



# CABINET

6 March 2014

A meeting of the CABINET will be held on Thursday, 13th March, 2014, 6.00 pm in Committee Room 1 Marmion House, Lichfield Street, Tamworth

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## A G E N D A

### NON CONFIDENTIAL

**1 Apologies for Absence**

**2 Corporate Update**

Title: Local Government Association Peer Assessment

Presenter: Chief Executive

**3 Minutes of the Previous Meeting (Pages 1 - 10)**

**4 Declarations of Interest**

*To receive any declarations of Members' interests (pecuniary and non-pecuniary) in any matters which are to be considered at this meeting.*

*When Members are declaring a pecuniary or non-pecuniary interest in respect of which they have dispensation, they should specify the nature of such interest. Members should leave the room if they have a pecuniary or non-pecuniary interest in respect of which they do not have a dispensation.*

**5 Question Time:**

To answer questions from members of the public pursuant to Executive Procedure Rule No. 13

**6 Matters Referred to the Cabinet in Accordance with the Overview and Scrutiny Procedure Rules**

None

**7 LGA Peer Assessment - Final Report (Pages 11 - 58)**

(Report of the Leader of the Council)

**8 Tamworth Borough Council Draft Local Plan and Duty to Co-operate Issues (Pages 59 - 392)**

(Report of the Portfolio Holder for Economy and Education)

- 9 **Local Authority Mortgage Rate for Mortgages Under Housing Act 1985**  
(Pages 393 - 394)  
(Report of the Portfolio Holder for Operations and Assets)
- 10 **Consideration of a request to Grant Landlords Permission to Erect a Permanent Statue in the Castle Grounds** (Pages 395 - 400)  
(Report of the Portfolio Holder for Operations and Assets)
- 11 **Declaration of an Air Quality Management Area (AQMA) At The Two Gates Crossroads, Tamworth** (Pages 401 - 442)  
(Report of the Portfolio Holder for Environment and Waste Management)
- 12 **Housing Revenue Account (HRA) Business Plan Summary Update** (Pages 443 - 464)  
(Report of the Portfolio Holder for Public Housing and Vulnerable People)

### **Restricted**

**NOT FOR PUBLICATION** because the report could involve the disclosure of exempt information as defined in Paragraphs 3 of Part 1 of Schedule 12A to the Local Government Act 1972 (as amended)

- 13 **Housing Regeneration Update** (Pages 465 - 516)  
(Report of the Portfolio Holder for Public Housing and Vulnerable People and Portfolio Holder for Operations and Assets)
- 14 **Staffordshire County Council (SCC) Proposals for Extra Care Funding in Tamworth** (Pages 517 - 600)  
(Report of the Portfolio Holder for Public Housing and Vulnerable People)
- 15 **Cultural Quarter Update** (Pages 601 - 606)  
(Report of the Portfolio Holder for Economy and Education)

Yours faithfully



### **Chief Executive**

People who have a disability and who would like to attend the meeting should contact Democratic Services on 01827 709264 or e-mail [committees@tamworth.gov.uk](mailto:committees@tamworth.gov.uk) preferably 24 hours prior to the meeting. We can then endeavour to ensure that any particular requirements you may have are catered for

To Councillors: D Cook, R Pritchard, S Claymore, S Doyle, M Greatorex and J Oates



## **MINUTES OF A MEETING OF THE CABINET HELD ON 20th FEBRUARY 2014**

**PRESENT:** Councillor D Cook (Chair), Councillors R Pritchard, S Claymore, S Doyle, M Greatorex and J Oates

The following officers were present: Anthony E Goodwin (Chief Executive), John Wheatley (Executive Director Corporate Services), Rob Barnes (Director - Housing and Health), Andrew Barratt (Director - Assets and Environment), Stefan Garner (Director of Finance), Jane Hackett (Solicitor to the Council and Monitoring Officer), Robert Mitchell (Director - Communities, Planning and Partnerships), Steve Pointon (Housing Strategy Manager), Christie Tims (Head of Organisational Development) and Jane Eason (Communications and PR Manager)

### **100 APOLOGIES FOR ABSENCE**

None

### **101 MINUTES OF THE PREVIOUS MEETING**

The minutes of the meeting held on 23 January 2014 were approved and signed as a correct record.

*(Moved by Councillor R Pritchard and seconded by Councillor J Oates)*

### **102 DECLARATIONS OF INTEREST**

There were no Declarations of Interest.

The order of business was changed to deal with the Golf Course Re-Development Project report first.

*(Moved by Councillor D Cook and seconded by Councillor R Pritchard)*

### **103 QUESTION TIME:**

**QUESTIONS FROM MEMBERS OF THE PUBLIC**

**NO.1**

**Under Schedule 4, 13, Mr K Dolman, 7 Saint Andrews, Amington, Tamworth asked the Portfolio Holder for Economy and Education, Councillor S Claymore, the following question:-**

"Given that the Local Plan was withdrawn following serious concerns made by the Plan Inspector David Vickary with regard to proposed changes and a lack of consultation (Letter to Mr A Roberts, Development Plan Manager from Inspector David Vickery 15th February 2013) is it not the case that as the Council works towards a new plan they are still in disarray and that decisions regarding potential housing developments are being rushed in order to include them into the Local Plan?"

**Councillor S Claymore gave the following response:**

When the work was being carried out on the original core strategy of the then LDF (Local development framework) the guidelines at that time allowed for a much more flexible approach to producing LDF documents, the two main documents that could be produced were a core strategy and a site allocations document. However, towards the later part of our work, changes to national planning policy came into force which at the time were not clear and relatively untested in terms of external examination by the planning inspector. The submission draft of our core strategy / local plan was passed through full council where it was agreed to submit our plan in its then current format.

During the subsequent exploratory meeting and within the letter you refer to from David Vickery, the Planning Inspector, we were informed that we should specifically allocate more housing land to meet our housing needs. Our suggested modifications to allow for these changes in policy and to address the inspectors concerns would, in his words (I am concerned that these modifications might open the local plan to legal challenge.) he also went on to state that (the local plan would be very substantially and significantly different to the plan publicly consulted upon and then submitted for examination).

At no point in his letter does he refer to any lack of consultation to date. He did suggest that the most appropriate action is for the Council to withdraw the Tamworth local plan allowing us to make the modifications and to republish it for public consultation.

A report then went to full council in March last year recommending we do exactly that and this was unanimously supported. Council also established a cross party working group to oversee the revisions to the Local plan.

Our officers set out a clear work programme of what work was needed to be done and this has been kept to.

Since May last year work has been continuing to assess the potential of housing sites, which involves a technical and sustainability appraisal of each site and these sites have been sent to some 34 separate bodies for technical appraisal, including the Environment Agency, Staffordshire County Council, Severn Trent and Natural England.



In order to inform the long list of options for the future of the golf course and as agreed by Cabinet at its meeting on the 30th May last year, we included the golf course in the proposed sites for assessment. In order to include development within any of the subsequent options for the golf course, we had to assess the site for suitability for allocation.

So, based on all the open and transparent information that's been available since we took back the operation of the course in March last year and even under local Government timescales I don't consider 9 months to be rushing things and neither do I consider at any time that this Council was in disarray.

As far as the new local plan is concerned, we have looked at all the sites in the Borough and are only proposing allocating sites where there is a willing landowner and where any constraints can be overcome. Out of the 64 sites that were assessed we are proposing to take forward 4 Greenfield extensions and 19 Brownfield sites in the urban area, All other sites were either unsuitable having insurmountable constraints or not supported by a developer.

Following a decision by Cabinet, scheduled for the 13th March we expect the draft local plan consultation will start on the 31st March and will run for 6 weeks. At that consultation you can make your comments on specific policies or sites. The next consultation will then take place during the summer when the plan will be available for comments on its legal compliance and tests of soundness.

Following that the plan will go to full Council for approval and then be submitted to the Secretary of State for examination by the Planning Inspectorate, which will allow for further testing of the plan.

### **Supplementary question**

After a short discourse Mr Dolman was asked to put his supplementary question. He said that the question is: Will you give us some hope, a vision better than we fear? An assurance that the Golf Course will be excluded from sale, which will become very valuable public space?

### **Councillor S Claymore gave the following response:**

Do not want urban sprawl. Will work with the residents to mitigate against the loss of the Golf Course. There will be part parkland on as much as we can and there will be houses on there. As long as I'm here you have my assurance.

### **QUESTIONS FROM MEMBERS OF THE PUBLIC**

### **NO.2**

**Under Schedule 4, 13, Mr C Stokes, 120 Tamworth Road, Amington, Tamworth asked the Portfolio Holder for Economy and Education, Councillor S Claymore, the following question:-**

"Could you quantify and provide a full breakdown of figures to support your statement, which you made recently on local radio, that the Tamworth Council were in receipt of £1,000,000 from Jack Barker during the time they ran the Tamworth Golf Course?"

**Councillor D Cook gave the following reply:**

Mr Stokes, the point I was making is that in the 5 years Jack Barker / Tamworth Golf centre ran the course the tax-payer in Tamworth benefited by over £1million.

The course operations cost £212,585 in 3 years between 2004/2007 as per the out-turns that every single Councillor of every single party have agreed when all voted every year for the statement of Accounts. If we assumed this loss would not have worsened, even though I suspect it would, that's an average loss of £71,000 per year. Over the 5 years from 2002/2007 this equates to £412,848, however, these figures are for the Golf Course operations only – they exclude the cost of Grounds Maintenance of the course as, from 2003/04, the management & costs of Grounds Maintenance for the Golf Course was transferred to Public Spaces (& no longer shown separately). The annual cost of £135,910 was identified during 2006/07 as part of the Leisure Futures review - and approved by Council on 26 February 2007 as a saving as part of the transfer of the Golf Course to Tamworth Golf Centre. Once this is added in the average deficit is £207k p.a. which means over 5 years the deficit is in excess of £1m (£1.090m from 2002/03 to 2006/07).

The Council also received rents between 2007 and 2012 totalling £289,944 which also need to be taken into account.

There was also the £150,000 the Council believed in 2006 that was required in Capital works on the drainage needed, certainly on the first fairway. Jack Barkers resolved this.

If we then include further pension contributions to staff that the Council has not had to budget for, then we are well in excess of £1million Mr Stokes.

**Supplementary Question:**

The figures are made up and not realistic at all. Initial rent of £50,000 increased up to £10,000 each year. Jack Barker was incapable of paying the rent and in fact did not pay it. In March 2013 renegotiated to reduce rent to £16,000. Is that good business?

**Councillor S Claymore gave the following response:**

I have a breakdown here to clarify the rent Jack Barker paid

Year	Budget (rent due lease)	Rent received	%
2007/8	£ 50,283.02	£ 50,283.02	100.0%
2008/9	£ 60,000.00	£ 60,000.00	100.0%
2009/10	£ 70,000.00	£ 69,999.96	100.0%
2010/11	£ 75,000.00	£ 75,833.33	100.0%
2011/12	£ 85,000.00	£ 33,827.35	47.2%
			88.46%

**QUESTIONS FROM MEMBERS OF THE PUBLIC****NO.3**

As Mr Bird was not in the Chamber due to the number of public in attendance the question was read out by Councillor Claymore.

**Under Schedule 4, 13, Mr K Bird, 18 St Andrews, Amington, Tamworth asked the Portfolio Holder for Economy and Education, Councillor S Claymore, the following question:-**

"Why was there no consultation with the local residents over the closure of the golf course by the councilors?"

**Councillor S Claymore gave the following response:**

The golf course has been a very public topic of conversation since 2005 when we first began the process of leasing out the golf course. Since then there has been a very open and transparent process of reporting to Cabinet and to the public via various media channels. In March 2013 the Cabinet decided to re-open the course for a maximum of two years rather than close the course at that point. At the same time a project was begun to review the future options including golf provision through various means but also disposal for re-development. As part of this project the Council undertook specific consultation with customers and residents. The consultation did include a proportion of residents from the local area. This process provided the Council with a clear steer from customers and residents showing that they preferred options that did not involve redevelopment. However as reported to Cabinet on the 23<sup>rd</sup> January 2014 the financial and wider strategic issues outweighed the public view and the Council selected to close the course in March 2015 and to move forward a project to dispose of the land for re-development.

**QUESTIONS FROM MEMBERS OF THE PUBLIC****NO.4**

As Mrs Bird was not in the Chamber due to the number of public in attendance the question was read out by Councillor Claymore

**Under Schedule 4, 13, Mrs C Bird, 18 St Andrews, Amington, Tamworth asked the Portfolio Holder for Economy and Education, Councillor S Claymore, the following question:-**

"Have you looked at other options regarding the running of the golf course by other leisure companies?"

**Councillor S Claymore gave the following response:**

Yes the Council undertook a long process to review its options in relation to the Golf Course and this was reported many times in the local press, and to Cabinet and Scrutiny.

The options appraisal looked at a range of options to sustain golf but concluded that retaining the golf course even under an external leisure company was not feasible.

The Council has previously leased the course to a private company but the Company failed and went into liquidation

#### **104 GOLF COURSE RE-DEVELOPMENT PROJECT**

The Report of the Portfolio Holder for Economy and Education updating members on matters relating to the implementation of the preferred future option for Tamworth Golf Course (minute 91; 23<sup>rd</sup> January 2014) and seeking approval of recommendations relating to the implementation of the preferred option was considered.

- RESOLVED:** That:
- 1 The proposed engagement strategy be postponed for one month, and;
  - 2 The recommended approach for disposal of the site through an unconditional sale following outline planning consent being secured be postponed for one month, and;
  - 3 As part of the budget process, the creation of a new Transformation Reserve (revenue) of £300k, financed from the current earmarked capital reserve, to fund the survey costs outlined within the report be approved, and;
  - 4 The procurement of the relevant technical and legal support, including authorising the Director of Planning, Partnerships, and Communities and the Director of Assets & Environment to enter into contract with the most advantageous providers of Assets & Environment to enter into contract with the most advantageous providers of these services be approved, and;
  - 5 A waiver of financial regulations to allow for the commissioning of the NHBC Land Quality Endorsement Service be approved.
- (Moved by Councillor D Cook and seconded by Councillor R Pritchard)*

#### **105 MATTERS REFERRED TO THE CABINET IN ACCORDANCE WITH THE OVERVIEW AND SCRUTINY PROCEDURE RULES**

None.

#### **106 CORPORATE VISION, PRIORITIES PLAN, BUDGET & MEDIUM TERM FINANCIAL STRATEGY 2014/15**

The Report of the Leader of the Council seeking approval for the Single Corporate Vision and Strategic Priorities for 2014/15, the recommended package of budget proposals and to comply with the requirement of the Council's Treasury Management Policy in reporting to Council the proposed strategy for the forthcoming year and the Local Government Act 2003 with the reporting of the Prudential Indicators was considered.

**RESOLVED:** That all 26 recommendations as contained in the report be approved.  
*(Moved by Councillor D Cook and seconded by Councillor R Pritchard)*

#### **107 QUARTER THREE 2013/14 PERFORMANCE REPORT**

The Report of the Leader of the Council providing Cabinet with a performance health-check was considered.

**RESOLVED:** That following a review of the HRA capital programme the predicted outturn be noted and the revised project budgets be approved.

*(Moved by Councillor D Cook and seconded by Councillor R Pritchard)*

#### **108 CABINET REPORT FOR WRITE OFFS 01/04/13 - 31/12/13**

The Report of the Portfolio Holder for Operations and Assets providing members with details of write offs from 1 April 2013 to 31 December 2013 was considered.

**RESOLVED:** That the amount of debt written off be endorsed.

*(Moved by Councillor R Pritchard and seconded by Councillor D Cook)*

#### **109 CONSERVATION GRANT APPLICATIONS**

The Report of the Portfolio Holder for Economy and Education seeking approval for two grant applications was considered.

**RESOLVED:** That:

- 1 A grant of £7,649 is made in respect of 110 Lichfield Street, Tamworth, and;
- 2 A grant of £7,777 is made in respect of 14 Aldergate, Tamworth subject to the additional condition that it is dependent upon the grant of the appropriate planning consents.

*(Moved by Councillor S Claymore and seconded by Councillor R Pritchard)*

**110 REFRESH OF THE JOINT MUNICIPAL WASTE MANAGEMENT STRATEGY FOR STAFFORDSHIRE AND STOKE ON TRENT**

The Report of the Portfolio Holder for Environment and Waste Management seeking Cabinet endorsement of the refreshed Staffordshire and Stoke on Trent municipal waste strategy was considered.

**RESOLVED:** That the refreshed Joint Municipal Waste Management Strategy for Staffordshire and Stoke on Trent be adopted.

*(Moved by Councillor S Doyle and seconded by Councillor D Cook)*

**111 THE COUNCIL'S APPROACH TO GREEN DEAL AND ECO**

The Report of the Portfolio Holder for Public Housing and Vulnerable People seeking agreement to the Councils approach to the delivery of Green Deal and the Energy Company Obligation was considered.

**RESOLVED:** . That:

- 1 A local agency model approach to deliver energy efficiency schemes for residents in Tamworth be adopted, and;
- 2 Authority to procure an appropriately qualified organisation to undertake the local agency role on behalf of the Council is delegated to the Portfolio Holder for Public Housing and Vulnerable People and the Director of Housing and Health.

*(Moved by Councillor M Greatorex and seconded by Councillor R Pritchard)*

**EXCLUSION OF PRESS AND PUBLIC**

**RESOLVED:** That members of the press and public be now excluded from the meeting during consideration of the following item on the grounds that the business involves the likely disclosure of exempt information as defined in Paragraph 1 and 3, Part 1 of Schedule 12A to the Local Government Act 1972 (as amended).

**112 RE-DESIGNATION OF COUNCIL OWNED PROPERTIES - LANDLORD SERVICES**

The Report of the Portfolio Holder for Public Housing and Vulnerable People setting out the arrangements for re-designating council owned properties that have been identified as a result of implementing the Welfare Reform Act 2012 was considered.

**RESOLVED:** That the recommendations as contained in the report be approved.

*(Moved by Councillor M Greatorex and seconded by Councillor R Pritchard)*

### **113 PAY POLICY 2014**

The Report of the Leader of the Council detailing Tamworth Borough Council's reviewed Pay Policy Statement so that statutory guidance as set out in Part 1 of Schedule 12A of the Local Government Act 1972 was considered.

**RESOLVED:** That the recommendations as contained in the report be approved.

*(Moved by Councillor D Cook and seconded by Councillor R Pritchard)*

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Leader

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THURSDAY, 13 MARCH 2014

## REPORT OF THE LEADER OF THE COUNCIL

LOCAL GOVERNMENT ASSOCIATION  
PEER CHALLENGE : 5<sup>TH</sup> TO 7<sup>TH</sup> NOVEMBER, 2013  
FINAL REPORT**PURPOSE**

To inform Members of the outcomes, key findings and recommendations arising from the LGA Peer Assessment of Tamworth Borough Council conducted between 5<sup>th</sup> and 7<sup>th</sup> November, 2013.

**RECOMMENDATIONS****That Cabinet**

1. Endorse the findings from the Peer Challenge and authorise the release of the report to staff and public;
2. Accept the suggestions for consideration as the basis for an improvement plan; and
3. That the Leader of the Council and Chief Executive submit said Improvement Plan to Cabinet for adoption at their meeting scheduled for 3<sup>rd</sup> April, 2014.

**EXECUTIVE SUMMARY**

Both the Local Government Association and District Council Networks have actively promoted the benefits of "Sector Led Improvement" since the changes to nationally imposed inspection and assessment regimes.

**Peer Challenges or Peer Assessments** seek to achieve a balance between qualitative and quantitative performance figures and information and the more strategic competencies such as Political and Managerial Leadership, Financial Planning and Governance and Decision Making.

Whilst there is tangible, evidence based information on performance figures as reported quarterly to Members, the executive management team was keen to obtain an independent assessment of its 'core' competencies.

The Peer Team feedback and the final report was extremely complimentary about the political and managerial leadership and its ability to lead, plan and deliver against a clear Vision.

The team acknowledged that by taking "tough decisions" and standing by them contributed to an MTFs based upon prudent assumptions and the delivery of considered efficiencies.

The Council's reputation for "getting things done" and as a strategic partner considered as the most organised and dynamic justified the decision to embed collaborative working as

core business.

Whilst enormously positive, the assessment also highlighted a number of areas for improvement. These are set out in the report and will form the basis of the Improvement Plan referred to in this report.

Perhaps the most important observation from the team came as no surprise: **Staff here have a clear passion, pride and commitment to doing their best for the people of Tamworth and they recognise the nature of the financial challenges faced by the Council.**

## Introduction

**Peer Challenges** or **Peer Assessments** are managed and delivered by the sector for the sector. They are focused upon improvement and the scope is designed to reflect local needs, circumstances and specific requirements.

Every **Peer Challenge** assesses and reviews five 'core' components; they are as follows:-

- i) **Understanding of local context and priority setting:** Does the Council understand its local context and has it established a clear set of priorities?
- ii) **Financial Planning & Viability:** Does the Council have a financial plan in place to ensure long term viability and is there evidence that it is being implemented successfully?
- iii) **Political & Managerial Leadership:** Does the Council have effective political and managerial leadership and is it a constructive partnership?
- iv) **Governance & Decision Making:** Are effective governance and decision making arrangements in place to respond to key challenges and manage change, transformation and disinvestment?
- v) **Organisational Capacity:** Are organisational capacity and resources focused in the right areas in order to deliver the agreed priorities?

In addition to the five core components, Councils have the opportunity to identify other areas of focus for inclusion in the **Peer Challenge**. The **Peer Team** is then assembled with this in mind thereby assuring that the assessment is undertaken by peers considered as best in class nationally.

The two main areas of focus for this exercise were:

### 1. Community Development

- How do we compare with best practice from other local authorities?
- Review the impacts and outcomes from our existing service delivery model; and
- Consider opportunities to improve the service

### 2. Partnerships & Commissioning

- Review corporate approach to commissioning; highlight gaps if any; and
- Review approach to voluntary and community sector engagement and commissioning

### Peer Challenge Team:

**Nicola Bulbeck**

Chief Executive – Teignbridge District Council

**Councillor Neil Clarke**

Leader, Rushcliffe Borough Council & Member of DCN Executive

**Jamie Carson**

Corporate Director – Chorley Borough Council

**Terry Collier**

Corporate Director – Spelthorne Borough Council

**Ernest Opuni**

Peer Challenge Manager, LGA

**Summary of Feedback : Overall Messages**

Tamworth Borough Council has clear vision of place for the town and this is supported by a mutually beneficial relationship with Lichfield which has prospects for further collaboration into the future.

You have a sound understanding of the economic drivers impacting on the borough and have a reputation amongst your various partners for 'getting things done'. Partnerships are seen as core business and you have good relations with the media. However, we encourage you to develop a strategy to facilitate Tamworth identifying and fully utilising all available joint working opportunities.

There are good working relationships between the senior political and managerial leadership at Tamworth Borough Council. Both have a clear purpose in delivering the vision for the borough and are willing to stand by the tough decisions that have to be taken. In order to maintain this we feel that it is very important that, together, you continue to provide clear, consistent, stable and mutually inter-dependent leadership of the council.

Staff at Tamworth Borough Council have a clear passion and pride and a commitment to doing their best for the people of the town. They value the clear communication they have had with the Council's political and managerial leaders which has ensured that they recognise and understand well the nature of the financial challenges you face. An integral part of your plans for addressing the challenges is the current service review you are undertaking. However, in progressing this we encourage you to ensure you have appropriate synergy and clarity between your 'Sustainability Strategy' and the 'Corporate Change Programme'. There is a need to more clearly prioritise the objectives for each to ensure that both contribute effectively to your overall vision for an effective and sustainable organisation.

Your Medium Term Financial Strategy (MTFS) is based on prudent assumptions and your strategy is buying time for your delivery of efficiencies. We encourage you to assure yourselves that the measures you have in place will help you to 'avoid' rather than 'delay' the risk of falling over the 'financial cliff' you have clearly identified. In doing this we believe there is more to do in addressing your challenges in a fundamentally transformational fashion.

There is a need to articulate clearly which services are appropriate for the various service delivery vehicles you are considering. The clarity at the top of the Council about the Authority being a 'hybrid' is not yet matched across all of the organisation or with all of your partners.

We do not feel that Scrutiny at Tamworth Council is as effective as it could be or that it is adding as much value to Council business as it ought to be. In spite of the improvements that you have made, we do not feel that Scrutiny is strategic or providing the challenge which would enhance the Council's development of policy. We encourage you continue to re-focus Scrutiny on policy development and performance management and give consideration to provision of dedicated support to the function.

You are very aware that in the medium to longer term, you will have yet more difficult decisions to make. Whilst we recognise your track record of taking and standing by tough

decisions, the challenges which all Local Authorities face at the present time are unprecedented. There may be some value in you considering whether, in looking to a future where yet more difficult decisions are required, a review of your current election arrangements might positively enhance your ability to do this whilst also yielding financial savings.

You are viewed as a strong partner by the voluntary and community sectors through your Community Development Officers (CDOs) and other individuals who have a reputation for understanding the value of the Sector (as well as its needs). There is perceived to be strong support from political and managerial leaders for effective community engagement and locality working which involves utilising the CDOs effectively. However, there may be opportunities for partners' contributions which you are not yet fully utilising whilst you may be able to increase take up by partners if you clearly demonstrate how your contributions enhance the achievement of their desired impacts and outcomes.

The Commissioning framework for Tamworth is founded on sound principles of 'procuring outcomes linked to priorities'. It is also 'Compact proofed'. Your 'Commissioning Intentions' document is perceived by partners to be clear and transparent in articulating how you intend to proceed. In building upon this, we encourage you to commence a dialogue with the Clinical Commissioning Group (CCG) and the County Council to establish appetite and scope for joint commissioning opportunities.

### **Suggestions for Consideration**

1. Consider opportunities for building further clarity on joint working with Staffordshire County Council in order generate more mutual benefits. This includes a focus on locality working and commissioning.
2. Consider how best to embed locality working within the Council and TSP. For example, an annual plan of priorities (for example improved Streetscene, health literacy and positive diversionary activities for young people in locality X) for each of the 4 locality areas would provide direction for the Community. Align mainstream resources to locality working and lever in funding and resources from partners and the HRA account.
3. Communicate and explain the Sustainability Strategy for the council with staff more widely. It was not clear to the team that all staff are as aware of this work as you would wish.
4. Consider developing a higher profile for the Council's political leadership in strategic business planning and decisions. The input from political leaders in raising awareness of future financial challenges for the Council has been effective and you may wish to replicate this more widely in relation to other areas, for example, locality working.
5. Seek to improve the ways in which the positive work you are doing with partner organisations is communicated. There appear to be benefits of more closely interlinked communications across different organisations which are not yet being utilised (e.g. links on each other's websites). Internally consider developing an internal "Who's Who" (in conjunction with the intranet) to help inform users as to who is responsible for what. Review your current approach to learning from (and communication of) complaints, comments and compliments.
6. Develop a more proactive approach to member training with clear rules on compliance and sanctions. With particular regard to scrutiny, consider a structured development programme for the Council's Scrutiny Committees utilising experience from other Authorities. This might include visits to other Councils and targeted support such as:

- mentoring for the committees as a whole (including observation of meetings with feedback)
- targeted one to one mentoring for the Tamworth Chairs from counterparts in other Authorities and
- Assigning Policy 'tasks/projects' for Overview and Scrutiny to consider (e.g. tasking Overview and Scrutiny to come up with recommendations on how you embed locality working).
- Consider introducing a convention that the Chairman and Vice-chairman of Scrutiny Committees are each appointed from opposing political groups.

## **RESOURCE IMPLICATIONS**

There are none arising directly from this report. However; subject to the Council's response to the issues for consideration there may be future resource implications. Due process will be applied in all cases.

## **LEGAL/RISK IMPLICATIONS BACKGROUND**

There are none arising directly from this report.

## **SUSTAINABILITY IMPLICATIONS**

There are none arising directly from this report.

## **BACKGROUND INFORMATION**

Information on Sector Led Improvement is available at: [www.local.gov.uk/sector-led-improvement](http://www.local.gov.uk/sector-led-improvement)

An interim evaluation of the process is available at: [www.local.gov.uk/peer-challenge](http://www.local.gov.uk/peer-challenge) This link includes a series of Case Studies.

## **REPORT AUTHOR**

Anthony E. Goodwin  
Chief Executive Officer

## **LIST OF BACKGROUND PAPERS**

Peer Challenge Correspondence & Files held by John Day on ext. 588.  
Peer Challenge Final Report  
Peer Challenge Presentation

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# Tamworth Borough Council Corporate Peer Challenge

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**Feedback from the peer challenge  
team**

November 2013

# The peer challenge team

**Nicola Bulbeck** Chief Executive of Teignbridge District Council

Page 18 **Councillor Neil Clarke** Leader of Rushcliffe Borough Council

**Jamie Carson** Corporate Director at Chorley Council

**Terry Collier** Corporate Director at Spelthorne Council

**Ernest Opuni** LGA Peer Challenge Manager

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# The purpose of peer challenge

Peer challenges are improvement-focused and tailored to meet individual council's needs. They are designed to complement and add value to a council's own performance and improvement focus. The peers used their experience and knowledge of local government to reflect on the information presented to them by people they met, things they saw and material that they read. The team provide feedback as critical friends, not as assessors or inspectors.

# The peer challenge process

- Peers reviewed a range of information to ensure we were familiar with the council, the challenges it is facing and its plans for the future
- We spent 3 days onsite in Tamworth during which we:
  - Spoke to more than 70 people including a range of council staff together with councillors and external stakeholders
  - Gathered information and views from more than 20 meetings, along with additional research and reading
  - Collectively spent more than 200 hours to determine our findings – the equivalent of one person spending nearly 6 weeks in Tamworth
- Feedback session at end of onsite visit, followed by a short report and follow up activity (to be confirmed)

# Scope and 'brief' for the peer challenge

You asked us to provide an external 'health-check' of the organisation by considering the core components looked at by all corporate peer challenges, namely:

- Understanding of local context and priority setting
- Financial planning and viability
- Political and managerial leadership
- Governance and decision-making
- Organisational capacity

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Within this framework you asked us to comment on your approach to Community Development and Commissioning.

# Overall messages and impressions

- There is a clear vision of place for Tamworth underpinned by a mutually beneficial relationship with Lichfield which has prospects for collaboration into the future
- You have a sound understanding of the economic drivers impacting on the borough and have a reputation for 'getting things done'. However, we encourage you to develop a strategy to facilitate Tamworth identifying and fully utilising all available joint working opportunities
- Partnerships are seen as core business.
- Staff here have a clear passion and pride and a commitment to doing their best for the people of Tamworth. They recognise the nature of the financial challenges you face. However, in addressing these we encourage you to ensure you have appropriate synergy and clarity between your Sustainability Strategy and the Corporate Change Programme. There is a need to more clearly prioritise the objectives for each.

# Overall messages and impressions

- Your MTFS is based on prudent assumptions and your strategy is buying time for your delivery of efficiencies. We encourage you to assure yourselves that the measures you have in place will help you to ‘avoid’ rather than ‘delay’ the risk of falling over the ‘financial cliff’ you have clearly identified. We believe there is more to do in addressing your challenges in a fundamentally transformational fashion.
- There are good working relationships between the senior political and managerial leadership at Tamworth. Both have a clear purpose in delivering the vision for the borough and stand by tough decisions that have to be taken. It is important that together you provide clear, consistent, stable and mutually inter-dependent leadership of the council.
- There is a need to articulate clearly which services are appropriate for the various delivery vehicles you are considering. The clarity at the top of the Council about the Authority being a ‘hybrid’ is not yet matched across all of the organisation or with all of your partners.
- You have good relations with the media.

# Overall messages and impressions

- There is an imperative to shift your approach to member training to be more proactive and where necessary to require attendance (e.g. Planning). This is important if Scrutiny is (i) to add value and become more strategic and (ii) councillors sitting on regulatory committees are equipped to make sound decisions. We feel that currently neither of these are happening.
- A focus on getting the greatest cost, quality and productivity benefits from ICT is required to mitigate risk to attaining full potential of agile working. Also a greater consistency of approach is required.
- There is potential to increase the impact and outcomes of your community development work by aligning it more closely to a more focussed programme of locality working.
  - Good work has been done with the first phase of commissioning; the Commissioning Intent document is a good example. In the next phase the priority needs to be clarity about what exactly is to be commissioned and the right level and scale at which commissioning takes place.

## Local Context/Priority setting

- Clear vision of place for Tamworth focussed on the town centre. Reality of edge of town retail (Ventura) recognised and complemented by innovative zoning approach to create 21<sup>st</sup> century Tamworth town centre.
- Mutually beneficial relationship with Lichfield provides a strong foundation for future collaboration.
- Sound understanding of economic drivers impacting on Tamworth and Lichfield (Birmingham LEP). Evaluate the payback versus resources required of joining both the Greater Birmingham and Staffordshire and Stoke on Trent LEPs
- Reputation in county for getting things done. Deep rooted culture of partnership working. 'Tamworth is the most organised and dynamic of the 3 LSPs'. Also 'partnerships are seen as core business'.

# Local Context/Priority setting

- Review and refine the synergy between the Sustainability Strategy and your Corporate Change Programme.
- The number of workstreams and groups is impacting on the clarity of the Strategy and the Programme as well as the capacity of staff involved to effectively deliver on either.
- Need to prioritise the workstreams and projects under each and communicate to the wider organisation.
- Maintain focus and resourcing on sign off for the Local Plan and close working with Lichfield and others on Duty to Cooperate.
- Strengthen bottom up inputs to make TSP even more effective and reduce risk of being too strategic/remote (e.g. re-focussed locality working).



# Financial Planning and Viability

- Both members and staff are aware of the 'financial cliff' and timescale, with broad understanding of the financial approach.
- MTFs based on prudent assumptions. Strategy is buying time for the delivery of efficiencies. However, a radical service reconfiguration is required if you are to avoid the 'financial cliff'.
- Evaluate the risk of significant reliance on back loading and on financial wins downstream.
- Business Rates and Council Tax income levels holding up. Protecting Council Tax base with annual increases. HRA under new regime is self-sustaining and creates potential funding opportunities.
- Good progress on shared services and collaborative working will continue to make a contribution to closing the deficit. However, there is a need to progress from being 'opportunistic' to taking a strategic approach.

# Financial Planning and Viability

- Consider deploying a percentage of NHB to supporting growth and infrastructure to deliver strategic objectives.
  - There are some challenges to current income (e.g. car parking income declining, low council tax base). Some entrepreneurial initiatives and income generation ideas already underway (e.g. marketing, web and communication skills).
  - Need for more creative thinking is recognised in order to generate more income (e.g. review of fees and charges, pre-application advice charging).
  - Consider broadening the terms of reference for service reviews to embrace opportunities for fundamental transformation of service delivery.
  - Consider using Participatory Budgeting as a tool to re-focus locality working.
-

# Political and managerial leadership

- There is visible, respected and approachable political and managerial leadership of Tamworth. This encourages corporate loyalty to Cabinet and CMT from staff at all levels and engenders confidence and influence internally and externally. The Executive Management Team are regarded as working as one, notably in respect of 'difficult issues'.
  - Cabinet are a cohesive and purposeful team who are prepared to make and stand by tough decisions and set direction.
  - Are there really no sacred cows?
- Page 29
- Good working relationships between Chief Executive and Leader/CMT and Cabinet.
- Ensure clarity of respective roles between members and officers throughout the organisation is defined, understood and maintained.
- Open and honest culture. Tamworth has embraced change to good ends: three criteria – customer experience, improved working environment and efficiency.
  - Cabinet and senior management have communicated the financial challenges clearly.
-

# Political and managerial leadership

- Given challenges facing local councils, clear, consistent, stable and mutually inter-dependent political and managerial leadership is essential.
- Given the hybrid model, clarity is required as to which services would be appropriate for the different delivery vehicles. This needs to be articulated and communicated internally and externally.  
Risk of perceived organisational over confidence in the context of responding to adverse feedback.
- Visible confidence to take risks after assessing potential rewards.
- Challenge the consistency of County Council interaction with districts
- We were impressed by the positive direction in which you are moving with respect to developing in-house expertise and improving your website. It is clear that you are grasping the potential of using web and social media effectively. However, communications (both internal and external) would benefit from strengthening (e.g. to celebrate successes and availability of services; to communicate rationale for what, why and when something has been/will be done)

# Governance and decision-making

- Directors/councillors meet regularly (e.g. meetings, briefings and away days).
- Councillors are effective on the ground – comparatively few complaints from the public.
- Good relations with the media.
- Shift member training from passive to proactive with clear rules on compliance and sanctions (e.g. no training no attendance)

# Governance and decision-making

- Scrutiny is not strategic or adding value. Review chairing and training arrangements.
- Show Scrutiny members best practice from elsewhere.
- Re-focus scrutiny on policy development and performance management. Re-balance scrutiny.
- Consider providing dedicated scrutiny support.
- Moving away from annual elections would create stronger direction and decision-making as well as savings.

# Organisational Capacity

- Positive approach to service reviews is perceived to be transparent and equitable across all service delivery areas.
  - There is a risk of siloed service reviews with consequent impact on capacity, identifying and utilising necessary skills leading to missed transformational opportunities.
  - Relationship/MoU with Lichfield provides a good foundation for the future.
- Open access for staff to communicate with senior managers enables ideas to be brought forward. Officers afforded increased discretion and flexibility (e.g. special offers).
- Training for staff to continue to develop commercial acumen and project management to assess viability of entrepreneurial ideas and manage risks. 'Concept, costed, to market'.
  - Early management structure review required focussing on spans of control, layers of management, transferrable skills and joint management posts.
-

# Organisational Capacity

- Embed project management across the organisation to maximise existing investment and manage capacity and risk.
- ICT
  - Inconsistent approach across the organisation
  - Functionality especially off site/mobile working
    - Impact of Code of Connection
    - Slow roll out of technology
    - Procurement issues
    - Limited knowledge of what effective ICT can deliver.
- Different ICT platforms are a potential barrier to shared services.



