

North Warwickshire Local Plan Additional SA – Growth Alternatives

Introduction

- 1.1 On 20th December 2018, the Inspector examining the North Warwickshire Local Plan issued a progress note to North Warwickshire Borough Council [INSP12] to request that additional Sustainability Appraisal (SA) work is undertaken to assist the examination process.
- 1.2 The relevant text in the Inspector's progress note is as follows:
8. *Aside from the option of accommodating none of Birmingham's likely unmet needs, no alternative levels of provision to the 3,790 homes figure cited above have been assessed in the Sustainability Appraisal [CD1/2]. In order to ensure that a requirement proposed via policy LP6 is justified, the Council should undertake a comparative assessment of the impacts of the plan making provision to deliver a minimum requirement of 5,808, 7,963 and 9,598 homes.*
 9. *The middle figure of 7,963 homes is on the basis of accommodating approximately 2,155 dwellings for Birmingham based on 2011 Census data related to the functional commuting relationship between the two areas [AD24, PS.M3.01]. That assessment should be by way of an update to the Sustainability Appraisal, and must be undertaken without a predetermined outcome in mind. **Clearly, should the additional SA work indicate that a housing requirement figure of 9,598 is not the most appropriate in the light of reasonable alternatives, it would likely be necessary for me to significantly alter my interim findings in this note.***
 10. *Work to address the concerns of the Environment Agency and Historic England [SLP302, SLP341] should be made available in advance of hearings on examination matter 6 'planning and environmental constraints', and may inform the Sustainability Appraisal work referred to above. I may need to request further information thereafter in the event that there are significant issue remaining. In advance of hearings into site allocations, the Council's Settlement Sustainability Assessment ('SSA')[CD6/3B], updated to reflect present circumstances, should also be made available as supporting evidence.*
- 1.3 This statement sets out the findings of the additional SA work requested by the Inspector, and the findings of that work. The work was undertaken by LUC, as was all the previous SA work on the Local Plan to date.

Method of approach

- 1.4 The approach to the SA used to date was used for the additional SA work, using the same SA objectives as presented in the SA Framework (Table 2.2 of the submitted SA Report dated December 2017 [CD1/2]).
- 1.5 With respect to the SA work undertaken to date, three main aspects were particularly relevant to the additional SA work undertaken:
- The SA of the spatial options as set out in the Growth Options Paper (see paras 4.2 to 4.49 of the main SA Report [CD1/2]), which appraised alternative spatial strategies for delivering growth generated from within the Borough and for growth generated from outside the Borough.
 - The SA of Policy LP6 'Amount of Development' (paras 6.18 to 6.23 of the main SA Report [CD1/2]).
 - The SA of Policy LP39 'Housing Allocations', which sets out the findings of the SA of the cumulative effects of delivering housing at the allocations included in the Local Plan, together

with a summary of the findings of the SA of each individual site allocation (see paras 6.10 to 6.98 of the main SA Report [CD1/2]).

- 1.6 The additional SA work has drawn upon and built on the work already undertaken described above. To be consistent with the original SA Report, 'smaller sites' in this additional SA are classified as those of under 5ha in size. 'Larger sites' comprise those sites greater than 5 ha in size.
- 1.7 Further details on the approach to the SA applied to each of the three growth alternatives prescribed by the Inspector are set out under the 'Findings of the additional SA work' below. In summary, the additional SA work has been prepared in the form of a proportionate commentary that explores the pros and cons against each SA objective of each of the alternatives described above. This is followed by a summary comparison of the significant effects of the three growth alternatives prescribed by the Inspector and comments on cross-boundary cumulative effects. The additional SA report then comes to a conclusion on the results of the additional SA work.

New evidence

- 1.8 In carrying out the additional SA work, reference has been made, where appropriate to any updated evidence gathered since the publication of the SA Report published in December 2017, such as information provided to address the concerns of the Environment Agency and Historic England [SLP302, SLP341] and the Council's Settlement Sustainability Assessment ('SSA')[CD6/3C], which has been updated to reflect present circumstances.
- 1.9 With respect to the concerns raised by the Environment Agency, discussions between the Council and the Agency have come to a conclusion on the work to be undertaken. This work involves looking at flood risk issues at sites H1, H2, H3, E1 and H14 in detail. Indications are that development will still take place as envisaged on sites H1, H2, E1 and H14. Due to uncertainties over the exact number of units that could possibly be developed on site H3 it is proposed by the Council that this site is put as a reserve housing site (which has a capacity of 46 dwellings). There are suggested changes to the Development Management policies but these are not considered to be of a scale that would affect this piece of work. At this time it is not therefore considered that this work will impact on this additional SA work so the report has been issued in draft subject to the final work to be agreed with Environment Agency.
- 1.10 The concerns of Historic England have been addressed through additional assessment work as reported in 'North Warwickshire Historic Environment Assessment 2019' [AD1], and proposed Main Modifications to the Submission version of the Local Plan, which have been agreed with Historic England [AD1A].
- 1.11 It should be noted that the updated Settlement Sustainability Assessment found that, for the vast majority of settlements in North Warwickshire, including some of the larger settlements such as Atherstone and Mancetter, the 2018 sustainability scores have reduced compared to the 2010 assessment. This is primarily because of the loss of post offices, libraries and public houses. The Settlement Sustainability Assessment notes that many of the settlements also have fewer bus routes, but the existing ones run more frequently offering a better service, although this cannot be relied upon to continue in the future. There are a few exceptions, most notably Polesworth and Dordon, where the score has increased.
- 1.12 The Settlement Sustainability Assessment generally supports the categorisation of settlements as presented in Policy LP2 (Settlement Hierarchy) of the Local Plan in terms of overall hierarchy. It notes that (para 6.1 [CD6/3C]):

"...the Local Plan's approach is still to steer most development to the Main / Market Towns and Local Service Centres within North Warwickshire, where a wide range of services and facilities already exist and these facilities could be built upon to create more robust sustainable settlements. A limited amount of development is targeted to the smaller settlements which follow the recommendations of the Matthew Taylor Report which advocated more development in the rural areas, to assist in maintaining the vitality of the rural settlements. However development takes a cascade approach in the other settlements with very little development towards the wide countryside. This is also influenced to over 60% of the Borough being within the Green Belt. The existence of services could be set as a prerequisite for defining locations for new development in

order to have a realistic prospect of achieving more effective balanced and sustainable communities.”

- 1.13 It recommends a small number of changes with regard to some of the smaller settlements (e.g. to accommodate a new development boundary for Ridge Lane with Birchley Heath where previously there was none, and the retention of a development boundary for Shuttington even though it no longer has sufficient services and facilities to justify inclusion within the 3rd ranking group of settlements). However, at the strategic level of SA, these changes are not significant. The Settlement Sustainability Assessment also notes that Corley, Nether Whitacre, Middleton and Wishaw are washed over by the Green Belt and therefore have no development boundary.

