlined; Deleted text: Struckthrough</p> <p>should:</p> <ul style="list-style-type: none"> Identify, maintain and enhance existing green infrastructure assets; Optimise opportunities to create links between existing green infrastructure within the district and to surrounding sub-regional networks; Help to deliver new green infrastructure assets where specific need has been identified. <p>Where new green infrastructure cannot be provided on site, or where an existing asset is lost or adversely affected, contributions will be sought towards wider green infrastructure projects and improvements within the district or, where appropriate, in the sub-region.</p>			
MM66	56	NW15	<p>Addition to the final paragraph "Further growth of the Atherstone and Mancetter area, outside of the current boundaries, will be focused in the broad direction of the north-west of the Settlement <u>north of Holly Lane Industrial Estate and South of the Anker Valley floodplain</u>"</p>	Clarity and effectiveness	<p>This modification provides further information on the likely location and extent of development to the north west of Atherstone and Mancetter. However, the description is still of a broad direction and is not sufficiently specific to remove the uncertainty surrounding the likely effects of development in this direction on landscape and other aspects of the natural environment and wider sustainability issues, as documented in the SA of the Submission Core Strategy. Therefore, no change is warranted in the previously identified SA scores.</p>	<p>This Main Modification increases certainty about the location to the north west of Atherstone and Mancetter that will be a focus for development. The broad location is a considerable distance from any European site and so this increased specificity does not alter the conclusions of the HRA Screening Report.</p> <p><u>HRA Conclusion</u></p> <p>The proposed Main Modification to the Core Strategy does not alter the conclusions of the HRA of the submitted Core Strategy that the Plan will not have a likely significant effect on any European site, either alone or in-combination with other plans and projects.</p>

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MM67	57	NW16	Amends last paragraph; 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 <u>development to the west of Polesworth & Dordon</u> proposals will be expected to be limited in size and maintain <u>must respect the separate identities of Polesworth and Dordon and Tamworth and maintain a meaningful gap between them</u> , the separation between the urban area of Tamworth and the settlements of Polesworth and Dordon	Clarity and effectiveness	None. Minor clarification that does not materially alter the Core Strategy's proposals for the development and use of land.	None – see sustainability effects column for justification.
MM68	57	Add new paragraph after 6.83	<u>"Retail uses will be focussed towards the Market Towns to help maintain their viability and vitality. Existing retail uses will be protected in accordance with the settlement hierarchy and developed further within the site allocations plan"</u>	Clarity and effectiveness	Supporting text to NW1 Settlement Hierarchy already states that the majority of development will be directed to the Market Towns and NW1 states that development of services and facilities will be permitted in these Category 1 towns. This modification makes it clear that services and facilities include retail and that retail will not only be permitted in but focussed towards the Market Towns. This provides additional certainty that most retail development will occur in these towns, helping to maintain and enhance retail centres that: <ul style="list-style-type: none"> • support the viability of their economies (positive effects on SA objective 1 economy and SA objective 2 employment); • maintain and enhance access to services and facilities (positive effects on SA objective 4 equal access); • are more likely to be accessible by sustainable modes and avoid large, out-of-town retail development (positive effects on SA 	Protection of existing retail uses is not capable of effects on European sites. Focussing new development towards Market Towns reduces the likelihood of retail development in out of town locations where its potential for adverse impacts on biodiversity may be greater. <u>HRA Conclusion</u> The proposed Main Modification to the Core Strategy does not alter the conclusions of the HRA of the submitted Core Strategy that the Plan will not have a likely significant effect on any European site, either alone or in-combination with other plans and projects.