# Community Development

- Recognised community development provides a route for service providers to communities. Draws in other partners to be able to access people.
- How can you increase take up by partners to enhance impacts and outcomes? Align more closely to locality issues e.g. community safety, health, education, employment and environment.

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Valued by partners but not yet receiving funding from them. Community Development Officers (CDOs) act as advocates for communities, 'honest brokers'.

- Ward members are actively involved with CDOs.
  - Managers of other services not engaging due to a lack of understanding, a disconnect between the off-site CDOs and office based colleagues – out of sight, out of mind.
  - Customer hubs need to be more customer friendly.
-

# Commissioning

- Good work has been done already with first phase of commissioning. The IEWM funded project looking at commissioning around Healthy Tamworth.
- Commissioning Intentions document perceived by partners as a clear and transparent approach. Partners need to reciprocate.
- Delayed discharge project - partnership money put in pot for joint working that saved costs for each partner, improved the service and enhanced the customer experience.
- Commissioning approach has potential to provide longevity to address threats and risks as council and partners retrench to core business.

# Commissioning

- Need to improve clarity on:
  - What is the right level/scale at which to commission (county/locality?)
  - What is to be commissioned?
- Need for training for staff to support commissioning, e.g. to write bids/specifications to maximise funding opportunities.
- Dialogue with CCG and County Council to establish appetite and scope for joint commissioning.

# Additional Suggestions and ideas to consider (1)

- Introduce a convention that the chairman and vice-chairman of Scrutiny Committees are each appointed from opposing political groups.
- The Council should move to “All-out” elections as soon as is practicable, in order to facilitate stronger direction, decision-making and cost savings.
- Develop an internal “Who’s Who” in conjunction with the intranet, to help inform users as to who is responsible for what.
- Re-visit and refresh the policies dealing with managing conflict/aggression and lone working.
- Capture, share and implement the corporate learning from communication of complaints and compliments.

# Additional Suggestions and ideas to consider (2)

- Communicate and explain the Sustainability Strategy for the council with staff more widely. It was not clear to the team that all staff are as aware of this work as you would wish.
  - Consider how best to embed locality working within the Council and TSP. For example, an annual plan of priorities (i.e. improved Streetscene, health literacy and positive diversionary activities for young people in locality X) for each of the 4 locality areas would provide direction for the Community Development resource, align mainstream resources to locality working and lever in funding and resources from partners and the HRA account.
  - Review the Council's existing policy on managing aggressive customers to ensure it is fully fit for purpose.
-

# Additional Suggestions and ideas to consider (3)

- Consider how you can further develop the relationship between Tamworth Borough Council and Staffordshire County Council. This includes political managerial relationships and operational relationships; with a focus on locality working and commissioning.

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Consider developing a higher profile for the Council's political leadership in strategic business planning and decisions. The input from political leaders in raising awareness of future financial challenges for the Council has been effective and you may wish to replicate this more widely in relation to other areas, for example, locality working. Review your current approach to learning from (and communication of) complaints, comments and compliments.

- Seek to improve the ways in which the positive work you are doing with partner organisations is communicated. There appear to be benefits of more closely interlinked communications across different organisations which are not yet being utilised (e.g. links on each other's websites)
-

# Additional Suggestions and ideas to consider (4)

- Consider a structured development programme for the Council's Scrutiny Committees utilising experience from other Authorities. This might include visits to other Councils and targeted support such as
  - (i) mentoring for the committees as a whole (including observation of meetings with feedback)
  - (ii) targeted one to one mentoring for the Tamworth Chairs from counterparts in other Authorities' and
  - (iii) assigning Policy 'tasks/projects' for Overview and Scrutiny to consider (e.g. tasking Overview and Scrutiny to come up with recommendations on how you embed locality working).

# Next Steps

- Questions and discussion now
- Offer of follow up activity and continued support – that can be shaped and informed by the peer challenge



Anthony Goodwin  
Chief Executive  
Tamworth Borough Council  
Marmion House  
Lichfield Street  
Tamworth  
B79 7BZ

December 2013

Dear Anthony,

### **Tamworth Borough Council - Corporate Peer Challenge 5-7 November 2013**

On behalf of the peer team, I would like to say what a pleasure it was to be invited into Tamworth Borough Council to deliver the recent corporate peer challenge as part of the Local Government Association (LGA) offer to support sector led improvement.

Peer challenges are delivered by experienced elected member and officer peers. The make-up of the team reflected your requirements and the focus of the peer challenge. The peers were selected on the basis of their relevant experience and expertise and agreed with you. The peers who delivered the peer challenge in Tamworth were:

- Nicola Bulbeck (Chief Executive – Teignbridge District Council )
- Councillor Neil Clarke (Leader, Rushcliffe Borough Council)
- Jamie Carson (Corporate Director, Chorley Borough Council)
- Terry Collier (Corporate Director, Spelthorne Borough Council)
- Ernest Opuni (Peer Challenge Manager, LGA)

#### **Scope and focus of the peer challenge**

You asked the peer team to provide an external view on several specific areas and issues relating to the Council's ability to deliver its future plans and proposals. These were:

1. Community development, including:
  - How Tamworth Borough Council compares to good practice from other local authorities
  - Peer observations on the impacts and outcomes from their existing model of service delivery and
  - Input from the team in the authority considering opportunities to improve the service
2. Partnerships and commissioning:
  - A review of the council's corporate approach to commissioning, highlighting gaps, if any

- A review of the council's approach to voluntary and community sector engagement and commissioning

The peer team covered these by considering the core components looked at by all corporate peer challenges. These are:

1. Understanding of local context and priority setting: Does the Council understand its local context and has it established a clear set of priorities?
2. Financial planning and viability: Does the Council have a financial plan in place to ensure long term viability and is there evidence that it is being implemented successfully?
3. Political and managerial leadership: Does the Council have effective political and managerial leadership and is it a constructive partnership?
4. Governance and decision-making: Are effective governance and decision-making arrangements in place to respond to key challenges and manage change, transformation and disinvestment?
5. Organisational capacity: Are organisational capacity and resources focused in the right areas in order to deliver the agreed priorities?

### **The peer challenge process**

It is important to stress that this was not an inspection. Peer challenges are improvement-focused and tailored to meet individual Councils' needs. They are designed to complement and add value to a Council's own performance and improvement plans. The peers used their experience and knowledge of local government to reflect on the information presented to them by people they met, things they saw and material that they read.

The peer team prepared for the peer challenge by reviewing a range of documents and information in order to ensure they were familiar with the Council and the challenges it is facing. The team then spent 3 days on-site at Tamworth during which they:

- Spoke to more than 70 people including a range of Council staff together with Councillors and external partners and stakeholders.
- Gathered information and views from more than 20 meetings along with additional research and reading.
- Collectively spent more than 200 hours to determine their findings – the equivalent of one person spending more than 6 weeks in Tamworth Borough Council.

This letter provides a summary of the peer team's findings. It builds on the feedback presentation provided by the peer team at the end of their onsite visit (5-7 November 2013). In presenting feedback to you, they have done so as fellow local government officers and members, not as professional consultants or inspectors. By its nature, the peer challenge is a snapshot in time. We appreciate that some of the feedback may be about things you are already addressing and progressing.

## **Summary of feedback: overall messages**

Tamworth Borough Council has clear vision of place for the town and this is supported by a mutually beneficial relationship with Lichfield which has prospects for further collaboration into the future.

You have a sound understanding of the economic drivers impacting on the borough and have a reputation amongst your various partners for 'getting things done'. Partnerships are seen as core business and you have good relations with the media. However, we encourage you to develop a strategy to facilitate Tamworth identifying and fully utilising all available joint working opportunities.

There are good working relationships between the senior political and managerial leadership at Tamworth Borough Council. Both have a clear purpose in delivering the vision for the borough and are willing to stand by the tough decisions that have to be taken. In order to maintain this we feel that it is very important that, together, you continue to provide clear, consistent, stable and mutually inter-dependent leadership of the council.

Staff at Tamworth Borough Council have a clear passion and pride and a commitment to doing their best for the people of the town. They value the clear communication they have had with the Council's political and managerial leaders which has ensured that they recognise and understand well the nature of the financial challenges you face. An integral part of your plans for addressing the challenges is the current service review you are undertaking. However, in progressing this we encourage you to ensure you have appropriate synergy and clarity between your 'Sustainability Strategy' and the 'Corporate Change Programme'. There is a need to more clearly prioritise the objectives for each to ensure that both contribute effectively to your overall vision for an effective and sustainable organisation.

Your Medium Term Financial Strategy (MTFS) is based on prudent assumptions and your strategy is buying time for your delivery of efficiencies. We encourage you to assure yourselves that the measures you have in place will help you to 'avoid' rather than 'delay' the risk of falling over the 'financial cliff' you have clearly identified. In doing this we believe there is more to do in addressing your challenges in a fundamentally transformational fashion.

There is a need to articulate clearly which services are appropriate for the various service delivery vehicles you are considering. The clarity at the top of the Council about the Authority being a 'hybrid' is not yet matched across all of the organisation or with all of your partners.

We do not feel that Scrutiny at Tamworth Council is as effective as it could be or that it is adding as much value to Council business as it ought to be. In spite of the improvements that you have made, we do not feel that Scrutiny is strategic or providing the challenge which would enhance the Council's development of policy. We encourage you continue to re-focus Scrutiny on policy development and performance management and give consideration to provision of dedicated support to the function.

You are very aware that in the medium to longer term, you will have yet more difficult decisions to make. Whilst we recognise your track record of taking and standing by tough

decisions, the challenges which all Local Authorities face at the present time are unprecedented. There may be some value in you considering whether, in looking to a future where yet more difficult decisions are required, a review of your current election arrangements might positively enhance your ability to do this whilst also yielding financial savings.

You are viewed as a strong partner by the voluntary and community sectors through your Community Development Officers (CDOs) and other individuals who have a reputation for understanding the value of the Sector (as well as its needs). There is perceived to be strong support from political and managerial leaders for effective community engagement and locality working which involves utilising the CDOs effectively. However, there may be opportunities for partners' contributions which you are not yet fully utilising whilst you may be able to increase take up by partners if you clearly demonstrate how your contributions enhance the achievement of their desired impacts and outcomes.

The Commissioning framework for Tamworth is founded on sound principles of 'procuring outcomes linked to priorities'. It is also 'Compact proofed'. Your 'Commissioning Intentions' document is perceived by partners to be clear and transparent in articulating how you intend to proceed. In building upon this, we encourage you to commence a dialogue with the Clinical Commissioning Group (CCG) and the County Council to establish appetite and scope for joint commissioning opportunities.

### **Summary of feedback:**

#### *Understanding of local context and priority setting*

You have a clear vision of place for Tamworth and this is focussed on the town centre. You recognise the reality of 'edge of town' retail at Ventura Park which is an integral part of your innovative zoning approach to create a twenty-first century Tamworth town centre. Your clear vision for place-making in Tamworth is enabling you to adopt a clear regeneration approach typified by the various zones (which includes retail and culture) complementing each other in devising a coherent future for the borough. You are engaging and involving partners and stakeholders in achieving your aspiration to make available to your communities private sector standards of provision (for example the Snow Dome) with public sector costs and outlay.

Your understanding of the economic drivers which impact on Tamworth is sound and is a key reason for your alignment with the Greater Birmingham Local Enterprise Partnership (LEP). The decision to join that LEP is founded on the clear vision the Council's political leadership holds that this is the best way for Tamworth to benefit in the longer term. The impetus in Birmingham from businesses such as KPMG and Jaguar Land Rover is seen as a more sustainable driver for economic growth from which Tamworth and your strategic partner, Lichfield District Council, can benefit. Council staff are very supportive of this decision viewing it as the right thing to do in continuing to develop the mutually beneficial relationship with Lichfield. Whilst we recognise how much thought has gone into this decision, we would also encourage you to evaluate the potential value of being a part of both the Greater Birmingham and Staffordshire and Stoke on Trent LEPS. We recognise that this will require you to assess the balance between the rewards of being in both and the resources required to commit to being in two LEPS.

Tamworth's reputation among your partners and stakeholders across Staffordshire county is that you are a borough committed to 'getting things done'. There is a deep-rooted culture of partnership working in Tamworth and the Tamworth Strategic Partnership (TSP) was described to us as 'the most organised and dynamic of the 3 LSPs' in your part of the county. The fact that partnership working is viewed as core business for the authority is demonstrated at TSP meetings where you and your partners are effective in identifying ways in which you can overcome any obstacles to effective collaboration. The Public Sector Hub, Multi-Agency Communications Hub, Data sharing protocol and the Agile Working initiative are examples of this way of working. Nonetheless we would encourage you to continue to strengthen 'bottom-up' input which will make TSP even more effective and reduce any risk of the partnership becoming too strategic or remote from frontline delivery. One way in which you might achieve this is through re-focussed locality working.

You also have good relations with the local newspaper, the Tamworth Herald. This is due in no small part to the efforts of your communications team who have committed efforts to nurturing this. This is exemplified by the joint work with the paper on a 'Question Time' event where both the Council and the Herald shared the podium in engaging with members of the communities of Tamworth. These good relationships have also enabled you to influence the coverage of the Council in the local press in a positive way which is making communications about the Council more effective.

We would encourage you to review and refine the synergy between the Council's 'Sustainability Strategy' and your 'Corporate Change Programme'. This will require you to clearly define and refine both in order that you can better prioritise the workstreams within each of them. This will involve you clarifying governance arrangements for both programmes and identifying synergies which will enable you to streamline activity. Currently there appears to be a lack of clarity and confusion among staff as to precisely what each of the activities is seeking to achieve. In particular the number of workstreams and groups is impacting negatively on the clarity of the outcomes sought from the Strategy and the Programme whilst also stretching the capacity of staff involved to deliver effectively on either. We feel that you need to prioritise the workstreams and projects under each and communicate these to the wider organisation once you have done this.

We also feel it is key you maintain focus on achieving the 'sign off' for the borough's Local Plan. You have been asked to do further work on a 'Plan B' following the examination in July 2013. This work will need to be appropriately resourced in order that you maintain your close work with Lichfield and others on the 'Duty to Cooperate' in addressing any remaining challenges to the borough Local Plan being completed in a timely manner.

### *Financial planning and viability*

Both elected members and staff at Tamworth Borough Council are aware of the resource challenge you face. You have called this a 'financial cliff' and it is clear you have communicated this effectively to staff who have a good understanding of the timescales involved and an appreciation of the approach you are taking to address this. Cabinet members are aware of the need to take tough decisions and there is good joint working between senior officers and both the Leader and the Deputy Leader on financial matters. The Leader of the Council is leading from the front as demonstrated by his personal delivery of a presentation outlining the full picture to all Tamworth Borough councillors at an annual Budget workshop. Your Heads of Service and managers demonstrated a good

understanding of the need to implement efficiencies and seek out opportunities for additional income generation to address the financial challenge by taking a more entrepreneurial approach in how the Council conducts business.

Your Medium Term Financial Strategy (MTFS) is based on prudent assumptions and is buying you time for the delivery of efficiencies. It has been well thought through and your programme-managed forward strategy allows realistic timescales for delivery of the savings you need and the income initiatives you are exploring. Your business rates collection levels, and therefore the retained share of business rates, is holding up. The Change Board is charged with overseeing your programme of service reviews and other workstreams whilst, corporately, you have reviewed your financial modelling to take account of factors such as the summer spending announcements, pensions, business rates and deployment of new homes bonus. This has resulted in the funding gap, in the short term, being improved.

We feel, however, that a radical service reconfiguration is required if you are to completely avoid the 'financial cliff'. Whilst current workstreams will help in closing the budget gap and the council is better placed financially than many other authorities, the funding cuts will nonetheless require you to make hard decisions about service provision and staffing in the future. We encourage you to further evaluate the risk posed by your current plans as there is a significant reliance on 'back loading' and a heavy dependence on achieving financial wins downstream. Further exploration of the possibility of 'front loading' some of your work may help achieve the savings required earlier.

Housing Revenue Account (HRA) as configured under the new regime at the time of the peer challenge is self-sustaining and creates potential funding opportunities. The implementation of the HRA self-financing regime is beneficial for the council as interest paid on the £45 million debt is significantly less than the £3 million regional subsidy previously paid over to central government each year. The Council's long-term approach will generate funds through renovating and building new dwellings and there is an empty site in Tamworth which was about to be occupied when the peer team was onsite which has potential to further improve the Council's financial position. The impact of welfare reforms and your council tax collection rate is broadly in line with achieving your target of 97.9 per cent. You are protecting your council tax base with annual increases.

You are making good progress with your plans for shared services and collaborative working and this will continue to make a significant contribution to closing the deficit. There are five service collaboration areas you have identified with Lichfield and this includes the significant spend area on waste recycling and disposal. You have a willingness to take forward a number of other shared service areas. We feel, however, that there is a need to progress from being opportunistic in this area to taking a more strategic approach. The proposed Memorandum of Understanding with Lichfield will help progress this.

There are already some entrepreneurial initiatives and income generation ideas underway. You have given your staff the opportunity to suggest innovative ways of generating income. For example your communications team have developed their skills through their work on redesigning and marketing the Council's website in-house. They are currently identifying ways in which this service could be provided to other authorities as a means of generating income for the Council whilst you have engaged Deloitte's to work with you in identifying further income generation opportunities. You recognise the need for more creative thinking

in order to generate more income (for example the review of fees and charges and charging for pre-application advice). We encourage you to review your current subsidies which may help you in increasing income to fund reinvestment. We also feel that there may be some benefit in you considering the deployment of a percentage of your New Homes Bonus (NHB) in supporting economic growth and infrastructure to deliver strategic objectives and generate income streams for the Council.

There are challenges to your current income for example car parking and your low council tax base. In addition to this you have a relatively low council tax rate although it is not low enough to be in the bottom quartile which would allow you to take advantage of the £5 rule. These have, therefore, increased the likely impact on the Council of grant funding reductions.

There is work underway in Tamworth to explore possible options for service reductions (for example looking at statutory and discretionary services and rating them in terms of the likelihood of acceptance). We did not, however, pick up any explicit reference to transformation as part of the service reviews; the focus appears to be on existing service configuration and references to scale. We would encourage you to consider broadening the terms of reference for your service reviews to embrace opportunities for fundamental transformation of service delivery in order to further strengthen the work you are doing in this area.

In the past, Participatory Budgeting has proved to be a useful tool in you controlling limited locality funds for projects. Could this methodology be used more widely at a local level to help allocate other funds? We would encourage you to consider using Participatory Budgeting further as a tool to re-focus locality working.

### *Political and Managerial leadership*

Staff view the political and managerial leadership of Tamworth Borough Council as being visible and approachable. Both are respected. This engenders confidence and influence internally and externally and has been enhanced by appreciation that Cabinet and senior managers have communicated the Council's financial challenges in a transparent manner and work well together in respect of 'difficult issues'. A particular example related to the decision to sell a Council leisure centre which was unpopular at the time but is now regarded as having been a sound decision due the savings realised and a better offer to users. We think the strategic commitment to paying for 'outcomes rather than services' is regarded as a more forward looking, future-proofed view of delivery.

The Cabinet appears to be a cohesive and purposeful team who are prepared to make and stand by tough decisions as they set direction. The Leader and Cabinet recognise the scale of the challenging decisions to be made regarding future shrinking resources. They demonstrate the confidence to take risks after assessing potential rewards as evidenced by the decision to turn towards the Greater Birmingham LEP. This willingness to base decisions on balancing risk and reward also assists in effective financial planning.

There are positive working relationships between the Leader and the Chief Executive as well as between CMT and the Cabinet more widely. We were given a clear indication that when brought together as a collective the relationships are supportive ones. The relationship is characterised by each being prepared to challenge the other robustly but

then move forward in partnership once an agreement has been reached. There is a clear decision by the political leadership of the council to 'set the direction and let the professionals deliver'.

We saw an open and honest culture at Tamworth within which managers are empowered to develop initiatives. Both the CMT and Heads of Service are supportive of managers seeking to innovate which should allow the organisation the flexibility to respond positively to challenges as these arise in the future. The programme of Service Reviews has been positively received as the process is one with which they are positively engaged. Tamworth has embraced change to good ends basing decisions on three clear criteria relating to: delivering a positive customer experience, improving working environments and delivering in an efficient way.

We felt that the number of tiers within the Council's structure could be making Tamworth Borough somewhat 'top heavy' in management terms which will inevitably have an impact on your overall revenue costs. We believe you have an opportunity to identify and develop transferrable skills in order to maximise capacity and streamline your overall management structure. Aside from potentially reducing costs, this process would allow you to further develop and equip staff to deliver more effectively. We feel that your management structure would benefit from review of its numerous layers and the various spans of control to reduce or, in some cases, remove potential overlaps at Director and Head of Service levels.

We were told on numerous occasions that any review of services across the Council would be undertaken with each being subjected to the same rigorous tests to ensure that there is clarity in your decisions about which of these may be delivered or configured differently. This is a prudent approach in ensuring that there are minimal constraints on how future financial planning is undertaken by officers as this would ensure a shared view of the way forward in this work. This will benefit the assessment of which services may be appropriate for the various delivery options you are considering.

We encourage you to ensure you are clear on the different and respective roles of both members and officers throughout the organisation and that the distinction is defined, understood and maintained. There have been instances of Cabinet members engaging directly with officers at all levels and whilst this is reflective of your open culture, there is a risk that this could create issues where the difference between political and managerial responsibilities become less clear. We encourage you to recognise this as presenting a risk that needs to be managed. Given challenges faced by all Councils at the present time, we feel it is essential for you to assure yourselves that Tamworth has a clear, consistent, stable and mutually inter-dependent political and managerial leadership.

As regards the political vision for the future, there is a clear understanding at the most senior levels in the Council that your preferred delivery model is a hybrid of commissioned services and direct delivery. However there is more for you to do in clearly communicating the Council's chosen direction as this is not as fully understood across the organisation. The hybrid model has often been mentioned in Directors' and Heads of Services meetings and there may be some added value in a renewed focus on the clear articulation of the Council's chosen direction to ensure its approach is clear among all councillors, staff and partners. Clarity is required as to which services would be appropriate for the different delivery options so that this can be articulated and



communicated both internally and externally. We did not find a clear steer as to the different options which can be considered. It may be that some form of framework would help you in achieving this. This will help give further consideration to identifying and articulating the strategic context and rationale for the different delivery channels you choose to utilise (for example partnerships or shared services models that you apply to different services).

We were impressed by the positive direction in which you are moving with respect to developing in-house expertise in improving your website. It is clear that you are grasping the potential of using web and social media effectively as an integral part of your communication. There may be opportunities to utilise these media further in effectively communicating your hybrid model. There is another wider opportunity we see you having as you re-vamp this part of your communications portfolio. This relates to you how you celebrate successes, raise awareness on the availability of your services and generally seek to communicate your rationale for 'what', 'why' and 'when' you have done (or intend to do) regarding any part of the Authority's business.

This renewed focus will help to minimise the risk of messages from the Council being misinterpreted in any way. We were informed of an instance in which the Council's reaction to a national story about obesity levels in Tamworth was perceived by some external stakeholders as being overly defensive in the face of adverse reports. On closer examination there were factors which influenced your reaction which were not communicated as clearly as might have been the case and your side of the story was not put forward as clearly as you might have wished. We feel that the successful management of perception is often about proactive and effective communication and that renewed focus on this would benefit you in instances such as this.

We would also encourage you to use this clarity of communication to aid you in working jointly with Staffordshire County Council to establish greater clarity around commissioning between you and the county. There will no doubt be challenges that the County Council is addressing in determining how it will deliver with commissioned services. Might a clearer communication of Tamworth's chosen direction positively influence the way in which you interact with the County and other partners? This may also be a reason for closer engagement by Tamworth Borough Council with the Staffordshire and Stoke on Trent LEP.

### Governance and Decision making

Councillors and Directors meet regularly through scheduled meetings, briefings and away days. You have allocated Mondays for strategic issues which involve meetings of various bodies such as CMT, the Change Board or the Executive Management Team. You recognise the value this brings in ensuring that you maintain an effective, on-going focus on strategic issues. It was clear to us that these meetings are characterised by a good and mutually respectful interaction between members and officers.

We were informed that Tamworth's Councillors are considered effective on the ground. Also there appear to be very few concerns regarding councillor ethics as evidenced by the low numbers of complaints from the public and minimal numbers of standards issues.

There has been some improvement in the approach to Overview and Scrutiny. For example, there is more focus by Scrutiny Committees on the Cabinet Forward Plan, and the introduction of review templates to help the business and focus of the Committees. . However despite the improvements made, there is scope for Scrutiny to be more strategic and more effectively provide policy development challenge to the Cabinet. We were informed Scrutiny members seem to treat meetings as a means of information gathering rather than as a forum for challenging council strategy and policy. We encourage you continue to re-focus scrutiny on policy development and performance management and give consideration to provision of dedicated support to the function.

You may also wish to consider a different approach to training your Scrutiny Committees. There may be an opportunity to use the Scrutiny Member's Best Practice Charter as a means of demonstrating and giving members a greater appreciation of what can be achieved through effective scrutiny. There are other active learning approaches that could be considered such as the facilitated re-running of a meeting immediately after it happens in order to demonstrate how business might have been handled differently. There may also be opportunities for members to observe and question Scrutiny Committees from other authorities about how they do business.

We wonder whether the role of your Scrutiny Committees would benefit from a re-definition of the function to provide an enhanced development opportunity for Councillors. Whilst we are mindful that care must be exercised in avoiding the dilution of functions, you may wish to consider whether the Audit and Scrutiny Committees could be combined to provide more substance and responsibility for members. This could also be a way of reducing officer workload in the number of meetings which need to be supported whilst improving the overall effectiveness of Overview and Scrutiny. We also feel there is an opportunity for you to review the current chairing arrangements as Scrutiny might focus more effectively on Cabinet business, and more strategic matters generally, if chaired by opposition councillors.

We feel that overall member training would benefit from a shift in its current passive delivery to a more proactive approach with clear rules on compliance and sanctions (for example Members not being allowed to join Committees such as Licensing and Planning unless they have completed the training relevant to these functions).

Whilst we feel that your Cabinet is committed to taking and standing by difficult decisions in order to achieve the outcomes the Council seeks, the challenges which all Local Authorities face at present are unprecedented. A number of Councils around the country are giving serious consideration as to whether an 'all out' electoral model may allow them to focus on taking tougher decisions which could yield benefits to their local areas and their organisations in the longer term. Some Councils have considered whether the frequency of annual elections 'by thirds' can hinder them in making the transformational change which all Councils have to consider. As you look to a future in which you recognise that further difficult decisions must be taken, we encourage you to assure yourselves that your current arrangements allow you to the maintain longer-term strategic focus that this will require. You may wish to consider moving away from elections by thirds to an all-out electoral model based on the possible benefits for positively enhancing decision-making on the Council's future direction as well as the potential financial savings that you could make.

## Organisational Capacity

The Council is taking a strategic view to service reviews and any re-structures which might result are based on assessment of the outcomes sought and structuring the Council accordingly to deliver these. The approach to service reviews is perceived by staff to be structured, transparent, consistent and equitable across all service delivery areas. This sophisticated assessment of service delivery and working environment improvements is playing a part in these considerations whilst enabling you to avoid a less strategic 'salami-slicing' approach to this. You are responding to the Council shrinking in resource terms by seeking efficiencies through retaining services whilst shedding direct delivery where appropriate. Your considerations are underpinned by an approach of looking at a range of options which will help to generate efficiencies in order to close the budget gap.

Whilst the strategic approach you are taking in service reviews is clear, we would encourage you to assure yourselves that any risk of siloed service reviews which could cause you to miss transformational opportunities managed effectively. The process will require all staff to think about the council as a whole as opposed to focusing on their own departments in isolation. We would also advocate you integrating an early management structure review within this work focussing on spans of control, layers of management, transferrable skills and joint management posts. You may also wish to review the size of some teams which may be over-stretched due to a lack of capacity and identify whether staff in other parts of the council might be deployed into these functions.

There is open access for staff to communicate with senior managers which is enabling ideas to be brought forward. This is also leading to staff being afforded increased discretion and flexibility to seek innovative solutions. Overall we found staff to be strongly committed to the organisation and the communities you serve which provides a strong platform for future positive development.

Your relationship with Lichfield provides a good foundation for the future. There are numerous examples of shared services which are either already in place or are being considered. Your joint working with Lichfield is supported by a proposed Memorandum of Understanding (MoU) and there are good relationships between the political and managerial leadership of both organisations which provides added stability to these arrangements moving forward.

We feel that you would benefit from identifying and providing training for staff which supports their continued development of commercial acumen along with project management skills. This would strengthen their ability to assess the viability of entrepreneurial ideas and manage risk effectively. This would allow for the development of concepts, costing of ideas and then identifying ways of taking these to market. You have already developed internal skills and expertise through your work on the Council website which could be sold at competitive rates to other councils. You may also wish to explore training opportunities for key staff to improve their skills in bid writing as this could to maximise commissioning opportunities open to Tamworth Borough Council.

We would also encourage you to seek ways of further embedding effective project management across the organisation in order to maximise existing investment whilst keeping a strong hold on managing capacity and risk. We were advised of a view in the Council that project management is not yet fully embedded across the organisation

which may be a result of difficulties in staff finding capacity to set aside the 'day job' and deliver discrete projects.

We would encourage you to assure yourselves that you are taking a consistent approach to ICT with a clear understanding of the improvements that this can deliver. There are challenges caused by the impacts of the Public Services Network and Code of Connection which has caused difficulties for staff wanting to use their own electronic devices. There have been some delays to the roll-out of technology resulting in this taking longer than had been expected. There is more for you to do in rectifying some difficulties which have presented in relation to off- site and mobile working and these must be addressed if your aspirations for 'agile working' are to be fully realised.

A common barrier to shared working between Local Authorities is the fact that Councils often have different IT platforms. We would encourage you to ensure that you assure yourselves of compatibility as an integral part of any future plans moving forward.

### Additional areas of focus

In addition to the five core areas of the peer challenge you asked the peer team to consider and comment on your Community Development work and approach to Commissioning.

#### (i) Community Development

You are viewed as a strong partner by the voluntary and community sectors through your Community Development Officers (CDOs) and other individuals who have a reputation for understanding the value of the Sector (as well as its needs). There is perceived to be strong support from political and managerial leaders for effective community engagement and locality working which involves utilising the CDOs effectively. Partly due to good individual relationships the voluntary sector has enjoyed a positive relationship with the Council because you 'strive to get things right' in your community engagement and development work. We would encourage you, however, to make sure your commitment to 'getting things right' is not undermined by the departure of individuals from the organisation and losing their knowledge and understanding of the sector.

Ward members are actively involved with CDOs in working in communities which is further evidence of an organisational commitment to this work. This is providing a valuable advocacy role in communities with the CDOs described to us as effective 'honest brokers' on behalf of communities. You have also used participatory budgeting well in the past. As an organisation partners consider Tamworth Borough Council to be a reliable 'first port of call'. You are described as a catalyst and facilitator (though linking partners effectively with both communities and each other) who delivers quickly, flexibly and visibly. We do feel however that more could be done to ensure communities are fully aware of what is available and you may wish to do this by communicating yours, and your partners', achievements and successes more proactively.

There is a corporate desire at Tamworth Borough Council to 'support communities to run communities'. You recognise the value of community development in providing a route for service providers to work directly with communities and your community hubs are an integral part of you delivering this. Because you see partnership working as core business

you seek to draw in other partners to increase their access to communities. This is evidenced in your work with the police and Homestart and as an organisation you are keen to learn from practice elsewhere; you were described to us as a 'listening' organisation.

We were informed that the opening times of hubs could be more customer friendly – we would encourage you to consider how hours of access can better match the requirements of those who will use the services in the hubs.

We found that managers of other services in the Council are not engaging fully with your community development delivery. This is due to a lack of understanding about what is available and how the CDOs might contribute to the achievement of objectives of other Council service areas. Some managers seemed unsure as to how they should engage with CDOs which means a key resource in you working effectively at a locality level is not being fully utilised. We found some of your locality working to be ad hoc on occasion and therefore there is a risk that full benefit and potential for working this way may not be realised.

Not all Council staff involved in Community Development work are able to focus on outcomes for people because some of the process and practice in this area does not allow this. To ensure you are getting the most out of this work, we believe a better focus on 'why' rather than 'what' is needed as you consider this function as part of the service review. In austere times we would encourage you to provide even greater focus for community development work by identifying key initiatives and projects which are founded upon clearly identified outcomes which are aligned to corporate objectives and undertaken with a clear evidence base underpinning any work you do.

The work you are doing in relation to community development is valued by partners but you are not yet benefiting from funding contributions from partners. In some other instances it has proved a challenge for Community Development to achieve engagement from other services and partners. We would encourage you to consider whether you could link your community development work more integrally into locality working with partners (for example community safety, health, education, employment and environment). There may be opportunities for partners' contributions which you are not yet fully utilising whilst you may be able to increase take up by partners if you clearly demonstrate how your contributions enhance the achievement of their desired impacts and outcomes. We would also encourage you to work towards improving communications across your partners in relation to proactively raising the profile of your work. The new website may be a catalyst for this.

Through your Position Statement, the issue of lone working was raised as a potential concern with regard to your Community Development team. We were informed that in relation to the work of the CDOs, there are systems in place to manage this. There was however a concern expressed to us about customers displaying challenging behaviours at your contact centre and a perception that this might be an increasing trend. You may wish to re-visit current the policies for managing conflict, aggression and supporting lone working in order to assure yourselves that these remain fit for purpose.

## (ii) Commissioning

Good work has been done already with first phase of commissioning. An example is the Improvement and Efficiency West Midlands (IEWM) funded project looking at commissioning around Healthy Tamworth. Also you have undertaken joint commissioning with the County in relation to healthy eating and physical activity. This provides opportunity for learning and evaluation of approaches which could be further replicated in other areas of future work.

The Delayed Discharge project utilised partnership money put into a single pot for joint working. This saved costs for each partner (by reducing the length of the patient stay) and enhanced the customer experience (on the back of partners working together to improve home conditions to which patients were returning).

The Commissioning framework for Tamworth is founded on sound principles of 'procuring outcomes linked to priorities'. It is also 'Compact proofed'. Your 'Commissioning Intentions' document is perceived by partners to be clear and transparent in articulating how you intend to proceed. We questioned whether partners need to reciprocate in order to enable a fuller, borough-wide picture of what will be commissioned. This in turn will in all likelihood highlight opportunities for joint work into the future. A borough-wide commissioning approach has the potential to provide longevity and resilience for any commissioning whilst address the threat and risk of the Council and partners retrenching to core business in austere times.

With this in mind, we encourage you to commence a dialogue with the Clinical Commissioning Group (CCG) and the County Council to establish appetite and scope for joint commissioning. Intrinsic to this conversation is consideration of what the right level and scale at which to commission is – would this be at a County level or would this best be done on a locality basis? We also believe that it will be important to identify what is to be commissioned. Until this is clear the full potential of a collaborative and sustainable approach to commissioning will not be realised. It will be important as well for you to increase the organisational capacity through training for staff to support commissioning. This will enable them to produce better bids and specifications to maximise funding opportunities

### **Moving forward - suggestions for consideration**

Based on what we saw, heard and read we suggest you consider the following actions to build on the Council's undoubted successes. These are things we think will help you improve and develop the effectiveness and capacity to deliver your future ambitions and plans. These are linked to areas you asked us to focus on:

1. Consider opportunities for building further clarity on joint working with Staffordshire County Council in order generate more mutual benefits. This includes a focus on locality working and commissioning.
2. Consider how best to embed locality working within the Council and TSP. For example, an annual plan of priorities (for example improved Streetscene, health literacy and positive diversionary activities for young people in locality X) for each of the 4 locality areas would provide direction for the Community. Align

mainstream resources to locality working and lever in funding and resources from partners and the HRA account.

3. Communicate and explain the Sustainability Strategy for the council with staff more widely. It was not clear to the team that all staff are as aware of this work as you would wish.
4. Consider developing a higher profile for the Council's political leadership in strategic business planning and decisions. The input from political leaders in raising awareness of future financial challenges for the Council has been effective and you may wish to replicate this more widely in relation to other areas, for example, locality working.
5. Seek to improve the ways in which the positive work you are doing with partner organisations is communicated. There appear to be benefits of more closely interlinked communications across different organisations which are not yet being utilised (e.g. links on each other's websites). Internally consider developing an internal "Who's Who" (in conjunction with the intranet) to help inform users as to who is responsible for what. Review your current approach to learning from (and communication of) complaints, comments and compliments.
6. Develop a more proactive approach to member training with clear rules on compliance and sanctions. With particular regard to scrutiny, consider a structured development programme for the Council's Scrutiny Committees utilising experience from other Authorities. This might include visits to other Councils and targeted support such as:
  - mentoring for the committees as a whole (including observation of meetings with feedback)
  - targeted one to one mentoring for the Tamworth Chairs from counterparts in other Authorities and
  - assigning Policy 'tasks/projects' for Overview and Scrutiny to consider (e.g. tasking Overview and Scrutiny to come up with recommendations on how you embed locality working).
  - Consider introducing a convention that the Chairman and Vice-chairman of Scrutiny Committees are each appointed from opposing political groups.