Findings of the additional SA work

High growth alternative

- 1.14 The highest of the three growth alternatives prescribed by the Inspector is the delivery of 9,598 homes over the plan period, rounded up in Table 7 of the Local Plan to 9,600 homes [CD0/1]. Included in this figure are 3,104 new homes that have already been built in the first part of the plan period (1,069 homes), the remaining capacity on existing planning permissions as 1 April 2017 (1,135 dwellings), and an allowance for windfalls from 2018 to 2033 (900 homes). This leaves a balance of 6,496 homes, plus a 5% allowance to ensure flexibility, choice and competition in the market for land (325 homes), giving a total of 6,821 homes for which site allocations have been identified in the Local Plan.
- 1.15 The site allocations to deliver the remaining 6,821 homes have already been appraised through the SA of Policy LP39. This SA sets out the cumulative effects against each of the SA objectives of delivering housing development at all of the sites allocated in the Local Plan which, after taking into account housing completions since 2011, sites with planning consent, and a windfall allowance, have the capacity to deliver the 9,598 dwellings if all come forward and are completed by the end of the Local Plan period (2033). This is supported by the appraisal of each individual site allocation as summarised in Table 6.12 and paras 6.70 to 6.98 of the main SA Report [CD1/2], and the detailed appraisal matrices in Appendix 7 of the SA Report Appendices [CD1/2].
- 1.16 Additional SA work to consider variations to the site allocations set out in Policy LP39 has not been carried out because reasonable alternative sites have already been subject to SA and considered by the Council when deciding which sites to allocate in the Local Plan that is currently at examination [CD0/1].

Findings

- 1.17 The SA score for Policy LP39 are presented in **Table 1** below (reproduced from Table 6.12 of original SA Report [CD1/2]). This shows that cumulative significant positive effects are predicted against SA objective 1 (Services and facilities), SA objective 3 (Health), SA objective 4 (Housing) and SA objective 6 (Recreation). This is because the a number of the allocated sites are well located for existing services and facilities, and open space, and in total the amount of housing being provided will meet identified housing need.
- 1.18 Conversely, it was considered that potentially cumulative significant negative effects could arise with respect to SA objective 7 (Landscape), SA objective 8 (Cultural heritage), SA objective 9 (Biodiversity), SA objective 10 (Efficient land use), SA objective 11 (Pollution), and SA objective 16 (Waste). The potential significant negative effects in relation to landscape and efficient land use relate primarily to the extent of greenfield land that will be subject to development under the high growth alternative. The potential significant effects in relation to cultural heritage and biodiversity relate to the proximity of the allocated sites to historic assets and biodiversity designations. The potential significant effects in relation to pollution relate to a variety of factors, most notably proximity of the allocated sites to aquifer/groundwater vulnerability zones, and the potential loss of potentially best and most versatile agricultural land. The potential significant effect in relation to waste relates primarily to the use of greenfield land rather than previously developed land.

Table 1: SA Scores for Policy LP39: Housing Allocations

SA Objectives	LP39: Housing Allocations
1. Services and facilities	++
2. Vibrant communities	+
3. Health	++
4. Housing	++
5. Crime	0
6. Recreation	++
7. Landscape	--
8. Cultural heritage	--
9. Biodiversity	--?
10. Efficient land use	--
11. Pollution	--?
12. Climate change	-?
13. Energy efficiency	0
14. Natural resources	-
15. Sustainable transport	+
16. Waste	--
17. Local sourcing	0
18. Economy	0
19. Employment	+
20. Skills	+?/-?

1.19 The detail behind the cumulative effects is provided by the appraisal of each of the site allocations included in the Local Plan, as shown in **Table 2** below (reproduced from Table 6.12 of the original SA Report [CD1/2] but with site capacities added in a new second column as per Policy LP39 in the Submission version of the Local Plan [CD0/1]). This shows which specific sites were considered by the SA to give rise to potential significant effects, both positive and negative. It should be noted that the effects were identified using a criteria based approach based on assumptions as set out in Appendix 6 of the original SA Report [CD1/1]. These criteria did not distinguish effects in terms of the scale of the site allocation, except with respect to SA objective 4 (Housing), SA objective 7 (Landscape), SA objective 10 (Efficient land use), and SA objective 16 (Waste), although it should be noted that the greater the scale of the site allocations the greater the likelihood for significant effects across many of the SA objectives, e.g. the larger the allocation the greater the likelihood of habitat loss. The majority of the remaining SA objectives identified significant effects on the basis of proximity to sensitive environmental assets, or to existing services and facilities, irrespective of the size of the site allocation.

Table 2: SA Scores for Site Allocation Policies

Site	Site capacity	1: Services and facilities	2: Vibrant communities	3: Health	4: Housing	5: Crime	6: Recreation	7: Landscape	8: Cultural heritage	9: Biodiversity	10: Efficient land use	11: Pollution	12: Climate change	13: Energy efficiency	14: Natural resources	15: Sustainable transport	16: Waste	17: Local sourcing	18: Economy	19: Employment	20: Skills
Residential site allocations (policy LP39)																					
H1	531	-	0	++	++	0	++	--?	-?	--	--	--?	--?	0	-	+	--	0	0	++	-?
H2	1282	0?	0	++	++	0	+	--?	--	--	--	--?	--?	0	-	+	--	0	0	++	0
H3	46	+	+	+	+	0	+	-	0	-?	-	--?	--?	0	-	+	-	0	0	++	-?
H4	25	++	+	++	+	0	++	0	-?	-?	+	0/-?	0	0	-	++	0	0	0	+	+
H5	40	++	+	++	+	0	++	-	-?	-?	-	0/--?	0	0	-	++	-	0	0	+	-?
H6	30	++	0	++	+	0	+	-	-?	-?	-	-?	0	0	-	++	-	0	0	+	+
H7	2000	++	+	++	++	0	++	-?	--	--	--	--?	0	0	-	+	--	0	0	++	++?
H8	32	--	0	+	+	0	++	-	?	-?	-	--?	0	0	-	-	-	0	0	-	-?
H9	9	++	0	+	+	0	++	-	?	0?	-	0/-?	0	0	-	+	-	0	0	+	+
H10	14	++	+	++	+	0	++	0	--	--?	+	0/--?	0	0	-	+	0	0	0	+	+
H11	9	0	0	++	+	0	+	-	0	--?	-	--?	0	0	-	-	-	0	0	-	-?
H12	7	0	0	+	+	0	+	-	0	--?	-	--?	0	0	-	-	-	0	0	-	-?
H13	1270	0	0	++	++	0	++	--?	-	--	--	--?	0	0	-	+	--	0	0	+	-?
H14	141	0	0	+	++	0	-?	--?	?	0?	--	-/?	--?	0	-	-	--	0	0	-	-
H15	47	++	+	++	+	0	++	-?	-	-?	-	0/-?	0	0	-	+	-	0	0	+	+
H16	7	+	+	+	+	0	++	-	0	--?	-	0/-?	0	0	-	+	-	0	0	+	-?
H17	60	0	+	++	+	0	++	0	?	--?	+	-?	0	0	-	+	0	0	0	+	-?