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					<p>objective 10 public transport etc., SA objective 11 natural environment, SA objective 12 biodiversity, SA objective 14 previously developed land & existing infrastructure).</p> <p><u>Changes to existing SA scores for Core Strategy as a whole</u></p> <p>These potential effects are judged not to be significant in the context of the sustainability performance of the Core Strategy as a whole, hence no change is warranted to the original SA scores.</p>	
MM69	57	NW17	<p>Amend policy as follows:</p> <p><u>Proposals that would have a detrimental impact on the viability and vitality of town centres will not be permitted.</u> Proposals that would result in the loss of an existing services or facilities <u>ties</u> which contribute to the functioning of a settlement will only be supported where the facility is replaced elsewhere or <u>it is</u> proven that <u>its loss would</u> it will not harm the vitality of the settlement.</p> <p><u>Town Centres will be the focus for new retail development.</u></p> <p>Disproportionate concentration of uses will be avoided. Robust justification using a sequential approach will be required to avoid a disproportionate concentration of uses.</p>	Clarity and effectiveness	<p>This modification makes it clear that the viability and vitality of town centres will be supported by resisting loss of retail and other town centre uses in these locations. Similarly to MM68, this is expected to:</p> <ul style="list-style-type: none"> • support the viability of Town Centre economies (positive effects on SA objective 1 economy and SA objective 2 employment); • maintain and enhance access to services and facilities (positive effects on SA objective 4 equal access); • make it more likely that services and facilities, including retail, are accessible by sustainable modes and help to avoid large, out-of-town retail development (positive effects on SA objective 10 	<p>Protection of existing town centre vitality is not capable of effects on European sites. Focussing new development towards existing town centres reduces the likelihood of retail development in out of town locations where its potential for adverse impacts on biodiversity may be greater.</p> <p><u>HRA Conclusion</u></p> <p>The proposed Main Modification to the Core Strategy does not alter the conclusions of the HRA of the submitted Core Strategy that the Plan will not have a likely significant effect on any European site, either alone or in-combination with other plans and</p>

Ref.	Page no.	Policy / paragraph	Main Modification New text: <u>Bold underlined</u> ; Deleted text: Struckthrough	Reason for modification	Sustainability effects of Main Modification	HRA implications of Main Modification
					<p>public transport etc., SA objective 11 natural environment, SA objective 12 biodiversity, SA objective 14 previously developed land & existing infrastructure).</p> <p><u>Changes to existing SA scores for Core Strategy as a whole</u></p> <p>These potential effects are judged not to be significant in the context of the sustainability performance of the Core Strategy as a whole, hence no change is warranted to the original SA scores.</p>	projects.
MM70		NW18	Change first sentence to read: Opportunities for securing transport routes and other improvements will...	Clarity	None. Minor clarification that does not materially alter the Core Strategy's proposals for the development and use of land.	None – see sustainability effects column for justification.
MM71	67	Glossary	Put definition of Green infrastructure in to Glossary	Clarity and effectiveness	None. No alteration to the Core Strategy's proposals for the development and use of land.	None – see sustainability effects column for justification.
MM72	64-66	Monitoring Table	NW2,NW8, NW9,NW10 – these triggers to be removed	Clarity and effectiveness	None. No alteration to the Core Strategy's proposals for the development and use of land.	None – see sustainability effects column for justification.
MM73	64-66	Monitoring Table	NW1, NW3, NW4 –be grouped together. Trigger to read " Where the development requirements identified within the housing trajectory are not delivered over a 2/3 year period (Monitoring with AMR)	Clarity and effectiveness	None. No alteration to the Core Strategy's proposals for the development and use of land.	None – see sustainability effects column for justification.
MM74	64-66	Monitoring Table	NW5 – Trigger to read " Where the development requirements identified within the housing trajectory are not delivered over a 2/3 year period (Monitoring with AMR)	Clarity and effectiveness	None. No alteration to the Core Strategy's proposals for the development and use of land.	None – see sustainability effects column for justification.
MM75	64-66	Monitoring Table	NW7 - Trigger to read " Where the development requirements (pro rata) identified are not delivered over a 2/3 year period (Monitoring with AMR)	Clarity and effectiveness	None. No alteration to the Core Strategy's proposals for the development and use of land.	None – see sustainability effects column for justification.
MM76	64-66	Monitoring Table	NW11, NW12, NW13, NW17 – reword to read " <u>any unjustified loss</u> "	Clarity and effectiveness	None. No alteration to the Core Strategy's proposals for the	None – see sustainability effects column for