We have made available to you a set of slides that summarise the above feedback. The slides are the ones used by the peer team to present its feedback at the end of the onsite visit.

### **Next steps**

You will undoubtedly wish to reflect on these findings, and suggestions made, with your senior managerial and political leadership before determining how the Council wishes to take things forward. As part of the peer challenge process, there is an offer of continued activity to support this. In the meantime we are keen to continue the relationship we have formed with you and colleagues through the peer challenge to date. We will endeavour to signpost you to other sources of information and examples of practice and thinking.

I thought it helpful to provide contact details for Howard Davis who, as you know, is our Principal Adviser (West Midlands). Howard can be contacted via email at [howard.davis@local.gov.uk](mailto:howard.davis@local.gov.uk) (or tel. 07920 061197). He is the main contact between your authority and the Local Government Association. Hopefully this provides you with a convenient route of access to the Local Government Association, its resources and any further support.

All of us connected with the peer challenge would like to wish you every success going forward. Once again, many thanks to you and your colleagues for inviting the peer challenge and to everyone involved for their participation.

Yours sincerely

Ernest Opuni – LGA Peer Challenge Manager

On behalf of the peer challenge team:

- Nicola Bulbeck (Chief Executive – Teignbridge District Council Council)
- Councillor Neil Clarke (Leader, Rushcliffe Borough Council)
- Jamie Carson (Corporate Director, Chorley Council)
- Terry Collier (Corporate Director, Spelthorne Council)
- Ernest Opuni – LGA Peer Challenge Manager



THURSDAY, 13 MARCH 2014

**REPORT OF THE PORTFOLIO HOLDER FOR ECONOMY AND EDUCATION****TAMWORTH BOROUGH COUNCIL DRAFT LOCAL PLAN AND DUTY TO CO-OPERATE ISSUES****EXEMPT INFORMATION****PURPOSE**

The report seeks Cabinet approval to publish the draft Local Plan for public consultation. The consultation will run for a period of 6 weeks. Members of the public, businesses, statutory bodies and persons listed as duty to co-operate bodies will have the opportunity to comment on the proposed Local Plan policies and proposed allocations for employment and housing sites and the supporting evidence base; including the Sustainability Appraisal. Following this consultation comments will be assessed and where necessary changes will be made to the draft Local Plan in preparation for the pre-submission consultation to be held later this year.

The report also seeks Cabinet approval to submit comments on Lichfield District Council's Local Plan – Main modifications.

**RECOMMENDATIONS**

**1) That the draft Local Plan and accompanying Sustainability Appraisal are released for a six week public consultation process in accordance with the Council's Statement of Community Involvement (2006) and emerging Statement of Community Involvement update (Recommended to Council 18 March 2014 to be adopted).**

**2) Authority is delegated to the Director for Communities Planning and Partnership and the Head of Planning & Regeneration, in consultation with the Portfolio Holder for Economy and Education, to make minor amendments to the draft Local Plan prior to the consultation process (expected 31<sup>st</sup> March 2014) .**

**3) Approve the proposed response to the Lichfield District Council Local Plan Main Modifications consultation.**

**4) Authority is delegated to the Director Communities Planning and Partnerships and Head of Planning & Regeneration in consultation with the Portfolio Holder Economy and Education to undertake further co-operation and work with Lichfield District Council, North Warwickshire Borough Council and other relevant bodies to address the short fall arising from Tamworth's housing and employment needs. Including the organisation of Members meeting to hold further discussions with Members at Lichfield and North Warwickshire.**

**EXECUTIVE SUMMARY****Withdrawn Local Plan**

In November 2012 the Council submitted the 2006-2028 Local Plan to the Secretary of State for examination. The appointed Planning Inspector (David Vickery) identified areas of concern, notably a requirement to make more specific and detailed land use allocations for housing, employment and town centre uses. This would ensure that a supply of deliverable housing and employment sites are identified to meet the borough's future needs. To address these concerns the Council proposed to

modify the Local Plan by making additional allocations. To do this, the Council would have needed to carry out a Sustainability Appraisal (SA) on all proposed sites and suitable alternatives. In February 2013 the Inspector called an Exploratory Meeting. Following this meeting the Inspector issued the Council with a letter which recommended a withdrawal of the Local Plan from examination due to the high risk of a legal challenge the concern was over the scale of the required changes and the need for public consultation on the Sustainability Appraisal work that would support the proposed changes.,

The Council selected to withdraw the Local Plan and set up a cross party working group to support the process of amending the Local Plan.

Since withdrawing the Local Plan from examination new evidence has been prepared and existing work has been updated and refreshed, this work has informed the draft Local Plan. At the next examination an inspector will apply the four tests of soundness to the Local Plan and it is important that these four tests are considered whilst preparing the evidence base and formulating planning policy. The tests are;

1. positively prepared;
2. justified;
3. effective, and
4. consistent with national policy.

The plan must seek to meet objectively assessed needs and infrastructure requirements and where reasonable work with neighbours to deliver un-met needs. The plan should be the most appropriate strategy when considered against alternatives. It should be deliverable over the period set out and it should enable the delivery of sustainable development as set out in the National Planning Policy Framework.

The draft Local Plan will now cover the period 2006-2031<sup>1</sup>. The new evidence and updates consist of:

- Updated Sustainability Appraisal (SA)
- Updated Habitats Regulation Assessment (HRA)
- Whole Plan Viability Assessment and affordable housing assessment (WPV)
- Updated Employment Land Review (ELR)
- Updated Strategic Housing Market Assessment (SHMA)
- Updated Strategic Housing Land Availability Assessment (Oct 2012)
- Appraisals for all potential housing and employment sites (2013)
- Updated Town centre and retail needs assessment & potential town centre use allocations assessment (2014)
- Anker Valley Spatial Framework – in particular a Transport Options Appraisal (2013)
- Updated Infrastructure Delivery Plan (currently included as part of the Local Plan)

The draft Local Plan aims to deal with the issues raised by the evidence as set out below

### **Housing**

Tamworth is projected to experience a significant level of population growth.

Further, the supply of new housing has failed to keep up with rising demand which has created an imbalance in the market. This has created affordability problems for first time buyers who have been priced out of the housing market, as well as increasing the demographic imbalance in the area.

The draft Local Plan sets out an overall housing need for 6,250 homes over the plan period. A key challenge for the strategy will be to increase the delivery of and the right type of housing, in order to create sustainable and mixed communities in the area.

### **Economy**

The local economy of Tamworth is relatively stable and is expected to experience growth during the life of the plan. It is currently diversifying from its traditional reliance on manufacturing to other employment sectors including business and financial services. It is relatively affluent with a low unemployment rate.

However, this masks the fact that employment is largely low-paid, unskilled and requiring few qualifications. To some extent these factors also explain the housing affordability problems in the area. There are also pockets of deprivation that exist (low income, poor qualification levels and poor health) within the borough, mostly within the post war planned estates, some of which are among the most deprived in England.

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<sup>1</sup> 2006 is used for the start date as we need to ensure any unmet needs are met within the rest of the Local Plan period.

To help address these issues, the draft Local Plan sets out that there is a need of 32 hectares of additional employment land from 2006 to 2031. A key challenge will be to ensure that the right types, quantity and locations of employment land are allocated in order to attract employers and investment and help the town to fulfil its true economic potential.

There is also a need to regenerate and diversify the town centre and ensure it remains vibrant and viable. To overcome this challenge, the Local Plan is seeking to increase the delivery of new homes, leisure and cultural development in the town centre. There is a need for convenience retail floor space (2,900 sqm between 2021 and 2031) and comparison retail goods floor space (7,600 sqm after 2021), to come forward within the borough later in the plan period.

The delivery of further employment land and retail floorspace and ensuring the town centre remains vibrant and viable will help to create a sustainable and prosperous future for Tamworth.

### **Environmental**

Tamworth is expected to experience high levels of growth. This is constrained by the scarcity of development land due to policy restrictions such as the Green Belt and administrative constraints arising from Tamworth's tightly drawn boundaries and planned neighbourhoods as a consequence of its status as an expanded town. There are also extensive areas of flood plain, particularly around the town centre and centre of the borough, areas of nature conservation importance and the historic nature of most of the town centre.

A key consideration will be the need to balance growth with the protection of natural and built assets to ensure it will not have a detrimental impact on the quality of life for Tamworth's communities. Furthermore, it will be important to ensure that the policies within the strategy do not contribute to, or increase the effects of climate change.

### **Infrastructure**

The expected growth of the town is likely to increase pressure on, and increase the demand for investment in additional infrastructure (highways, open spaces, and social community facilities). This could potentially have a detrimental impact on the well being of existing and future communities living within the borough. For instance, this is an issue for transport infrastructure which is unable to cope with the high levels of car usage during certain times of the day and experiences congestion hot spots across the borough, particularly along the Gungate corridor, within the town centre, the out of town shopping parks and some junctions along the A5.

A key consideration for the Local Plan is therefore to ensure that the existing infrastructure is utilised efficiently and new infrastructure is delivered in locations where there is demand, in order to support the creation of sustainable communities and the growth of the town.

The more significant changes to the local plan from the previous withdrawn plan are updates to the objectively assessed needs for retail, employment and housing and the proposal of land use allocations to help meet these needs. The following sections describe the work which has been undertaken to inform proposed policy decisions in the draft Local Plan.

### **National Planning Policy Framework**

The NPPF came into effect on 27 March 2012, it sets out planning policies for England and how they are expected to be applied. It provides guidance for local authorities, both in drawing up plans and making decisions about planning applications. Two key changes from previous policy were that Local Plans should be 'positively prepared' especially regarding the duty to co-operate and that they should not threaten the viability of development. The withdrawn Local Plan was prepared before the NPPF came into place, however it was examined under the new system. The work which was set out by the Council at the Exploratory Meeting for the withdrawn Local Plan was designed to address these requirements arising from the NPPF. This work has been completed for the draft Local Plan.

At the heart of the NPPF is the presumption in favour of sustainable development, which should be seen as a golden thread running through the plan making process. Specifically for plan making and Local Plans this means that:

- Local authorities should positively seek opportunities to meet the development needs of their area, and
- Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change.

Local Authorities should set out the strategic priorities for the area; this should include policies to

deliver the homes and jobs needed in the area and provision of retail, leisure and other commercial development. The Local Plan should allocate sites to promote development.

For **town centre uses** (Retail) the NPPF requires planning policy to be positive and promote a competitive town centre environment. An assessment of the capacity of existing centres to accommodate new town centre development should be carried out. This will then inform the allocation of sites in the town centre to meet the scale and type of retail leisure, commercial etc needed in the town centre. Where this is not possible edge of centre sites should be allocated and if this is not possible the Local Plan should set out policies which allow the consideration of town centre uses to be brought forward which are out of centres.

For **employment needs** Local Authorities should plan pro-actively to meet the development needs of business. They should set criteria or identify strategic sites to meet anticipated needs over the plan period. An evidence base to assess the need for land and floor space over the plan period should be prepared.

For **housing needs** Local Authorities should use an evidence base to ensure that the Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area. The housing assessment should meet the household and population projections and take into account migration and demographic change. It should also address the need for all types of housing; affordable, family, elderly etc.

The Local Plan should identify key sites which are critical to the delivery of the housing strategy over the plan period.

## **Draft Local Plan Evidence Base**

### **Needs**

An evidence base has been prepared which assesses the future need for town centre uses, employment and housing over the plan period.

### **Town Centre uses**

The town centre assessment looks at how much available spend there is within the area and converts this into floor space and projects this forward across the plan period (taking into account population and demographic changes). This is then assessed against the existing and planned level of retail provision in the borough and then the amount of new floor space required to meet future needs can be calculated. This assessment was updated between December 2013 and January 2014.

The town centre evidence base sets out that there is capacity for **7,800m<sup>2</sup>** of comparison retail floor space and **2,900m<sup>2</sup>** of convenience retail floor space after 2021.

### **Employment Land**

The employment land assessment looks at how much floor space is required to meet future employment growth. This assessment looks at a range of factors, including; past build out rates of employment land in the borough, population change: how many jobs are needed to support a growing population and economic forecasting: what are the growth sectors likely to be, which sectors are performing well, which are we trying to bring to Tamworth? This assessment also takes into consideration the amount of floor space which has been lost to other uses in recent years and ensures that future needs take this into account. This assessment was updated in December 2013.

Employment Land Review identified six future employment land scenarios for Tamworth. The range spans from 22.91ha to 69.87ha over the plan period. Scenario two and four (a) were deemed the most appropriate to Tamworth, as they consider the level of employment land required with a 'regeneration and growth' thrust and the expected population and demographic changes. The plan period requirement for scenario two is 34.47ha and for scenario four (a) 29.07ha, the mid point of these scenarios is 31.77ha, therefore **32ha** of new employment land is needed. The review specifically looked at the need for new office space in Tamworth arising from B1(a) office and A2 professional needs. The assessment showed there was no specific need for either, however the 32ha is a mix of all B class employment uses including office.

### **Housing Needs**

The housing need assessment looks at the number of new dwellings required to meet the projected levels of population growth and demographic change within the Borough. The assessment was jointly carried out in 2012 with Lichfield and Cannock Chase. The consultants who undertook the 2012 work updated the study to support the Lichfield Local Plan examination last year and there were no

significant changes to the Tamworth needs figure. They have advised that no further update is required at the present time.

The housing needs assessment set out 12 scenarios to project future demand. The scenarios identified a range of growth options for Tamworth from 2006 to 2028, from 4,400 dwellings to 11,150 dwellings. The study also analysed the core constraints on delivery including the environmental and infrastructure capacity and concluded that the objectively assessed need for Tamworth ranged between 240-265 dwellings per annum (5,280 to 5,830 dwellings). Taking a mid-point of these figures annualised over the course from 2006 to 2028 equates to an overall need of 5,500 dwellings. The plan period has now been extended to 2031 and therefore the objectively assessed need is **6,250** dwellings. With seven years of the plan period gone (2006 – 2012) there has been a total of 1,347 (net) new homes delivered, an additional 29 dwellings were under construction and a further 371 with planning permission as of 1 April 2013. This leaves **4,503** of Tamworth’s objectively assessed housing need to be delivered by 2031. This number is expected to change before the Plan is submitted as completion figures from 2013-2014 will be available. However it is not expected to change significantly.

New needs assessments compared to the assessments in the withdrawn Local Plan. As described in the preceding sections, new information has been used where available to refresh the needs of these 3 land uses. The same methodology has been used to carry out the updates.

	<b>Withdrawn Local Plan</b>	<b>Draft Local Plan</b>
<b>Retail</b>	20,000m <sup>2</sup> comparison goods 1,600m <sup>2</sup> convenience goods	7,800 <sup>2</sup> comparison goods after 2021 2,900m <sup>2</sup> convenience goods after 2021  Some new retail units have received planning permission and the amount of available household spend has decreased slightly. This new figure reflects a longer plan period.
<b>Employment</b>	36ha employment land 20,000m <sup>2</sup> office space	32ha no specific office floor space requirement  A small amount of employment use has received planning permission. New assessment takes into account a protracted economic recession and longer recovery. This new figure reflects a longer plan period.
<b>Housing</b>	5,500 dwellings	6,250 dwellings (4,503 left)  The updated census information showed that the previous assessment is still accurate. Additional homes are added to the need to reflect a longer plan period.

**Supply of available land**

The NPPF states that: Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change and that Local Plans should allocate sites to promote development.

To quantify the capacity for development within the borough for the three different land uses, several assessments have been carried out. These were a technical consultation, sustainability appraisal and ascertaining if the land is available for development during the plan period.

The sites assessed through this process were drawn from the Strategic Housing Land Availability Assessment and the Employment Land Review. Both documents provide an initial assessment of all potential land for development. Any site with a capacity of 10 dwellings or over and sites of 0.4ha or over were assessed. Some sites below these thresholds were also assessed as they could form larger comprehensive schemes.

The technical consultation was carried out ‘without prejudice’ and involved statutory bodies and infrastructure providers to assess each site. Their comments on the consultation were used to form a baseline as to whether development on the site could be achieved and if so what mitigation would be required. Once this had been completed every site was subject to a sustainability appraisal, this assessed the sustainability implications of bringing forward that site for development both positive and negative. Finally landowners and developers were contacted again to gauge whether they are willing to

bring forward development within the plan period.

At each stage of these assessments sites were removed from the process and no longer considered as possible allocations.

### **Retail**

After carrying out the technical assessments and contacting landowners it was considered that there are no additional sites within the existing town centre or on the edge of centre available for development, apart from Gungate which already has planning permission. However a need still remains and this may be met through planning applications. Proposals will be assessed individually, ensuring that they are in the best available location and do not significantly impact on existing centres in the borough.

### **Employment**

Of the 14 sites assessed for new employment land, a total of **18ha** of employment land on 10 sites is suitable and available for development. This leaves a short fall of 14ha which will either come forward through the planning application process on the most suitable sites or it will need to be delivered in another local authority area. Considering that all land available for employment needs has been assessed, it is unlikely that windfall sites will come forward and therefore the full 14ha should be sought beyond the borough boundary.

### **Housing**

In total over 60 sites with a capacity of 10 or more dwellings have been assessed for housing, this includes 24 greenfield sites within the borough and rest brownfield sites, Following the assessment work detailed above, of these sites, a total of 24 are suitable to be allocated for housing, 20 urban brownfield sites would bring forward 428 dwellings and 4 greenfield strategic extensions would bring forward 2,519 dwellings; 2,947 in total. This gives in total a **further 2,900** dwellings that could be delivered to help meet Tamworth's objectively assessed need.

<b>Number of Dwellings</b>	<b>Stage in Planning Process</b>
1,347	Completed
29	Under Construction
371	With Planning Permission
2,900	To be allocated in the Local Plan

As described in previous sections, the housing need assessment showed that there is a need for 6,250 new homes from 2006 to 2031. But given that the total amount of housing from 2006 to 2031 that can be delivered in Tamworth is 4,600 a more appropriate housing requirement for Tamworth to plan for should be **4,250**. This allows for some flexibility (350 dwellings less or roughly two years supply). A total of 4,250 equates to 170 dwellings to be delivered each year within Tamworth.

**By planning for 4,250 new homes in total, this would leave a shortfall of 2,000 dwellings. This unmet need cannot be ignored and will need to be delivered outside of the Borough by 2031.**

In order for the objectively assessed needs to be met (6,250), 2,000 new homes will need to be delivered outside of the Borough. The Housing Needs assessment established that Lichfield and Tamworth are within a shared housing market area and that the work currently being undertaken by the Greater Birmingham Solihull Local Enterprise Partnership (GBSLEP) supports this. The GBSLEP work also shows that Tamworth and North Warwickshire share a housing market area. Irrespective of this, it is clear from the geography and local government administrative boundaries of the three authorities that for Tamworth to grow and meet its needs, land will need to be made available within Lichfield and North Warwickshire. Currently both Lichfield and North Warwickshire are planning to deliver a total of 1,000 dwellings (500 each) to help meet Tamworth's objectively assessed needs. This however still leaves a shortfall of a further 1,000 dwellings from meeting the objectively assessed need. Therefore further work is required to assess options for Tamworth's growth outside of the borough to determine the most sustainable and deliverable options. This work will need to build upon the existing evidence base from all three local authority's Local Plans. Approval is sought to allow officers to progress these discussions and to include Members from all Authorities in renewed Duty To Co-operate discussions.

The specific sites proposed for employment and housing allocations are listed within the draft Local Plan and can be identified on the Policies Map. It is clear from the evidence that there is a significant shortfall in suitable and available land to meet the borough's housing and employment needs. Therefore it is essential that all options for development in Tamworth are considered. Without fully considering the options within Tamworth it would be difficult to request that any shortfall over the



agreed 1,000 should be delivered outside of the borough.

In addition to addressing the future needs of the borough, the draft Local Plan proposes planning policy on several key topics.

Chapter 4 'A prosperous town' defines the town centre and network of Local and Neighbourhood centres. Ensures that the 'town centre' development out of the centre is properly assessed and that cultural and leisure development within the town centre is supported. In addition to setting out new employment areas it protects the existing strategic employment areas.

Chapter 5 'Strong and vibrant Neighbourhoods' sets out the location and amount of new housing in the borough and identifies the infrastructure required within urban extensions. It identifies key regeneration priority areas within the borough and how they can be improved. The density and type of housing on new sites is established as is the level of affordable housing.

Chapter 6 'High quality environment' provides policy to protect and enhance the existing green infrastructure network in the borough and how new development can improve and provide links to it. It sets out how the built environment should be protected and how new development should be of good design

Chapter 7 'A sustainable town' promotes sustainable transport, energy efficiency, flood risk mitigation and prevention, climate change adaptation and ensuring the facilities new development requires is provided in the right locations.

#### Local Plan Consultation

After the withdrawal of the Local Plan from examination in March 2013 a cross party Members sub-group was formed to keep members informed and updated of Local Plan progress. The remit of the group is to; provide a political mandate for the Local Plan; consider and make recommendations based upon evidence; for officers to develop Members knowledge of the process enabling them to actively and positively communicate this each political party and key stakeholders; and for Members to advise officers of key issues facing local communities. The group meets on a regular basis and is formed by 3 members from the Conservative Group and 3 members from the Labour Group.

#### Consultation Dates

Subject to approval by Cabinet the Local Plan is expected to begin its consultation on 31 March and will last for 6 weeks.

The draft Local Plan will have a series of questions set out within the document. A questionnaire will be available on the website, at libraries, at consultation events and from Marmion House. This can be completed when reading the Local Plan. It is important that comments are made through this process and in writing.

The public consultation will

- Conform to the legal requirements set out in planning legislation and the Council's adopted SCI (Existing 2006 and the emerging SCI due at Council March 18<sup>th</sup> 2014)
- Send letters and e-mails to the consultation database of persons listed in planning regulations (interested people, statutory bodies, utility providers, duty to co-operate bodies)
- Public notice in the Herald informing of when the consultation is and where any possible exhibitions will take place
- Press release in the Herald – Members statement
- Council's website notice
- Members seminar – to take place before or early on in the consultation
- Council, Corporate Management Team / Heads Of Service meeting – to take place early on in the consultation
- Citizens Panel – to take place early on in the consultation
- Make copies of the Local Plan and SA available: all on the website, hard copies at Marmion House and local libraries
- When available to publish articles in 'Talk Back'
- Preparing leaflets to ensure wider publicity
- Exhibitions; these should take place at various locations across the borough, be held during in the day, evenings and weekends to ensure a full range of people can attend.

Possible locations are:

- Libraries
- Ankerside
- Community buildings

### **Local plan next steps**

Following this consultation we will move towards a pre-submission Local Plan which will be presented to Cabinet and then Council with the recommendation to approve a further 6 week consultation in the Summer of 2014. Following that and subject to that consultation the Local Plan and evidence base will be submitted to the Secretary of State for examination.

### **Comments for the consultation of Lichfield's Local Plan Main Modifications**

During the examination hearing for Lichfield's Local Plan the Inspector considered: whether Lichfield District Council had discharged its duty to co-operate as required by section 33A of the 2004 Act (as amended); secondly, whether the *Lichfield District Local Plan; Strategy* (the Plan) makes adequate provision for the objectively assessed need for housing; thirdly, whether the Sustainability Appraisal is a reliable piece of evidence; and fourthly, whether the various sites identified in the Plan as Sustainable Development Areas and the site identified as a Broad Development Location are deliverable or developable, whether they are viable, whether they are sustainable and whether they are the most appropriate when judged against reasonable alternatives.

The Lichfield Local Plan proposes a Broad Development Location north of Tamworth, capable of accommodating 1,000 dwellings, half of which would meet needs arising within Tamworth Borough. At the time of the examination, the Inspector noted that it was common ground that the development of this land should be planned comprehensively with the adjoining Anker Valley Sustainable Urban Extension proposed in the Tamworth Local Plan, commenting that both would rely on improvements to the local highway network.

The Inspector also stated in his findings that "without the Anker Valley scheme, the development of the land to the east of the railway within Lichfield would result in a salient of built form jutting into the countryside and poorly related to the urban area".

At that time the Inspector recognised that there was no certainty that the Anker Valley scheme will come forward, but, on the basis of the information available, considered that there appeared to be a reasonable prospect that it will, given the firm commitment to it by Tamworth Borough Council. However, the Inspector commented that "if this proves not to be the case the Council will need to reconsider its position when preparing the *Lichfield Local Plan: Allocations* document when it will be considering the Broad Development Location in more detail."

The Inspector concluded that the allocation of this Broad Development Location was soundly based.

Furthermore, he was satisfied that Lichfield District Council had discharged its duty to co-operate, that the Sustainability Appraisal is a reliable piece of evidence and that the Strategic Development Areas and the Broad Development Location identified in the Plan are soundly based. However, the Inspector raised concerns that the Plan as submitted was unsound in that it did not make adequate provision for the objective assessment of housing need contained in its own evidence base.

Following receipt of the Inspectors Report, Council's are able to propose Main Modifications to the submitted plan with the intention of resolving soundness issues. Lichfield District Council indicated at the hearings that it would be willing to identify a further site or sites to address such a shortfall, carry out the necessary Sustainability Appraisal, and make any resulting main modifications to the Plan and consult on these.

As such, since receipt of the Inspectors Report, Lichfield District Council has carried out further work and has identified 'main' modifications to the Local Plan Strategy that was submitted for Examination in March 2013. The 'main' modifications are intended to address matters of soundness or legal compliance raised. It is these modifications that are being consulted upon at present for a six week period between 6<sup>th</sup> February and 20<sup>th</sup> March 2014.

The Main Modifications relate to a number of policies (and supporting text) but are primarily focused upon housing numbers, phasing and the identification of new strategic housing sites at Cricket Lane, Lichfield and Deans Slade Farm, Lichfield; policies relating to Cannock Chase Special Area of Conservation (SAC); the plan period and the need to work collaboratively with other authorities in considering future housing need.

Recent work on the Anker Valley site has demonstrated a limited capacity of 500 houses subject to further transport improvements (Gungate Pinch Point Programme). The maximum capacity that could



be achieved in this location would be 1350 houses but the work suggests that the necessary additional highway infrastructure work over that identified in the Gungate Pinch Point Programme scheme would make this size of development unviable.

As such, we are concerned that the main modifications to Lichfield's Local Plan proposed do not address the new information arising from the jointly commissioned transport options appraisal report (BWB report). The broad allocation site north of Tamworth would have significant implications on the Gungate Corridor and also on Tamworth's ability to meet its own housing needs within the borough.

The proposed response is attached to this report and authorisation is sought to submit that response before the end of consultation period. Please see attachment for the proposed response

## **RESOURCE IMPLICATIONS**

There are no financial implications arising from this report. A budget already exists for the production of the Local Plan and public consultation.

## **LEGAL/RISK IMPLICATIONS BACKGROUND**

There is a considerable risk that through not having an up to date Local Plan in place, planning applications in Tamworth will be assessed against the National Planning Policy Framework leading to a 'loss of control' over development and impinging on the Council's ability to deliver key spatial objectives. Having a Local Plan will allow for the housing allocations and the sustainable urban extension sites to be planned in full and ensure that they are delivering the right type of housing and the necessary infrastructure. Without a Local Plan in place there is a risk that development could occur in areas which are not currently being proposed for housing or employment.

The draft Local Plan consultation must be carried out in accordance with the adopted Statement Community Involvement (at the time of consultation).

There are no specific legal questions asked through the consultation, such as duty to co-operate.

## **SUSTAINABILITY IMPLICATIONS**

The draft Local Plan has been subject to a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA). These assessments have ensured that sustainability issues are given full consideration in the preparation of Local Plan policies and allocations. The Sustainability Appraisal is contained in the appendices of this report. The SA raises no significant concerns with the draft Local Plan and where appropriate it has suggested further mitigation measures to those already within the draft Local Plan.

An Equalities Impact Assessment and a Health Impact Assessment have been prepared along side the draft Local Plan and are contained in the appendices of this report. The HIA appraises the potential impact of Local Plan policy on delivering health objectives within the borough.

The EIA raised no concerns with promoting equality and diversity. However to ensure equality needs are maintained in the future, further consultations will be in accordance with the SCI ensuring that all residents who wish to be involved in the preparation of DPDs can express their views.

The Health Impact Assessment (HIA) shows that the policies in the draft local plan will have a positive impact on the health of Tamworth's residents, particularly in the most deprived areas which are a priority for regeneration. Some policies have more obvious connections with health and physical exercise, such as sustainable transport and policies that protect and enhance the open space networks and sport and recreation facilities. Through these policies, people will be encouraged to walk and cycle along sustainable transport routes linking housing areas with the town centre, employment areas, schools, local centres and leisure facilities. More regular exercise, either on a formal or informal basis, will address a number of the physical activity health objectives.

Other policies have a less direct impact on health. Policies that support the town centre, local and neighbourhood centres, combined with sustainable transport links, will enable people to access health and other support services and fresh food. A strong and vibrant town centre with a wide range of facilities and an attractive historic and green setting will have positive effects on mental well being as will areas of well maintained natural open space. Policies to promote high quality affordable housing

will improve living conditions.

The local plan can only address health inequalities from a spatial planning viewpoint. There are other considerations such as funding, behaviour and education which will necessitate partnership working with other organisations.

The Habitats Regulations Assessment (HRA) shows that the policies of the draft local plan are unlikely to lead to significant effects on either the River Mease SAC or Cannock Chase SAC (Special Area of Conservation). In the case of the Cannock Chase SAC, Tamworth was already outside the zone of influence and Natural England has recently advised that the zone has contracted from 19km to 15km. This means that Tamworth is further removed from the SAC and development in the borough is even less likely to lead to recreational or traffic pressure or pollution.

When responding to the consultation on the Pre-submission Draft Local Plan, Natural England was of the opinion that the Council had not been able to confirm whether development in Tamworth would adversely affect water quality in the River Mease SAC. Severn Trent has subsequently advised that sewage and wastewater from the entire borough is treated at the Coton Lane Waste Water Treatment Works and discharges into the River Tame not the Mease. The conclusion is that no development within the borough will affect the water quality of the River Mease SAC.

The recommendation from the HRA is that references to both the River Mease SAC and Cannock Chase SAC are removed from the Local Plan.

## **BACKGROUND INFORMATION**

See appendices

## **REPORT AUTHOR**

Alex Roberts – Development Plan Manager x279

## **LIST OF BACKGROUND PAPERS**

Lichfield Local Plan comments  
Sustainability Appraisal  
Draft Local Plan

## **APPENDICES**

Draft Local Plan 2006 to 2031  
Policies Map  
Town Centre Insert Map  
Sustainability Appraisal  
Habitats Regulation Assessment  
Equalities Impact Assessment  
Health Impact Assessment  
Lichfield Local Plan comments

**RE: LICHFIELD LOCAL PLAN: MAIN MODIFICATIONS FOR LICHFIELD DISTRICT COUNCIL'S LOCAL PLAN**

Dear ...

In response to the main modifications proposed to Lichfield District Council's Local Plan, including the ELR addendum and related Green Belt Review Supplementary Report, Tamworth Borough Council has a number of comments to make.

Tamworth is reliant upon adjoining authorities to assist in meeting its housing needs. Currently there is a signed Memorandum of Understanding (July 2013) between Tamworth, Lichfield and North Warwickshire Council's which includes the following:

*1. For both Lichfield District Council and North Warwickshire Borough Council to agree to deliver a proportion, identified as at least 500 new homes per authority (representing at least 1,000 in total), of Tamworth's future housing needs within their respective administrative boundaries.*

*3. That in the case of Lichfield District Council, the broad location be restricted to land north of the Anker Valley allocation. A firm allocation within Lichfield District will be identified through the Lichfield District Local Plan: Allocations document.*

*6. To agree that delivery of new homes within Lichfield District to meet Tamworth Borough's needs will be informed by an Anker Valley masterplanning exercise that will inform the Tamworth Local Plan and the Lichfield District Local Plan: Allocations document.*

Since the withdrawal of the Tamworth Local Plan 2006-2028, further work has been carried out, particularly in respect of proposals for new development in the Anker Valley area. Staffordshire County Council commissioned JCT to examine the Gungate and Fountains junction corridor as to how further development could take place feeding off this corridor, investigating how it could be improved. In short, the report demonstrated that a certain set of improvements would allow for a development of 500 units to take place in the Anker Valley area.

A further report was commissioned jointly by Staffordshire County Council, Tamworth Borough Council and Lichfield District Council with input from the development industry and landowners with interests in Anker Valley and to the north of Tamworth. Transport consultancy BWB completed a report in November 2013. It examined how the JCT report could be built on and what possible measures could be taken to allow for more than 500 units to be developed in this location.

The report concludes:

*... that the following highway and demand management transport package is likely to be deliverable and would provide the best overall transport strategy for the Anker Valley SUE by providing both strategic and local connectivity improvements:*

- Contribution towards the Upper Gungate improvements [works identified in JCT report]*
- Improved frequency bus service to the site*
- Contribution towards A5/Mile Oak and A5/Stoneydelph junction improvements*
- Anker Valley link Road*
- Improve existing footpath through Stationfields Park Homes*
- Direct pedestrian/cycle access to Tamworth Railway Station*
- Vehicular access via Ashby Road*
- Footbridge across the Birmingham to Derby Railway*
- Station car park and public transport connection*
- Pedestrian/cycle link to Amington*
- Funding Education Travel Plans .*

*1.14 This would enable approximately 1,350 dwellings to be developed on the Anker Valley SUE without detriment to the Upper Gungate corridor. However, based on high level cost estimates of £10,000 to £15,000 per dwelling, the transport package is unlikely to be viable without public investment. This investment could be justified on the basis that the transport package would address a key strategic transport issue by improving public transport provision to the West Midlands through increasing accessibility to Tamworth Railway Station and providing much needed car parking.*

*1.15 Without public investment and subject to additional investment in demand management measures, the Anker Valley SUE could be developed for approximately 700 dwellings without detriment to Upper Gungate. Whilst this would provide similar local connectivity improvements to the preferred package, it would result in fewer strategic transport benefits.*

Without the substantial public investment, the capacity for development would be limited to 500 dwellings by completing the works outlined in the JCT report or to 700 dwellings by implementing above transport solutions apart from the Anker Valley link road. However the increase to 700 would only be justifiable once further detailed work has been done to assess the impact a station car park and public transport connection and funding a new education travel plan would have.

To date, this further assessment has not been completed by the public or private sector and therefore the total capacity of the Gungate and fountains junction corridor is 500 dwellings.

Having taken account of the reduced capacity at the Anker Valley site and extended plan period, further work on potential allocations for meeting Tamworth's future housing needs has been carried out. This shows that there is limited capacity in Tamworth Borough and therefore there will be a greater reliance upon adjoining authorities to help deliver Tamworth's housing need. Assuming that Anker Valley will deliver 500 dwellings, there is a total shortfall of approximately 2,000 dwellings, 1,000 more than agreed in the July 2013 Memorandum Of Understanding. This places added pressure on Lichfield and North Warwickshire to assist in meeting Tamworth's needs.

Having read the Inspectors report from Lichfield's Local Plan Examination, which took place in March 2014, the Inspector makes some important points which are:

*"108. The situation is, therefore, that there is no certainty that the Anker Valley scheme will come forward and certainly I am not in a position to prejudge the outcome of the examination into the Tamworth Local Plan. However, on the basis of the information available there appears to be a reasonable prospect that it will, given the firm commitment to it by Tamworth Borough Council.*

*109. If this proves not to be the case the Council will need to reconsider its position when preparing the Lichfield Local Plan: Allocations document when it will be considering the Broad Development Location in more detail."*

There is little prospect that a scheme of more than 500 dwellings will come forward despite the commitment of Tamworth Borough Council and Staffs County Council over the past 12 months and the further work produced (BWB report). As such, the policy for this broad location to the north of Tamworth needs to be reconsidered now in this examination.

The Main Modifications proposed do not address these issues. Lichfield District Council's plan includes an area allocated for residential development to the north of Tamworth which, if it comes forward for development without a joined up comprehensive approach, it would have a serious impact on the capacity and deliverability of Anker Valley. Furthermore, the result would be, to use the inspectors words, "a salient of built form jutting into the countryside and poorly related to the urban area" (para 104).

Anker Valley meets a significant proportion of Tamworth Borough Council's housing need and would be a significant loss to housing supply. It would also increase the 2,000 houses now

needed outside of Tamworth Borough's boundaries, putting further pressure on Lichfield District Council and North Warwickshire Council. Taking paragraph 108 of the Inspectors report, there is currently no reasonable prospect of 1,350 dwellings in this location now. As per the Inspectors advice in paragraph 109, if this proves to be the case then Lichfield District Council would need to reconsider its position when preparing the Lichfield Local Plan: Allocations document. We therefore ask Lichfield District Council to re-consider its position on the north of Tamworth broad location and to work with us towards a mutually agreeable solution.

Additionally, you may be aware that Tamworth is unable to meet its Employment needs for the plan period. We note from the Employment Land Review Addendum that there are potential sites within Lichfield over and above the amount needed to meet its future employment needs. As Tamworth is unable to meet its own employment needs, it is considered that those needs could potentially be met in the surplus that could be allocated by Lichfield District Council. Again, the Cricket Lane site is within a commutable distance from Tamworth with good road links and this site could contribute towards Tamworth's shortfall.