Site	Site capacity	1: Services and facilities	2: Vibrant communities	3: Health	4: Housing	5: Crime	6: Recreation	7: Landscape	8: Cultural heritage	9: Biodiversity	10: Efficient land use	11: Pollution	12: Climate change	13: Energy efficiency	14: Natural resources	15: Sustainable transport	16: Waste	17: Local sourcing	18: Economy	19: Employment	20: Skills
H18	120	+	+	++	++	0	++	--?	?	--?	--	-?	0	0	-	+	--	0	0	+	0?
H19	400	++	+	++	++	0	++	--?	--	--?	--	--?	0	0	-	+	--	0	0	+	++?
H20	450	0	+	++	++	0	++	--?	?	--?	--	--?	0	0	-	-	--	0	0	-	+
H21	48	++	0	++	++	0	++	-	-?	--?	-	-/?	0	0	-	+	-	0	0	+	-?
H22	12	+	+	+	+	0	++	-	?	-?	-	--?	0	0	-	+	-	0	0	+	-?
H24	21	++	+	+	+	0	++	-	--	-?	-	-?	0	0	-	+	-	0	0	+	+
H25	24	+	+	+	+	0	++	-	-?	--?	-	-?	0	0	-	+	-	0	0	+	-?
H26	88	+	0	++	+	0	++	-	0	-?	-	--/?	0	0	0	+	-	0	0	+	+
H27	80	++	0	++	+	0	++	-	-	-?	-	--/?	0	0	-	+	-	0	0	+	+
H28	28	+	+	+	+	0	++	-	0?	-?	-	--?	0	0	-	+	-	0	0	+	-?
Reserve residential sites (policy LP39a)																					
RH1	360	+	0	+	++	0	+	--?	?	--?	--	-?	0	0	-	+	--	0	0	+	-?
RH2	388	++	+	+	++	0	+	--?	?	--?	--	-?	0	0	-	+	--	0	0	+	++?

- 1.20 It should also be noted that, since the publication of the original SA Report [CD1/2] further detailed assessment work with respect to the historic environment has taken place for a small number of the site allocations where Historic England raised particular concerns. These sites are:
- H2 Land to north west Atherstone off Whittington Lane, Atherstone.
 - H7 Land to the east of Polesworth and Dordon.
 - H15 Land at Church Farm, Baddesley.
 - H24 Manor Farm, Newton Regis.
- 1.21 The findings of this assessment have been published in the 'North Warwickshire Historic Environment Assessment 2019' [AD1]. This work has led to proposed Main Modifications as published in 'Schedule of Main Modifications to be made due to HEA' [AD1A]. The proposed Main Modifications have been agreed with Historic England and, on this basis, it is assumed that the risk of harm to the historic environment is considered to be acceptable to Historic England and, therefore, significant adverse effects will be avoided, or where this is not possible can be mitigated.
- 1.22 The updated Settlement Sustainability Assessment [CD6/3C] notes that many settlements, from the largest to the smallest, are struggling to retain their services and facilities. Therefore, the high growth alternative is most likely to deliver the growth needed to stimulate demand and slow down this trend, and it could even help to reverse it through investment in existing and new services and facilities, particularly through the larger scale allocations.
- 1.23 This alternative would make the greatest contribution to helping to meet the unmet needs of Birmingham. Although none of the large scale developments proposed in the Local Plan are within walking distance of stations on the rail network into Birmingham city centre, development at H13 (Land west of Robey's Lane, adjacent Tamworth) would give relatively close access to Tamworth and Wilnecote stations to access trains to Birmingham New Street. Likewise development at Polesworth and Dordon is relatively well located to Junction 10 of the M42, although car travel is the least sustainable form of regular travel and there are congestion issues on the A5 at peak hours. The Local Plan acknowledges the need for substantial investment in this route in Policy LP28 (Strategic Road Improvements). H14 (Site at Lindridge Road, adjacent Langley Sustainable Urban Extension, Wishaw) links into the proposed development at Wishaw allocated in the Birmingham Local Plan. Smaller housing allocations are proposed at Coleshill, which is surrounded by Green Belt, and at Water Orton. In addition, site allocations at Baddesley Ensor/Grendon, Warton and Wood End might prove attractive to people from Birmingham due to their relatively close proximity to road connections. Together, these allocations have the capacity to deliver over 4,000 dwellings.
- 1.24 Although these site allocations are the ones that are best placed to meet the needs of the Birmingham population, there are no guarantees that these are the locations where they will choose to live. People will be seeking different experiences in terms of choice of home and community and may be willing to commute further to meet their aspirations. Some will be happy to live in a new home on a new development. Others will prefer to live in a village or in a town. Some will be happy with new build whereas others will want period homes. Therefore, there could be a displacement effect whereby people from Birmingham may purchase or rent homes that would otherwise have been the homes of North Warwickshire residents, with the North Warwickshire residents moving to new developments within the Borough as a result.
- 1.25 People will live where they want and can afford to live. The key objective in terms of socially oriented SA objectives is therefore to provide enough homes of different types, tenure and affordability to meet all needs. Larger developments are more likely to provide this choice, and also be able to contribute to investment in services and facilities. But the greater the impact they are likely to have on the environment, although the extent and significance of the impacts can be reduced by sensitive design.
- 1.26 In summary, the high growth alternative is likely to result in the most significant negative effects (primarily with respect to the environmentally focused SA objectives), and the most significant positive effects (primarily with respect to the social and economic focused SA objectives).
- 1.27 It should be noted that mitigation is provided within the Local Plan, which should help to avoid or reduce the potential significant adverse effects identified, either within site allocation policies or

the generic development management policies included within the Local Plan. The cumulative effects of the Submission version of the Local Plan, taking into account all forms of development and mitigation provided for in policies in the Local Plan is shown in **Table 3**. This summarises the description given in paras 6.111 to 6.177 of the original SA Report [CD1/1].