Ref.	Page no.	Policy / paragraph	Main Modification New text: <u>Bold underlined</u> ; Deleted text: Struckthrough	Reason for modification	Sustainability effects of Main Modification	HRA implications of Main Modification
				s	development and use of land.	justification.
MM77	64-66	Monitoring Table	NW14 – is linked to the delivery of the employment development expected in Policy NW7	Clarity and effectiveness	None. No alteration to the Core Strategy’s proposals for the development and use of land.	None – see sustainability effects column for justification.
MM78	64-66	Housing Trajectory	NWBC to update to reflect plan period – put in Core Strategy as an Appendix with the Monitoring table	Clarity and effectiveness	None. No alteration to the Core Strategy’s proposals for the development and use of land.	None – see sustainability effects column for justification.

SA of reasonable alternative

- 2.17 As described in **Chapter 1**, a single reasonable alternative to the Main Modifications was considered by NWBC, that of altering the housing provision to 4,100 net additional dwellings over 2011-2029 rather than the 3,650 dwellings proposed in the Main Modifications. The figure 4,100 was made up of:
- 200 homes per annum to meet North Warwickshire's housing needs.
 - 500 homes to meet Tamworth's housing needs.
- 2.18 The sustainability implications of this level of housing provision for the October 2012 SA findings are set out below.
- 2.19 The potential additional housing growth figure, whilst representing a substantial percentage increase on the submitted provision, is small in scale when considered in the context of the likely increase in urban area it would result in or the likely additional population it would support as a proportion of figures for the Borough as a whole.
- 2.20 Whilst the total scale of growth in the Borough under the reasonable alternative would still be relatively modest, especially compared to that in neighbouring districts, the 2012 SA did identify a number of significant effects and this remains the case under the potential modification.
- 2.21 The SA objectives which, in LUC's view, warrant revision of the October 2012 sustainability score as a result of the reasonable alternative modification to housing numbers are as follows:
- 2.22 *SA objective 8 Provide decent and affordable housing to meet local needs:* The sustainability performance of the Core Strategy in relation to the affordable housing provision element of this objective is judged to change from a significant adverse effect (--) to a minor adverse effect (-), based on an assumed increase in the delivery of affordable homes that the higher total housing provision would support and taking into account the new SHMA which suggests that affordable housing need is lower than at the time of the previous SA Report.
- 2.23 The combined effect of the Main Modifications which have actually been proposed to Core Strategy policies on housing (NW3) and affordable housing (NW5) are assessed as having the same effect on the score for SA objective 8, although for slightly different reasons (see explanation in assessment of MM30 in **Table 2.4**).
- 2.24 *SA objective 12 Valuing, enhancing and protecting the quality and distinctiveness of the built environment, including the cultural heritage:* The potential additional housing provision is judged to place additional potential pressure on the historic assets of the Borough's main towns which judged to change the sustainability score from a mixed, minor effect (+/-) to a mixed, potentially significant adverse effect (+/--?). The potential significant adverse effect is uncertain as actual outcomes will depend on the location and design of development in relation to historic assets and the sensitivity of the potentially affected assets.
- 2.25 This represents a more negative performance than under the proposed Main Modifications which are assessed as improving the sustainability performance of the Core Strategy against SA objective 12 to a significant positive effect with uncertainty (++?) (see explanation in assessment of MM57 in **Table 2.4**).
- 2.26 *SA objective 16 Minimising North Warwickshire's contribution to the causes of climate change whilst implementing a managed response to its unavoidable impacts:* The sustainability performance of the Core Strategy in relation to the flood risk element of this objective is judged to change from a minor positive effect (+) to a mixed, uncertain effect (+/?). based on uncertainty at this stage of the plan making process as to whether sufficient sites with a low level of flood risk will be available at the Borough's main towns to accommodate the higher level of housing growth.
- 2.27 This represents a more uncertain performance than under the proposed Main Modifications which are assessed as producing no change to the sustainability performance of the Core Strategy against SA objective 16.