**We request that Main Modification 1 should be altered to read:**

*Following discussions falling under the Duty to Cooperate Lichfield District Council recognises that evidence is emerging to indicate that **Tamworth and** Birmingham will not be able to accommodate the whole of **their** new housing requirement for 2011-31 within their administrative boundaries and that some provision will need to be made in adjoining areas to help meet **these** needs. Lichfield District Council will work collaboratively with **Tamworth and** Birmingham, other authorities and with GBSLEP to establish, objectively, the level of long term growth through a joint commissioning of a further housing assessment and work to establish the scale and distribution of any emerging housing shortfall. **Lichfield District Council will also continue to work with Tamworth Borough Council and North Warwickshire Borough Council to update the 2013 Memorandum of Understanding.** In the event that the work identifies that further provision is needed in Lichfield District, an early review of the Lichfield District Local Plan will be brought forward to address this.*

**We request that elements of the supporting text in paragraph 15.2 of the submitted Local Plan and of the Inspector's report be incorporated into Policy: North of Tamworth to read:**

#### **Policy: North of Tamworth**

Within the Broad Development Location identified to the north of Tamworth, a sustainable, safe, well designed mixed use development of approximately 1,000 dwellings will be delivered by 2028:

1. It is important that the delivery of homes within this broad location does not undermine the ability for Tamworth Borough Council to deliver homes within its boundary, particularly at Anker Valley. Therefore it should be recognised that development within Tamworth takes precedent over this broad location.
2. The latest evidence supporting this broad location and Anker Valley in particular infrastructure requirements and delivery should be considered when preparing Lichfield Local Plan: Allocations. If the evidence does not demonstrate that this site can be delivered an alternative should be identified and allocated and the broad location removed from this Local Plan.
3. Any planning applications received within this interim period should adhere to this policy. In particular they should recognise that any application will not undermine the ability for Tamworth Borough Council to deliver homes within its boundary, particularly at Anker Valley. The infrastructure requirements of the whole area (Anker Valley and North of Tamworth) should be considered as one and assessed as such.

**We request that reference throughout the Local Plan to the delivery of 500 homes to meet Tamworth's needs is changed to a *minimum* of 500 homes to meet Tamworth's needs.**

**We request that Main Modification 18 should be altered to include an additional bullet point to read:**

79.1 hectares of land will be allocated for employment uses, **including approximately 12 hectares within the Cricket Lane SDA**, informed by the employment portfolio as shown within the Employment Land Review. Around 10 additional hectares of land will be defined by the Local Plan Allocations document to ensure flexibility of provision.

Any unmet employment need arising from Tamworth Borough will also be considered during the preparation of the Local Plan Allocations document. This unmet employment will need to be considered specifically alongside any provision North Warwickshire Borough Council and Birmingham City Council may meet and any future work arising from the GBSLEP.





**Tamworth Borough Council –  
Draft Local Plan 2006-2031  
For Public Consultation  
March to May 2014**





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Policies Map Separate Document

Town Centre Insert Map Separate Document





## CHAPTER 1 - INTRODUCTION

### Context to the Tamworth Local Plan

- 1.1 Since 2006, Tamworth Borough Council has been working with a wide range of stakeholders (local communities, local strategic partnership and developers etc) to produce a development plan for the borough. This was being produced in the context of previous national and regional planning guidance and was called a Core Strategy. It has now been renamed the Tamworth Local Plan, as part of the Government's on going reform of the planning system.
- 1.2 In November 2012 the Council submitted the Local Plan to the Planning Inspectorate for examination. The Inspector raised a number of concerns relating to the soundness of the Plan, notably in respect of a lack of suitable land use allocations for housing, employment and town centre uses. An exploratory meeting was held in February 2013 to discuss the work required to overcome the Inspector's concerns. Despite the Council's intention to make additional allocations, the Inspector was of the opinion that the plan should be withdrawn. The Council subsequently withdrew the Local Plan in March 2013.
- 1.3 Since the withdrawal of the Local Plan the work set out in the exploratory meeting has been completed and parts of the evidence base updated and refreshed where necessary
- 1.4 Tamworth Draft Local Plan sets out the spatial planning strategy for the borough over the period 2006-2031 in terms of the type of development required to meet local community and business needs, its scale and location as well as the policies that will apply to ensure that development is sustainable. It also includes policies to ensure that appropriate supporting infrastructure is delivered and the area's built and natural environment is protected and enhanced. The Plan aims to be sufficiently flexible to adapt to the changing circumstances during its life.
- 1.5 The government has published the National Planning Policy Framework (March 2012), which sets out planning policies for achieving sustainable development. Emphasis has been placed on the importance of ensuring that Local Plan policies contribute to achieving sustainable development, in terms of promoting sustainable economic growth. The Tamworth Local Plan has been prepared in compliance with the National Planning Policy Framework (NPPF).
- 1.6 It should be noted that, as part of the Government's ongoing reform of the planning system, the West Midlands Regional Spatial Strategy (WMRSS)<sup>1</sup> has been revoked under the Localism Act 2011. The Local Plan reflects the NPPF requirement for a locally derived evidence base, particularly in relation to future housing need. Where considered relevant, working in partnership with neighbouring authorities to discharge the duty to co-operate has resulted in cross-boundary issues being addressed.
- 1.7 The Tamworth Local Plan is expected to be adopted by 2015 and will replace the existing Local Plan (Adopted in 2006/07)<sup>2</sup>. Further detailed guidance will be included in a limited number of SPDs which will support the implementation of the plan. Once it is adopted, planning applications will be determined in accordance with the Local Plan unless other material considerations (including the NPPF) indicate otherwise.

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<sup>1</sup> West Midlands Regional Spatial Strategy: Phase Two Revision (2008)

<sup>2</sup> Tamworth Borough Council - Local Plan 2006-2011 (Adopted July 2006 and Policies Saved in July 2011)

## Delivering Sustainable Development

- 1.8 The NPPF places great emphasis on the presumption in favour of sustainable development. This is reflected through the policies within this Local Plan and its future implementation. The World Commission on Environment and Development (1987) defined sustainable development as “meeting the needs of the present without compromising the ability of future generations to meet their own needs”
- 1.9 The Tamworth Local Plan policies and proposals will impact on the three facets of Sustainable Development (i.e. economic, social and environmental) and measures have been taken to integrate them and minimise any potential conflicts and adverse impacts, in order to achieve the most sustainable outcome for the borough.
- 1.10 For example: to promote the borough’s economic well being, the policies include measures to build a strong, responsive and competitive economy, by ensuring that land of the right type and location is available to encourage growth and innovation, including delivering the supporting infrastructure. This is balanced by policies to promote the social wellbeing of the borough, including measures to promote strong, vibrant and healthy communities through promoting an increased supply of the right type of housing, a good quality built environment, with accessible local services that reflect the community’s needs, whilst simultaneously considering the environmental wellbeing of the borough. The SA/SEA and other assessments have underpinned this approach.

### Presumption in Favour of Sustainable Development

- 1.11 The NPPF sets out the presumption in favour of sustainable development and the need for sustainable economic growth, on which local plans are to be based and includes clear policies that will guide how the presumption should be applied locally.

#### Overarching Policy for the Development Plan

##### NP1: Presumption in Favour of Sustainable Development

Any proposals for development that demonstrate that they are in accordance with policies in this plan and are sustainable will be granted planning permission without any delay.

When determining applications the Council will take the following approach to reflect the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

- a) Any adverse impacts of granting permission would significantly and demonstrably

outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or

b) Specific policies in that Framework indicate that development should be restricted.

## SA/Combined Assessments

- 1.12 A Sustainability Appraisal (SA), which includes a Strategic Environmental Assessment (SEA) has been undertaken during the production of the Local Plan. This considers the social, economic and environmental effects (including impact on natural resources) of the strategy and ensures it accords with the principles of sustainable development. Each of the draft policies was developed, refined and assessed against sustainability criteria throughout the preparation of the Local Plan. The Sustainability Appraisal Report is published alongside this draft document.
- 1.13 Under the Habitats Regulations, the council has undertaken in consultation with Natural England, a Habitats Regulations Assessments (HRA) to ensure that the policies in the Local Plan do not harm sites designated as being of European importance for biodiversity.
- 1.14 In addition to the assessments described above, the policies contained within this version of the Local Plan have been subjected to both a Health Impact Assessment and Equalities Impact Assessment.
- 1.15 The Local Plan is closely related to the Tamworth Sustainable Community Strategy and associated strategic objectives which were produced by the Tamworth Strategic Partnership, a multi-agency partnership committed to improving the quality of life of local people. 12 strategic objectives have been defined, which concentrate the Vision into key specific issues that need to be addressed. A key element of the Local Plan is how it will be delivered.
- 1.16 The Tamworth Sustainable Community Strategy is focussed on delivering specific strategic priorities. One of its key challenges is to deliver sustainable growth in Tamworth's local economy and promote Tamworth as a Place.

### **Its vision is of: “One Tamworth, Perfectly Placed”**

(The people)

(The place)

Below this sit two strategic priorities:

#### **Strategic Priority 1: To Aspire and Prosper in Tamworth**

**Primary Outcome:** To create and sustain a thriving local economy and make Tamworth a more inspirational and competitive place to do business through:

- Raising the aspiration and attainment levels of young people
- Creating opportunities for business growth through developing and using skills and talent
- Promoting private sector growth and create quality employment locally
- Branding and marketing “Tamworth” as a great place to “live life to the full”
- Creating the physical and technological infrastructure necessary to support the achievement of this
- primary outcome.

## **Strategic Priority 2: To be healthier and safer in Tamworth**

### **Primary Outcome:**

#### **Strategic Priority 2: To be healthier and safer in Tamworth**

**Primary Outcome:** To create a safe environment in which local people can reach their full potential and live longer, healthier lives through;

- Addressing the causes of poor health in children and young people;
- Improving the health and well being of older people by supporting them to live active, independent lives;
- Reducing the harm and wider consequences of alcohol abuse on individuals, families and society;
- Implementing 'Total Place' solutions to tackling crime and ASB in designated localities;
- Developing innovative early interventions to tackle youth crime and ASB; and
- Creating an integrated approach to protecting those most vulnerable in our local communities.

1.17 Tamworth Strategic partnership has identified a number of causal factors, which may require targeting to achieve these strategic priorities:

- Reduce the levels of unemployment by reducing the number of jobseeker allowance claimants and in particular youth unemployment;
- Reduce alcohol misuse by tackling both the inappropriate availability and consumption of alcohol;
- Improve the location, quality, quantity, and types of Housing;
- Reduce the numbers of residents who live significantly more time in ill or poor health to the national average;
- Improve the quality, quantity and stock of suitable land and premises for economic development (enable expansion, start-ups and inward investment);
- Develop a modern, future proofed infrastructure for residents and visitors;
- Improve the capacity and generic skills and awareness of parents;
- Reduce harm and inequalities caused by tobacco consumption;
- Increase aspiration levels;
- Increase the levels of physical activity;
- Provide flexible, integrated and effective public services that meets the needs of Tamworth's Communities;
- Improve positive nutrition choices and promote healthy eating;
- Increase self esteem levels particularly in vulnerable groups.

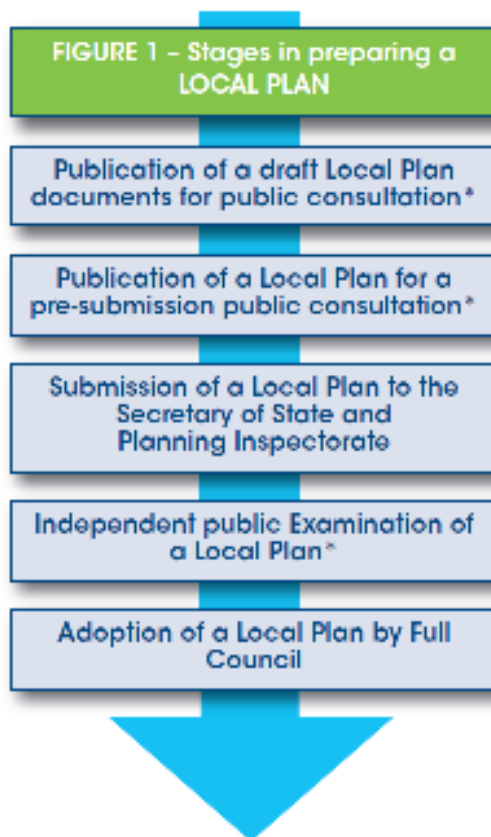
1.18 The Local Plan's spatial vision is closely aligned to Tamworth's Sustainable Community Strategy's vision and priorities. The Local Plan policies and proposals will help deliver the spatial elements of the above strategic priorities. For example, housing policies will help increase the delivery of and the right types of housing, to ensure local communities are able to meet their aspirations; the built environment design policies will help reduce crime and encourage more active, healthy life styles.



## The Local Plan production process to date

- 1.19 Work commenced on the Local Plan in 2006. Since then the council has undertaken a number of consultation exercises with the communities of Tamworth, along with other stakeholders during 2007-08, to identify and agree a series of issues and options for delivering future development within the borough. This influenced the production, in 2009, of a preferred spatial strategy for the borough and a subsequent housing policies consultation in 2011. The consultation responses to these two documents influenced the pre-submission publication Local Plan which was submitted for examination in 2012. The responses to the pre-submission consultation and the comments and questions raised by the inspector during the examination period of November 2012 to March 2013 have influenced the production of this draft Local Plan. In addition to this a 'technical consultation' was carried out with statutory bodies and infrastructure providers between the summer and December in 2013, the consultation was primarily concerned with gathering detailed information on potential land use allocations.
- 1.20 In addition to public consultation, the Local Plan is based on robust evidence. Specialist studies and existing and developing strategies have together built a comprehensive evidence base. Throughout the production process, the Council has updated the evidence base covering a range of topics including employment land availability, strategic housing land availability and needs, linkages between the town centre and Ventura and Jolly Sailor Retail Parks, open space, water infrastructure, flooding, retail, renewables and affordable housing viability to name but a few. These have been used to justify the approach taken by the Local Plan.
- 1.21 An essential part of the process is community engagement and we have set out our approach to involving the community in the Local Plan through the Statement of Community Involvement which was adopted in June 2006 and is currently being refreshed and will be adopted in 2014. It is important that at all stages the process is transparent and accessible to all and is continuous. This is crucial to ensuring that the outcome leads to a sense of community ownership of local policy decisions.

## Draft Local Plan for public consultation (this document)



- 1.22 The draft Local Plan has been published for a six week consultation between [DATE] and [DATE], following this consultation and analysis of comments a pre-submission Local Plan will be prepared for another six week public consultation.
- 1.23 This six week consultation period is an opportunity to comment on all aspects of the Local Plan, Sustainability Appraisal and evidence base.
- 1.24 Copies have been made available to download from the Council's website and physical copies have been distributed to the council office and libraries
- Tamworth Borough Council, Marmion House,  
Lichfield Street, Tamworth B79 7BZ  
(Monday to Thursday, 08.45–17.10, Friday 08.45-17.05)
  - Tamworth Library, Corporation Street,  
Tamworth, B79 7DN  
(Monday to Tuesday, 08.30-19.00,  
Wednesday, Thursday and Friday 08.30-18.00  
Saturday 09.00-16.00)
  - Wilnecote Library, Wilnecote High School,  
Tinkers Green Road, Wilnecote, Tamworth, B77 5LF  
(Monday 09.00-12.00 and 14.15-17.00,  
Wednesday 09.00-12.00 and 14.15-19.00,  
Friday 14.15-19.00  
Saturday 09.30-16.00)

- Glascote Library Caledonian, Glascote, Tamworth, B77 2ED  
(Monday, Thursday, Friday 09.00-17.00  
Tuesday 14.00-17.00,  
Saturday 09.30-13.00)

- 1.25 A press notice has been published in the Tamworth Herald. In addition, anyone who has previously been involved in the Local Plan process or has indicated they wish to be involved in the consultation process has been informed about this consultation.
- 1.26 Further details on this consultation and guidance on how to comment on the draft Local Plan, including a comment form, can be downloaded from, <http://www.tamworth.gov.uk/local-plan>
- 1.27 Your views are important so please do not hesitate to contact the Development Plan Team if you have difficulty in understanding any part of the document or submitting your comments.

Please contact:

The Development Plan Team on 01827 709279, 709278, 709274 and 709384

## Next Steps

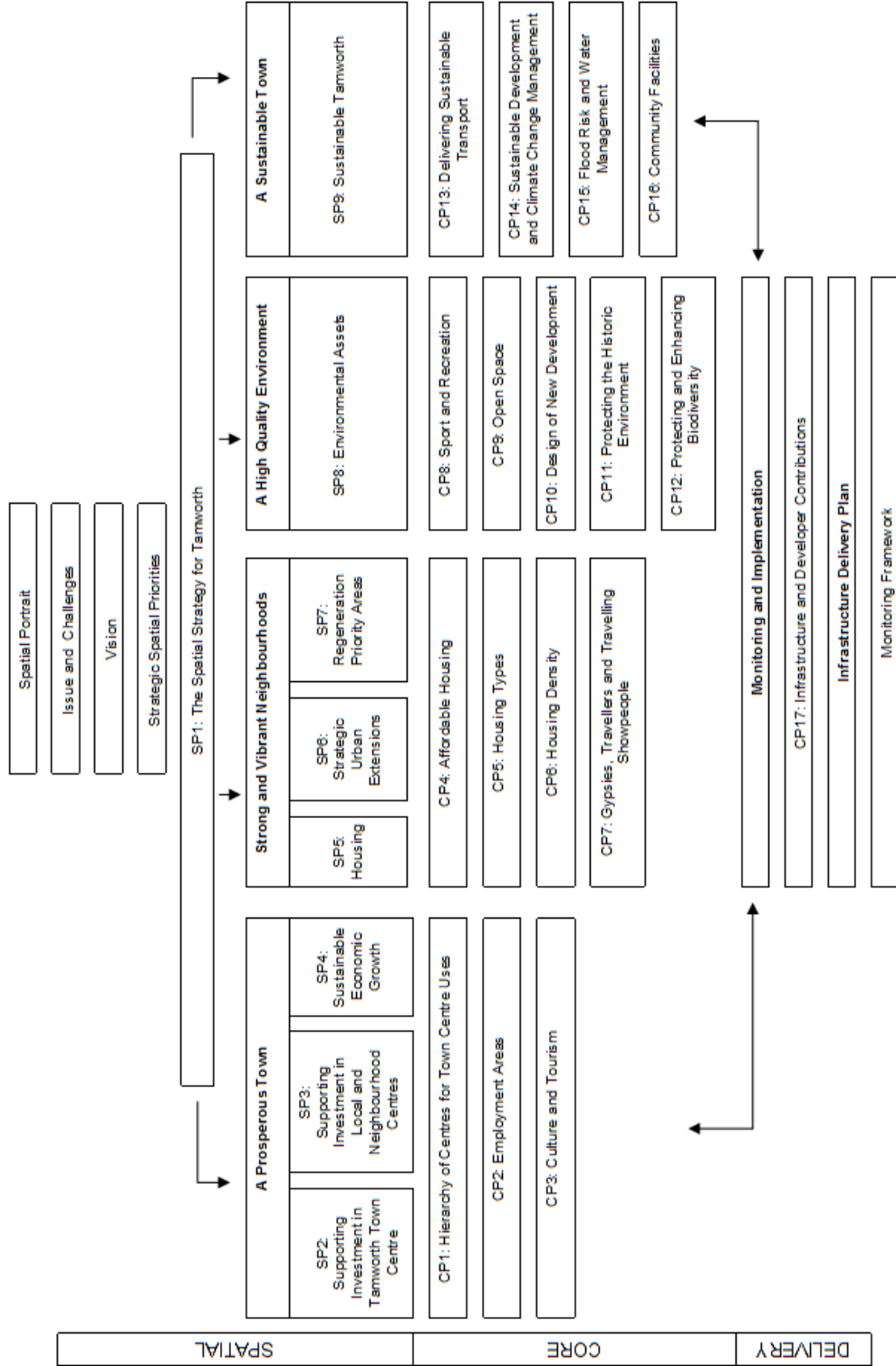
- 1.28 Once the six week draft Local Plan consultation period is completed then the comments will be summarised as part of the consultation process, this will then feed into the next version of the Local Plan; the pre-submission.

## How to read this Document

- 1.29 The draft Local Plan is divided into a number of chapters. The first includes a spatial portrait and vision for the borough. It sets out the key characteristics of Tamworth and identifies the strategic issues and challenges facing the borough that the Local Plan seeks to address. The vision sets out the type of place Tamworth should become by 2031, taking into account existing plans and strategies produced by both the council and its partners. The vision results in a set of 12 strategic spatial priorities which are set out in relation to the key themes to which they relate.
- 1.30 The policy chapters are summarised in four over-arching themes: a prosperous borough, strong and vibrant neighbourhoods, a high quality environment and a sustainable town. The chapters include policies to guide how the spatial vision and strategic spatial priorities will be achieved in practical terms. Spatial policies are high level policies that set out how much and what development there will be, allocate sites and direct where it will go, when it will take place and where possible who will deliver it. Core Policies contained within each theme seek to deliver the spatial policies.
- 1.31 The Monitoring and Delivery chapter sets out how the policies will be monitored and delivered. It contains a Monitoring and Implementation Framework which includes setting out a series of monitoring indicators and targets against each policy to measure their delivery. The indicators will be monitored regularly and if it is shown that targets are not being achieved then contingency measures, also set out in the framework, will be implemented.

- 1.32 The Local Plan's success will depend on effective implementation of the policies. Whilst the council will play a major role in implementing the policies through its statutory planning functions, implementation will also rely on a range of partner organisations including the Tamworth Strategic Partnership, Staffordshire County Council, statutory service providers, developers, Registered Social Landlords and infrastructure providers amongst others. As such, an Infrastructure Delivery Plan is included setting out what infrastructure is required, when, how it is going to be delivered and by whom.
- 1.34 The following chart outlines the overall structure of the document and shows how each core policy fits within the spatial policy which in turn delivers the overall spatial strategy.

**Figure 2: Structure of Document**



## CHAPTER 2 - BACKGROUND: SPATIAL PORTRAIT, VISION & OBJECTIVES

### Spatial Portrait

- 2.1 Tamworth is an ancient borough established as the Saxon Mercian Capital. It is located in the south-eastern corner of Staffordshire bordered by Warwickshire to the south and east. Situated 18 miles from the Birmingham conurbation and on the edge of the West Midlands Greenbelt, Tamworth Borough is only 12 square miles in extent making it one of the smallest in England. Geographically the Borough is related to the neighbouring districts of North Warwickshire and Lichfield. Socially, Tamworth has many links with Birmingham having received overspill in the 1960s and 1970s which resulted in the development of a series of planned housing estates with associated centres, green spaces and community facilities.
- 2.2 Consequently, the population of Tamworth has tripled since the post-war years due to the relocation of Birmingham residents as a result of the overspill agreement. The overspill development raises challenges for the Borough, in particular the preservation of Tamworth's history, historic core and identity, which has become overpowered by the 1960s and 1970s planned housing estates. Many areas, in particular the social housing areas, contain housing stock which is showing signs of stress, whilst being dated in design and uniform in appearance. As Tamworth has grown from its original historic core, surrounding rural hamlets and villages such as Wilnecote and Amington have been enveloped into the urban structure of Tamworth. This means that the town, which was largely confined to the historic core and river system, now spreads out into what was the rural hinterland. Absorbing various hamlets and villages has created small pockets of historical interest amongst the newer housing and industrial developments, the most important of which have been recognised by various Conservation Area designations. Tamworth's urban area is continuous with Fazeley and Mile Oak, both of which are situated outside the Borough in Lichfield District. Fig 2 illustrates this pattern of development in Tamworth.
- 2.3 Tamworth Borough is almost exclusively urban with limited areas of countryside within the borough boundary. The close proximity of Tamworth to the countryside provides residents and visitors with recreational opportunities, and employers and inward investors with a quality environment. The post war development of the borough, combined with natural features (including rivers, flood plains, biodiversity sites) has resulted in a borough that appears 'urban-green' in character with the urban area softened by a network of green linkages and spaces. However, the circle of countryside is under pressure due to the lack of development opportunities within the urban area.
- 2.4 The population of Tamworth in 2011 was approximately 77,000 and projected figures suggest Tamworth will experience a population growth of 11.6% by 2031, a total of 9,000 people. However, numbers are set to reduce in the number of young adults and growth will be concentrated in the older age groups. The proportion of people over 65 will increase by 58% (7,000) by 2031. An ageing population requiring increasing care and support will need to be accommodated. Additionally house price inflation has led to a housing market that first time buyers find difficult to access. Affordable housing is also an issue that needs to be addressed to ensure that the young are retained within the Town. Tamworth's housing stock is skewed towards

semi-detached and detached housing, which does not necessarily reflect the needs of both younger and older groups.

- 2.5 Tamworth's housing market is relatively self contained. However there are strong ties with settlements surrounding Tamworth but within other Local Authority areas. Tamworth loses population to Lichfield District and North Warwickshire but gains considerable population from Birmingham, demonstrating the historical links with the city. To a lesser extent there are also links beyond the West Midlands to South Derbyshire and North West Leicestershire.
- 2.6 Part of a network of strategic centres encircling Birmingham, Tamworth is the focus of development that meets the needs of the town and provides for the immediate rural catchment. This extends into Lichfield District, North Warwickshire and up to South Derbyshire and includes a network of villages which rely on the borough for their services and facilities. It is traditionally a working class town with its roots in manufacturing until the late 1990s when the town experienced decline in what was a vibrant and buoyant employment sector. Employment restructuring is underway to diversify the employment offer and move away from the dependency on manufacturing. Whilst manufacturing is still important, the majority of jobs are now in the service industry.
- 2.7 The Council is a key partner in the Greater Birmingham and Solihull Local Economic Partnership and works closely with businesses and neighbouring authorities to capitalise on Tamworth's strengths to promote and deliver local economic development.
- 2.8 Within the town there are both significant pockets of affluence and deprivation combined with low aspiration levels; the latter especially in Glascote, Amington, Belgrave and Stonydelph. There are concentrations of unemployment, poor health, poor literacy and numeracy, anti-social behaviour and poverty. According to the "Indices of Multiple Deprivation", 18.1% of the population live in areas that are amongst the most deprived in England. The Glascote ward of Tamworth has the highest level of income deprivation in Staffordshire, where 45% of the adult population is living in an income deprived family.
- 2.9 The Council is working to foster strong relationships with the community and to develop a long term programme of community engagement and participation, offering support and advice on education, training and funding for community projects. The health of people in Tamworth is varied compared to the England average. Whilst life expectancy for both men and women is similar to the England average, it is 8 years lower for men and 7 years lower for women in the most deprived areas of Tamworth than in the least deprived areas. Estimated adult healthy eating and obesity levels are worse than the England average. Levels of teenage pregnancy and GCSE attainment are also worse than the England average.
- 2.10 Tamworth's compact urban form provides good opportunities for transport accessibility, particularly to and from the town centre where the town's retail and leisure services are predominantly located. Tamworth's close proximity to the national motorway network and to Birmingham makes it an accessible place to live and work. However, it is estimated that around 50% of the adult population out-commute each day to work which does not contribute to a sustainable lifestyle where services, facilities, jobs and housing are all accessible without having to use the car for long journeys. Despite this, evidence suggests that Tamworth's transport related carbon emissions are one of the lowest per population in England which may be a result of its compact form and sustainable development pattern focused around

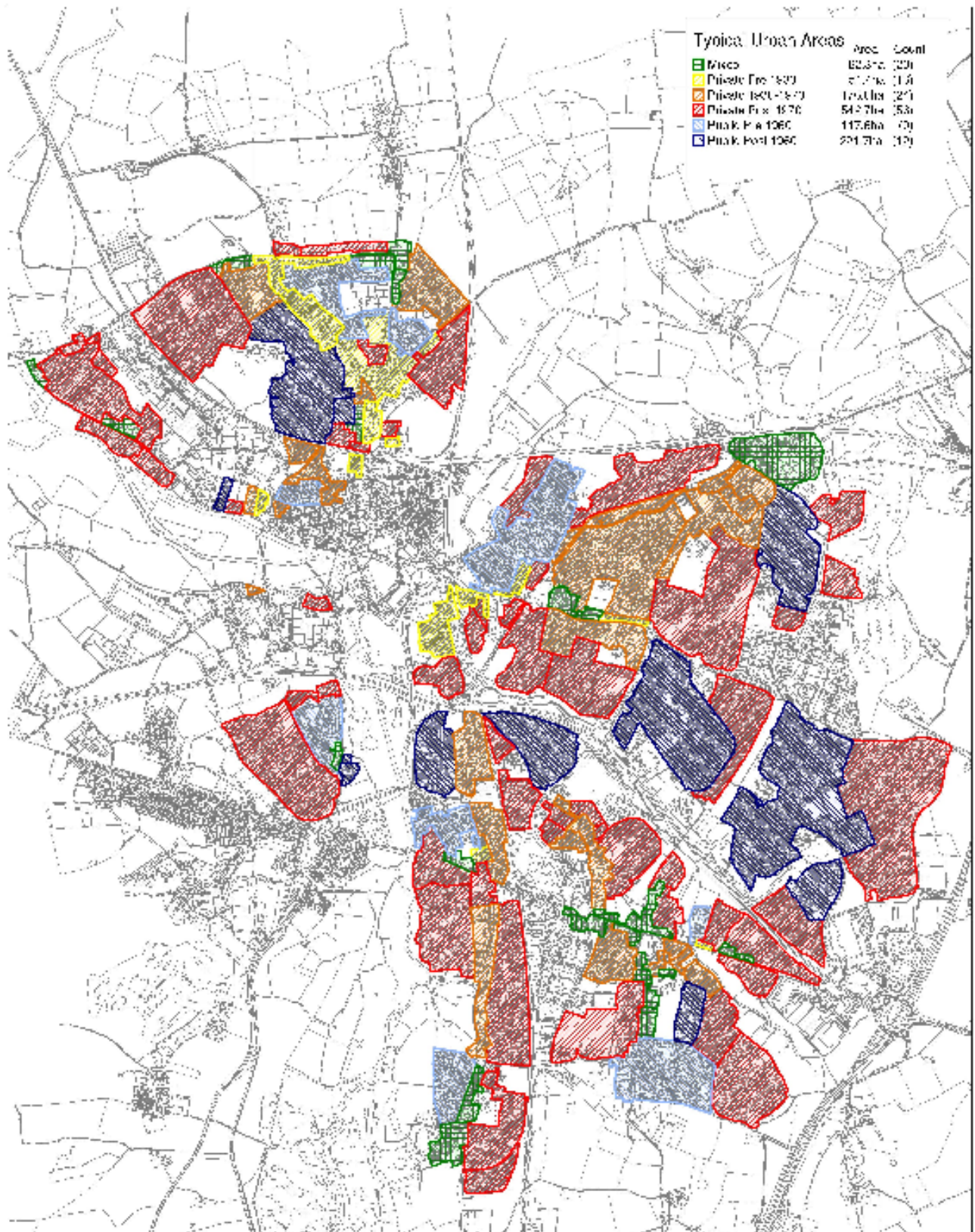
connected neighbourhoods and centres. This poses a challenge for future development to ensure this trend continues.

2.11 The location of the Norman Castle at the point where the Rivers Tame and Anker meet in the centre of Tamworth is a focal point for the town. The Castle Grounds are a well-used and highly valued area of recreation, open space and sports facilities for residents and visitors that compliment other important facilities in the town. The historic core of Tamworth surrounds the Castle, set out along a Medieval street pattern. Much of the town centre is covered by conservation area designations.

2.12 The town centre performs relatively well but could improve with better representation from multiple retailers and leisure operators and a more attractive environment to enhance its role as a service hub and a focus for independent, specialist retailers. An improved town centre offer, particularly focussing on specialist retail and restaurants, combined with its status as a tourism and cultural hub is required to counter-balance the attractions of the out of town shopping parks. These retail areas are predominantly travelled to by car causing congestion and an unpleasant pedestrian environment. As such, the Council is working to bring forward key development opportunities within the town centre together with proposals to improve the linkages between the town centre and the out of town retail areas to attract more people to visit the town centres.



**Figure 3: Tamworth Typical Urban Areas**



## Issues & Challenges

2.13 Tamworth is expected to experience a high level of housing and economic growth in order to meet the needs and aspirations of the town and create sustainable communities. However, opportunities for expansion of the town are constrained by a tight administrative boundary, environmental constraints such as the flood plain and the Greenbelt and sections of the highway network limiting site capacity. With the exception of the sustainable urban extensions, a proportion of Tamworth's housing and employment opportunities will come forward within the existing urban area with any remaining need being met within adjoining local authorities.

2.14 Based upon the evidence base that has been collected and the characteristics of the area, the key issues and challenges that need to be addressed through the Local Plan are outlined below:

### Housing

2.15 Tamworth is projected to experience a significant level of population growth and this is likely to result in a higher proportion of elderly people residing in the town.

2.16 Further, the supply of new housing has failed to keep up with rising demand which has created an imbalance in the market. This has created affordability problems for first time buyers who have been priced out of the housing market, as well as increasing the demographic imbalance in the area.

2.17 The Draft Local Plan sets out an overall housing need for 6,250 homes. The key challenge for the strategy will be to increase the delivery of and the right type of housing, in order to create sustainable and mixed communities in the area.

2.18 Key evidence:

- Southern Staffordshire Districts Housing Needs Study and SHMA Update (2012)
- Strategic Housing Land Availability Assessment (2011, 2012)
- Site Selection Technical Paper (2014)

### Economic

2.19 The local economy of Tamworth is relatively stable and is expected to experience growth during the life of the plan. It is currently diversifying from its traditional reliance on manufacturing to other employment sectors including business and financial services. It is relatively affluent with a low unemployment rate.

2.20 However, this masks the fact that employment is largely low-paid, unskilled and requiring few qualifications. To some extent these factors also explain the housing affordability problems in the area. There are also pockets of deprivation that exist (low income, poor qualification levels and poor health) within the borough, mostly within the post war planned estates, some of which are among the most deprived in England.

2.21 To address these issues, the draft Local Plan sets out that there is a need of 32 hectares of additional employment land from 2006 to 2031. The key challenge will be to ensure that the right types, quantity and locations of employment land are allocated in order to attract employers and investment and help the town to fulfil its true economic potential.

2.22 There is also a need to regenerate and diversify the town centre and ensure it remains vibrant and viable. To overcome this challenge, the Local Plan is seeking to increase the delivery of new homes, leisure development, convenience retail floor space (2,900 sqm between 2021 and 2031) and comparison retail goods floor space (7,600 sqm after 2021), together with supporting infrastructure. This will help to create a sustainable and prosperous future for Tamworth. An additional challenge is to ensure that a successful mix of uses can be achieved which is fit for the future in terms of its quality and sustainable use of resources.

2.23 Another key challenge is to ensure development delivers benefits to all of Tamworth's communities to create strong and vibrant communities. Tackling deprivation and social exclusion through improving health and educational attainment and access to employment is therefore a key objective.

2.24 Key evidence:

- Tamworth Town Centre and Retail Study (2011) and update (2014)
- Employment Land Review (2012) and update (2013)

### **Environmental**

2.25 Tamworth is expected to experience high levels of growth. This is constrained by the scarcity of development land due to policy restrictions such as the Green Belt and administrative constraints arising from Tamworth's tightly drawn boundaries and planned neighbourhoods as a consequence of its status as an expanded town. There are also extensive areas of flood plain, particularly around the town centre and centre of the borough, areas of nature conservation importance and the historic nature of most of the town centre.

2.26 The key challenge will be the need to balance growth with the protection of natural and built assets to ensure it will not have a detrimental impact on the quality of life for Tamworth's communities. Furthermore, it will be important to ensure that the policies within the strategy do not contribute to, or increase the effects of climate change.

2.27 Key evidence:

- Open Space Review 2011
- Green Infrastructure Strategy 2014

### **Infrastructure**

2.28 The expected growth of the town is likely to increase pressure on, and increase the demand for investment in additional infrastructure (highways, open spaces, and social community facilities). This could potentially have a detrimental impact on the well being of existing and future communities living within the borough. For instance, this is an issue for transport infrastructure which is unable to cope with the high levels of car usage during certain times of the day and experiences congestion hot spots across the borough, particularly along the Gungate corridor, within the town centre, the out of town shopping parks and some junctions along the A5.

2.29 The key challenge for the Local Plan is therefore to ensure that the existing infrastructure is utilised efficiently and new infrastructure is delivered in locations where there is demand, in order to support the creation of sustainable communities and the growth of the town.

2.30 This could be achieved through incorporating measures in Local Plan Policies, such as ensuring traffic generating uses are placed in accessible locations to reduce the need to travel and carbon emissions. Delivering growth and future development will



require the provision of adequate transport links within and out of the borough; between homes to employment activity, town and local centres, community facilities and to centres and facilities in neighbouring towns, villages and beyond. Linked to this is the need to exploit the underused green and blue corridors (open spaces, canals and rivers) that connect different neighbourhoods to each other and the town centre. These both add to Tamworth's identity as 'urban green' whilst offering environmental and health benefits to communities and fostering local identity and inclusiveness as a connected town.

2.31 Key evidence:

- Infrastructure Delivery Plan (2014)
- Whole Plan Viability Assessment (2014)

In the context of delivering the council's overall corporate vision for the borough, as 'One Tamworth Perfectly Placed', the following Local Plan vision adds the spatial dimension and seeks to set the future spatial direction for Tamworth to address the issues and challenges identified.

**Vision - One Tamworth, Perfectly Placed**

2.32 By 2031 sustainable Tamworth will have a dynamic economy comprising of a vibrant town centre consisting of a thriving retail and leisure offer supported by a local town centre community which complements its role as a sub regional tourism hub. It will have a strong, distinctive identity equally known for its historic assets and history as the Mercian Capital as for its safe and thriving neighbourhoods. The green and blue linkages which connect the town centre with its neighbourhoods and employment areas will assist to project an image of the borough as 'urban green'.