Table 3: Cumulative effects of the Submission version of the Local Plan

SA Objectives	Cumulative effects
1. Services and facilities	+
2. Vibrant communities	+
3. Health	++
4. Housing	++
5. Crime	0
6. Recreation	++
7. Landscape	+/--
8. Cultural heritage	+/--
9. Biodiversity	+/--
10. Efficient land use	+/--
11. Pollution	--
12. Climate change	+/-
13. Energy efficiency	+
14. Natural resources	-
15. Sustainable transport	++
16. Waste	-
17. Local sourcing	0
18. Economy	++
19. Employment	++
20. Skills	+

Low growth alternative

- 1.28 The lowest of the three growth alternatives prescribed by the Inspector, being 5,808 dwellings over the plan period, represents the amount of growth required to meet North Warwickshire's needs, and to help meet the needs of Tamworth Borough and Coventry and Warwickshire. This growth alternative would not meet any of Birmingham's housing needs, and represents nearly a 40% reduction in the total amount of housing to be delivered from that provided for in the Local Plan.
- 1.29 Under this alternative, sites with capacity for 2,839 dwellings would be required to be allocated (after taking into account housing completions since 2011, sites with planning consent, and an unchanged windfall allowance of 900 dwellings 2018 to 2033) ($5,808 - 3,104 = 2,704$ plus 5% flexibility buffer of 135 = 2,839 dwellings). It would be feasible for a number of the allocations in the Local Plan to be deleted in order to bring the total housing number down to 5,808 dwellings.
- 1.30 Given that the Spatial Strategy in the Local Plan follows the Settlement Hierarchy as set out in Policy LP2, there are numerous combinations of allocations currently in the Local Plan that could be deleted or reduced in scale to deliver the low growth alternative. The SA has therefore taken a

proportionate approach by appraising the principle of deleting allocations and comments in broad terms on how different combinations of site allocations sufficient to meet the low growth alternative perform against the SA objectives.

Findings

- 1.31 In order to deliver the lower level of growth under this alternative, one approach would be to retain those allocations that perform most favourably against the SA objectives. For example, it would be possible to delete all those allocations that were scored in the original SA Report [CD1/2] as having the potential for significant negative effects against the greatest number of SA objectives. If this approach were to be adopted, it would lead primarily to the deletion of the largest site allocations, primarily by virtue of their scale (i.e. the larger site allocations involve the greatest greenfield land take and therefore have the potential for the greatest effects on habitats, landscape, cultural heritage, etc., compared to the smaller sites).
- 1.32 The six sites with the highest number of significant negative effects against SA objectives (five or more, and being primarily environmental SA objectives), are also those with the highest dwelling capacities (sites H1, H2, H7, H13, H19 and H20). The remaining 21 sites with significant negative effects recorded against four or fewer SA objectives have capacity for a total of only 888 dwellings, which is some distance short of the 2,839 dwellings required under this alternative. Therefore, even to reach the low growth alternative of 2,839 dwellings would require one or more of the larger site allocations to be added to the smaller site allocations. This could be achieved, for example, by also allocating H7 (2,000 dwellings), or without H7, by the allocation of at least two and sometimes three of the other larger sites.
- 1.33 On the other side of the equation, the larger sites tend to score well in terms of significant positive effects against other SA objectives (primarily social and economic), with the same six sites all falling into the top half of those sites likely to deliver significant positive effects. It should also be noted that the larger sites are those that are more likely to deliver or generate funding for investment in community services and facilities, such as health and education.
- 1.34 An alternative approach would be to rely on larger site allocations, and delete the majority of the smaller site allocations. If this approach were to be adopted it would result in the concentration of significant effects, both positive and negative, at those locations where large scale development takes place. The downside of this approach would be that the smaller settlements in the settlement hierarchy would not receive the development that they need to maintain their vitality and viability (as evidenced by the Settlement Sustainability Assessment [CD6/3C]), except by virtue of windfall development. Also, it would put a lot of onus on the larger site allocations to deliver in the short and medium term. If for any reason these do not come forward as planned, then there would be little in the way of other allocations coming forward to deliver the homes needed. Smaller allocations, although they may not result in significant investment in services, facilities and infrastructure, are often quicker and easier to deliver and provide a constant stream of housing delivery.
- 1.35 Given that this alternative is designed to help meet the needs of Tamworth Borough and Coventry and Warwickshire, it would make sense to retain some or all of site allocation H13 (Land west of Robey's Lane) as it is adjacent to Tamworth, and some or all of site allocations H19 (Land between Church Road and Nuneaton Rd, Hartshill), and H20 (Land south of Ansley Common) as these can contribute to the wider needs of Coventry and Warwickshire, being close to the Borough of Nuneaton and Bedworth. These site allocations have potential significant positive and negative effects typical of all the larger allocations in the Local Plan.
- 1.36 However, together these have site capacities for 2,120 dwellings leaving only site allocations for 719 dwellings to be found elsewhere. If all of these are retained, this would seriously skew the bulk of development away from the main settlements in North Warwickshire, undermining the preferred spatial strategy, which is designed to deliver the Borough's own needs and sustain the vitality and viability of the Borough's main settlements. Therefore, the low growth alternative may require a reduction in the amount of development at these three locations in order to provide for a more sustainable balance of development across the Borough, and in particular at the Category 1 Market Towns of Atherstone with Mancetter and Polesworth with Dordon.
- 1.37 There are likely to be numerous options for reducing the scale of growth at these three locations – too many to consider the effects of different options in detail through the SA – however, in broad

terms, it is likely that reductions in the scale of development in any one location or a combination would result in equivalent reductions in the potential for adverse effects against the environmental SA objectives and positive effects against the economic and social SA objectives.

- 1.38 As the low growth alternative is not designed to meet the needs of Birmingham, it could be argued that site allocation H14 (Site at Lindridge Road, adjacent to Langley Sustainable Urban Extension, Wishaw) could be deleted. This site allocation has capacity for 141 dwellings and was scored as having one significant positive effect, and four significant negative effects. However, given the established need for districts and boroughs surrounding Birmingham to help to meet Birmingham's housing needs, it is difficult to conclude that this is a sustainable response. If it were to be adopted, it is likely that some of Birmingham's population would still look to find their homes within North Warwickshire, which would be likely to put pressure on housing prices due to lack of supply in relation to demand. This could have a knock-on impact on North Warwickshire's own residents, who would be faced with reduced housing choice and affordability.
- 1.39 Under the low growth alternative, it is not clear whether all of the employment land allocated in the Local Plan would need to come forward under the low growth scenario. The employment allocations in the Local Plan are for very specific needs, and the demand for significant tracts of employment land tends to be driven by regional demand (e.g. warehousing, distribution and logistics). The Employment Land Review Further Update [CD8/8] does suggest, though, that the more housing that is delivered, the more employment land is required and that under the low growth scenario just 36 ha of employment land would be required compared to 100 ha under the high growth scenario. Again, this would result in fewer significant negative effects against the environmentally focused SA objectives but also offer less scope to generate significant positive effects on the economically and socially focussed SA objectives influenced by economic growth.
- 1.40 In summary, the low growth alternative would undoubtedly reduce the risk of significant adverse effects to the primarily environmental SA objectives that have been identified for the high growth alternative, notwithstanding any mitigation built into the policies in the Local Plan. It would, though, also offer less scope to capitalise on the economic and social benefits of greater scales of growth. Simply put, where development would no longer need to take place, the effects would no longer materialise. However, even under the low growth alternative there would still be a need for the larger allocations, even if on a reduced scale. On the other hand, the low growth alternative would do nothing to respond to the unmet housing needs of Birmingham, and the benefits of development, particularly large-scale development, in terms of support for and investment in services, facilities and infrastructure, would also be reduced.
- 1.41 The mitigation included in policies in the Submission version of the Local Plan would continue to apply, which would help to avoid or reduce any significant adverse effects under the low growth alternative.

