

From: Fox, Mike
Sent: 04 March 2015 15:51
To: External Email for Programme Officer
Cc: Phillips, Rebecca (Inspector)
Subject: Tamworth Local Plan Examination

Hi Amanda,

Further to the Council's request for clarification in respect of my initial considerations of the Sustainability Appraisal (SA) and in view of the potential work and time implications for the Examination, I set out below, without prejudice, some of the matters that will need to be explored during the Examination.

1. Has the Plan strategy been informed by consideration of relevant and reasonable alternatives?

Whilst I accept that the Local Plan cannot assess specific sites outside Tamworth, I consider that there needs to be an SA option which assesses the impact of the full OAHN for Tamworth being delivered. This would look at the impact of maximising new housing (and other uses, such as employment) on sites within Tamworth, but would also consider the impact on Tamworth of the remaining quantum of housing and employment land which would need to be delivered elsewhere, if the full OAHN were to be met in the Plan. This has to be a reasonable option, as the Plan is proposing such an outcome.

2. Where potential conflicts between the Plan and SA have been identified, has there been adequate justification for the preferred option/s proposed?

Where there are potential conflicts between the Plan and the SA, these should be highlighted, with the reasons given why the preferred option in the Plan has been selected in the face of these potential conflicts.

If the LPA decides to carry out further work on the SA, it must bear in mind that this is an integral part of the plan making process, which should be transparent and open to public participation. It must not be undertaken as an exercise to justify a predetermined strategy or position. It is important to consider whether any changes to the SA would meet the requirements of the 2004 Regulations e.g. adding an addendum to the SA Report without making consequential amendments to other parts of the report, including the Non-Technical Summary would not be sufficient. I recommend that the Council looks at the requirements in the 2004 Regulations, as if it were doing a 'check list', to make sure that there are not any omissions. In this respect work put in at this stage could save considerably more work for the Council at a later stage.

Referring back to the Council's request for a timetable for work to be carried out prior to the Hearings, these will be set out in my Guidance Note, which I aim to complete by 13 March. In terms of the issues that I will require further input from the relevant parties, these will be set out in a Discussion Note, which again I hope to have completed by 13 March. The full exploration of the issues, of course, will take place at the Hearings.

Regards

Mike