2.33 Its economy will be thriving as a result of improved communication links with the Greater Birmingham area. Investment in accessible employment areas will have provided an environment that encourages new and existing businesses to remain and locate in Tamworth. Job opportunities and employment growth in business and professional services as well as environmental and building technologies and general manufacturing will have helped to build on the town's employment strengths and minimised outward commuting. The tourism and leisure sectors will have continued to prosper.

2.34 Investment in health and education facilities and improvements to open spaces and leisure and sports facilities, combined with greater outdoor opportunities and ensuring development is located in sustainable locations, will have helped make the town healthier and safer whilst improving qualification and aspiration levels.

2.35 A total place approach to regeneration in those areas of most need will have tackled pockets of deprivation by improving access to both employment and housing whilst improving the general environment. Other vulnerable neighbourhoods will have received housing led regeneration to improve the quality of the stock and support the vitality of existing local and neighbourhood centres.

2.36 New house building will have responded to local need by increasing the supply of affordable housing, widening housing choice and preventing homelessness. Appropriate housing will have been built to meet the needs of an ageing population requiring specialist needs and support or care. The design of

new housing and the adaptation and renovation of the existing housing stock will have created safer, greener and accessible living conditions in both the public and private sector.

2.37 The Strategic housing allocations will create sustainable extensions to the town with a mix of housing and community facilities where required with excellent connectivity to the town centre and beyond.

2.38 A balance between growth the protection of the natural environment needs to be achieved. It will be important; to protect and enhance biodiversity, geodiversity; that flood risk is managed and reduced; new development is resilient to climate change; all resources are used efficiently and the quality of green and blue infrastructure is improved across the borough.

2.39 To promote sustainable modes of transport appropriate infrastructure must be put in place. Where appropriate new pedestrian and cycle ways will be put in place and existing improved to widen the choice of travel to and from new development. The improvement of existing public transport infrastructure and hubs will be supported.

2.40 Together, this will have created Tamworth as a place which projects a positive image as a borough where people want to live, work and invest.

## Strategic Spatial Priorities

2.32 The vision will be delivered by the following strategic spatial priorities;

Reference	Strategic Spatial Priorities
<b>SO1</b>	Making the most efficient and sustainable use of the Borough's limited supply of land and recognising that an element of future development will be provided by neighbouring authorities.
<b>SO2</b>	To make Tamworth Town Centre a priority for regeneration to create a safe and attractive place for residents, businesses and visitors by strengthening and diversifying the town centre offer, optimising retail, leisure and housing development opportunities and increasing its liveability and by making the most of the town's tourism and cultural offer, thus creating a positive image for the borough.
<b>SO3</b>	Working in partnership with economic stakeholders to create a diverse local economy, including regeneration of employment areas and provide appropriate education and training that will provide local job opportunities that will reduce the need for residents to travel outside of the Borough.
<b>SO4</b>	To facilitate the provision of convenient and accessible services and community infrastructure across the Borough, particularly in the most deprived neighbourhoods where initiatives that provide additional support, information and services to residents will be encouraged and supported.

<b>SO5</b>	To provide a range of affordable, adaptable and high quality housing that meets the needs of Tamworth residents.
<b>SO6</b>	To ensure that appropriate infrastructure, including ICT, is in place to support the delivery of development across the borough.
<b>SO7</b>	To encourage active and healthier lifestyles by providing a network of high quality, accessible green and blue linkages and open spaces and formal indoor and outdoor recreation facilities that meet identified need and link neighbourhoods to each other and the wider countryside.
<b>SO8</b>	To protect and enhance statutory and non-statutory areas of nature conservation, ecological networks and landscape value on the doorstep of Tamworth residents, for their biodiversity, geological, historical and visual value and for the opportunities they provide for education and leisure.
<b>SO9</b>	To protect and enhance historic assets by ensuring that proposals for change respect the historic character of the borough including street layout, surviving historic buildings, street furniture, archaeology and open spaces.
<b>SO10</b>	To create safe, high quality places that deliver sustainable neighbourhoods and reflect Tamworth's small-scale and domestic character using a blend of traditional and innovative design techniques.
<b>SO11</b>	To minimise the causes and adapt to the effects of climate change by encouraging high standards of energy efficiency, sustainable use of resources and use of low carbon/renewable energy technologies.
<b>SO12</b>	To promote sustainable transport modes for all journeys by improving walking, cycling and public transport facilities throughout the Borough and to neighbouring areas and beyond.

### Question One

Do you agree with the Strategic Spatial Priorities?  
Do you think any should be added, removed or changed?

## **CHAPTER 3 - A SPATIAL STRATEGY FOR TAMWORTH**

- 3.1 The spatial strategy is central to the Local Plan. It provides a guide to how the spatial vision and strategic objectives, namely how a prosperous town, strong and vibrant neighbourhoods, a high quality environment and a sustainable town will be achieved in practical terms. The role of the spatial strategy is to set out how much development there will be, broadly where it will go, when it will take place and, where possible, who will deliver it. A diagrammatic interpretation of the strategy is shown in figures 4 and 5.

**Figure 4: Key Diagram of Tamworth Borough**

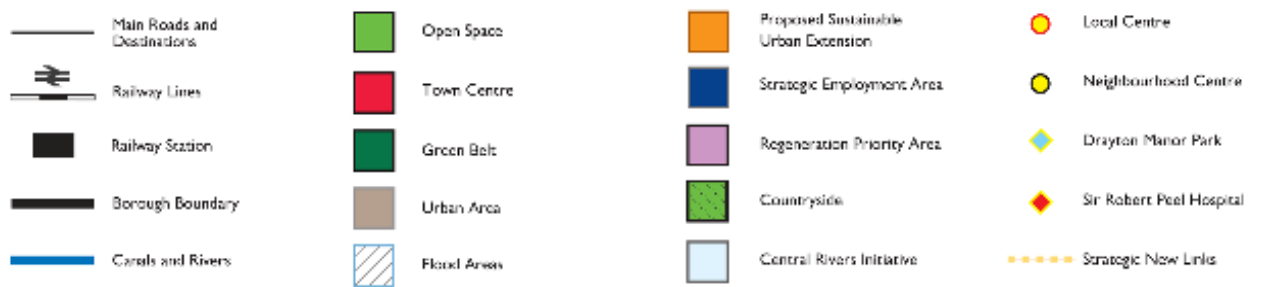
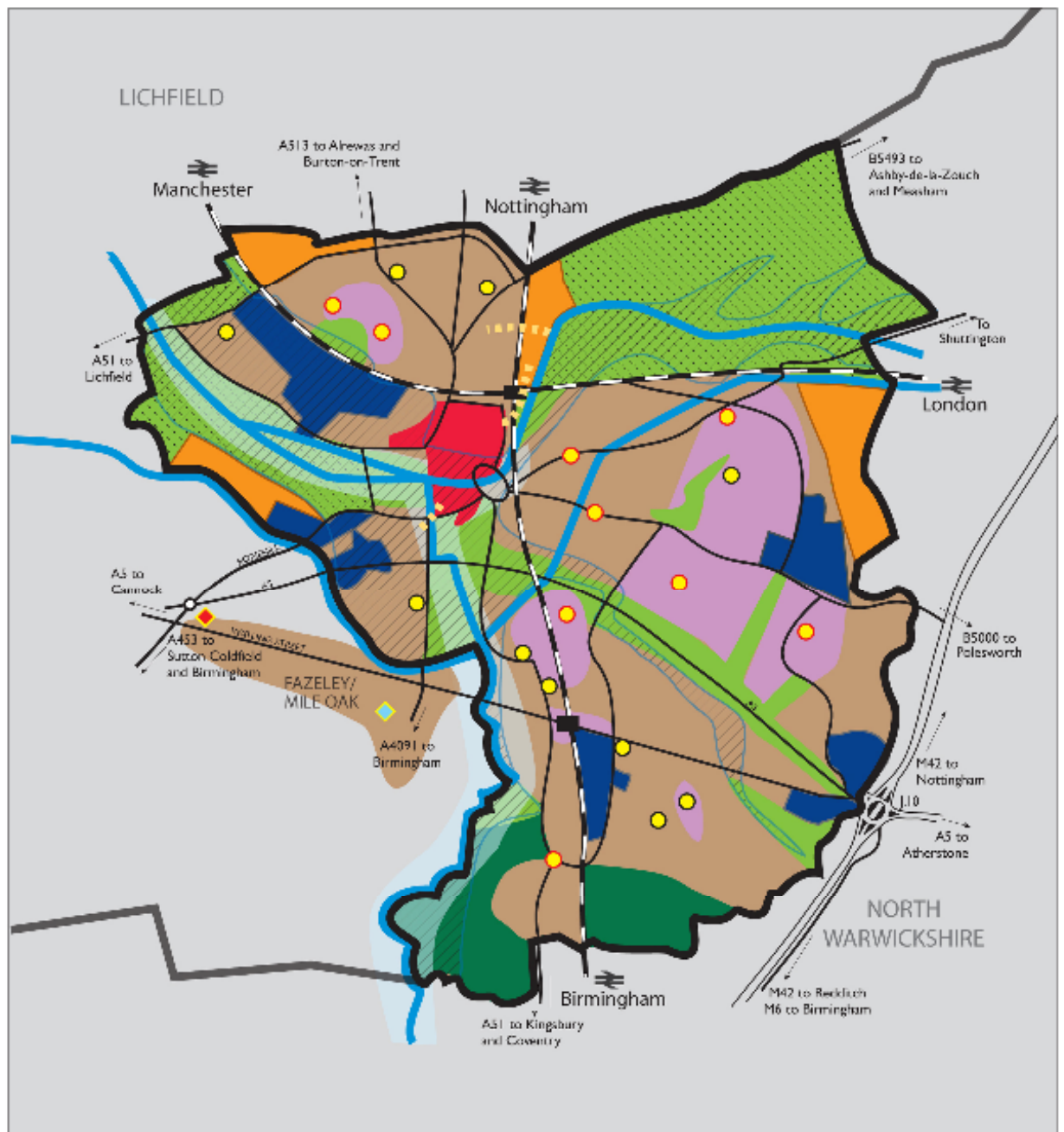
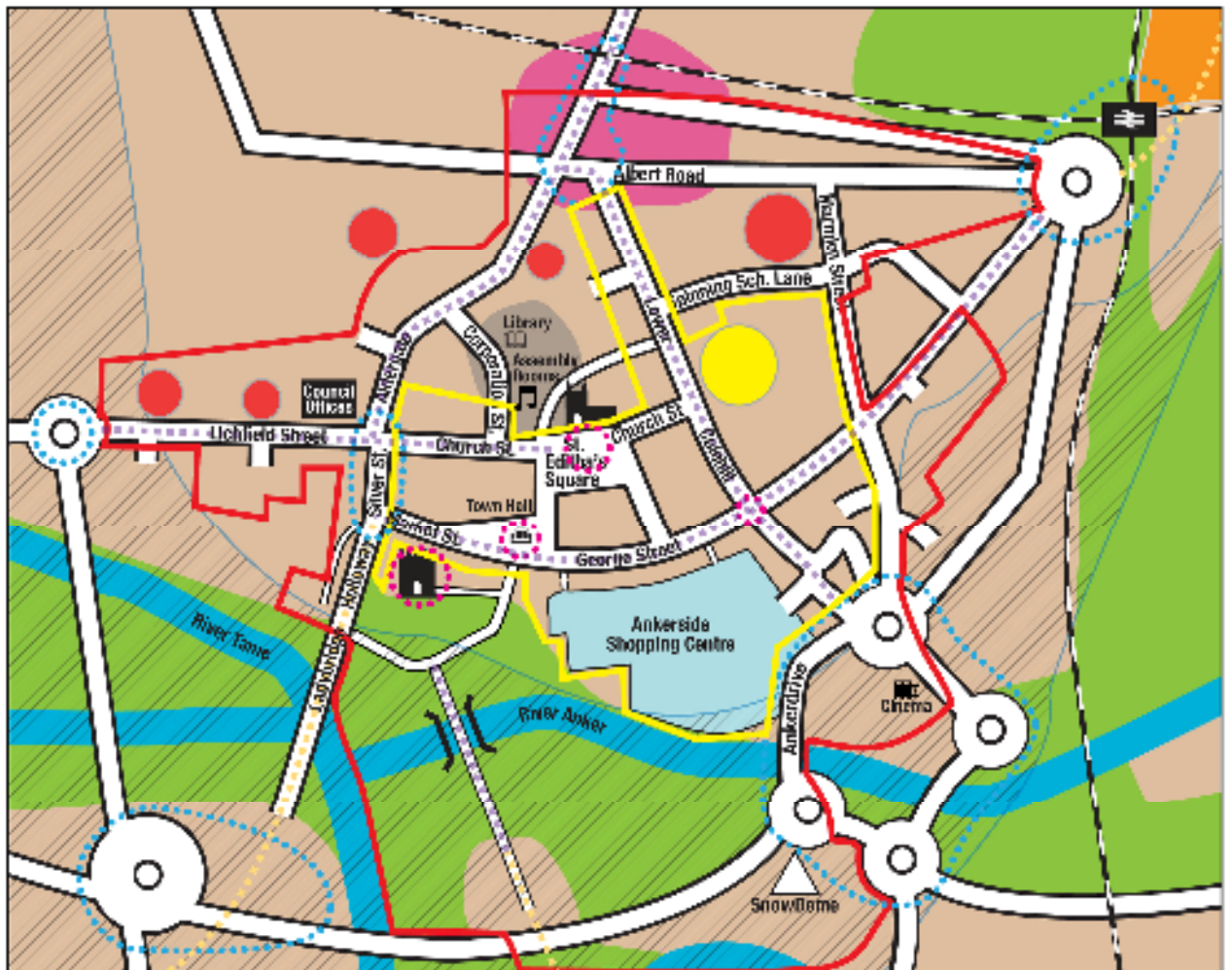




Figure 5: Tamworth Town Centre Key Diagram



- |                             |  |                        |
|-----------------------------|--|------------------------|
| Main Roads                  | Change Local (Increase) Footways                     | Gateway                |
| Railway Lines               | Proposed Anker Valley<br>Sports Club/Urban Extension | Strategic Linkage      |
| Railway station             | Flood Zone   | Corridor Improvements  |
| Town Centre Boundary        | Open Space   | Priority Shopping Area |
| Retail Led Proposal         | Food Points  | Cultural Quarter       |
| Proposed Housing Allocation |  |                        |

## **This policy aims to address all strategic spatial priorities**

### **SP1 The Spatial Strategy for Tamworth**

The Council's spatial strategy is to provide development in the most accessible and sustainable locations, including within and around the town centre, within the network of local and neighbourhood centres, regeneration priority areas and employment areas. In addition to this the Local Plan will set out which areas of the urban area are to be expanded and ensure that these locations are accessible and sustainable. This will meet most of the borough's housing and employment needs whilst safeguarding natural and built assets and addressing social and economic deprivation and exclusion.

Outside of these specified areas, the majority of the borough will not experience significant change during the lifetime of the plan. The focus for these areas will be on protecting and enhancing environmental and historic assets whilst ensuring that development has a positive impact on local amenity and character.

Within the allocated strategic urban extensions and smaller sites within the urban area at least 2,800 new dwellings will be delivered. As a result of a shortage of developable land, a minimum of 2,000 new homes will be required outside of the borough within locations which assist the delivery of Tamworth's strategy and those of its neighbours.

Allocations will be promoted within the borough to support the delivery of at least 18 hectares (ha) of B1 (a,b,c), B2 and B8 employment land to meet an overall need of 32ha. A further 14ha of employment land will be required outside of the borough within locations which assist the delivery of Tamworth's strategy and those of its neighbours.

Tamworth Town Centre will become the primary focus for new retail leisure and tourism development complimented by appropriate residential development to create a vibrant town centre community. The town centre will be the preferential location for 7,800 sqm of new comparison retail floor space and 2,900 sqm new convenience retail floor space between 2021 and 2031.

Investment in local and neighbourhood centres will enable local needs to be met in a sustainable way whilst strengthening their role as community hubs. Regeneration will be focussed in the most deprived 'post war planned neighbourhoods' and the Wilnecote Corridor along Watling Street, with an emphasis on improving the quality of the physical environment, housing provision, employment and health facilities and the availability of community facilities and services.

Existing green belt, high quality open spaces and sport and leisure facilities will be retained and where possible, enhanced. This will help to project a positive image of the borough as being 'urban green' and to provide opportunities for improving biodiversity and recreation, thus improving health and wellbeing. The existing network of green and blue linkages will be enhanced through the provision of environmental and access improvements to provide safe linkages between Tamworth's neighbourhoods, employment sites and to the town centre. Linkages between the urban area and areas of countryside outside the borough will be developed and promoted.

All development proposals will be of a high design quality and contribute to creating

safe and welcoming places whilst making efficient use of Tamworth's limited supply of land. Proposals will promote sustainability by minimising and or mitigating pressure on the natural, built and historic environment, natural resources, utilities and infrastructure whilst also mitigating and or adapting to climate change and reducing pollution. Tamworth has a significant amount of land identified as being at risk of flooding, and as such, development in flood risk areas will be appropriately designed and shall include mitigation measures. Where appropriate and necessary development will be resisted altogether in these areas.

Accessibility to and through the borough will be delivered through improvements to the road, walking and cycling networks and public transport. Infrastructure improvements to increase the frequency of the train service to Birmingham and beyond from both Tamworth and Wilnecote Railway Stations will also be supported along with improvements to their physical fabric and facilities.

### **Question Two**

Do you agree with the policy SP1?

Do you think anything should be added, removed or changed?

## CHAPTER 4 - A PROSPEROUS TOWN

- 4.1 **Delivering a prosperous Tamworth involves planning positively for sustainable economic growth and focussing investment in the town centre and the network of defined local and neighbourhood centres. Allocating new employment land in accessible locations and protecting existing employment areas will ensure jobs are retained and attracted to the borough to support the reduction of high levels of out-commuting. Directing investment in existing centres and accessible employment sites will reduce the need to travel and make the most effective use of Tamworth's limited land supply.**
- 4.2 Tamworth Town Centre is the focus for large scale future investment and development as well as the preferred location for uses that attract a large number of people. Below this level, there is a need to provide for people's day to day needs in locations close to where they live. Local and neighbourhood centres play a vital role, not only as places to shop but because they provide the opportunity to deliver a wide range of services locally in places that are accessible by a choice of means of transport. They are particularly important in deprived neighbourhoods and areas with low levels of car ownership as residents can access basic services within walking or cycling distance or by public transport.
- 4.3 Tamworth has a widespread network of shops and facilities outside the town centre, which are well distributed throughout the Borough. Some are isolated but others cluster together, either in purpose built shopping centres or parades, many of which are located within the 1960's and 1970's overspill neighbourhoods, or they have evolved over time along main roads in the traditional housing areas. The Council has made a distinction between local and neighbourhood centres, depending on the range of services and catchment area served.
- 4.4 Tamworth is unusual in having a large amount of retail floorspace (in proportion to the town centre) in an out of centre location that is relatively close to the town centre at Ventura, Jolly Sailor and Cardinal Point Retail Parks. In addition, Tame Valley Retail Park exists to the east of the town and includes large superstores and a smaller number of bulky goods retailers. The Policies Map defines the boundary of the out of centre retail areas. To some extent the development has provided the opportunity for Tamworth to meet the needs of major retailers that have not been able to find suitable sites and premises in the town centre. This has been of benefit to shoppers in the town and it has enabled the town to develop a strong retail offer for a town of its size. They also offer a generally better quality of shopping provision than the town centre. However, it is clear that the retail parks have become too dominant compared to the town centre and the balance needs to be redressed.
- 4.5 In view of the limited capacity for additional retail development in Tamworth beyond present commitments within and outside the town centre, it is not considered necessary or appropriate to identify further sites that could be capable of accommodating larger format developments. The focus for future development in the out of centre retail areas will be on improving the general environment as part of improving the linkages to the town centre, improving access by means other than the private car as part of congestion reducing measures and retro fitting of renewable and low carbon technologies.
- 4.6 There is a significant amount of commercial leisure provision in the borough, mostly located within the town centre including the Odeon multiplex cinema, the Snowdome, bowling alley and a range of other facilities.

## Tamworth Town Centre

- 4.7 The town centre boundary is shown on the Policies Map and is where town centre uses, including those which contribute directly to the town centre will be located.
- 4.8 Tamworth has a long history as a successful market town and experienced high levels of prosperity in the 18<sup>th</sup> Century when a considerable number of Georgian buildings were constructed, including the Town Hall and Almshouses built by Sir Thomas Guy. Many of the buildings built during this time remain intact and contribute to the strong character of the town. From the 1960's through to the 1990's, in conjunction with the increase in population as a result of the overspill designation, major redevelopments in the town centre took place such as the square next to St Editha's Church, the Middle Entry Shopping Centre, the former Gungate Precinct and Ankerside Shopping Centre. Despite these recent interventions and some sporadic infill development, much of the historic fabric of the town centre remains intact including the medieval street pattern. Protecting and enhancing the historic assets of the town will assist in defining Tamworth's unique streetscape, fostering local distinctiveness and preserving local character. The recent discovery of the Staffordshire Hoard near Tamworth has created an opportunity for the borough to exploit its connection to Mercian history and increase its tourism role.
- 4.9 The town centre remains a place where people want to live, work, visit and shop including spending time at leisure destinations and visiting the cultural and tourism offer. It functions as a service hub for the borough, offering a range of services including banks, building societies, estate agents and health services and is a focus for arts and culture based events. It also contains a significant number of independent specialist retailers, leisure operators and a thriving outdoor market, which together create a distinct 'Tamworth' offer. However, it faces a number of threats to its vitality primarily arising from the changing nature of shopping and the proximity to large out of centre retail parks including Ventura, Jolly Sailor and Cardinal Point, along with Tame Valley in the east of the borough.
- 4.10 The rise in the popularity of internet shopping, together with the preference of national retailers for larger, purpose built stores and the recent economic climate, which has depressed consumer expenditure, poses challenges for traditional town centres such as Tamworth's. In particular, the tendency for town centre units to be smaller, as a result of restrictions created by the historic street patterns and buildings, creates both challenges and opportunities which require a co-ordinated approach between the council and its partners. This is a key role for the newly formed Tamworth Place Group. Organisations from across Tamworth and from private, public and voluntary sectors have come together to form the group as they were concerned about the image and reputation of Tamworth and wish to work together to understand these perceptions and address issues and seek solutions. The group is private sector led and its aim is to promote a new strategic view of the distinctiveness of Tamworth and to influence developments, communications and actions across the borough.
- 4.11 Whilst recent health checks (Tamworth Town Centres Health check) and monitoring of the town centre have shown the centre to be performing relatively well in terms of shopper numbers and rental values, concerns have been identified regarding vacancy rates and the quality and range of the retail and leisure offer, in particular the emphasis on low value retail and a narrow leisure offer. Other issues include the lack of national retailer representation (and lack of demand identified for future



representation) and the tendency for a significant number of the remaining national retailers to be either actively looking to dispose of their units or facing an uncertain future as operators.

- 4.12 The popularity of the out of centre retail areas has increased to such an extent that Tamworth is one of the few towns where comparison expenditure in its out of centre retail areas is double that of the town centre - with the town centre only attracting 28% of comparison goods spending by Tamworth residents in contrast with the out of centre retail areas receiving 58% (Tamworth Town Centre and Retail Study). It is predicted that this market share will increase at least in the short term as a result of recent development in the out of centre retail parks and the lack of new development in the town centre.
- 4.13 The regeneration and economic development of the town centre is seen as a key council objective and driver to the wider regeneration of Tamworth. The town centre should present a distinctive environment: an offer that complements the out of centre retail areas, is related more to the retail parks and takes advantage of the higher expenditure levels of shoppers visiting these areas. This will require improving the physical linkages between the out of centre retail areas and the town centre whilst diversifying the town centre's offer, including attracting new developments, and improving the quality of its environment to increase its overall attractiveness and image.
- 4.14 A Cultural Quarter is proposed, focused around public realm enhancement and structural improvements to and expansion of the Assembly Rooms building. The project will include significant public realm enhancements around the building and Tamworth library and key linkages between the Cultural Quarter and the town centre, specifically the Gungate redevelopment.
- 4.15 The town centre has several strengths and opportunities not least its accessible location, particularly by public transport and established walking and cycling links to Tamworth's neighbourhoods, which makes it a sustainable location for development. However, there are barriers to pedestrian movement and the quality of the public realm is poor in places with extensive signage, guard rails and poor quality street furniture. Proposals to address these issues will be supported by future SPDs where appropriate.
- 4.16 A report entitled 'Tamworth Town Centre and Out of Town Linkage Proposals' (Town Centre Links Project) was prepared for the council in December 2010 to assess the linkages between the town centre and the out of centre retail areas and leisure offer. The report considers linkages between the town centre and Ventura Retail Park and the Snowdome in particular. The report concludes that significant potential exists to enhance the route along Fazeley Road by creating a unified character, improving the quality of the public realm, upgrading crossings and introducing wider connectivity. The report proposes the use of Fazeley Road as the main link with a shuttle bus operating a circular route taking in Ventura Park Road, Bitterscote Drive and Bonehill Road, with bus stops providing direct access between shops in the town centre, Ventura Retail Park and Jolly Sailor Retail Park. A new pedestrian crossing at the River Drive and Fazeley Road junction could be integrated into proposed highway works to this junction. A stronger emphasis should be placed upon the pedestrian north-south linear axis linking the town centre to the retail parks.
- 4.17 Improved linkages from the town centre to other areas on the edge of the town centre such as the train station and the Leisure Zone will also allow greater accessibility through sustainable modes of transport and will encourage increased movement to

and from the town centre. This will help to reduce congestion in and around the town centre and consequently reduce air pollution.

- 4.18 The perception of the town centre as a destination of choice will be addressed by improvements to the retail, leisure and service offer supporting the market along with expansion of its tourism and cultural role. A key element will involve enhancing the role of the Castle Pleasure Grounds as a valuable sport, recreational, open space, and leisure asset for the town, reinforcing it as an important link to the out of centre retail parks. The town centre's role as a leisure hub will be promoted, making the most of its existing leisure facilities whilst encouraging a wider night time economy offer particularly focusing on family restaurants and cultural activities. The Retail Study identified a significant opportunity for the restaurant and bar market in the town centre, to capitalise on the current low proportion of expenditure in restaurants and pubs in the town centre by residents within the Tamworth study area. Together with the lower than average proportion of such uses within the town centre, this market represents a key opportunity to exploit and widen the town centre's attractiveness.
- 4.19 Concentrating new retail, leisure, services, tourism, cultural and office development in the town centre is the best way to ensure that preference is given to sites that best serve the needs of deprived areas. It is also the location which best satisfies the sequential approach to site selection, giving preference to sites within centres to achieve a more sustainable pattern of development to help combat climate change. It will provide the opportunity to increase accessibility by pedestrians, cyclists and public transport thereby maximising opportunities for improving the environment and the overall image of the town. Allocating sites for development within the town centre has further benefits in terms of developing on previously developed sites and maximising investment in a location that offers the greatest spin-off benefits for all town centre uses.
- 4.20 Residential development, in particular that of a higher density will be encouraged within the town centre. This will help deliver benefits associated with making the most of the borough's limited supply of land through maximising development on brownfield sites whilst increasing the demand for town centre services and increasing natural surveillance to deliver a safer environment.
- 4.21 A series of 'gateway development sites' situated at key entrances to the town centre have been identified which have the opportunity to create welcoming gateways to the town centre through improving legibility, promoting pedestrian and cycle priority access to key linkages and assisting the delivery of town centre regeneration.
- 4.22 The Gungate redevelopment will meet Tamworth's retail needs in the short to medium term. After 2021 there is a further need of 7,800 sqm gross floorspace of comparison goods and 2,900 sqm of convenience goods.. The town centre is considered to be most appropriate location to meet these retail needs. The Gungate development in particular will attract retailers who are seeking accommodation in Tamworth but are unable to find suitable premises elsewhere within the town centre. Its development is seen as critical to delivering the regeneration of the town centre in terms of improving its offer to complement that of the out of town retail areas. The compact nature of its development and high quality design will link it into the historic network of existing streets and although predominantly retail led, there may be opportunities to incorporate a mixture of uses including residential, leisure and offices. Gungate will therefore be a key catalyst for bringing forward further investment in surrounding areas, increasing the town centre's attractiveness and overall viability and vitality.

4.23

Where development is proposed which results in a loss of existing car parking provision, the Council will assess proposals on a site-by-site basis to ensure that suitable alternative car parking is provided if required. This will ensure that a satisfactory level of car parking is provided within the town centre to protect its vitality and viability.

**This policy aims to address strategic spatial priorities SO2, SO3, SO4, SO9, SO12**

**SP2: Supporting investment in Tamworth Town**

The Council will work in partnership with businesses and landowners to revitalise Tamworth Town Centre and attract visitors. In accordance with the council and its partners' key objectives, the town centre will be promoted as the borough's preferred location for development containing town centre uses along with higher density, high quality residential developments. In particular, planning permission will be granted for development such as retail (7,800 sqm comparison and 2,900 sqm convenience goods floor space after 2021), leisure, tourism, cultural and office development that support and enhances its dual function as both the borough's town centre and growing status as a sub regional tourism and leisure hub.

The shopping area, defined on the Policies Map town centre insert, identifies the primary and secondary frontages areas. Within the primary frontages area, it is expected 75% of uses to fall within the A1 retail use, loss of A1 class uses at ground floor level should be resisted to retain accessible local shops and a lively and viable centre, particularly where they occupy large units or frontages. Within secondary frontages uses that result in active ground floors and promote the evening economy will be encouraged.

The outdoor street markets should be protected by nearby development and will be enhanced through environmental improvements and promotional activity.

Development within the town centre and appropriate edge of centre locations should protect and enhance its historic character.

Key historic landmarks such as the castle, St Editha's Church and the town hall define Tamworth's identity as a historic market town. Development should respect and enhance these assets in terms of use, design, appearance, and interpretation.

Tamworth Town Centre will benefit from improved connectivity in terms of cycling, walking and public transport, to and from the existing out of town retail areas, the railway station and leisure zone. Where possible development should contribute to enhancing the public realm through high quality building design, the town centre's open spaces and linkages at strategic entrances to the town centre.

Development that will have a negative impact on the vitality and viability of the town centre and its function will not be supported unless it has been demonstrated that the wider economic benefits will outweigh the detriment to the town centre.

**Question Three**

Do you agree with the policy SP2?

Do you think anything should be added, removed or changed?

Do you think the comparison and convenience retail need for Tamworth is appropriate?



Do you think town centre allocations should be made?
--

### Local Centres

- 4.24 The Tamworth Town Centre and Retail Study (2012, 2014 update) defined eight local centres within the borough. These tend to provide a convenience food store plus a range of other services such as a post office, hot food takeaway, newsagent, library, pharmacy, community centre or doctor's surgery. Their size means that they serve a wider area than neighbourhood centres.

Local Centres
Amington Road, Bolehall
Caledonian Centre, Glascote
Coton Green (Fotenaye Road)
Ellerbeek, Stoneydelph
Glascote Road
High Street, Dosthill
Masefield Drive, Leyfield
Tamworth Road, Amington

### Question Four

Do you agree with the list of Local Centres?
--

- 4.25 The Council will help to strengthen local centres by supporting proposals for uses and facilities that would remedy deficiencies and help to address social exclusion. In the most deprived neighbourhoods of Amington, Belgrave, Glascote and Stonydelph, the Council is delivering a Locality Working initiative that will bring together a number of public service and voluntary organisations to provide advice where it is most needed. The aim is to locate these 'community hubs' within the existing local centres.
- 4.26 The local centres will continue to complement the town centre by providing retail and community facilities for their local population. These are the focus for many social, community and cultural activities, and as such, their role will be supported. Local centres may also be suitable for other uses such as employment, leisure and residential, particularly medium to high density.
- 4.27 In its assessment of their vitality and viability, the Retail Study rated 7 of the 8 local centres as being good with the remaining one as fair. Whilst the local centres, in the main, enjoy generally good accessibility by modes of transport other than the car, there are opportunities for further improvements to support their vitality. These include improving their connectivity, particularly through bus connections and walking and cycling facilities, to surrounding residential neighbourhoods, the town centre and employment areas. Public realm enhancements would improve the quality of the environment and help make the centres safer and easier for pedestrians to use.

### Neighbourhood centres

- 4.28 The Retail Study defined seventeen neighbourhood centres within the borough. These comprise of small clusters of shops, one of which is a convenience food store, with a limited range of associated shops or services. They are important in meeting the day to day needs of the local residential areas and as such, their roles will be protected.

<b>Neighbourhood centres</b>
Chartwell
Cedar Drive
Lakenheath
Kerria
Fazeley Road / Sutton Avenue
Springfield Road
Exley
Park Farm
Pennymoor
Scott Road
Glascote Road, Basin Lane
Tinkers Green
Hockley Road
Wilnecote Lane
Watling Street, Wilnecote
Bowling Green Avenue

**Question Five**

Do you agree with the list of Neighbourhood Centres?

- 4.29 The Retail Study identified only six of these centres as having a good level of vitality and viability and two are considered to be poor.
- 4.30 Most of the centres are serviceable rather than attractive and due to the age of a number of the neighbourhoods some of the centres are now in need of enhancement. Exley has been identified as being in particular need of physical improvements to the buildings and environment. There was a general lack of secure cycle stores and access difficulties for people with disabilities. The Council will therefore encourage better access and additional secure cycle stores.
- 4.31 Where necessary the strategic urban extensions allocations should include new neighbourhood centres alongside other community facilities in order to create a sustainable neighbourhood that will reduce the need to travel whilst helping to create a sustainable community.

**This policy aims to address Strategic Spatial Priority SO4**

**Policy SP3: Supporting investment in local and neighbourhood centres**

Both local and neighbourhood centres offer the potential to be a focus for the regeneration of surrounding communities and proposals which enhance their vitality and viability will be supported. These include higher density residential development and improvements to existing housing provision, particularly in those centres located within regeneration priority areas identified in Policy SP7. Environmental enhancements, including improvements to green links and spaces, will be supported and encouraged to improve their overall attractiveness and help design out crime. Transport improvements, particularly in relation to the frequency and quality of public transport provision will be encouraged to enhance the accessibility of centres.

a) Local centres are suitable for retail, leisure, employment and community uses serving local needs. Planning permission should be granted for such development provided it is of an appropriate scale and design and only where it maintains or enhances the range of uses available. Local centres are suitable locations for

medium-higher density development including residential to support local services

b) Neighbourhood centres are suitable for retail and other 'A' class uses, particularly convenience retail, services and community facilities that meet the day-to-day needs of their immediate catchments. Planning permission will be granted for such development provided it is of an appropriate scale and design, and maintains or enhances the range of uses available.

### Question Six

Do you agree with policy SP3?

Do you think anything should be added, removed or changed?

### Retail Capacity and Hierarchy

- 4.32 The need for additional floorspace for retail uses up to 2031, having regard to relevant market information and economic data, was assessed in 2013 by The Tamworth Town Centre & Retail Study update. In the quantitative need assessment, a capacity analysis for convenience (food) and comparison (non food) goods was undertaken in the Tamworth study area. This assessed the capacity for additional floorspace in Tamworth using a market-share approach. The capacity analysis shows:
- There is additional convenience retail capacity after 2021 to support 2,900 sqm gross floorspace.
  - There is additional comparison retail capacity after 2021 to support 7,800 sqm gross floorspace,
- 4.33 Whilst the study identified an adequate overall level of existing leisure provision in Tamworth, a need was identified to improve the provision of cafes and restaurants in the town centre. Increasing the offer of these operators, particularly aiming at family focussed providers will be key to increasing the overall attractiveness of the town centre, particularly in terms of helping to deliver linked trips between the out of centre retail areas and the town centre.
- 4.34 All the available capacity should be met within Tamworth Town centre in order to deliver the key spatial objective of regenerating and focussing investment within the town centre.
- 4.35 Whilst there is currently no opportunity to expand the town centre boundary due to physical constraints and the centre's historic environment, there is potential to consolidate the town centre through redevelopment opportunities within the town centre boundary.
- 4.36 Focussing retail and leisure investment in Tamworth Town Centre will balance the attraction with the out of town centre retail areas more towards the town centre. However, this will also require restricting the growth of the out of centre retail areas that could weaken the attraction of the town centre, especially until the Gungate redevelopment scheme becomes established. Whilst proposals to refurbish existing units and environmental and accessibility improvements will be encouraged, development which results in the creation of additional retail and or leisure floorspace at the existing out of centre retail parks at Ventura, Jolly Sailor, Cardinal Point & Tame Valley will therefore not be supported.

- 4.37 Local and neighbourhood centres have a complementary role as part of the established retail hierarchy, serving the local community. The existing centres ensure a sustainable focus and pattern for development with each having its own distinctive character and mix of uses, including shops, services and community facilities. The mix of uses will be carefully managed, with an emphasis on protecting facilities that provide for people's day to day needs and community facilities unless it can be demonstrated that they are no longer required to serve local needs. Loss of A1 class uses at ground floor level should be resisted to retain accessible local shops and a lively and viable centre, particularly where they occupy large units or frontages.
- 4.38 Small scale offices offering professional advice such as solicitors or financial services are also appropriate uses in local centres, particularly for the less mobile who cannot access the town centre easily. They would be suitable for smaller ground floor units or upper floors. Some of the centres provide residential accommodation above ground floor, in purpose built flats or converted floorspace. Higher density residential schemes within local and neighbourhood centres, including using upper floors above commercial uses, will be supported because they are sustainable locations with generally good access to public transport.
- 4.39 The distinctive characteristics of each centre will be protected and promoted. There is scope for making improvements to the public realm and shopping environment, linked to other key objectives of increasing their accessibility, particularly by public transport, walking and cycling. Their potential to become community regeneration hubs, particularly in the regeneration priority areas, will be supported particularly where this involves delivering education-training and health related facilities of an appropriate scale.
- 4.40 Whilst the need for additional convenience provision is small, qualitative issues should be taken into account. In particular, a possible qualitative need for additional convenience goods shopping in Tamworth Town Centre has been identified to enhance its vitality and viability. Proposals for any additional food shops of appropriate size within the town centre, local or neighbourhood centres should be assessed in relation to the extra benefits to maintain or enhance the centre..