Middle growth alternative

- 1.42 The middle alternative prescribed by the Inspector would be the delivery of 7,963 dwellings on the basis of accommodating approximately 2,155 dwellings for Birmingham based on 2011 Census data related to the functional commuting relationship between the two areas. It would represent a 17% reduction in the total amount of housing to be delivered from that provided for in the Local Plan.
- 1.43 Under this option, sites with capacity for 5,102 dwellings would be required to be allocated (after taking into account housing completions since 2011, sites with planning consent, and an unchanged windfall allowance of 900 dwellings 2018 to 2033) $(7,963 - 3,104 = 4,859$ plus 5% flexibility buffer of 243 = 5,102 dwellings).
- 1.44 As with the low growth alternative, it might also be possible to achieve the lower figure by deleting a number of allocations currently included in the Local Plan. An alternative realistic and reasonable approach would be to plan for a lower rate of housing delivery whilst keeping all the allocations currently in the Local Plan. This would still represent a step-change above the completion rates experienced over recent years, but not as high as anticipated in the Local Plan. Housing completion rates over the last five years have averaged 232 dwellings per annum (dpa)¹

¹ Calculated for years 2013/14 to 2017/18 from rows under (c) in the table on page 9 of 'North Warwickshire's Five Year Housing Land Supply As at 31 March 2018 [CD8/13B]

compared to an average over the whole plan period of 362 dpa under this alternative (7,963 dwellings/22 years). To achieve an average of 362 dpa would require higher rates of completion in the remaining years of the plan period, because of lower completion rates in the plan period to date.

- 1.45 Therefore, the middle growth alternative was subject to SA assuming two different scenarios:
1. The deletion in principle of some of the allocations in the Local Plan, but not identifying the specific allocations that would be deleted. This enabled the SA to comment in broad terms on how different combinations of site allocations sufficient to meet the middle growth alternative might perform against the SA objectives, similar to the approach applied to the low growth alternative.
 2. The retention of all the allocations, but assuming a slower build out rate than currently assumed in the Local Plan, but significantly higher than has been the case in recent years. Under this scenario, the capacity of the sites would remain the same, but the assumption for how many homes would be built during the Local Plan period at each site would be 25% lower than the capacity figures suggest (i.e. $(6,821 - 5,102)/6,821 \times 100\%$). In practice some sites may be built out in their entirety within the Local Plan period whilst others may lag further behind. This scenario allows greater flexibility for sites to come forward. (Note, this scenario could in principle also apply to the low growth alternative, but given the extent of the reduction in dwellings required under the low growth alternative, it would not be a realistic or practical approach on its own, as deletions of some site allocations would still be required).

Findings

- 1.46 Adopting the first scenario of deleting allocations would result in similar effects as the low growth alternative, albeit less marked. There would be a reduction in the number and scale of significant negative effects (primarily in relation to the environmentally focused objectives) compared to the high growth alternative, but more than the low growth alternative. Conversely, the middle growth alternative is likely to deliver less in the way of significant positive effects against the social and economic objectives compared to the high growth alternative, but more than the low growth alternative. However, this is less certain given that the middle growth option is linked to functional commuting patterns between North Warwickshire and Birmingham (although the additional growth provided for in the Submission version of the Local Plan was also based on commuting patterns plus migration, suggesting a discrepancy between the two analyses).
- 1.47 Delivering an additional 5,102 dwellings could not be achieved without including nearly all of the larger site allocations being included within the Local Plan. The cumulative total capacity of all the smaller site allocations (i.e. those less than 5 ha in size) is 627 dwellings which is, by some distance, not enough to meet the required housing figure. It might be possible to delete some of the smaller allocations and reduce down in scale some of the larger allocations, but it would still require a significant amount of land allocated for housing.
- 1.48 The reduction in the amount of housing under this alternative is due to a reduced contribution to meet Birmingham's unmet housing need. It would still need to make a contribution, and therefore it would make sense for those allocations most closely or conveniently located for Birmingham would be retained. These are site allocation H14 (Site at Lindridge Road, adjacent to Langley Sustainable Urban Extension, Wishaw), and the smaller site allocations at Coleshill and Water Orton. Together, these have a capacity of 284 dwellings.
- 1.49 Therefore the remainder of the Borough's contribution to Birmingham's unmet housing need would have to be met from other site allocations elsewhere in the Borough. People from Birmingham could choose anywhere to live in the Borough. For ease of commuting into Birmingham, it might be considered more likely that they would choose homes in the site allocations to the east of Tamworth and at Polesworth and Dordon, although this could not be guaranteed.
- 1.50 The second scenario would be to retain all site allocations, but to accept a slower build out rate. Under this scenario, the effects in the long-term would be the same, but they would take longer to materialise. This approach may allow for advances in technology and ways of living (e.g. carbon neutrality) to be incorporated into developments over time, so by the time that they are built out they could be more sustainable in environmental terms. Also, a slower rate of build may

be more realistic in terms of delivery, given past experience of build-out rates, and pressures on the construction industry to deliver across the country – there is a limit to how much housing delivery can be stepped up at a time of virtually full employment. A slower build rate may also more closely match the business models of the private sector construction industry, who will require a satisfactory return on their investment to reward investors.

