

Tamworth Local Plan Examination

**MATTER 3: Sustainability  
Appraisal (SA) and Habitats  
Regulations Assessment  
(HRA)**

*Lichfield*  
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[www.lichfielddc.gov.uk](http://www.lichfielddc.gov.uk)

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## **INSPECTORS ISSUE 3: SUSTAINABILITY APPRAISAL (SA) AND HABITAT REGULATION ASSESSMENT (HRA)**

### **3.1 Is the spatial strategy of the Plan supported by the SA and HRA?**

The main concern which Lichfield District Council (LDC) has with the SA is with regard to the way in which the Green Belt sites have been assessed and dismissed at the earliest stage, and the impact this has upon the Plan in terms of whether exceptional circumstances could be demonstrated to enable some Green Belt to be released for development. This issue is set out in the Hearing Statement for Matter 7 and for context is also set out here.

The SA does not progress SHLAA sites referenced 352 (Land South of Hockley Road) and 354 (Land west of A51 Dosthill) (see SA Appendix G). It codes them 'red' in terms of their Green Belt status, whereas LDC would argue that this a policy constraint rather than an absolute constraint in sustainability terms. LDC would argue that a Green Belt site could still be a sustainable site.

In terms of the Hockley Road site, other key constraints relate to the need to provide a new primary school and the need for landscape regeneration, the loss of grade 2 agricultural land, the proximity of landfill and issues with local sewage works requiring further investigation.

In terms of Land west of Dosthill, constraints again relate to the need to provide a school, landscape restoration issues, biodiversity issues and potential flooding in parts of the site.

However, these do not appear to be absolute constraints but no potential mitigation has been provided therefore it appears they have not been progressed to the next stage of SA as being more sustainable options and, without this mitigation therefore they continue to score poorly, with Green Belt status also being used to provide this overall negative score. LDC would suggest, however, that mitigation measures should be more thoroughly explored before Tamworth Borough Council (TBC) sets requirements and figures for its neighbouring districts to deliver growth on its behalf – particularly as neighbouring areas are also in the Green Belt and similar constraints are likely to be experienced in these areas.

### **3.2 Have reasonable alternatives been considered in the SA?**

As stated above, the Green Belt should have been investigated more thoroughly as a potential option given that its early exclusion from the process leads a potentially greater impact on neighbouring authorities to deliver a proportion of the housing growth.

### **3.3 Which adverse effects identified by the SA require significant mitigation, and how is the Council addressing these issues?**

As set out in 3.1, the potential for mitigation of impacts relating to Green Belt options should have been explored more thoroughly. For example a primary school could potentially be provided as part of a development, landscape restoration could be integrated into a development proposal, development could avoid those parts of the site which might flood and so on. LDC accepts that mitigation might not be possible to enable development to proceed but does not feel that there is sufficient evidence to enable this to be concluded at this point.