**This policy aims to address Strategic Spatial Priority SO2, SO3**

CP1 Hierarchy of centres for town centre uses

Tamworth's 'town centre uses' hierarchy is defined as follows:

- First - Tamworth Town Centre
- Second – Network of Local Centres
- Third – Network of Neighbourhood Centres

Planning permission will be granted for 'town centre uses' that are appropriate in relation to the role and function of each centre. If development is proposed outside of the town centre, local or neighbourhood centres, it must demonstrate:

- a) Compliance with the sequential test,
- b) Good accessibility by walking, cycling and public transport,
- c) That there will be no adverse impact on the vitality and viability of other existing centres
- d) Will not prejudice the delivery of other strategic objectives.

For town centre uses proposed outside of the defined hierarchy of centres, an impact assessment will be required accompanying a planning application in line with the criteria set out below.

	<u>Area for Application of Floorspace Thresholds</u>	<u>Assessment Required</u>
Tamworth Town Centre	Tamworth Borough, outside the town centre primary shopping area (unless within the catchment of a Local or Neighbourhood Centre or in the Ventura/Jolly Sailor Retail Parks or the Tame Valley Industrial Estate)	over 500 sq. metres gross
Local Centres	Within 400 metres of the boundary of a Local Centre	over 250 sq. metres gross
Neighbourhood Centres	Within 400 metres of a Neighbourhood Centre	over 100 sq. metres gross
Retail Parks and industrial areas	Within the Ventura and Jolly Sailor Retail Parks or parts of the Tame Valley Industrial Estate – as identified on the Policies Map	over 250 sq. metres gross

The impact assessment must assess the impact specifically on the Gungate

redevelopment.

Where appropriate, the impact assessment should consider the cumulative effects of the proposal, any recently completed retail developments and any outstanding planning permissions for retail development.

Where it can be demonstrated that development would not have a significant adverse impact on the defined centre, or centres, the principle of development will be supported.

### Question Seven

Do you agree with policy CP1?

Do you agree with the town centre use hierarchy?

Do you agree with the floorspace threshold for applications outside of the hierarchy?

Do you think anything should be added, removed or changed?

### Sustainable Economic Growth

- 4.41 A significant contribution of the Local Plan to create a diverse local economy and achieve economic prosperity in the Borough is to ensure that sufficient employment land is available in the right locations in order to support local businesses, encourage expansion of small business and attract inward investment.
- 4.42 Tamworth is strategically located at the heart of the motorway network with close links to the M42 and M6 toll and the A5 which runs through the Borough.
- 4.43 In recent years there has been an increase in investment from the logistics and high skilled manufacturing sectors. However, the amount of employment land has declined in Tamworth in the last decade with significant redevelopment of a number of sites for residential purposes, including Tame Valley Alloys, Metrocab, Doultons and Smurfit. This has left a network of strategic employment areas distributed throughout the Borough which will be required to meet future employment needs.
- 4.44 Delivering economic growth will be crucial to ensure that Tamworth has a robust and growing economy in the future, to raise prosperity for its residents and businesses and to enable it to continue to play a key role within established economic partnerships. However, Tamworth's economy does not sit in isolation; there are a range of areas where people currently work outside of the Borough such as the West Midlands conurbation and Birch Coppice in North Warwickshire alongside potential future locations such as Whittington Barracks in Lichfield. To assist with delivering a growing, prosperous economy, partnership working across Tamworth's functioning economic geography will be essential, particularly as Tamworth is unable to meet its employment needs within the borough.
- 4.45 The 2013 Employment Land Review identified six future employment land scenarios for Tamworth. These are based on: the latest experian data; the analysis of past trends and population growth and demographic change through the plan period. The range spans from 22.91ha to 69.87ha over the plan period. Scenario two and four (a) were deemed the most appropriate to Tamworth, as they consider the level of employment land required with a 'regeneration and growth' thrust and the expected population and demographic changes. The plan period requirement for scenario two is 34.47ha and for scenario four (a) 29.07ha, the mid point of these scenarios is 31.77ha.

## Question Eight

Do you agree with the overall employment need for Tamworth?

- 4.46 Whilst every effort is made to secure and protect sites and permissions for employment land, the NPPF clearly states that sites for employment which have no prospect of delivery should not be unnecessarily protected from other forms of development. There is up to 11ha (gross) of land with permission for an employment use that is not yet developed, which is now proposed to be allocated for housing. Such losses have been factored into the future employment need projections at an annual loss of 1.2ha, which is based upon past trends. This allowance allows for the loss to occur and leave further flexibility within the plan period.
- 4.47 The Employment Land Review 2012 looked at the existing portfolio of employment land and identifies potential supply. In general none of the existing employment areas were considered to be performing poorly as a whole, although some parts of the employment estates did have high vacancy levels. The market view confirmed that there was a demand for units in the majority of the employment areas and that they had relative strengths and weaknesses for businesses of different types looking to locate there which supported a diverse Tamworth market. Consequently the review highlighted that the network of strategic employment areas should be retained in employment use although some parts may need modernisation and environmental enhancements.
- 4.48 However the review did highlight issues with Kettlebrook Road Industrial estate related to its location and surrounding uses. The industrial estate, not considered to be strategic in its size, is constrained by the A5 bypass and the adjacent railway line and is surrounded by residential properties to the west, all of which are considered to limit the scope for expansion. Furthermore, because of poor access to the strategic highway network it is not considered an attractive location for modern business requirements and therefore significant redevelopment for employment uses may be challenging
- 4.49 In relation to future supply, the review identified a portfolio of sites, including key strategic sites around Bitterscote and the M42 Junction. It also highlighted the important role of regenerating the existing strategic employment areas in particular where land is not yet developed. In total there is approximately 18ha of land suitable for employment uses within the borough. This is a significant shortfall of 14ha from the identified need of 32ha over the plan period. Whilst the NPPF does not require employment allocations to be made but only a criteria set out in policy to deliver the most suitable sites, it is unrealistic that this 14ha will be found within Tamworth outside of the proposed allocations. Therefore this employment need shortfall should be met beyond the borough boundary.
- 4.50 To ensure that the town centre is the key driver in delivering a prosperous Tamworth, it will be important to encourage the development of new office space. Increasing the number of people who work within the town centre has numerous 'spin-off' benefits. Not only is it the most sustainable location, accessible by a variety of transport modes, office development will also increase the number of people using associated services and facilities, thus improving vitality and viability and helping to regenerate the town centre.



- 4.51 As a result of limited land supply, the need to focus a variety of uses, including retail, leisure and residential, and constraints related to the historic fabric and need to protect and enhance the conservation areas, it is considered that office space will be delivered in the form of mixed-use development.
- 4.52 As part of this approach it will be important to maximise the role of the train station in particular, with its excellent links to London, Birmingham, Manchester and Nottingham.
- 4.53 There is no specific requirement for new office floorspace, any future development should be delivered within the town centre. If no sites are available then strategic employment sites could be considered for office development, providing this helps deliver the overall strategy and is not in locations that would be considered detrimental to the future vitality and viability of the town centre.
- 4.54 The government supports the creation of Local Enterprise Partnerships (LEPs) to promote local economic development. LEPs are joint local authority-business bodies that will assume a strategic leadership role in economic renewal for a defined and agreed functional economic area. Tamworth is part of the Greater Birmingham and Solihull LEP. The LEP's emerging Economic Strategy, in particular its focus on job creation, will be supported through ensuring sufficient land is identified for delivery.

<b>This policy aims to address strategic spatial priorities SO2 and SO3</b>	
<b>SP4 Sustainable Economic Growth</b>	
Sustainable economic growth will be delivered through protecting and enhancing the existing network of strategic employment areas; promoting the role of the town centre and; providing 18ha new employment land to meet some of the borough's additional employment land needs up to 2031.	
<p>The existing network of Strategic Employment Areas comprises of the following;</p> <ul style="list-style-type: none"> <li>• Bitterscote (Bonehill Road, Cardinal Point, Bitterscote South)</li> <li>• Tame Valley Employment Area (Hedging Lane, Two Gates, Tame Valley Industrial Estate)</li> <li>• Amington Employment Area</li> <li>• Lichfield Road Employment Area</li> <li>• Centurion Park Employment Area</li> <li>• Relay Park Employment Area</li> </ul> <p>These areas are identified on the Policies Map.</p> <p>This network will be supported by the allocation of new employment sites to deliver B1 (b,c), B2 and B8 uses:</p>	
<b>Site Reference Number</b>	<b>Site Name</b>
EMP 1	Land south of the A5, Bitterscote south
EMP 2	Cardinal Point
EMP 7	Land north of Bonehill Road. Part of Bonehill Road employment area
EMP 8	Land adjacent to Relay Park
EMP 9	Land adjacent to Centurion Park
EMP 10, EMP	Sandy Way, part of Amington employment area



30, EMP 34	
EMP 26	Land adjacent to Sandy Hill Business Park
EMP 33	Site off Bonehill Road

Specific details for each of these sites and information relating to capacity and site area can be found in appendix C

The location for new office development (B1a) will be in line with policy CP1.

<b>Question Nine</b>
Do you agree with policy SP4? Do you agree with the quantum of employment land to be allocated in Tamworth? Do you agree with the proposed sites for employment allocations? Do you think anything should be added, removed or changed?

- 4.56 It is evident that improvements need to be made to the network of Strategic Employment Areas, including the environmental quality and transport network such as road surfacing. Furthermore there is significant potential for the employment areas to deliver the provision of renewable and low carbon energy initiatives through the retrofitting of renewable energy techniques, such as photovoltaic and green roofs. In addition improvements to the layout of existing employment areas could increase the possibility of using combined heat and power.
- 4.57 There has been increasing pressure for alternative town centre uses on existing employment areas. However there is a risk that this could be to the detriment of the function of the employment areas and also that of the town centre. It is therefore important that the B class uses remain at the employment areas. Any change of use to alternative uses would have to demonstrate need, compliance with the sequential test and the accessibility of the proposal by a variety of sustainable transport modes.
- 4.58 Increasing skills and training is an important element to promoting economic growth and enterprise. It is a key target of enterprise partnerships to create an appropriately skilled workforce to support their own development and the needs of the local business community. It is important to facilitate the creation of strong links between skills, training providers and businesses to ensure that existing and new businesses alongside Tamworth’s residents maximise their potential and help to deliver a growing, sustainable economy. Therefore it is important to focus training in the appropriate sectors, utilise and promote existing vocational centres at TORC, South Staffordshire College and Landau Forte academy alongside the wider education facilities within Tamworth.

<b>This is policy aims to address strategic spatial priorities SO2 and SO3</b>
CP2 Employment Areas
Planning permission should be granted for B1 (b,c), B2 and B8 uses on the network of strategic employment areas identified in SP4. The expansion of any existing business within these use classes will be supported, provided it promotes and supports the role and performance of the employment area in meeting the strategic economic objectives of the plan and the wider objectives of sub-regional economic partnerships.
Where planning permission is proposed for non B1(b,c), B2 and B8 uses within

existing employment areas, the development will be required to demonstrate:

- a) through an independent assessment, that the site is no longer viable and attractive to the market for its existing permitted use,
- b) need and compliance with the sequential test,
- c) good accessibility by walking, cycling and public transport, and
- d) there will be no direct or cumulative negative impact on the vitality and viability of existing employment areas and other centres.

To ensure improvements to the overall sustainability and viability of the employment areas, where feasible all development should provide the following measures:

- e) Accessibility by all means of transport in particular public transport, cycling and walking
- f) Appropriate soft and hard landscaping, permeable surfaces, signage and lighting.

The provision of renewable and low carbon energy initiatives including, combined heat and power, photovoltaic, green roofs, grey water harvesting, ground source heat pumps will be accepted where appropriate to the location and in compliance with CP10.

Planning permission for Office use B1 (a) will be supported in accordance with policy CP1.

### Question Ten

Do you agree with policy CP2?

Do you think anything should be added, removed or changed?

### Culture and Tourism

4.59 Tourism is one of the largest and fastest growing industries in the country. It is the largest growth industry in Staffordshire, generating £987 million per annum and providing the equivalent of over 40,000 full time jobs. The total expenditure generated by visitor trips to Tamworth in 2010 is estimated to be £50 million with the major receiving sectors of all tourism spend being retail at £19 million (35%) and catering at £17 million (31%). It is estimated that from the tourism expenditure in Tamworth of £50 million, a total of 1,362 jobs are supported by tourism spend, although not all of these jobs are filled by Tamworth residents (.43 Tamworth Tourism Economic Impact Assessment (2011).

4.60 The strength and potential of Tamworth's tourism sector owes much to its history and setting, which is focussed on the town centre. It has a strong historic centre with a number of landmark buildings which are open to the public, Tamworth Castle and St. Editha's Church being the most visited.

4.61 The town centre is the most visited part of the borough and the majority of its attractions are located within the centre. However, Tamworth suffers from a poor image within the region, which reflects its recent history as a post war expanded town and the resulting urban form. A main contributing factor is the comparative weakness in respect of the quality of the retail and leisure offer with a shortfall of family orientated food and drink outlets and a predominance of pubs results in a narrow evening economy. In addition, aspects of the built environment are considered to be poor, which is compounded by poor physical linkages with the out of centre retail areas which discourages linked trips.

- 4.62 Overnight visits boost spend in the local economy, however, there has traditionally been a lack of good quality accredited accommodation. Tourism spend is not restricted to the attractions themselves, a range of other local businesses benefit and increasing the number of overnight stays would increase spend in related services such as restaurants and shops. The situation has been helped by the recently completed hotels on the edge of the town centre. This may help to attract recreational as opposed to business tourists who is seen as a potential market to exploit, as a result of Tamworth's excellent connectivity and location.
- 4.63 In addition to the town centre, a unique cluster of sport and leisure facilities is located immediately south and east of the town centre within the Castle Grounds, forming a focus for events and activities. Tamworth also has the benefit of the extensive green linkages that run through the borough and out to the countryside beyond. Proximity to the river and canal networks also presents a unique recreation and under-used tourist resource. This will form the basis of projects promoted through the Central Rivers Initiative (CRI) (Tamworth is perceived as a key gateway location into the CRI and, as such, opportunities to promote this role will need to be maximised.)\*. Linked to this is the RSPB nature reserve at Middleton Lakes, which is located to the south just outside of the borough within Lichfield District. The reserve is expected to become the most important site for breeding birds in the West Midlands and will undoubtedly attract a significant numbers of visitors. Other attractions outside the borough but on Tamworth's doorstep include Drayton Manor Theme Park, Kingsbury Water Park, The Belfry golf course and the National Memorial Arboretum at Alrewas. Improving the public transport access to these attractions from the borough is seen as a key objective to increase the overall attractiveness of Tamworth as a tourism destination.
- 4.64 The Council and its partners' overall vision is to raise the profile of Tamworth within the Heart of England, promoting it as 'A Market Town for the 21st Century'. A key component of this is partnership working with tourism organisations and neighbouring local authorities to promote Tamworth as a visitor destination.
- 4.65 The recent discovery of the Staffordshire Hoard represents an opportunity for the borough to exploit its connection to Mercian history and increase its tourism role. As the Ancient Capital of Mercia, Tamworth is hugely significant in the Saxon story. The Hoard has resulted in the Mercian Trail being developed with the major partners, Birmingham, Stoke on Trent, Lichfield and Tamworth. Each area will focus on a different aspect of the Saxon era. Tamworth will focus on the Royal and Military stories, Lichfield, the religious aspect, Stoke on Trent the actual find and archaeology of the hoard and Birmingham the trading links and craftsmanship. Stoke on Trent and Birmingham will continue to house the majority of the find, Lichfield and Tamworth will hopefully have a permanent exhibition with some of the items. Tamworth Castle will look to find funds to redevelop the top floor of the Castle to house such an exhibition that will attract visitors to the town.
- 4.66 An attractive town centre is a key element of the tourism offer. Much of Tamworth's future success depends on regenerating the town centre in order to improve the perception and image of the town as a destination for retail and leisure. Major redevelopment schemes such as the Gungate site provide the opportunity to provide a development built to a high standard of design that complements the historic centre. Investment in major schemes should generate a knock on effect to stimulate wider regeneration. Public realm improvements encompassing high quality paving and street furniture would enhance the visitor experience.

- 4.67 The Improvements to the physical linkages and signage between the town centre and the out of town retail parks, leisure zone and railway station will make them more convenient and attractive to use.
- 4.68 It is recognised that to expand the offer of Tamworth town centre to local residents and visitors alike, cultural development is seen as a key catalyst, in conjunction with other local investment. The current focus for many cultural related events is the Assembly Rooms. However it is limited in its ability to deliver further events, due to its age, historic grade II listing and its overall quality as a venue. Significant improvements and extensions to the existing Assembly Rooms building are therefore proposed to cater for events and activities which at the current time cannot be met, primarily due to current building limitations. It is envisaged that the Assembly Rooms will form the focal point of a cultural quarter for the town.
- 4.69 Tamworth is currently lacking an appropriate conference and exhibition facility for local businesses and the local community. Existing venues are too small and were designed first and foremost for purposes other than conferences, exhibitions and training.
- 4.70 A purpose built facility would enhance the reputation of the area as a place in which to do business, provide sustainable opportunities for employment, both directly and indirectly. The secondary effects from such a facility would also be beneficial with increased potential for take up of the local tourism offer and hospitality venues through an increase in business tourism.

**This policy aims to address strategic spatial priorities SO2 and SO9**

CP3 Culture and Tourism

To deliver a vibrant cultural and tourism economy which will help improve the quality of life of residents and visitors, the Council will work with partner agencies and organisations to:

- a) Safeguard existing cultural facilities that are viable and support the expansion of the Assembly Rooms as the centrepiece of the emerging Cultural Quarter
- b) Promote, protect and enhance the borough's landscape and historic character
- c) Encourage provision of a diverse range of cultural facilities, including leisure and conference facilities within Tamworth Town Centre
- d) Encourage leisure and cultural facilities as part of mixed use development schemes within Tamworth Town Centre and of an appropriate scale in local and neighbourhood centres
- e) Support appropriate proposals for re-use of historic buildings
- f) Promote existing tourist attractions such as Tamworth Castle, and awareness of and interest in heritage assets such as mining, pottery and the borough's Mercian heritage
- g) Encourage developments which result in additional tourist attractions within Tamworth Town centre including a Heritage Centre as well as appropriate infrastructure such as hotel accommodation, public transport, improved walking and cycling routes and facilities, signposting, interpretation and information centres
- h) Promote a family focussed evening economy within Tamworth Town Centre by expanding the restaurant and leisure offer
- i) Deliver improved physical linkages between the out of centre retail parks, the railway station and leisure facilities to the town centre
- j) Encourage the regeneration and restoration of the rivers and the Coventry Canal through the borough as an important tourism resource

k) Improve the transport connections and physical routes through promoting what already exists to visitor attractions outside of the borough; particularly to Drayton Manor, Kingsbury Waterpark and the National Memorial Arboretum.

Planning applications that achieve these aims will be supported.

### **Question Eleven**

Do you agree with policy CP3?

Do you think anything should be added, removed or changed?

## CHAPTER 5 - STRONG AND VIBRANT NEIGHBOURHOODS

- 5.1 **Delivering new housing, of the appropriate type, tenure and cost and in accessible, sustainable locations whilst focussing on areas requiring regeneration will deliver strong and vibrant neighbourhoods.**
- 5.2 The Southern Staffordshire Districts Housing Needs Study (May 2012), which covered the areas of Tamworth, Cannock and Lichfield set out the potential scale of future housing requirements in the three districts based upon a range of housing, economic and demographic factors, trends and forecasts. 12 scenarios to project future demand were established.
- 5.3 The scenarios identified a range of growth options for Tamworth from 2006 to 2028, from 4,400 dwellings to 11,150 dwellings. The 11,150 figure is economic led, based on past employment trends and predicts a significant amount of in-migration to counter a predicted ageing workforce. However this approach is not considered appropriate because it would result in excessive development pressure on Tamworth which would have a detrimental impact on infrastructure and the network of green infrastructure. Aside from the figure of 11,150 dwellings the remaining figures range from the aforementioned 4,400 to 6,231 dwellings. These options all have strengths and weaknesses and it is not considered appropriate to use a single figure when establishing an overall target for the Borough. The study also analysed the core constraints on delivery including the environmental and infrastructure capacity and concluded that the objectively assessed need for Tamworth ranged between 240-265 dwellings per annum (5,280 to 5,830 dwellings). Taking a mid-point of these figure annualised over the course from 2006 to 2028 equates to an overall need of 5,500 dwellings. The plan period has now been extended to 2031 and therefore the objectively assessed need is **6,250** dwellings.
- 5.4 With seven years of the plan period gone (2006 – 2012) there has been a total of 1,347 (net) new homes delivered, an additional 29 dwellings were under construction and a further 371 with planning permission as of 1 April 2013. This leaves 4,503 of Tamworth's objectively assessed housing need to be delivered by 2031.
- 5.5 Through the Local Plan process an evidence base has been collected to assess potential housing allocations to meet this objectively assessed need. The primary source for sites has been the Strategic Housing Land Availability Assessment (SHLAA), which has also given information on capacity and delivery. Since summer 2013 each potential housing allocation has been subject to a technical appraisal, sustainability appraisal and landowners and developers have been invited to submit further information. This process has rejected sites that have insurmountable constraints or have no prospect of delivery within the plan period from potentially being allocated for housing. Sites within Tamworth urban area and sustainable urban extensions have been assessed, in total a further 2,900 dwellings could be delivered to help meet Tamworth's objectively assessed need.
- 5.6 It is evident in establishing past delivery and assessing the future supply for the plan period that there is insufficient land within Tamworth to meet its objectively assessed need of 6,250 dwellings. Given that the total amount of housing from 2006 to 2031 that can be delivered is 4,600, an appropriate housing requirement for the plan period should be 4,250. This allows for some flexibility (350 dwellings, roughly two



years supply). This equates to 170 dwellings to be delivered each year within Tamworth and 2,000 dwellings to be delivered outside of the Borough by 2031.

- 5.7 In order for the objectively assessed needs to be met, new homes will need to be delivered outside of the Borough. The Southern Staffordshire Districts Housing Needs Study establishes that Lichfield and Tamworth are within a shared housing market and that the work currently being undertaken by the GBSLEP supports this. The GBSLEP work also shows that Tamworth and North Warwickshire share a housing market area. Irrespective of this, it is clear from the geography and local government administrative boundaries of the three authorities that for Tamworth to grow, land will need to be made available within Lichfield and North Warwickshire. Currently both Lichfield and North Warwickshire are planning to deliver a total of 1,000 dwellings (500 each) to help meet Tamworth's objectively assessed needs. This however still leaves a shortfall of a further 1,000 dwellings from meeting the objectively assessed need. Therefore further work is required to assess options for Tamworth's growth to determine the most sustainable and deliverable options. This work will need to build upon the existing evidence base from all three local authority's Local Plans.

#### Question Twelve

Do you agree with the objectively assessed housing need for Tamworth?  
Do you agree that Tamworth cannot meet this housing need in full?  
Do you agree that this housing need should be met outside of the borough, in which locations or authorities do you think it should be met in?  
Do you agree with the annual housing requirement for Tamworth?

- 5.8 The Local Plan seeks to allocate sustainable urban extensions to the north of the borough at Anker Valley to the east at the former Golf Course and towards the west at Dunstall Lane and Coton Lane. These sites will bring forward a total of 2,500 dwellings. Aside from these sustainable urban extensions there is a limited supply of land for housing development within Tamworth's urban area, by allocating these sites a further 400 dwellings will be brought forward.
- 5.9 Empty homes are an important consideration when assessing the overall demand for housing. There are many reasons why a home may be long term empty, such as being in a poor condition, being refurbished, up for sale, or the owner may be working abroad, caring for a relative or being cared for themselves elsewhere to name but a few. At the end of January 2014 there were 160 privately owned empty homes in the Borough but over 1900 people on the housing register. The proportion of empty properties to numbers on the housing register clearly demonstrates that new house building, including affordable housing, is important to increasing the supply of housing to meet need in Tamworth. However, the Council is also working hard to bring empty properties back into use. The Council brought back 47 empty properties into use during 2011/12. Activity is now being concentrated more effectively on those properties that have been identified. The Council, in partnership with the County Council and RSLs, has been successful in securing funding for a project operated by the Homes and Communities Agency to tackle empty homes, with a view to increasing the supply of affordable housing & provision for specialist provision in Tamworth.

**This policy aims to address Strategic Spatial Priority SO5**

SP5 Housing

Within the Borough of Tamworth a net increase at least 4,250 dwellings will be delivered within the plan period at an average of 170 units per annum. At least 2,500 dwellings will be provided for within sustainable urban extensions (policy SP6). The remainder will be provided within the existing urban area taking the opportunity to maximise the effective use of brownfield land in sustainable locations.

Development to meet Tamworth’s housing needs within Lichfield and North Warwickshire will be set out within their respective Local Plans.

Housing development will be expected to contribute to the achievement of sustainable communities. Development will be supported in locations with good accessibility to existing or planned community services and facilities. The Council will secure high quality well designed housing development that contributes to creating inclusive and safe mixed communities and reducing health inequalities. This will be achieved by providing a mix of dwellings of the right size, type, affordability and tenure and will be supported by services, facilities and infrastructure to meet community needs.

The following sites, as shown on the Policies Map will be allocated for housing:

Site Reference Number	Site Name
341	Land south of St Peter’s Close – Phase 2
343 and 344	Land off Cottage Farm Road and derelict buildings south of B5404
347	Phoenix Special Purpose Machines, Hospital Street
348	Norris Bros, Lichfield Street
349	Arriva Bus Depot, Aldergate
357	Northern part of Beauchamp Employment Area
376 and 377	Hyundai Garage, Lichfield Street and Land and buildings off Wardle Street
399	Coton’s Van Hire and Millfield House, Lichfield Road
405	Land off Overwoods Road and Freasley Lane (this site now has planning permission and will be shown as a commitment after the annual monitoring process)
467	Fazeley Autocentre and units behind
488	Former Staffordshire County Council Care Home, New Road
496	Seaton Hire Ltd and land to the south of Wilnecote Road
507, 508 and 509	Club, Spinning School Lane, Former Magistrates Court and Police Station and Youth Centre, Albert Road
521	Former railway goods yard, Wilnecote
541	Land adjacent to Tame Valley Alloys
558	Factory, Basin Lane

Specific details for each of these sites can be found in appendix B and information relating to capacity, site area and delivery can be found within the housing trajectory in appendix A.



### Question Thirteen

Do you agree with policy SP5?  
Do you think anything should be added, removed or changed?  
Do you agree with the proposed housing allocations?

- 5.10 It is recognised that sustainable urban extensions are more than just housing. Each extension, where necessary, will require the delivery of supporting infrastructure to create a sustainable, inclusive community. This may include a neighbourhood centre, community facilities and the provision of a primary school, links and access to open space in a high quality and a well designed environment.
- 5.11 Good accessibility by public transport to the town centre and employment areas will be a critical requirement for each proposal. Internal trips will be maximised through the provision of services and facilities on site and having a high degree of public transport accessibility will reduce the need to travel by private car, therefore minimising congestion on the local road network.
- 5.12 Each location will require measures to be put into place including appropriate landscaping on the edge of the open countryside. This is of particular importance with the Anker Valley, which will need to take into consideration the character appraisal for Amington Hall Estate Conservation Area which identifies its principal feature as being the setting of open countryside and woodland and the long distance open rural and semi rural views available from within its boundaries. Similarly, Dunstall Lane will need to consider Hopwas Conservation Area and the Green Belt nearby in Lichfield District. Developers will need to have regard to maintaining the setting of the conservation area through careful design, layout and landscaping.
- 5.13 To reduce the risk of flooding and to contribute towards water management objectives, opportunities for the inclusion of Sustainable Urban Drainage Systems (SuDs) will be sought.
- 5.14 The Council will work with the land owners and developers of each site to produce masterplans informed by the policies set out in this Local Plan to further guide the planning application process.

### This policy aims to address strategic spatial priorities SO2, SO4 and SO5

#### SP6: Strategic Urban Extensions

The following sites, as shown on the Policies Map will be allocated for housing

a) Anker Valley

- Anker Valley is located on agricultural land and will form an urban extension to the north of the borough. Although physically separated by the rail network from the town it should be well connected to Tamworth Town Centre and Tamworth Railway Station. It will provide at least 500 new dwellings and associated infrastructure as detailed below.
- The development should minimise any visual impact on the nearby Amington Hall Estate Conservation Area.
- Make use of and improve existing rights of way to the town centre and train station.
- Create pedestrian and cycle access to the existing urban areas, running east to west.

Required Infrastructure:

- Local convenience store
- A new primary school or a significant contribution and land to facilitate development
- A contribution to secondary education provision

b) Golf Course

- The site is located on Tamworth golf course and will form an urban extension to the east of the borough up to the administrative boundary with North Warwickshire. It will provide at least 1,100 new dwellings and associated infrastructure as detailed below.
- Development must take into consideration the existing oil pipeline and electricity pylons and adhere to guidelines for development.
- Two points of vehicular access must be established onto Mercian Way. The existing access to the golf club along Eagle Drive is suitable for one, with a second point of access coming directly onto Mercian Way south of the Woodland Road – Mercian Way roundabout.
- Development must avoid any impact on the nearby Alvecote Pools SSSI and mitigation should ensure there is no waste or run-off.
- Development should take into consideration the Hodge Lane Local Nature Reserve, which could be achieved through wildlife areas, additional planting of native species to provide a buffer and green linkages by pedestrian or cycleway.

Required Infrastructure:

- Primary school
- Contribution to secondary school provision
- Local convenience store
- Open Space

c) Dunstall Lane

- The site is located on agricultural land and will be part of a mixed use development extending from existing employment and retail areas to the west of the borough. It will provide at least 700 new dwellings and associated infrastructure as detailed below.
- The development should have regard to the Hopwas Conservation Area in Lichfield District and the two listed bridges within Tamworth.
- The site is located near to the River Tame and Broad Meadow SBI (in process of becoming an LNR) any development should ensure there is no adverse impact on these features. The site is also within close proximity to the Coventry Canal which is an ecological corridor so any potential impact must be taken into consideration.
- Appropriate landscaping and open space should be provided to link with the river corridor, flood plain and wider Green Infrastructure network. In addition to this the existing ancient hedgerows should be retained and site design and layout should take the landscape character into consideration.
- Two points of vehicular access must be established
- There is a public right of way through the site and appropriate mitigation must be taken to ensure the route remains.

Required Infrastructure:

- A new primary school and contributions to secondary school

- Pedestrian and cycle way access to near by employment and retail areas and to the town centre
- Local convenience store

d) Coton Lane

- Coton Lane will form a small urban extension to the north west of the borough up to the administrative boundary with Lichfield. It will provide at least 190 new dwellings and will contribute to or provide associated infrastructure as detailed below.
- Access from the site to Coton Lane can be achieved in a number of locations, but if access is taken opposite Fontenaye Road, traffic signals or a roundabout would be required.
- A pedestrian and cycle way should be provided and extended along the boundary of the site with suitable crossing facilities to the local schools and beyond.
- The site is located in close proximity to Tamworth water treatment works and some level of odour mitigation may be required.

Required Infrastructure:

- Pedestrian and cycle way and appropriate crossing facilities
- Contribution to education for primary and secondary school provision

Where appropriate all sustainable urban extensions should:

- Encourage the co-location of any required community infrastructure, retail or services to form a new neighbourhood centre. All new infrastructure should be easily accessible by foot, cycle and other sustainable modes of transport.
- Be well connected internally and to the adjacent urban areas, the town centre, employment areas and green infrastructure by means of walking, cycling, green linkages and sustainable transport. This will to help maximise both internal trips and sustainable travel whilst mitigating the traffic impacts of the proposal on the strategic and local road network
- Ensure that the development is of a high quality, sustainable and inclusive design and that the layout reflects the requirements of Policy CP11
- Protect, utilise and enhance existing and provide additional green and blue infrastructure linkages to the adjacent and surrounding green space and waterscape networks and the urban area.
- Create appropriate new habitats and links to existing sites of high biodiversity value.
- Create integrated, distinctive neighbourhoods to meet the needs of the community including young and older persons and families to ensure social cohesion.
- To reduce the risk of flooding and to contribute towards water management objectives, opportunities for the inclusion of Sustainable Urban Drainage Systems (SuDs) will be sought.

### Question Fourteen

Do you agree with policy SP6?

Do you think anything should be added, removed or changed?

Do you agree with the proposed strategic housing allocations?

## Regeneration Priority Areas

- 5.15 The Council's priorities for regeneration focus on neighbourhoods with high levels of deprivation, and where there may be a need to redevelop some housing stock that is coming to an end of its useful life. In addition, the Wilnecote Corridor along Watling Street has been identified as an area requiring a comprehensive approach to regenerating the housing and employment offer and improving the immediate environment to enhance this important transport corridor.

## The post war social housing areas

- 5.16 Tamworth has a good record of neighbourhood regeneration through focusing interventions in the borough's most deprived neighbourhoods. Within Tamworth four distinct neighbourhoods have been identified as council priority areas. These are Amington, Belgrave, Glascote, and Stonydelph. The Locality Working initiative has been established to address disadvantage within these defined communities and involves a neighbourhood level multi-agency activity to focus resources upon a defined community to address issues of local needs. This has resulted in the provision of community hubs in the local or neighbourhood centre within each locality providing accommodation for local services, support initiatives for local people along with a community space.

- 5.17 In addition there are areas outside these localities that display similar attributes concerning housing and health. These all share common physical characteristics, namely being located within the post war planned neighbourhoods and consisting of predominantly social housing which is either currently, or predicted to require investment and regeneration during the lifetime of the Local Plan.

- 5.18 On this basis, the neighbourhoods listed below have been identified as regeneration priority areas, as a result of demonstrating high levels of deprivation and/or a poor quality environment. The regeneration priority areas are identified in figure 4

- Amington
- Glascote Heath
- Stonydelph
- Belgrave
- Tinkers Green
- Leyfield

- 5.19 Within these areas, a partnership approach between the council's strategic housing department, RSLs and other service providers will need to ensure the housing stock is refreshed to meet changing needs. This is in terms of ensuring access to jobs and services, protecting local character and sense of community whilst improving and enhancing the natural environment and mitigating the impacts of climate change. Key to achieving this will be promoting and protecting the role of local and neighbourhood centres which lie within and/or adjacent to these neighbourhoods to ensure services and facilities, including retail, remains accessible particularly to those without access to a car. Specific area boundaries will be established through the production of area based master plans, where appropriate.

## The Wilnecote Regeneration Corridor

- 5.20 The Wilnecote Regeneration Corridor (shown on figure 3) runs along Watling Street (the former A5) starting at the crossroads at Two Gates, extending east from the Watling Street-Dosthill Road/Tamworth Road junction for almost half a mile to the roundabout that intersects Watling Street and the B5440 Marlborough Way / Ninian Way.
- 5.21 It is a well used stretch of road linking key residential areas together and providing access to a significant employment area in the borough, Tame Valley industrial estate and out of town retail areas and access to the nationally significant theme park, Drayton Manor.
- 5.22 The corridor suffers from a number of issues, including derelict and empty plots of land that have not been developed, sporadic residential units mixed in between dated industrial estates. Additionally the corridor is intersected by a railway track and local station, which is no more than a platform with a car park. Due to varied land ownership and existing development the area lacks a unified strategic approach to improvement and has become run down. It could suffer from ad hoc individual developments that do not improve the corridor as a whole and as such, this well travelled route projects a poor image for the Borough.
- 5.23 The area has several sites which will be allocated for redevelopment through the Local Plan. It is evident that either side of the railway line the area is split into two distinct characters, predominantly commercial to the east with a number of car dealerships and Beauchamp Trading Estate in close proximity to Tame Valley Industrial Estate. To the west, the character is more residential in nature, featuring Cottage Farm Road (within Dosthill) to the south and a number of residential properties within Two Gates to the north. Consequently, whilst it is considered that it will be important to achieve a mixed-use development in close proximity to Wilnecote Railway Station, it will still be important that the main uses should reflect their local context.
- 5.24 Delivering improvements within the area creates an opportunity to align with the Fazeley component of Lichfield District's Rural Planning Project. This approach to rural masterplanning results in a set of guiding principles relating to improvements in relation to the environment, traffic management, housing and social well-being. Work to date has identified the need to address the environment along the former A5.

**This policy aims to address strategic spatial priorities SO3, SO4, SO5, SO7, SO10 and SO12**

Policy SP7 Regeneration Priority Areas

In the following areas the focus for regeneration will be on improving the physical environment and delivering social and economic renewal.

### **1. Post war planned neighbourhoods**

These areas shown on Figure 4 are identified for regeneration with the purpose of revitalising the housing areas and building cohesive and sustainable communities.