- 1.51 The flip-side of this is that slower delivery could result in higher prices than would otherwise be the case, and there would be delays in securing investment in existing and new services and facilities, such that the developments would take longer to become fully functioning, potentially affecting social cohesion.
- 1.52 It is of note that the GL Hearn Wood 'Greater Birmingham HMA Strategic Growth Study' [CD8/27], reported that "*there are particular constraints to introducing further residential land supply in North Warwickshire, which is already planning in its emerging Local Plan to deliver housing growth of 1.8% pa*" (para 9.67). This suggests that the amount of housing growth currently included in the proposed Submission version of the Local Plan could be a challenge to deliver, and includes a growth rate that is in excess of all other districts and boroughs covered by the study. The middle growth alternative would bring it more into line with planned delivery rates of other districts and boroughs in the sub-region.
- 1.53 The middle growth alternative could result in a reduced need for employment land allocations. The closest scenario in the Employment Land Review Further Update [CD8/8] is Scenario C, which suggests that 82 ha of employment land would be required. This is a relatively small reduction from the employment land requirement under the high growth alternative, but could help to contribute to a small reduction in potential significant negative environmental effects.
- 1.54 In summary, the effects of the middle growth alternative would be likely to fall between the effects of the high growth and the low growth alternatives, both for positive effects and negative effects. Whilst making a contribution to Birmingham's housing needs, this would not be as great as the high growth option, although it would be well related to the functional commuting relationship between the two areas as put forward by the Inspector.
- 1.55 The slower build rate scenario may be the more realistically achievable approach, and would generate effects against the SA objectives over a more drawn out period, and the site allocations if they remained the same size would contribute beyond the Submission Plan period when longer term growth would be subject to review.
- 1.56 The mitigation included in policies in the Submission version of the Local Plan would continue to apply which would help to avoid or reduce any significant adverse effects, under the middle growth scenario.

Comparative summary

- 1.57 The overall purpose of the additional SA work is to help inform judgements about which alternative is the most sustainable against the SA objectives. The high growth alternative is fixed as this is the alternative in the Submission version of the Local Plan. There are a number of different ways that the low growth and the middle growth alternatives could be delivered. Notwithstanding this, it is likely that both the middle growth and the low growth alternative would show similar scores against the SA objectives to the high growth alternative. This is because each alternative would generate significant effects, even under the low growth alternative. Therefore, the alternatives have not been given scores against each SA objective, because this would not obviously reveal variances between the alternatives.
- 1.58 Instead, it is considered more helpful to explore the nuances of the alternatives and to draw out the differences between them, using a combination of the findings of the SA of the site allocations and professional judgement.
- 1.59 **Table 4** below summarises in comparative terms how the three alternatives perform. The middle growth alternative is divided into two scenarios – on the basis of deletion/reduction in site allocations, and on the basis of slower build out rates.

- 1.60 The alternatives have been ranked to show, using professional judgement, which performs best, and which least well against each SA objective. A ranking of '1' indicates that the alternative is the best performing, and a ranking of '4' the poorest performing in relative terms.
- 1.61 It is not appropriate to total up the scores, because there are more SA objectives that address environmental topics than social and economic topics. To do so, would create a bias towards environmental factors. Sustainable development is about achievement and balance across all three pillars – social, economic, and environmental.

Table 4: Comparative appraisal of the growth alternatives (Ranking: 1 = performs best against SA objective)

SA Objectives	High growth	Middle growth: delete/ reduce site allocations	Middle growth: slower build out rates	Low growth	Comments
1. Services and facilities	1	2=	2=	4	The high growth alternative is most likely to generate the support for and investment in existing, improved and new services and facilities through developer contributions and achievement of critical mass. The low growth alternative is the least likely to do this for the opposite reasons. There is not much to choose between the two middle growth scenarios. The deletion of site allocations or reduction in the capacity of some of the site allocations is likely to provide a greater concentration of investment in certain locations, whereas the slower build out rates is likely to be slower in providing support and investment in any one location but it is likely to provide this support and investment across a greater number of communities/locations.
2. Vibrant communities	1	2=	2=	4	Although the scale of development under the high growth alternative is likely to involve the greatest impacts in terms of construction and change of character to settlements, especially where the larger allocations are concerned, it is the most likely to provide opportunities for people to live and work within their communities and to support local jobs, services and facilities. It is also most likely to provide this support across the widest number of communities. The low growth alternative will see less in the way of change in character, but also less in terms of support and investment in local communities. The middle growth alternative scenarios are likely to be in-between with not much to choose between them.
3. Health	?	?	?	?	It is difficult to make a judgement between the alternatives in terms of health objectives. There are pros and cons to each. The high growth alternative is most likely to deliver homes and jobs (two of the most important factors in facilitating good health). It is also most likely to generate investment in health care facilities, but at the same time could place extra strain on existing services. It is also likely to lead to the greatest impacts from construction activity. The low growth alternative will have least impacts from construction, but will deliver less in the way

SA Objectives	High growth	Middle growth: delete/ reduce site allocations	Middle growth: slower build out rates	Low growth	Comments
					of jobs and homes. The middle alternatives fall in-between. Health will also be influenced by how developments are designed, for example in terms of their recreation and sport facilities, and their encouragement for walking and cycling.
4. Housing	1	2=	2=	4	Performance against this objective is determined by how well each alternative responds to housing needs. For example, there are different interpretations of the amount of housing that North Warwickshire needs to provide for the unmet housing needs of Birmingham. On balance, it is considered that the high growth alternative performs best, because it should deliver the greatest amount of housing and provide for choice in terms of location, type and tenure. It is also the most likely to reduce pressure on house prices through greater supply to match demand. The low growth alternative will do nothing to contribute to Birmingham's unmet housing needs, but this will not stop residents of Birmingham seeking to live in North Warwickshire, which could have impacts on the ability of North Warwickshire residents to buy or rent homes that meet their needs or desires. The middle growth alternatives will make a contribution to Birmingham's needs and therefore will make a more positive contribution than the low growth alternative, but not as significant as the high growth alternative.
5. Crime	?	?	?	?	It is not possible to distinguish in a meaningful way whether the scale of growth will affect crime rates per capita. The creation of jobs and affordable housing may help, but on the other hand it could introduce more opportunities for crime. The most important response is to design-out crime as far as possible by the way that development is designed and integrated into existing communities.
6. Recreation	1	2=	2=	4	The high growth alternative is the most likely, and the low growth alternative the least likely, to result in the loss of countryside to development, and therefore this could lead to a reduction in the opportunities to carry out informal recreation close to their homes. However, it is considered that this is outweighed by the potential support for existing sport and recreation facilities provided by the high growth

SA Objectives	High growth	Middle growth: delete/reduce site allocations	Middle growth: slower build out rates	Low growth	Comments
					alternative, plus investment in new formal and informal sport and recreation facilities, including play areas for children, designed open space within development, cycling and walking. The middle growth scenarios again falls in-between, with little to choose between them.
7. Landscape	4	2	3	1	The high growth alternative will result in the highest amount of development on greenfield land, and is therefore most likely to result in the greatest landscape impacts. The low growth would result in the lowest amount of development on greenfield land and therefore the least landscape impacts. Of the middle growth alternatives, the slower build out rates would eventually involve greater use of greenfield land (and hence landscape impacts) than the deletion of some site allocations or reduction in capacity of others. There are no designated landscapes that would be affected under any of the scenarios, so the impacts would be quite localised in all cases. In addition, sensitive design can help to reduce landscape impacts, and create new land/townscapes that can be valued by future generations.
8. Cultural heritage	4	2	3	1	The high growth alternative would result in the greatest amount of development and therefore the greatest risk of harm to historic assets. It could, though, reveal unknown historic assets for recording and protection through the development design process. The low growth alternative would result in the least development and therefore the lowest risk of harm to historic assets. For the middle growth alternative, the deletion of site allocations/reduction in capacities scenario is likely to result in the long-term in less land take and therefore risk of harm to historic assets. It should be noted, however, that Historic England have agreed the wording of proposed Main Modifications to address the issues identified with respect to four specific site allocations in the high growth alternative where they raised concerns, which were assessed in more detail by the 'North Warwickshire Historic Environment Assessment 2019' [AD1], and these would follow through as relevant to all the other alternatives.