Conclusion

- 2.28 Overall, the reasonable alternative would result in a more negative effect on SA objective 12 *Valuing, enhancing and protecting the quality and distinctiveness of the built environment, including the cultural heritage* and more uncertain effects on SA objective 16 *Minimising North Warwickshire's contribution to the causes of climate change whilst implementing a managed response to its unavoidable impacts* than the proposed Main Modifications to the Core Strategy. The proposed Main Modifications therefore perform better, in terms of overall sustainability, than the reasonable alternative.

3 Summary and conclusions

Implications of Main Modifications for the SA

- 3.1 This SA Addendum has assessed the sustainability effects of the Main Modifications proposed by North Warwickshire Borough Council to its Submission Core Strategy. As detailed in **Chapter 2**, the Main Modifications will have both positive and negative sustainability effects. However, only two of these effects are of sufficient magnitude to alter the sustainability performance of the Core Strategy as a whole and to therefore require alteration of the SA scores set out in the October 2012 SA Report for the Submission Core Strategy as follows.

Change in significant effects on SA objective 8: Provide decent and affordable housing to meet local needs

- 3.2 The total number of houses to be provided per annum has increased from 150 per year in the Submission Core Strategy to 175 per year under the Main Modifications. The proportion of new homes to be provided as affordable homes has changed from 40% under the Submission Core Strategy to 20%-40% (depending on the size of the development and whether it is on brownfield land) under the Main Modifications. The combined result of these changes is that affordable housing delivery will change from 60 per annum to somewhere in the range 35-70 per annum. Based on the fact that the updated SHMA now identifies affordable housing need at the much lower level of 112 units per annum (286 per annum previously), the modified policy makes a more significant contribution to identified need. The modified policy also provides more certainty in delivery of affordable housing by providing more detail about how viability and deliverability issues will be taken into account.
- 3.3 The SA score in respect of affordable housing delivery at Submission stage was significant negative (--) because the amount of affordable housing provided by the Core Strategy fell so far short of the identified need. Recognising that there will remain a shortfall in supply of affordable housing vs. identified need, the Core Strategy this score is now judged to have improved to a minor negative (-) effect on the affordable housing aspect of SA objective 8.

Change in significant effects on SA objective 12: Valuing, enhancing and protecting the quality and distinctiveness of the built environment, including the cultural heritage

- 3.4 The SA of the Submission Core Strategy identified minor, mixed (+/-) effects on SA objective 12. Minor positive effects related to the provisions for protection and enhancement of Cultural Heritage contained in policies NW10, NW11 and NW15 and to the potential offered by locating the majority of development in the main settlements for bringing derelict historic buildings back into appropriate use and for providing high quality new buildings that improve the built environment. Minor negative effects related to the fact that focussing development in the main settlements may also lead to further development pressure on listed buildings and conservation areas and their settings.
- 3.5 The new bullet point on the historic environment in Policy NW10 (MM56) together with the strengthening of the policy provisions on the historic environment in Policy NW11 (NW11A as modified – see MM57 and MM61), and related supporting text changes (MM55, MM58), are together judged to improve the SA score for the Core Strategy as a whole. The revised score is a significant positive effect but with uncertainty relating to the potential for additional development pressure on listed buildings, conservation areas and their settings.
- 3.6 The mixed, minor (+/-) effect of the Core Strategy as a whole SA objective 12 is now improved to a significant positive effect with uncertainty (++?).

Implications of Main Modifications for the HRA

- 3.7 As detailed in **Chapter 2**, none of the Main Modifications is judged to alter the conclusions of the October 2012 HRA Screening Report that the Core Strategy will not have a likely significant effect on any European site, either alone or in-combination with other plans and projects.