Development will be supported and encouraged in these areas that:

- a) improves the quality of the existing housing stock, including retro-fitting existing properties with renewable and low carbon technologies or energy efficiency measures
- b) enhances the mix of housing within the area that meets local needs
- c) improves or provides local community facilities and services where opportunities

are available

d) protects and enhances the network of high quality open space

e) supports the vitality and viability of existing local and neighbourhood centres

f) increases integration of the areas with surrounding areas and improves accessibility to employment, key services and the town centre by walking, cycling and public transport

g) is of a high quality design which contributes towards designing out crime and improving the attractiveness of the area.

## **2. Wilnecote Regeneration Corridor**

The Wilnecote Regeneration Corridor is defined the Policies map. Proposals to enhance the roadside environment and access to and the fabric of Wilnecote Railway Station will be supported. Planning applications for refurbishments to existing and new B1 (b,c), B2 & B8 uses along with new housing and environmental improvements and investment in Wilnecote Railway Station will be supported. Development should improve the visual appearance and street-level activity on the corridor and provide walking, cycling and public transport access integrated with an improved network.

### **Question Fifteen**

Do you agree with policy SP7?

Do you think anything should be added, removed or changed?

Do you agree with the proposed areas?

### **Housing Needs**

- 5.25 In the period 2006 to 2013, 304 gross affordable housing units were completed, on average 61 affordable dwellings a year. As at the 31st March 2011 there were a further 58 units committed (Availability of Residential Land) . Although Tamworth is more affordable than other parts of the sub region, the updated Strategic Housing Market Assessment (Southern Staffordshire Districts Housing Needs Study and SHMA Update) indicates a net housing need of 183 dwellings per annum. Delivering this amount of affordable housing is clearly unrealistic.
- 5.26 The Council has undertaken a Whole Plan viability Assessment which includes an affordable housing viability assessment. The affordable housing assessment tested 9 scenarios looking at different overall provisions of affordable housing and also different splits between rented and shared ownership within each. The study examined recent planning history and also current market information to establish a base line to work from when testing the 9 scenarios. The details of this can be found in the report. It has been concluded from the study that for sites of 1 and 2 units there would be no on site provision and no commuted sum for affordable housing. Of sites from 3 to 6 units a commuted sum for affordable housing would be sought and for all sites of 7 units of more an on site provision of affordable housing is expected.
- 5.27 However, whilst this provides a greater degree of flexibility in the process and is considered to be deliverable, it is recognised that there may still be factors which make a site unviable and the Council will need to be flexible on a site by site basis whilst still seeking to maximise the proportion of affordable housing. To establish a deliverable annual requirement the thresholds set out above have been applied to the supply of proposed housing allocations and sustainable urban extension. When applying the threshold set in policy CP4 the total supply is identified as 634 dwellings.



- 5.28 The total supply should also consider existing completions of affordable dwellings to establish a total supply over the course of the plan period. In total 307 units have been completed and 58 units are committed. Taking all of the above into account a total of approximately 1,000 affordable dwellings are considered to come forward between 2006 and 2031. This supply should be considered to be a minimum figure as there is the potential for some sites to provide a greater proportion of affordable housing and as stated above, there remains a significant need beyond this figure, therefore wherever possible it will be important to maximise the delivery of affordable housing.
- 5.29 The updated SHMA identified that the split of affordable housing tenure should be 50% Social Rented, 25% Affordable Rented and 25% Intermediate Tenure.
- 5.30 In 2001 over 75% of the housing stock in Tamworth had 3 or more bedrooms. By 2012 this percentage was estimated to have remained fairly static at 74%. In planning the provision of a housing stock that meets the need of all households in the future, we need to consider changes which are taking place in both demographic structure and household formation and preferences. The data in relation to household formation is extremely important as those households requiring smaller units are those which are growing most significantly.
- 5.31 In March 2009, the Department of Communities and Local Government published updated household projections to 2031 to take account of revisions to the Office for National Statistics 2006-based population projections, published by the Office for National Statistics in June 2008. These estimate that in 2006 the number of households in Tamworth was 31,000 and by 2028 this will increase to 37,000. It is also estimated that the average household size is getting smaller. Nationally one-person households are projected to grow by 52.2%, but this differs considerably between age bands. Households consisting of 55-64 year olds (growth of 80.2%) and 45-54 year olds (up 66.1%) will grow the most. Older single person households (65+) will also grow more than younger households.
- 5.32 The significant growth in one person households and the age of these new one person households suggests an increased requirement for smaller properties, but not so small that they cannot accommodate overnight guests or space to work at home; in other words at least two bedrooms will be needed.
- 5.33 The Southern Staffordshire Districts Housing Needs Study and SHMA Update concludes that 42% of all households need two bedroom units and 39% of all new forming households need three bedroom units. This takes into consideration needs, aspirations and viability.

**This policy aims to address Strategic Spatial Priority SO5**

**CP4 Affordable Housing**

The provision of at least 1,000 affordable housing units over the plan period will be sought, approximately 40 per annum. The provision of affordable housing to meet local needs will be maximised through working in partnership with relevant organisations. Unless demonstrated to be unviable, the Council will require:

- a) new residential development involving 7 or more dwellings (gross) to provide a target of 20% affordable dwellings on site
- b) Strategic Urban Extensions at Coton lane and Dunstall Lane will be expected to provide a target of 25% affordable dwellings on site
- c) new residential development involving 3 to 6 dwellings (gross) to provide a

financial contribution through a S106 agreement, equivalent to a target of 20% on site affordable dwellings

d) for on site provision a mix of 25% Intermediate Tenure and 75% Rented which should be split between Social Rented and Affordable Rented as specified in the evidence base

e) the release and development for affordable housing of Council, Registered Social Landlords and other public bodies surplus land holdings

f) a range of sizes of residential dwellings to be provided to meet local requirements

g) a range of housing to meet the needs of older persons, persons with disabilities and those with special needs where there is a proven need and demand.

Affordable housing units should be well designed and blend in well with the rest of the development to promote cohesion within the community.

The Council will monitor development activity, land values and market signals to ensure it adopts a flexible approach to negotiations to achieve the above targets. This monitoring will inform discussions over viability, local needs and where appropriate lead to a review of targets to ensure the overall requirement is met during the plan period.

### Question Sixteen

Do you agree with policy CP4?  
 Do you think anything should be added, removed or changed?  
 Do you agree with the proposed level affordable housing?

5.34 Staffordshire County Council Flexi Care Strategy estimates that the growth in population of those aged 65 and over between 2010 and 2030 will be 72% in Tamworth, the largest growth in Staffordshire. Flexi Care Housing provides an opportunity for people to live in their own accommodation with the security of care and support being available when needed. The Strategy identifies the level of units required to meet demand in Tamworth (823) and how many need to be available for rent or purchase. At the 1st April 2013, 68 Flexi Care Housing units were already available for rent. It is expected that Flexi Care Housing will lead to a diversion from residential placements reducing the number of residential care beds required and limiting the growth in nursing beds. It will be important to meet the need of flexi care accommodation alongside any other specific needs identified.

### This policy aims to address Strategic Spatial Priority SO5

CP5 Housing Types

In granting planning permission for residential development, housing size, type and mix that reflect local needs based upon the evidence set out in the latest Housing Needs Survey, will be secured.

Proposals for housing development should achieve the following mix of units;

- 4% of new housing will be 1 bedroom sized units
- 42% of new housing will be 2 bedroom sized units
- 39% of new housing will be 3 bedroom sized units
- 15% of new housing will be 4 bedroom or more sized units

Where it is demonstrated that this is not feasible or viable, an alternative mix will be acceptable that matches local needs as far as possible.

The Council will monitor the delivery of housing, market and household trends to



ensure the development of sustainable mixed communities.

All proposals for housing development should meet the requirements of different groups within the population, where there is a proven need and demand and provide an appraisal of the local community context and housing need of that community.

### Question Seventeen

Do you agree with policy CP5?

Do you think anything should be added, removed or changed?

Do you agree with the proposed housing mix?

5.35 In the context of Tamworth housing, there is a limited supply of unconstrained available land that is suitable for development, which contrasts with a growing need for development. Therefore it is imperative to make the most effective and efficient use of the land resources in the Borough. The SHLAA (2008) included six sample schemes based on actual sites in Tamworth to reflect the variety of sites found in Tamworth. These sites had densities ranging from 43 dph to 133 dph. The SHLAA also identified a range of typical urban areas (TUA's) reflecting different building phases in Tamworth's history. There were 136 identified TUA's totalling 1171.95ha and containing approximately 30459 units, an average of 26 dwellings per hectare. The revised SHLAA (2011), after consultation with the SHLAA panel and using the data from the TUA's established and applied the following densities;

- 30dph applied in urban locations
- 35dph applied for sites within the town centre and in close proximity to public transport nodes.

This also took into account the local context based on the TUA data and sensitivity allowance for certain sites e.g. within a conservation area.

5.36 The SHLAA also adopted a net developable area approach for each site to take into account open space, community facilities and associated infrastructure, these are calculated as follows;

Site Size	Gross net ratio standard
Up to 0.4 hectares	100%
0.4 to 2 hectares	80%
2 hectares and above	60%

5.37 If these net developable areas are applied to the TUA's then the average dwellings per hectare in Tamworth is 39.45, with the majority of homes (17,346, 57%) being in a TUA with a dwelling per hectare ratio between 30 and 50. 15% of all units were in TUA's with a density of below 30 dwellings per hectare, and 28% of all units were in TUA with a density ratio of over 50.

5.38 It will be important to consider the local context in particular the proximity to sustainable transport hubs to maximise the effective and efficient use of land to ensure sustainable patterns of development going forward.

<b>This policy aims to address Strategic Spatial Priority SO5</b>									
CP6 Housing Density									
New residential development, whilst making the efficient and effective use of land, will enhance the character and quality of the area it is located in. Where viable and appropriate to the local context and character it will be expected to achieve the following densities:									
a) Within or in close proximity to the town centre, Local and Neighbourhood centres or at sustainable transport hubs a density of 40 dwellings per hectare.									
b) Away from these locations but within the urban area, a density of between 30 and 40 dwellings per hectare.									
Net developable areas (as defined above) will be applied as follows:									
	<table border="1"> <thead> <tr> <th>Site Size</th> <th>Gross net ratio</th> </tr> </thead> <tbody> <tr> <td>Up to 0.4 hectares</td> <td>100%</td> </tr> <tr> <td>0.4 to 2 hectares</td> <td>80%</td> </tr> <tr> <td>2 hectares and above</td> <td>60%</td> </tr> </tbody> </table>	Site Size	Gross net ratio	Up to 0.4 hectares	100%	0.4 to 2 hectares	80%	2 hectares and above	60%
Site Size	Gross net ratio								
Up to 0.4 hectares	100%								
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2 hectares and above	60%								

<b>Question Eighteen</b>
Do you agree with policy CP6?
Do you think anything should be added, removed or changed?
Do you agree with the proposed densities?

### **Gypsies and Travellers**

5.39 A sub-regional Gypsy and Traveller Accommodation Needs Assessment (GTAA 2012) has been undertaken with Lichfield District Council. The figures are based on a 'need where it arises' methodology, it does not take account of opportunities or constraints within each local authority area. The report identifies that there is the need for 1 additional residential pitch within Tamworth. However, the report recognises that it should not necessarily be assumed to imply that those needs should actually be met in that specific locality. Decisions about where need should be met should be strategic, taken in partnership with local authorities, the County Council and the Regional Bodies involving consultation with Gypsies and Travellers and other interested parties, which will take into account wider social and economic planning considerations such as equality, choice and sustainability.

5.40 Proposals for pitches and sites will be subject to the same criteria as any other type of development. This will mean that sites should be located in suitable and sustainable locations that are well connected to services and facilities and minimise potential impacts. Tamworth has a limited supply of unconstrained suitable land and as such, opportunities in neighbouring Districts to accommodate development to meet this need will be sought.

<b>This policy aims to address Strategic Spatial Priority SO5</b>
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## CP7 Gypsies, Travellers and Travelling Showpeople

The Council will work with surrounding Local Authorities, the County Council, landowners, Gypsies, Travellers and Travelling Showpeople communities and other interested parties to enable the development of pitches in accordance with the sub regional Gypsy and Traveller Accommodation Needs Assessment (GTAA) as below:

Site Type	2012-2028
Residential Pitches	1
Transit Pitches	0
Travelling show People	0

Proposals will be expected to contribute to the creation of sustainable mixed communities and have regard to the existing levels of provision and identified need. In addition to the relevant national guidance, the following considerations will be taken into account in the determination of locations for Gypsy and Traveller sites:

- a) There should be safe and convenient vehicular and pedestrian access to the site;
- b) The site must be large enough to provide for adequate on site facilities for parking, storage, play and residential amenity dependent on the number of pitches;
- c) The development should provide the appropriate infrastructure required both on and off site.
- d) There should be convenient access to schools, shops and other local facilities, preferably pedestrian, cycle or by public transport;
- e) The site should be able to be landscaped and screened to provide privacy for occupiers and maintain visual amenity; and
- f) It should have no significant detrimental impact upon the residential amenity of adjoining properties or neighbouring land.

### Question Nineteen

Do you agree with policy CP7?

Do you think anything should be added, removed or changed?

Do you agree with the proposed level of need?

## CHAPTER 6 - A HIGH QUALITY ENVIRONMENT

- 6.1 Delivering a high quality environment will involve protecting and enhancing Tamworth's network of green infrastructure to provide sufficient opportunities for sport and recreation and biodiversity. Through positive planning, development will achieve high quality design that preserves and enhances Tamworth's historic character.**
- 6.2 Despite being a predominantly urban authority, the planned layout of Tamworth has resulted in a unique legacy in the form of a network of urban green and blue infrastructure which runs east-west and north-south through the centre of the Borough. These main corridors follow the lines of the Rivers Tame and Anker and the Kettlebrook, with more local links extending into the housing and employment areas. These links offer significant benefits, acting as a sustainable transport network for walking and cycling which is accessible to all residents. Furthermore they play a key role in delivering benefits around increased community cohesion, education, regeneration and improving health and wellbeing.
- 6.3 With the exception of the strategic urban extensions there are few opportunities to create new open space as part of development. It will be critical that the extension sites have a well designed, useable network of open space and that they make the most of their immediate links with the countryside.
- 6.4 Beyond these sites, it will be crucial to make the most efficient use of Tamworth's network of environmental assets, including enhancing the quality of existing open space through management and developer contributions. There are a number of projects which can be implemented which make use of the existing network and address certain deficiencies. These include an Urban Park in the east of the borough to address an identified deficiency, restoring the Broad Meadow SBI and increasing the level of semi-natural space at Wigginton Park. Furthermore, it will be important to maintain the existing biodiversity habitats and improve the links to them.
- 6.5 Delivery of the Central Rivers Initiative has the potential to be an important element of Green and Blue Infrastructure, both as a multifunctional green space and an important component of social infrastructure. The Central Rivers Initiative is a broad partnership of local authorities, agencies and initiatives working together to shape and guide the progressive restoration and revitalisation of the river valley between Burton-on-Trent, Lichfield and Tamworth. The overall objective is to create a landscape linking Burton with Tamworth that people are proud of and enjoy, with healthy rivers, lakes and valleys attracting wildlife and a thriving, sustainable, economy. It covers a key swathe of land alongside the river network within the borough and as such offers a significant contribution to the delivery of the urban green network.
- 6.6 Approximately one fifth of the borough is undeveloped, which offers a varied landscape and acts as an important buffer between the urban area and its rural hinterland. The vast majority forms part of the flood plain of the Anker and Tame Rivers. In addition to the designated nature conservation sites, the countryside offers a variety of informal recreational opportunities for the borough's residents. The strategy seeks to improve access to green infrastructure from all new developments.
- 6.7 The 211ha of Green Belt to the south of the Borough forms just under 7% of the total area. Most of the Green Belt within Tamworth's boundary has additional protection because it is part of the Tame River Corridor (including Middleton Lakes) or is

designated for its biodiversity or geodiversity value, including Dosthill Quarry. Protection of the Green Belt therefore helps to retain these important features in Tamworth and such land is generally unsuitable for development. A review of sites has been carried out through the SHLAA and Local Plan process which did not identify any sites that would be suitable for large-scale strategic development. An assessment of the Green Belt has been undertaken (May 2012). The detailed Green Belt boundary is shown on the Policies Map and will only change through the production of another Local Plan.

**This policy aims to address Strategic Spatial Priorities SO7 and SO8**

**SP8 Environmental Assets**

Tamworth’s network of green and blue infrastructure, including the green linkages which contribute to Tamworth’s character as ‘Urban Green’ (as shown on Figure 4), open space and green belt, will be protected, managed and enhanced. The emphasis will be on making the best use of existing open space through enhancement and appropriate management.

Priority will be given to:

- a) Maintaining the Green Belt boundary (defined on the policies map) during and beyond the lifetime of the Local Plan and allowing uses in accordance with national planning policy
- b) Restoration of the Broad Meadow SBI primarily for biodiversity but also to incorporate opportunities for public access
- c) Reinforcing links between green spaces and habitats, particularly where there are gaps and the wider green infrastructure network beyond the borough boundary
- d) Increasing the amount of semi-natural green space at Wigginton Park
- e) Enhancing the quality and accessibility of the canal corridor and rivers, particularly in the town centre
- f) Creation of a new open space network and links in the strategic housing allocations
- g) Delivering initiatives associated with The Central Rivers Initiative, the extent of which is shown in Figure 4.
- h) Safeguarding and enhancing the character and setting of areas of historic assets of acknowledged national and local importance, including statutory and locally listed buildings, conservation areas (defined on the policies map), scheduled ancient monuments and archaeological remains.

**Question Twenty**

Do you agree with policy SP8?

Do you think anything should be added, removed or changed?

**Sport, Recreation and Open Spaces**

6.8 A key strategic priority related to improving the quality of life is to make Tamworth a healthier and safer place with an environment where local people can reach their full potential and live longer, healthier lives.

6.9 There is clear evidence that an individual’s level of participation corresponds with their health. Tamworth, in conjunction with Sport Across Staffordshire aims to increase participation in physical activity by 1% per year. Tamworth has consistently met this target and to ensure it continues to in the future the provision of both sports

and recreation facilities and an appropriate and accessible network of open space are considered to be key factors in achieving this.

6.10 Within the context of improving health and increasing participation related to improving the quality of life of Tamworth residents the Joint Indoor and Outdoor Sports Strategy (2009) identifies local need, audits local provision, sets and applies local standards and develops an overall strategy for the borough. The strategy recommends that there is a need to increase access to a range of 'core' facilities including swimming pools, sport halls and health and fitness facilities with a key recommendation relating to the need for a new multi-purpose community-use leisure centre in an accessible location with associated facilities, to potentially include:

- A 25 x 12 metre swimming pool with a teaching pool
- A minimum of a 4 court sports hall
- An ancillary hall/studio
- A health and fitness studio with a minimum of 70 stations

6.11 The quality, quantity and accessibility of new and existing sports recreation facilities is a key focus in ensuring an excellent sport and recreation infrastructure for Tamworth's neighbourhoods, and is integral to ensure that the associated health and social benefits of increased physical activity and participation are achieved.

6.12 To ensure sufficient access to sport and recreation facilities in a sustainable manner throughout Tamworth's neighbourhoods, particularly those that are more deprived, the strategy recommends the use of existing community centres for physical activities. New facilities should be capable of flexible use and include the provision of changing and storage facilities.

6.13 The strategy recognises that there is a significant amount of sport and recreation infrastructure already in place on school sites and examples where improvements have been made in both quantitative and qualitative terms. In the context of the constrained environment of Tamworth Borough such facilities can play an important role in providing accessible sports and recreation facilities. Subsequently a key recommendation of the strategy is promoting the dual use of school sites and improving the quality of such sports provision, setting out a range of criteria to ensure that this is done in the most appropriate way to ensure that quality, quantity and accessibility of overall provision is enhanced. This includes the introduction of formal maintenance agreements between users to ensure the quality is maintained, provision of separate reception and changing facilities and accessible opening hours.

<b>This policy aims to address Strategic Spatial Priority SO7</b>
CP8 Sport and Recreation
<p>A network of good quality sport and recreation facilities that meet the needs of Tamworth's current and future population, in particular ensuring needs arising in the Regeneration Priority Areas (SP7) are met where possible. This will be achieved by:</p> <p>a) Ensuring all new facilities are in locations accessible by a range of transport modes including walking, cycling and public transport</p> <p>b) Delivering through contributions and public funding a new multi-purpose community sports centre in an accessible location, with appropriate facilities to meet identified need</p> <p>c) Protecting and enhancing existing sport and recreational facilities. Where a need</p>



for the facility remains and if possible any loss should be compensated by the provision of an equal or higher standard of facility and in an accessible location

d) Promoting the dual use of existing school sites in accordance with the following criteria;

- i. Where there is a proven need and would not be detrimental to existing and proposed facilities.
- ii. Designed to enable convenient public access
- iii. Provides separate reception and changing facilities from the school
- iv. Accessible opening hours
- v. Introduces formal maintenance agreements between users to maintain quality

### Question Twenty One

Do you agree with policy CP8?

Do you think anything should be added, removed or changed?

- 6.14 The provision of a good quality, easily accessible network of open space in an urban borough like Tamworth plays a key role in improving the quality of life for residents through promoting healthier lifestyles, alongside defining local identity and promoting economic and social regeneration. Maintaining and increasing green and blue linkages contributes to wider sustainability aims of modal shift by performing a dual function of a sustainable transport network.
- 6.15 Tamworth has an extensive network of 'Urban Green' which will play an important role in delivering improvements to health and additional regeneration benefits. The 'Urban Green' network contains a significant amount of multi-purpose, publicly accessible open space, covering a range of typologies from urban parks, amenity open space with play provision to semi-natural space. All of these spaces contribute to the overall provision in Tamworth and each play an important role in delivering an improved quality of life to residents, for example semi-natural space can contribute to play provision through natural features such as woodland.
- 6.16 The 2012 Open Space Review assessed all publicly accessible open space in terms of quantity, quality, value and accessibility. The study identifies that when applying a 400m buffer there is no overall shortage of open space. Whilst accepting that there will be requirements for additional open space in the future, the study identifies that improving access to 'good' quality open space is a key area of focus. The study sets out what constitutes a 'good' quality open space which varies by typology. However, in general terms, it relates to a site which is clean, appropriately maintained, and contains sufficient ancillary accommodation (such as benches and bins). The study recommends that, with the assistance of developer contributions, the existing network of open spaces is improved. This is important in the context of constrained land supply, with a limited number of strategic residential sites that would qualify for on-site provision and an increased population putting pressure on existing open spaces.
- 6.17 A number of specific projects and the important role of partners in their delivery, has been identified in the Infrastructure Delivery Plan. Further recommendations include increasing the provision of semi-natural space at Wiggington Park and increasing the provision of play space.
- 6.18 Tamworth's surrounding countryside can play an important role in providing alternative spaces for activities such as cycling and walking and can contribute to

improved health and wellbeing. It is important to maintain and improve the physical links with the countryside.

**This policy aims to address Strategic Spatial Priority SO7**

**CP9 Open Space**

Open space should be multi-functional and should contribute to a range of objectives such as; measures to reduce climate change and flood risk, recognise the potential for recreation and improving health and enhancing biodiversity and landscapes.

Developer contributions towards improving the quality and accessibility will be sought. The Council’s priority list of schemes contained in the Infrastructure Delivery Plan should be referred to.

New developments should incorporate existing landscape features and promote links for cycling and walking to the wider green infrastructure network within and outside of the borough, through existing or new green and blue infrastructure linkages.

Biodiversity opportunity mapping (figure 6) should be used as a guide when considering the best way to protect and enhance open space for biodiversity.

Proposals for development that would result in either loss of open space or which would adversely affect open spaces will not be permitted unless it can be demonstrated that:

- a) The strategic benefits of delivering the Local Plan outweigh the negative impact or loss.
- b) There remains access to good quality publicly accessible open space. Where alternative sites are not of good quality contributions to improving their quality will be expected.
- c) The integrity of the open space network and in particular its role in providing green links is maintained.

**Question Twenty Two**

Do you agree with policy CP9?  
Do you think anything should be added, removed or changed?

**High Quality Built and Natural Environment**

6.19 Until the 1950’s Tamworth was a modest sized town that was tightly focussed around the historic town centre and connected to small villages by linear developments along arterial routes like Comberford Road, Amington Road and Dosthill Road. In the 1950’s the town started to take ‘overspill’ population from Birmingham and this process was accelerated in 1965 when it was designated as an ‘Expanding Town.’ Its history as a post war expanded town defines its image and urban form and it is recognised as much for its castle as for the estates of modern post war houses.

6.20 The best of the historic areas are recognised as conservation areas that vary in size and character. Outside the conservation areas, there are areas of medieval, Victorian and Georgian development, but it is difficult to define a distinct ‘Tamworth character’ other than local red brick, slate or tiled roofs and domestic scale architecture. Much of the architecture and layouts in the post war neighbourhoods were related to the



rapid expansion and reflected the need to be functional and built quickly. In more recent years a more sensitive approach has been to encourage developers to create places where residents are happy to live.

- 6.21 The town centre is the public face of the Borough and has retained much of the medieval street pattern and a high proportion of historic buildings, some of which are key landmarks, but they are interspersed with unsympathetic infill development and cleared sites which now function as surface car parks.
- 6.22 It is essential to raise standards of design in all parts of the Borough to create more attractive inclusive developments and mixed communities that will improve the image of the town. Not only will it provide better living and working environments for local residents, but it will also help to attract investment and increase its potential for tourism.
- 6.23 Well designed buildings and environments are fundamental to the way we live our lives. Design is not just about individual buildings, but the spaces and public places around them and the relationship between buildings and their wider surroundings. Developers should consider the characteristics of an area to inform a development proposal. It is important for developments to have a distinctive character and to exhibit a high standard of urban design, architecture and landscaping.
- 6.24 In a Borough with areas of historic townscape, new development should protect and enhance the best of the Borough's built and historic assets. The use of contemporary designs and materials alongside more traditional designs throughout the Borough will be promoted, providing the design is appropriate to its setting.
- 6.25 Places also need to function efficiently and to be truly sustainable they should be of durable construction and capable of adaptation to accommodate users' changing requirements. This might include layouts that lend themselves to adaptation and ensuring that wireless and broadband connections are supplied at the outset.
- 6.26 It is important to consider the social and environmental aspects of development and how it integrates with its surroundings. The Borough's neighbourhoods should be comfortable, feel safe and be easy to move around. New development should create and contribute to a sense of place and be well connected to the surrounding neighbourhood and its facilities, including shops, schools and public transport, through physical and visual links. Sustainable modes of transport will be promoted, whilst recognising the need to accommodate cars. However, the building layout should take priority over road layout, which should integrate with the street scene and not dominate it. Through high quality design it is also important to mitigate any negative impacts on the environment. Outcomes arising from the Manual for Streets project plan (which the council is working on in partnership with Staffordshire County Council) will be an important tool. This may be further elaborated on in any design focused SPD.
- 6.27 There are a number of significant long distance views, both within and beyond the Borough. These include views of key landmark buildings such as the Castle, St. Editha's Church, Town Hall and Moat House, which are located in and around the town centre. Important longer distance views include the Amington Hall Estate, Fazeley Mill and the Hopwas ridgeline.

**This policy aims to address Strategic Spatial Priorities SO2, SO9 and SO10**

**CP10 Design of new development**

Well designed buildings and high quality places will be achieved across the borough, particularly to support the enhancement of the town centre, conservation areas and Regeneration Priority Areas.

New development should:

- a) respect existing architectural and historic character, the built and natural environment and other valued characteristics of areas by having regard to the appearance, landscaping, boundary treatments, layout, scale, and detailing appropriate to the local context as well as the amenity, privacy and security of nearby properties
- b) incorporate measures to mitigate environmental impacts such as noise and pollution on existing and prospective occupants.
- c) enhance the existing character of the area and where the area is not considered to be of a high quality, new development should actively aim to enhance the area.
- d) be physically and visually linked to its surroundings and be outward facing with active frontages in order to create public interest on all public facing elevations. Places should be legible and easy to navigate and create opportunities for community interaction.
- e) take into account local and long distance views of key landmark buildings and landscapes, both within and outside the borough to ensure that new development does not have a detrimental impact.

Further detailed design guidance will be set out within a design focused SPD, expanding on what constitutes good design in Tamworth.

**Question Twenty Three**

Do you agree with policy CP10?

Do you think anything should be added, removed or changed?

6.28 Despite being a town that experienced substantial development and change in the second part of the twentieth century, Tamworth has retained many heritage assets, historic buildings, areas of wider historic importance and archaeological assets that define its overall character and form. Heritage assets are either designated or non-designated. Designated conservation areas, listed buildings and scheduled monuments are protected by legislation and as sites and areas of significant heritage value; they are a priority for safeguarding for the future and enhancing where possible. Assets of local significance do not benefit from the same protection although the features that make them significant will be taken into consideration when dealing with development that affects them.

6.29 The majority of the borough's heritage assets are concentrated within the town centre, which is the focus of the Council's regeneration programme. It is based around a medieval street pattern and contains a cluster of listed buildings, many of which are key local landmarks. This area has undergone significant change and experiences the greatest pressure for development. Six of the conservation areas are located within the urban area, either within the town centre or the small former village cores that have been absorbed into the built up area as the town has expanded. Amington Hall Estate is the only semi-rural conservation area, located to the north east of the urban area and separated from Amington by open countryside.

- 6.30 Various studies have appraised the borough to identify features that are of importance and significance, including the Conservation Area Character Appraisals (which examined each of the seven conservation areas) and the Extensive Urban Survey (which took a wider perspective of the whole borough.) These studies provide an understanding of the special character of these areas, which include listed and key non listed buildings, above and below ground archaeology, important views and open spaces, negative features and opportunities for improvement.
- 6.31 Even minor changes can have a cumulative impact on the character of a building or area so it is important that all development is carried out in a manner that is sympathetic to the setting. Even in sensitive locations there is scope to use sustainable and innovative designs to create new modern landmarks. The Council will take specialist advice when necessary from the South Staffordshire Partnership and MADE on planning proposals.
- 6.32 The Council will co-ordinate enhancement of the conservation areas through the production of management plans, which will be based on recommendations from the character appraisals and the County Council's Extensive Urban Survey. These will include public realm and open space improvements, targeting of buildings for enhancement and interpretation of the historic environment. The management plans will be subject to community involvement.
- 6.33 There are a number of vacant and under-used buildings which have been identified as being in poor condition through the Buildings at Risk Survey. The key to their long term survival is to bring them back into productive use. The Council operates a scheme of grant assistance to historic buildings and will be proactive in engaging with owners to secure improvements.
- 6.34 The local list comprises buildings or structures that are not of sufficient merit to be statutorily listed, but are regarded as being of local historic or architectural significance. The Council is responsible for maintaining the local list, which was most recently updated in 2008. The Council encourages their protection and enhancement. The Council intends to review the local list and will develop criteria for additions. Their presence on the local list and the features that make them significant will be material when considering development that affects them.
- 6.35 The canal network in the Borough consists of the Coventry Canal which runs through Amington, Glascote, Bolehall and Kettlebrook to Fazeley where it joins the Birmingham and Fazeley Canal, which lies in Lichfield District. There are a number of original features, including canal bridges, locks and other structures, many of which are already statutory or locally listed and as a collective group, form a close knit assemblage of late 18th and early 19th century structures.

**This policy aims to address Strategic Spatial Priority SO9**

CP11 Protecting the historic environment

Development that affects designated heritage assets including conservation areas, listed buildings and scheduled monuments, will be required to assess and clearly demonstrate how their character, appearance and setting will be conserved and, where possible, enhanced. Proposals will be required to conserve the significance of the asset and pay particular attention to:

- a) the scale, form, height, massing, detailing and materials of the development, the existing buildings and physical context to which it relates.
- b) historically significant boundaries, street layouts, open spaces, landscape

features and structures identified in the conservation area character appraisals including walls, railings, street furniture and paved surfaces.  
c) preservation of important views of notable listed buildings and townscape identified in the conservation area character appraisals.  
d) evaluation and/or mitigation of surviving below ground archaeological deposits.

Where practical and viable, development should address issues identified in the buildings at risk survey, conservation area character appraisals, emerging conservation area management plans and the findings of the Extensive Urban Survey.

Proposals that promote the use of vacant, under-used listed and locally listed buildings, particularly those located in the town centre will be supported, including necessary and appropriate minor changes that involve sensitive adaptation and minimal disturbance.

Non designated assets, including local listing and archaeology, will be a material consideration in determining planning applications, with weight given to the significance and contribution of locally listed assets to their environment. The Council will support the conservation and enhancement of locally listed buildings and review the local list as necessary.

#### **Question Twenty Four**

Do you agree with policy CP11?

Do you think anything should be added, removed or changed?

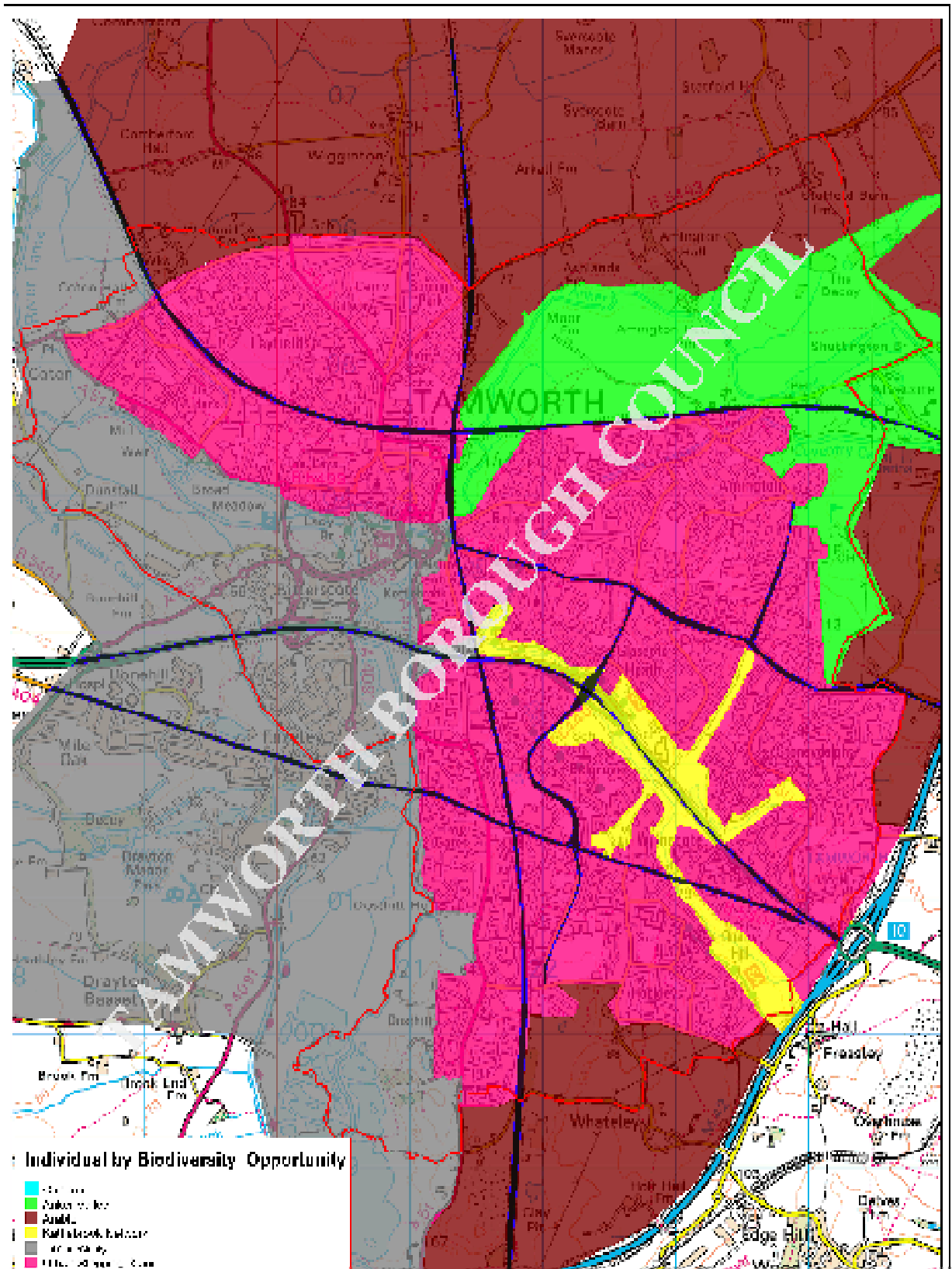
- 6.36 The Borough's network of natural assets is a valuable resource and as a consequence, requires sensitive management and in some cases a high degree of protection. These assets contribute significantly to Tamworth's distinctive local identity and support a wide range of local, regional and nationally important areas of biodiversity. They further provide an attractive environment for existing and new residents and play a key role in the Sustainable Community Strategy (2006) for Tamworth to be renowned regionally for its exceptional natural environment.
- 6.37 The most biologically rich parts of the borough are linked to the Rivers Anker and Tame. A varied range of natural assets exist in the Borough of national and local value. These include one Site of Special Scientific Interest (SSSI) at Alvecote Pools, four Local Nature Reserves (LNR) all within the urban area, seventeen Sites of County Biological Importance (SBI) and six Biodiversity Alert Sites (BAS). The Alvecote Pools SSSI is of national importance and benefits from statutory protection. All other sites in Tamworth are non-statutory and of local importance with SBIs and BASs designated at county level and the LNRs designated by the Borough Council. Important water based habitats include Amington Hall Fishponds, Tameside Nature Reserve, Fazeley, Dosthill Quarries, Egg Meadow, Dosthill Church Quarry, Warwickshire Moor, The Decoy and Dosthill Park. None of the local designations have any legal protection and it is the local authority's responsibility to give them appropriate protection.
- 6.38 It is crucial that new development does not lead to the permanent loss of irreplaceable natural assets and that it avoids adverse impact on habitats and biodiversity. New development which leads to a loss should result in a net gain and will be expected to provide compensatory provision at both designated and non-

designated sites, such as previously developed land. Compensatory provision can include measures such as green and brown roofs.