SA Objectives	High growth	Middle growth: delete/reduce site allocations	Middle growth: slower build out rates	Low growth	Comments
9. Biodiversity	4	2	3	1	<p>The high growth alternative will result in the greatest amount of development of greenfield land and the habitats and species they contain. It will also result in a greater amount of development in close proximity to designated habitats, and has the potential to disrupt ecological networks. It is also most likely to result in disturbance from recreation, and damage from pollution, due to increased people pressure, traffic and run-off. On the other hand, intensively farmed agricultural land can be poor in terms of biodiversity, and the creation of new habitats and green infrastructure as part of the design process can deliver biodiverse habitats and ecological networks within development. The low growth alternative is likely to have the least impact on existing habitats and species, but will not offer the opportunities for investment in habitat creation and green infrastructure of the high growth alternative. The loss of existing habitats, increased amount of development in close proximity to designated habitats, and increased disturbance and pollution are considered to outweigh the opportunities for habitat creation, although this judgement is finely balanced. The scenario of reduced allocations/capacities in the middle growth alternative is considered to perform slightly better than the slow build-out rate scenario for similar reasons.</p>
10. Efficient land use	4	2	3	1	<p>Under all alternatives, it is assumed that the objective will be to re-use previously developed land and buildings where possible. The high growth alternative performs least well purely on the basis that it will result in the most greenfield land take, but also because the increased availability of greenfield land allocations, may take a bit of pressure of developers to prioritise the use of brownfield land, which can be more challenging to develop. The low growth alternative performs the best for the opposite reasons of the high growth alternative. The middle growth scenario of deleting/reducing capacity of site allocations is likely to use less greenfield land and put greater pressure on developers to use brownfield land than the slower build out rate scenario.</p>

SA Objectives	High growth	Middle growth: delete/reduce site allocations	Middle growth: slower build out rates	Low growth	Comments
11. Pollution	4	2	3	1	The high growth alternative is most likely to generate increased traffic and hence air pollution, take up of best and most versatile agricultural land, urban run-off, and place pressure on waste water treatment works. On the other hand, the high growth alternative is most likely to generate developer contributions to address pollution issues, helping to mitigate some of these effects. The low growth alternative is likely to generate a smaller increase in pollution for the opposite reasons. The delete/reduce capacity of site allocations scenario for the middle growth alternative is likely to deliver less dispersed development than the slower build out rate scenario, as well less agricultural land take, and greater concentration of development allowing for more focused developer contributions to go towards mitigation.
12. Climate change	4	2=	2=	1	With respect to the location of growth, this SA objective focuses on the extent to which flood risk will be increased by development (flood risk is forecast to increase as a result of extreme weather events arising from climate change). The majority of site allocations would not be in Flood Risk Zone 3, so this is not a major issue for any of the alternatives. However, there are four site allocations which would be delivered under the high growth alternative that do include some of Flood Risk Zone 3. These are currently subject to additional assessment work as agreed between the Council and the Environment Agency. The other alternatives would provide greater scope to avoid Zone 3, although this depends upon which site allocations would be included under each alternative. The total capacity of these sites is 2,000 dwellings, so even under the middle growth scenario, some site allocations would include Flood Zone 3. Theoretically, the low growth alternative could deliver development without any need to include Flood Zone 3, but there may be other sustainability reasons that would mean that they are still allocated. In all instances, it should be possible to deliver carefully-designed development that avoids the areas at greatest risk of flooding through the design of development.

SA Objectives	High growth	Middle growth: delete/reduce site allocations	Middle growth: slower build out rates	Low growth	Comments
13. Energy efficiency	1	3	2	4	<p>This SA objective relates primarily to energy efficiency in built development and providing for low carbon and renewable energy development. The high growth alternative is most likely to generate support for more significant investment in energy efficiency, low carbon and renewable technologies, with the larger scale development creating the economies of scale necessary for initiatives capable of saving more carbon, such as decentralised heat networks. There is not much to choose between the two middle growth scenarios. The deletion of site allocations or reduction in the capacity of some of the site allocations is likely to create fewer opportunities for significant investment in energy efficiency initiatives. The scenario accepting a slower build out rate may allow for advances in technology and ways of living (e.g. carbon neutrality) to be incorporated into developments over time, so by the time that they are built out they could be more sustainable in environmental terms. The low growth alternative is least likely to provide opportunities for investment in low carbon and renewable technologies due to the smaller scale of development.</p>
14. Natural resources	4	2	3	1	<p>This SA objective focuses on the potential sterilisation of mineral resources through development. The SA of the site allocations under the high growth alternative found that all sites are within, or within 250m of, a Minerals Safeguarding Area. Therefore the growth alternatives have been scored on the basis of the amount of greenfield land take each is likely to involve (and hence potential mineral resources), with the high growth alternative resulting in the greatest land take, and the low growth alternative the least. In practice, it is unlikely that this will be a major issue, because all site allocations are within or adjacent to existing settlements, and it is unlikely that minerals development will be proposed to in close proximity to residential areas. However, the development of sites for housing could provide opportunities to extract mineral resources present on site as part of the development process.</p>

SA Objectives	High growth	Middle growth: delete/reduce site allocations	Middle growth: slower build out rates	Low growth	Comments
15. Sustainable transport	1	2	3	4	<p>The high growth alternative is most likely to generate the greatest volume of traffic, and the low growth alternative the least volume of traffic. However, as was described in the updated Settlement Sustainability Assessment [CD6/3C], there has been a loss of bus services over recent years (although some routes have seen an improved frequency of service). The high growth alternative offers the greatest opportunity to create a critical mass of demand to support and invest in public transport services, and may also help lever in funding to address highways upgrading issues to address congestion. It will also provide opportunities to improve the cycling and walking network. On balance, the potential for increased investment in sustainable transport modes is considered to outweigh the overall growth in traffic, although this is finely balanced. The low growth alternative, although it is likely to generate the least traffic, is the least likely to support existing and new public transport services. The deleted/reduced capacity of site allocations scenario under the middle growth alternative is considered to perform more strongly than the slower build out rate scenario, as it will provide for more concentrated and earlier investment where development takes place.</p>
16. Waste	4	2	3	1	<p>The high growth alternative is likely to generate the highest amount of waste and the low growth alternative the least, and it is less likely to incentivise the use of existing land and buildings and re-use the materials that these contain. The delete/reduced capacity of site allocations scenario under the middle growth alternative is likely to result in less greenfield land take in the long-run, and could give greater incentive to developers to re-use brownfield land than the slower build out rates alternative. Furthermore, accepting a slower build out rate may allow for advances in technology and ways of living (e.g. circular economy) to be incorporated into developments over time, so by the time that they are built out they could be more sustainable in environmental terms.</p>

SA Objectives	High growth	Middle growth: delete/ reduce site allocations	Middle growth: slower build out rates	Low growth	Comments
17. Local sourcing	?	?	?	?	It is not considered possible to make a judgement between the alternatives in respect of this SA objective.
18. Economy	1	2=	2=	4	The high growth alternative is likely to provide the greatest catalyst for economic activity in North Warwickshire, temporarily through construction work and use of local suppliers, and in the longer-term by accommodating a higher population who will use the goods and services provided by North Warwickshire's businesses. In addition, it is the alternative most likely to provide for the highest addition of employment land allowing for new business investment. The low growth alternative is the least likely to strengthen the local economy for the opposite reasons. The two middle growth scenarios are likely to deliver similar inputs into the local economy.
19. Employment	1	2=	2=	4	The scores for employment are similar for the economy, following the same rationale. The greater the stimulus for economic activity the higher the likelihood of job creation and a diverse choice of jobs. Hence, the high growth alternative performs strongest and the low growth alternative the least well.
20. Skills	1	2=	2=	4	The high growth alternative is most likely to provide for a range of training and employment opportunities, plus investment in educational facilities and courses, and is therefore the most likely to help develop the skills base of North Warwickshire's population. The low growth alternative is the least likely to achieve these outcomes, with the middle growth alternative scenarios in-between.

Cross-boundary cumulative effects

- 1.62 The SA of the Submission version of the Local Plan carried out an assessment of the cross-boundary cumulative effects with neighbouring districts and boroughs (paras 6.178 to 6.184 [CD1/1]). This found that:
- The development of a significant proportion of both Tamworth Borough Council's and the Greater Birmingham and Black Country HMA housing and employment needs with North Warwickshire Borough is likely to have cumulative significant positive effects in relation to the following SA objective 4 (Housing) and SA objective 19 (Employment).
 - Development within the neighbouring Districts close to the administrative boundary of North Warwickshire have the potential to generate cumulative significant negative effects, particularly in relation to SA objective 7 (Landscape), SA objective 8 (Cultural heritage), SA objective 9 (Biodiversity), SA objective 10 (Efficient land use) and SA objective 12 (Climate change).
 - Traffic generated by development proposed through the North Warwickshire Local Plan could combine with traffic increases from development in neighbouring authorities to impact upon key commuting routes into Coventry and Birmingham which could result in cumulative significant negative effects on SA objective 11 (Pollution), SA objective 12 (Climate change), SA objective 15 (Sustainable transport).
 - Strategic employment and retail allocations along the region's main transport links have the potential to attract North Warwickshire residents which has the potential to generate adverse effects of the viability of North Warwickshire Borough's employment sites and town and village centres, with the potential for cumulative negative effects in relation to SA objective 1 (Services and facilities), SA objective 18 (Economy) and SA objective 19 (Employment), although it was difficult to determine whether these effects could be significant.
 - There is the potential for synergistic significant positive effects on SA objective 1 (Services and facilities), SA objective 18 (Economy) and SA objective 19 associated with the combined effects of multiple employment and retail allocations in the region helping to achieve a critical mass that will attract and retain growth industries and higher skilled employees.
- 1.63 It is difficult to predict what the cross-boundary cumulative effects of the middle and low growth alternatives might be. In principle, it could be assumed that cumulative negative effects might be reduced and cumulative positive effects also reduced. However, if the contribution of North Warwickshire to the unmet needs of Birmingham is reduced, it is reasonable to assume that other districts or boroughs will need to make a greater contribution instead to make good the difference. Although the cumulative effects on North Warwickshire might be reduced, this would result in their potentially being experienced in other districts and boroughs instead. Without a detailed assessment at a sub-regional level of the alternative scenarios, it is not possible to determine the comparative effects on sustainable objectives.

Conclusion

- 1.64 It can be seen from the above appraisal commentary that the high growth alternative is likely to result in the most significant positive effects against the primarily social and economic SA objectives and the most significant negative effects against the primarily environmental objectives. The low growth alternative would result in the opposite, performing least well against the social and economic SA objectives, but performing best against the environmental SA objectives. The middle growth alternative performs in-between the high and low growth alternatives.

- 1.65 The low growth alternative could be considered not to be a reasonable alternative, because it makes no contribution towards the unmet housing needs of Birmingham. Although this alternative would have less in the way of environmental impacts, it does not achieve the social objective of providing sufficient housing to meet the needs of the sub-region. In any event, if this alternative were to be pursued, it would not stop some of Birmingham's population seeking housing in North Warwickshire, which could have knock-on impacts in terms of meeting the housing needs of North Warwickshire's own residents. It may therefore be sensible to rule this alternative out.
- 1.66 The choice between the high growth alternative and the middle growth alternative will largely come down to which option most accurately reflects the contribution that North Warwickshire needs to make to providing for Birmingham's unmet needs, and the extent to which this is deliverable in practice in terms of build out rates. The middle growth alternative suggests a lower amount of housing is required to be delivered by North Warwickshire than the higher growth alternative. The higher growth alternative may well be at the limit of what can realistically be expected to be delivered. The middle growth rate would allow for slower build out rates and potentially greater flexibility. Although the SA has identified a number of significant effects against the environmental SA objectives under both alternatives, and that these are likely to have the greatest impact under the high growth alternative, the mitigation safeguards provided in policies in the Submission version of the Local Plan help to avoid and reduce these effects.
- 1.67 Inevitably, the final determination about which of the alternatives is the most sustainable comes down to the weighing up of the positive effects against the negative effects, and this in turn needs to be informed by an agreement over what contribution North Warwickshire needs to make to Birmingham's unmet housing needs, and its deliverability. In our view, the difference in effects for the environmental SA objectives between the high and the middle growth alternatives are not that marked, and therefore the priority in sustainability terms should be to ensure that North Warwickshire's contribution to the unmet housing needs of Birmingham is fully achieved, so long as it is deliverable. The only qualification to this would be if there are other districts and boroughs that can make a greater contribution with less in the way of environmental effects on the environment, and with sufficient certainty of deliverability, but this is an analysis that is beyond the scope of this SA because it would need to be undertaken on a sub-regional scale.

LUC
25th February 2019