- 6.39 The UK Biodiversity Action Plan, the Staffordshire Biodiversity Action Plan and the Staffordshire Geodiversity Action Plan set out specific targets for natural habitats and biodiversity. The Tamworth Phase One Habitat Survey highlights the importance of meeting these targets by working closely with Staffordshire Wildlife Trust, Natural England, the Environment Agency, Staffordshire County Council, Wild About Tamworth, neighbouring authorities and other partners.
- 6.40 Increasing the accessibility to priority habitats not only contributes to a more attractive environment for Tamworth's residents, it also serves an education purpose. This will benefit the wider-community and other natural assets such as those on non-designated sites with greater public awareness of the importance of the environment. Projects such as Wild About Tamworth and the Central Rivers Initiative represent an opportunity to create an enhanced visitor experience by combining landscape and recreation opportunities with improved access, interpretation and habitat restoration in accessible urban locations and the river valley.
- 6.41 Landscape features including trees, woodlands, hedgerows and ponds often contribute significantly to the character of the landscape or its surroundings. In certain locations the planting of new native broad-leaved trees would make a positive contribution to the natural environment and local landscape of the Borough.
- 6.42 The Tamworth Phase One Habitat Survey highlights the importance of linking habitats and creating buffer zones around sites of biodiversity importance to prevent habitats becoming isolated. Development should therefore incorporate natural green features such as trees and hedgerows, which may be combined with pedestrian and cycle ways to link up with the wider green infrastructure network. Green links also enable the wider movement of species occurring as a consequence of climate change. Buffer zones can provide wildlife habitats, increase biodiversity and protect habitats by intercepting or moderating adverse pressures and minimising disturbance.
- 6.43 There are opportunities to enhance biodiversity and habitat creation across the borough. The Tamworth Borough Biodiversity Opportunity Mapping Study (Figure 6) divided the borough into discreet habitat areas based on local knowledge and habitat and species data. This provides the opportunity for localised habitat work throughout the borough based around identifying potential new locations for the development of habitat types, softening existing areas of open space through the introduction of natural areas, management of existing resources such as hedgerows and ditches, creating links and connectivity between habitat locations and encouraging diversity vegetation structures alongside key transport corridors across the borough.
- 6.44 Under the Habitats Regulations, the council has undertaken in consultation with Natural England, a Habitats Regulations Assessment (HRA) to ensure that the policies in the Local Plan do not harm sites designated as being of European importance for biodiversity.
- 6.45 The HRA concluded that the Local Plan will result in no significant effects and no in combination effects on sites identified.



**Figure 6: Tamworth Biodiversity Opportunity Map**



**This policy aims to address Strategic Spatial Priority SO8**

**CP 12 Protecting and enhancing biodiversity**

Development will be supported that preserves sites and species of value, incorporates existing biodiversity features and creates and reinforces links between semi-natural habitats. Proposals which result in a detrimental impact on biodiversity will be refused, unless adequate mitigation can be demonstrated.

When dealing with an application that impacts on a site of biodiversity value, a distinction will be made between statutory and non-statutory sites (defined on the policies map) as follows:

- Statutory sites (SSSI): will be protected from any development that would have an adverse impact
- Non-statutory sites (SBIs, RIGS, LNR and BAS): no development should have an adverse impact on a site that is designated as having local importance for nature conservation or as a green link, except in exceptional circumstances where the importance of the development outweighs the harm. In these circumstances, the opportunity should be taken to create compensatory habitat of equivalent type and standard in an appropriate location.
- Non-designated sites that provide the opportunity for habitat enrichment to create more robust and functional ecological units will be safeguarded, particularly if they form part of a green link, including links to the wider network outside the borough.

The opportunity will be taken through the planning system, funding, developer contributions and community engagement to enhance the biodiversity resource through habitat creation and restoration, particularly where it comprises Biodiversity Action Plan habitats.

The Council will support habitat restoration proposals on existing and future sites of biodiversity importance using biodiversity opportunity mapping as a guide to restoration (Figure 6).

Where appropriate housing and employment allocations will be expected to incorporate natural features beneficial to biodiversity, promote habitat creation and connectivity to existing biodiversity sites in line with biodiversity mapping.

Development will not be permitted that has a negative impact on the water quality of the Alvecote Pool SSSI.

Development that would involve the removal of any tree, woodland or hedgerow, which contributes significantly to the character of the landscape or its surroundings, will be resisted unless the need for development is sufficient to warrant the loss which cannot be avoided by appropriate siting or design. Where removal is necessary, suitable mitigation is required to prevent a net loss of these features.

**Question Twenty Five**

Do you agree with policy CP12?

Do you think anything should be added, removed or changed?

## CHAPTER 7 - A SUSTAINABLE TOWN

- 7.1 **Ensuring a combination of strong retail centres, accessible housing and employment sites, accessible community facilities and the regeneration of existing developed sites lays the foundation to deliver a connected, sustainable town. Making the most of existing transport links, addressing congestion and improving public transport will ensure Tamworth's centres, employment sites and housing sites are accessible by different methods of transport and reduce reliance on the private car. Maximising renewable energy generation and reducing flood risk to mitigate the impacts of climate change will help to deliver sustainable development.**
- 7.2 Tamworth has very good connections to the national transport network. The A5 trunk road provides links to Nuneaton, Cannock, M69, M1, M42 and the M6 Toll. The A51, A513 and A4091 local primary routes also run north-south through the Borough. It is estimated that 50% of the working population out-commute each day to work and 69% of employed residents drive to work. Around 6% travel by bus which is higher than most other Districts in Staffordshire and walking and cycling levels are similar to national averages.
- 7.3 Tamworth is served by a local bus network and has hourly or more frequent daytime bus services to Lichfield and the West Midlands conurbation. Bus services are supported by the Tamworth Community Transport scheme which operates mini buses and cars. Tamworth Railway Station is located on the edge of the town centre, whilst Wilnecote station is to the south of the town centre near Two Gates. Both stations are located on the Cross Country line between Birmingham, Tamworth, Burton-upon-Trent and Tamworth station is also located on the West Coast Mainline with frequent services to both London and the North West. There is significant passenger and freight demand on both corridors, although there is no dedicated local service on the Cross Country line so demand is catered for by less frequent stops of longer distance services. The rail industry has plans to improve capacity on the Cross Country line to help cater for this existing and future demand.
- 7.4 Getting to and from Tamworth is relatively easy but there are localised areas where congestion is experienced, particularly at the Ventura, Cardinal Point and Jolly Sailor Retail Parks, in and around the town centre and to the north along the Gungate Corridor. Improving the accessibility of locations such as the town centre, employment areas and places for leisure is important as it can make Tamworth more sustainable by reducing the need to travel, shortening travel distances and where travel is necessary, by providing alternatives to the private car. Good transport connections and accessibility also help the town's economy to develop as it becomes a more attractive location to do business. Any development will need to ensure that it contributes to improving sustainable transport infrastructure and accessibility within the town. The successful delivery of new housing, employment and leisure development will only be possible if it is planned in a way that brings jobs, services and facilities closer to existing and new residents and workers.
- 7.5 Drayton Manor Park is a major tourist attraction on the edge of Tamworth in Lichfield District. During peak visiting times congestion in and around the site occurs, impacting on people living and working in Tamworth. There are opportunities to reduce this congestion by improving existing sustainable travel choices from Tamworth, particularly existing bus service from the town centre to Drayton Manor Park. This will have the added benefit of providing greater opportunity for visitors to



the park to visit and use services and facilities within Tamworth itself, adding to the local economy.

7.6 The County Council in partnership with Network Rail is seeking to develop a joint vision for railway services and infrastructure provision in Tamworth that will include the alignment of investment programmes. During the Plan period, improvements to rail services will be identified through Network Rail's Route Utilisation Strategies. The West Midlands Region Rail Development Plan (West Midlands Rail Development Plan (Draft): (2009) identifies a project to improve rail services between Tamworth and Birmingham through a dedicated service. At present, passengers travelling between Tamworth and Birmingham use the cross country through services. These improvements may also provide opportunities to increase the number of services from Wilnecote station which will improve accessibility for residents in the south of the town. It is hoped, through partnership working with local authorities, that the West Coast Main Line RUS will take into account the scale of housing growth forecast for Tamworth. In addition to rail service improvements funded by Network Rail, the level of housing growth in Tamworth may allow for additional contributions from developers for further improvements to railway station facilities.

7.7 To date, the main transport achievements in Tamworth relate to meeting Local Transport Plan targets to reduce all road casualties through education, enforcement and engineering measures. A number of local safety schemes that reduce vehicle conflict and help manage capacity have been completed, including roundabout improvements at the A51 Lichfield Road/B5493 Lichfield Street and B5404 Watling Street/B5400 Marlborough Way junctions. Significant improvements have been made to the local network support the out of centre retail parks and vehicle speeds and safety have also been addressed on the A453 Sutton Road.

7.8 Improvements to the local cycle network have enhanced safety and accessibility to local facilities and schools. Additional car parking capacity has been provided at Tamworth rail station to supply approximately 300 spaces, encouraging increased patronage and promoting sustainable commuting. In terms of bus travel, in excess of 90% of residents in the Borough now live within 350m of a bus stop with a better than half-hourly weekday service.

7.9 It is, however, expected that there will be a significant reduction in the amount of public money available for transport in the future. With this in mind, a key priority going forward in the next three years, and in the longer term up to 2031, is to make the best use of the existing highway network by focusing on maintaining its condition and ensuring that road casualties are reduced. Transport improvements funded through both public and private sector funding streams will also focus on encouraging commuting by public transport rather than the car and support the Borough Council's plans to regenerate the town centre and accommodate proposed housing development.

7.10 Staffordshire County Council's Integrated Transport Strategy for Tamworth (November 2011) is based around delivering the following key strategic issues:

- Accommodate development at Sustainable Urban Extensions
- Manage congestion, particularly at Jolly Sailor and Cardinal Point out of town retail parks
- Support investment in the town centre that complements the out of town retail parks
- Improve public transport provision to the West Midlands
- Support A5(T) junction capacity and safety improvements

- Encourage sustainable travel

7.11 The following transport related priorities have been agreed to deliver the spatial strategy:

- The Ventura Park to Town Centre Local Transport Package to complement the Council's Town Centre proposals and masterplan. It supports the need to improve walking, cycling and public transport links between key attractions and the town centre. Proposals to reduce traffic congestion at Ventura Park require further investigation as part of a transport study. The outcome of the plan has helped to inform the proposals within the Local Plan and the Integrated Transport Strategy. Further phased measures will be delivered as resources permit.
- Town Centre linkages. There are a number of barriers to pedestrian and cycle access to and within the town centre. A package of improvements has been identified including new bridges, public realm improvements and highway remodelling.
- The Anker Valley Local Transport Package. This will focus on linking traffic signals in the Aldergate / Upper Gungate corridor in order to improve journey time reliability, reduce vehicle delays and accommodate development of a new Post 16 Academy building at Queen Elizabeth's Mercian School. Facilities at the Academy will include walking and cycling links and vehicular access, accompanied by a comprehensive School Travel Plan. Longer term development traffic in the Anker Valley will be accommodated through capacity improvements at the A513/B5493 Fountains junction, sustainable transport provision and further car parking capacity and access improvements at Tamworth rail station. A transport study has been carried out to determine the traffic impact of development scenarios on the Upper Gungate Corridor to identify what scale of development can be achieved and the infrastructure required.
- Tamworth to Birmingham Rail Service. The West Midlands Rail Development Plan identified that significant travel flows take place between Tamworth and Birmingham but rail is not well placed to accommodate these at present. The route is on a major regeneration corridor and there is significant opportunity for a better rail service to act as a catalyst for development. The West Midlands & Chilterns RUS proposes a half-hourly dedicated Tamworth to Birmingham service. This is likely to require investment in a turnback facility at Tamworth, improvements to Wilnecote Station and possible improvements to the Camp Hill Cord. A dedicated Service would improve the attractiveness of Tamworth to future employers and help reduce congestion on the M42. It would also assist in providing a quick link to the proposed HS2. There is a desire to maintain good rail links in terms of frequency and journey times with Birmingham, London, the North West, East Midlands and Yorkshire. If HS2 proceeds, Tamworth will need to exploit its proximity to both Birmingham City Centre station and the Birmingham interchange station through ensuring good public transport links to them.
- Proposed bus accessibility improvements, cycle links and A5 junction improvements proposed in the Integrated Transport Strategy, but outside the areas covered by Local Transport Packages. Proposals include improved bus facilities and enhanced passenger information at stops within the town centre,

along local routes serving Tamworth residents and inter-urban routes to Lichfield and the West Midlands

- 7.12 Linked to this are the Tamworth Rail Station improvements. These include forecourt improvements and links to the town centre to complement improvements to the station building currently being undertaken by London Midland.
- 7.13 Tamworth benefits from a good cycle network although there are a small number of gaps in provision which reduce the links to the town centre and employment areas from residential areas.
- 7.14 The Highways Agency have undertaken modelling work to examine the impact of development on the A534 (Highways Agency, Tamworth Core Strategy: Preferred Option Test Modelling (2012)) and have indicated that some improvements may be required, in terms of junction improvement and highway safety at Stonydelph, Mile Oak (within Lichfield District) and Bitterscote South.
- 7.15 The Council is working with adjoining authorities to deliver a strategy for the A5. This aims to identify the priority improvements along the A5 corridor that are needed to facilitate growth, reduce congestion, improve air quality and deliver a lower carbon transport system. The central theme of the strategy is to ensure that the corridor functions efficiently to allow safety, ease of movement, facilitates and supports economic growth and tourism, preserves its cultural heritage and plays its full and proper role in delivering future housing and employment growth. The priority improvements identified for the Tamworth section of the A5 align with those identified by the Highways Agency in their modelling work.
- 7.16 The draft Local Plan seeks to maximise existing infrastructure and transport networks by promoting development on previously developed land. Allocations have been proposed for housing on several sites within Tamworth, totalling approximately 400 dwellings. Future development within the existing urban area will be encouraged through plot in-filling and bringing forward vacant sites. Proposed Policy within Chapter 5 supports the efficient use of land.
- 7.17 The Staffordshire County-wide Renewable and Low Carbon Energy Study (Staffordshire County wide Renewable and Low Carbon Energy Study, 2010) has estimated that the authority is only capable of meeting a small proportion of its energy demand through renewable energy sources by 2020. The study identifies where the greatest opportunities lie.
- 7.18 The main producers of UK carbon emissions are from energy (through burning of fossil fuels), 39%, buildings, 34% and transport and travel, 24%.
- 7.19 Tamworth demonstrates one of the lowest emission rates in the UK. However it has a small, limited industrial base and there are no major motorways within its geographical boundary which will have impacted on these figures.
- 7.20 Whilst it is important not to be complacent, the existing pattern of development in Tamworth appears to generate lower carbon emissions than its neighbours and therefore emphasises the need for future development to be carefully managed to continue to deliver this trend whilst identifying opportunities for improvements.
- 7.21 Although Tamworth can only make a small impact on reducing the level of global greenhouse gases, it should not be deterred from pursuing a climate change strategy based on management of its own business activities, long term strategic planning

and community engagement. The Council is committed to tackling climate change through implementing its recently produced Climate Change Strategy, which provides a framework for adapting to the effects of climate change, reducing energy consumption and managing the use of resources.

7.22 There is a recognition at all levels that relying on landfill for waste disposal is unsustainable and is a waste of scarce resources. There has been a gradual acceptance of the need to give much higher priority to waste minimisation, recycling, composting and recovery (such as energy from waste), making disposal in landfill sites the last resort. The Tamworth Waste Strategy was adopted in 2007 to tackle the increasing amount of waste being produced by households both nationally and in Tamworth. Three key objectives of the Strategy are to reduce the amount of waste produced in Tamworth, to increase the rate of recycling and composting of household waste and to reduce to zero the amount of waste that the Borough sends to landfill by 2020. The Local Plan will support the Waste Strategy and the move towards a more sustainable approach to waste management.

7.23 Having developed alongside the confluence of two rivers, 25% of the Borough is within floodplain. Tamworth has been affected in the past by flooding, most recently in the summer of 2007. It is important to have strong policies to try to reduce the risk of flooding in the area to all properties in the area.

7.24 Overall the current risk (accounting for probability and consequence) from surface water flooding within Tamworth town is relatively low, especially for the higher probability (more frequent) flood events. However, as witnessed in numerous recent flood events and within the historic flooding record, Tamworth is at risk of fluvial flooding and, where this interacts with the surface water, depths are likely to increase dramatically.

7.25 Flooding across Tamworth stems from overland runoff originating both from rural areas upstream of the town and from within the urban area. Potential measures to address this include the retrofitting of Sustainable Urban Drainage Systems (SuDS) in existing developments, where feasible and investigating the potential to install storage ponds and utilise the existing and naturally occurring storage areas to accommodate surface water runoff upstream of residential areas and flow constrictions, perhaps through dual use of open space or playing fields.

7.26 A Strategic Flood Risk Assessment (SFRA) has been prepared for Tamworth to refine flood risk areas, identify areas likely to be at most risk of flooding and consider likely impacts of climate change. The probability of flooding is likely to worsen according to the predicted effects of Climate Change.

<b>This policy aims to address Strategic Spatial Priorities SO6 and SO12</b>
SP9 Sustainable Tamworth
<p>Delivering the sustainable pattern of growth identified in the strategy will help mitigate the impacts of climate change. This requires the provision of appropriate supporting infrastructure to:</p> <ul style="list-style-type: none"> <li>• promote access to sustainable modes of transport and address congestion and capacity issues</li> <li>• provide community facilities in accessible locations</li> <li>• promote opportunities for zero carbon development and maximise opportunities for renewable energy generation</li> <li>• make the most efficient use of land whilst mitigating flood risk.</li> </ul>

Investment will be focussed on Tamworth's transportation network. The strategic transport network for Tamworth is shown on in figure 4.

The ease and quality of access to and between the town centre, local and neighbourhood centres, employment sites, key internal and external destinations will be improved by:

a) Promoting sustainable transport and access to strategic employment areas within the borough and Birch Coppice in North Warwickshire

b) Supporting proposals which improve both the attractiveness and passenger capacity of both Tamworth & Wilnecote Railway Stations. Proposals which increase the frequency of services to Birmingham, London & the North West will be actively encouraged

c) Providing new and supporting existing dedicated bus links to and from the out of town shopping areas to the town centre and improved pedestrian linkages between them as part of the Ventura Park to Town Centre Local Transport Package. Improved bus accessibility in the town centre, on local routes within Tamworth and inter-urban routes, including to Lichfield and the West Midlands conurbation will also be supported.

d) Delivering junction improvements and highway safety measures at Stonydelph, Mile Oak (within Lichfield District) and Bitterscote South junctions on the A5

e) Working towards providing, by addressing barriers and missing links, a joined up, Tamworth-wide cycle and pedestrian network, which exploits the existing green linkages to and from the town centre and between local and neighbourhood centres, railway stations and employment sites. This includes delivering priority measures to improve accessibility, create safer roads, and reduce the impact of traffic

f) Providing improved public transport links from the town centre to Drayton Manor Leisure Park.

Opportunities to deliver renewable energy generation and energy efficiency within new and existing development should be maximised. The existing built environment offers great potential for renewable or low carbon energy generation using a variety of suitable micro and larger stand-alone technologies, which could include the retrofitting of existing development.

Large scale development and area based regeneration initiatives may offer opportunities to incorporate large scale or area wide renewable energy or low carbon technologies including community heating, biomass heating, CHP and utilising surplus heat. Proposals within the town centre, regeneration priority areas, strategic housing sites, employment sites and other areas with high heat density will be explored through pre-application discussions and masterplanning activity, where appropriate.

Proposals for energy from waste, combined heat and power and district heating schemes will be supported subject to appropriate measures to mitigate any environmental, social and economic impacts.

The Council will consult with the Minerals Planning Authority and Coal Authority on the existence and extent of mineral and coal reserves when dealing with applications within or in proximity to strategic mineral allocations, mineral safeguarding areas and



mineral consultation areas. This will avoid sterilisation of these resources. Consideration will be given to mineral and coal reserves with cross boundary implications.

Tamworth's Strategic Flood Risk Assessment indicates the areas within the Borough at high risk of flooding. These are shown on the policies map. Development will be expected to be located outside of these areas, must not increase the risk of flooding in other areas and where appropriate should incorporate measures to reduce flood risk .

### Question Twenty Six

Do you agree with policy SP9?

Do you think anything should be added, removed or changed?

### Sustainable Transport

- 7.27 Delivering the spatial strategy will involve reducing the need to travel and promoting the use of sustainable modes of transport such as walking, cycling and public transport. It is also important to manage the impact of the remaining residual traffic, avoiding unnecessary physical highway improvements where possible.
- 7.28 Research indicates that significant reductions in car trips could potentially be achieved by modal shift, supported by appropriate transport improvements and traffic restraint measures. Achieving a reduction in traffic levels will depend on the level of commitment and resources made available.
- 7.29 In addition to these 'soft' initiatives, a key part of the strategy is the provision of improved linkages between the strategic urban extensions and the rest of the Borough. Not only will these enable improved accessibility and opportunities to switch to sustainable modes of transport for new residents but also for the existing residents in other areas of the town. They will provide links to the town centre, the railway station and employment sites. In delivering the broad locations identified to accommodate for growth beyond the Borough boundary, it will be important to consider the capacity of existing infrastructure to identify measures to mitigate any anticipated impacts.
- 7.30 These measures will help to reduce congestion, which will both improve air quality and the overall image of the town, thus making it a more attractive place for residents and businesses.
- 7.31 It is therefore essential that effective improvements to all the town's transportation networks, including infrastructure and facilities are achieved. These will be required to ensure that housing and jobs growth can be successfully met in a balanced and sustainable way to achieve regeneration and growth. Without such improvements, Tamworth's economic potential cannot be realised and the development of sustainable communities achieved.
- 7.32 Streets have a wide range of functions as key features of the public realm. They have a social function as places in their own right where people shop, relax, eat and drink and walk through. They are hubs for the community to enjoy. Street environments need to be managed so that excessive traffic and poor design does not suppress these other activities.

- 7.33 Best practice, as reflected in the Government’s Manual for Streets, is increasingly moving away from strictly demarcated spaces for pedestrians and vehicles to design solutions that involve sharing public spaces, which not only improves the attractiveness of the street but also makes it a safe place. This can be achieved by removing barriers and fences, placing the right amount and type of seating, bins, lighting and other street furniture in the right places, together with traffic calming measures.
- 7.34 Many public and private organisations have an impact on the appearance and management of the street environment. To deliver improvements organisations will need to work together in partnership. Any new development will be expected to demonstrate how it will deliver these improvements and in some cases may be expected to contribute to the improvements, whether through direct works or as a financial contribution.
- 7.35 Appendix E includes the borough’s car parking standards to guide the amount of car parking that new development should provide, seeking to maximise the potential for the use of sustainable transport and seeking to agree management and pricing regimes with developers to ensure that all parking is operated in a manner which benefits the town as a whole.
- 7.36 Appendix G sets out the thresholds and requirements for Travel Plans.
- 7.37 Whilst it is not possible to resolve all the issues of climate change through the planning system the government views effective spatial planning as one of the many elements required for a successful response to tackling climate change.

<b>This policy aims to address Strategic Spatial Priority SO12</b>
CP13 Delivering Sustainable Transport
<p>Planning permission should be granted for development which provides measures to:</p> <ul style="list-style-type: none"> <li>a) Prioritise access by walking, cycling and public transport,</li> <li>b) Improves highway safety and reduces the impact of travel upon the environment</li> </ul> <p>A Transport Assessment and comprehensive Travel Plan must accompany all major development proposals as set out in Appendix G.</p> <p>Development proposals will be required to make appropriate provision for off street parking in accordance with adopted parking standards. In considering the level of provision regard will be had to:</p> <ul style="list-style-type: none"> <li>a) the anticipated demand for parking arising from the use proposed, or other uses to which the development may be put without needing planning permission;</li> <li>b) the scope for encouraging alternative means of travel to the development that would reduce the need for on-site parking. This will be particularly relevant in areas well-served by public transport;</li> <li>c) the impact on highway safety from potential on-street parking and the scope for measures to overcome any problems, increase highway capacity where appropriate; and</li> <li>d) the need to make adequate and convenient parking provision for people with disabilities.</li> </ul> <p>The Council’s parking standards are set out in Appendix 3. The Council will require</p>

the provision of sufficient, safe, weatherproof, convenient and secure cycle parking within developments to assist in promoting cycle use where viable and appropriate. Development with lower levels of parking provision may be acceptable in locations that are highly accessible by walking, cycling and public transport, including Tamworth's network of centres.

New developments will be required to contribute towards public realm improvements where appropriate. They should also provide active street frontages to create attractive and safe street environments. New roads, both public and private, should be designed to meet Manual for Streets specifications and any design guidance set out in a design focused SPD.

### Question Twenty Seven

Do you agree with policy CP13?

Do you think anything should be added, removed or changed?

- 7.38 The strategic planning system can provide guidance as to how the Borough will contribute towards objectives aimed at reducing carbon emissions, which are identified as the main cause of global warming. It can also help to deal with the effects of climate change through adaptation and mitigation.
- 7.39 The changing weather patterns of warmer and drier summers and increased rainfall with risk of flooding in the United Kingdom look set to continue and in Tamworth the main effects are felt through increased flood water levels in the Rivers Tame and Anker.
- 7.40 The Department of Energy and Climate Change (DECC) (DEC: Local and Regional CO2 Emissions Estimates for 2005 - 2008 for the UK (2010) produced a report in November 2010 which estimates the carbon emissions output per person for each year from 2005 to 2008. These estimate figures attempt to help us understand what the current emission levels are at a regional, county and local level. They are estimates and use domestic, industrial use and transport data. According to recent government estimates, Tamworth appears to score well.
- 7.41 Whilst the Climate Change Strategy does not specifically set a carbon target for Tamworth (as the Climate Change Act has a clear national target we all need to work to), the strategy sets out a number of ambitious targets and actions for the council and its partners to deliver. These include an increase in public transport use, completion of a Tamworth cycling network, and the widespread installation of photovoltaic panels on all public buildings.
- 7.42 Addressing climate change is based on the following four levels:
- promoting sustainable use of resources,
  - energy and water efficiency,
  - a sustainable approach to waste,
  - alleviating flooding problems.
- 7.43 Linked to this is ensuring new development is located in sustainable locations; those that are well served by public transport, cycling and walking and close to existing homes and services.
- 7.44 The choice of construction materials has potential impacts on energy efficiency during manufacture and in application. The Council will promote the use of locally produced materials in order to reduce travel distances and the re-use and recycling



of materials to prevent waste, reduce the consumption of raw materials, landfill and energy usage. The use of local labour will assist the local economy and reduce travel distances.

**This policy aims to address Strategic Spatial Priority SO11**

CP14 Sustainable Development and Climate Change mitigation

Proposals for new development will be expected to demonstrate how they will address the effects of climate change and where feasible and viable, achieve zero carbon development through:

- a) maximising energy and water efficiency
- b) supporting opportunities for renewable and low carbon energy generation
- c) promoting efficient and effective use of land
- d) ensuring development is located in accessible locations which promote the use of sustainable modes of transport
- e) appropriate sustainable design, layout, orientation and use of construction materials/methods
- f) encouraging the retrofitting of the existing building stock
- g) exploiting opportunities for energy from waste, combined heat and power and district heating schemes subject to appropriate measures to mitigate any environmental, social and economic impacts.
- h) promoting landscaping and tree planting to provide shade, reduce local temperatures and carbon capture.

Development will be required to contribute towards the Tamworth Waste Strategy, providing site waste management plans as appropriate and incorporating suitably located on-site facilities. The Council will work with neighbouring authorities to identify and promote the provision of appropriate waste management, treatment and disposal sites.

**Question Twenty Eight**

Do you agree with policy CP14?

Do you think anything should be added, removed or changed?

7.45 Development in the floodplain will be discouraged. A flood risk assessment will be required for all development in Flood Zones 2, 3a or 3b and where required by standing or site specific advice from the Environment Agency. Development can lead to an increase in the amount of impermeable land, which can increase the risk and impact of flooding. Traditional drainage systems can be harmful to the environment by increasing the risk of flooding downstream, contamination and depletion of groundwater and watercourse supplies (Southern Staffordshire Surface Water Management Plan: Phase 1 & 2 2010/11). The Environment Agency promotes the use of Sustainable Drainage Systems (SuDS) as a way of managing surface and groundwater regimes.

7.46 SuDS use a wide range of drainage techniques such as grassed channels, retention ponds, soakaways and permeable pavements. Infiltration and soakaways of surface water must be investigated as the first and primary means of draining surface water from a site. In addition to reducing flood risk and risk of pollution, SUDS can have wider amenity benefits where they are incorporated into the green infrastructure network and can result in improvements in biodiversity value.

- 7.47 It is important to take opportunities to improve access to the riverside to promote healthy and active lifestyles and improved awareness and education of the river environment. A balance will need to be struck between formalising access to the riverside, maintaining a natural character to the river and safeguarding sensitive sections of the river. Initiatives such as the Central Rivers Initiative have the potential to support this objective (Southern Staffordshire: Outline Water Cycle Study (2010) and Addendum (2011)).
- 7.48 The River Tame has been identified as having a 'poor' ecological status. In addition, it has been assigned protected status under the Freshwater Fish, Nitrates and Urban Wastewater Treatment Directives. The River Anker currently has a 'moderate' ecological status, but has also been assigned protected status under all the directives listed above, whereas the Bourne Brook has a 'poor' ecological status and protected designation under the Freshwater Fish and Nitrates Directives.
- 7.49 As a result, improvement is necessary to meet the required 'good' ecological status required under the Water Framework Directive (WFD) by 2015 and a reduction in pollution entering the watercourse from its tributaries will be essential.
- 7.50 As such, appropriate SuDS schemes to reduce surface water discharge and cease the connection of surface water discharges into the combined sewer network will be required.

<b>This policy aims to address Strategic Spatial Priority SO11</b>
CP15 Flood Risk and Water Management
<p>A sequential approach will be applied to all proposals for development in order to direct it to areas at the lowest risk of flooding, unless it has met the requirements of the sequential test and exceptions test as set out in government guidance.</p> <p>All new development, including regeneration proposals, will need to demonstrate that there is no increased risk of flooding to existing properties and shall seek to improve existing flood risk management. All proposals for development in Flood Zone 2, 3A or 3B must be accompanied by a Flood Risk Assessment that sets out the mitigation measures for the site and agreed with the relevant authority.</p> <p>Developers should consult the Environment Agency's maps to ascertain the effects of surface water flooding on potential development sites. Where necessary, proposals will be expected to contribute towards building and maintaining any necessary defences.</p> <p>All developments will be expected to incorporate appropriate SuDS techniques that will limit or reduce surface water run off. Sustainable drainage should be considered at an early stage of the design process and be clearly demonstrated and evidenced within the information accompanying planning applications. Development should capitalise on opportunities for incorporating accessible green infrastructure and improving biodiversity with SuDS.</p> <p>Development will be permitted where proposals do not have a negative impact on water quality, either directly (through pollution of surface or ground water) or indirectly (through overloading of Wastewater Treatment Works.)</p>

<b>Question Twenty Nine</b>
Do you agree with policy CP15? Do you think anything should be added, removed or changed?

**Community Facilities**

- 7.51 Education and health care are fundamental to achieving sustainable communities and economic prosperity. The provision of a sustainable network of education and health care facilities is a critical component of delivering strategic spatial priorities 3 and 4 to address the socio-economic inequalities which exist within Tamworth. Such uses, along with other community infrastructure such as places of worship and community centres, are particularly suitable for location within the existing network of centres as a result of their proximity to local communities and facilities including public transport, walking and cycling links and related facilities such as retail and services. Proposals for facilities which combine a mix of community uses on a single site will be encouraged as these have the potential to reduce the need to travel whilst generating associated linked benefits. Where education and health facilities are proposed outside of centres, locations should be selected on the basis of addressing accessibility gaps, in accordance with supporting evidence.
- 7.52 Improved access to education, training and support facilities is seen as a key objective for the borough, particularly within the most deprived neighbourhoods. The council’s Locality Working initiative has encouraged the use of neighbourhood based multi-use and agency spaces which are particularly suited to being located in local and neighbourhood centres due to their accessibility. The council will continue to work with partner agencies to improve access to training and skills development whilst identifying potential location for future provision.
- 7.53 Where appropriate, education facilities will be expected to include provision for community use, including multi-use facilities open to the wider community.
- 7.54 It is important that residents of new housing developments have good access to facilities and that existing facilities do not become oversubscribed. It is appropriate, therefore, for new residential development to contribute towards the cost of the provision of education and healthcare facilities.
- 7.55 Ensuring adequate facilities for emergency services is a key priority in order to achieve community safety objectives.

<b>This policy aims to address Strategic Spatial Priority SO4</b>
CP16 Community Facilities
In accordance with policy SP6 and the infrastructure delivery plan, a network of high quality, well designed and accessible facilities will be provided across the borough to serve local identified needs.  Proposals will be encouraged that include dual uses on a single site, in locations accessible by walking, cycling and public transport. Funding to enable the timely provision of necessary community facilities will be sought from developments that generate that particular need.  The existing network of borough wide education and health care facilities will be protected and enhanced to meet local needs. Subject to it being of high quality

design and having an acceptable impact on the immediate environment and amenity, the physical enhancement and expansion of higher and further educational facilities will be supported. Proposals involving the loss of a community facility will only be permitted where adequate alternative provision is available to meet the needs of the community served by the facility.

**Question Thirty**

Do you agree with policy CP16?

Do you think anything should be added, removed or changed?

## CHAPTER 8 - MONITORING AND IMPLEMENTATION

- 8.1 The Local Plan's success will depend on effective implementation of its policies. In addition to the council's statutory planning function, implementation will require working with a range of delivery partners, including Tamworth Strategic Partnership, developers, Registered Social Landlords, Staffordshire County Council and other key partners from the private, public and voluntary sector.
- 8.2 The Local Plan must also show it is capable of being monitored effectively. Monitoring of specific, measurable, achievable, realistic and time based policies will enable the success of the Local Plan to be measured during its lifetime whilst assisting the instigation of contingency plans where it is demonstrated that policies are not achieving their stated objectives.
- 8.3 Each policy within the Local Plan will be monitored using specific indicators and targets. Progress against the delivery of these indicators and targets will be reported via the council's website each year to assess how far the policies are being implemented. In some cases, where delivery is not expected in the short term, a series of milestones are included instead of annually measurable indicators.
- 8.4 The Sustainability Appraisal has a key influence on the Local Plan monitoring framework. The SA Report identifies crucial monitoring requirements in relation to the predicted effects of the Local Plan policies and strategies, which has informed the choice of Local Plan monitoring framework indicators. This alignment will help ensure compliance with the Strategic Environmental Assessment Directive.
- 8.5 Previously, the implementation of policies was measured using indicators contained within the council's published Annual Monitoring Report (AMR). The government's Localism Act removed the requirement for local planning authorities to produce an AMR, while retaining the overall duty to monitor. Authorities can now choose which targets and indicators to include in the report as long as they are in line with the relevant UK and EU legislation. Their primary purpose is to share the performance and achievements of the planning service with the local community. As a Council, we will use the indicators identified to revise what indicators to use and the frequency of publication.
- 8.6 Monitoring may indicate that further action is required, particularly where targets are not being met and are unlikely to be met in the future. Significant variation from performance required by the policy and target may result in the need to amend the target, or ultimately to amend the policy. Such a circumstance may trigger a need to consider a review of the Local Plan.
- 8.7 Indicators have been selected based on their appropriateness for gauging the effectiveness of Local Plan policies in helping to meet the Council's Local Plan objectives. The choice of specific indicators is dependent upon the availability of data and in this respect it is possible that this could change over time. The specific indicators used will therefore be reviewed on a regular basis and where the availability of data changes, then some indicators may need to be removed and others added. Any change to the indicators will be shown within regular monitoring.
- 8.8 The monitoring table (set out in Appendix F) shows the Local Plan's policies and respective indicators and targets for each of the sections of the document.

- 8.9 Developer contributions will be used to ensure that the necessary physical, social, economic, blue and green infrastructure is in place to support development. Contributions will be used to mitigate the adverse impacts of development (including a proportional contribution to address the cumulative impact of the development proposals). The Council will, where appropriate, seek to secure such measures through planning obligations, and once adopted, through the Community Infrastructure Levy (CIL). Where appropriate, pooled contributions will be used to facilitate the necessary infrastructure in line with development.
- 8.10 New development should not overburden existing infrastructure and should be adequately supported by an appropriate range and scale of infrastructure, whether existing or new. Delivering or improving infrastructure in a timely manner is extremely important to ensure roads, local services and facilities can cope with additional demand placed on them. However, there is a recognition that the viability of new development is also taken into account when agreeing the type and amount of infrastructure required.
- 8.11 In some cases, effective demand management and making better use of existing infrastructure will play an important role in supporting new development.
- 8.12 Infrastructure and service requirements, as identified by the Infrastructure Delivery Plan (IDP), require monitoring either through the Local Plan monitoring framework or in close association with it. The IDP is the beginning of a process to integrate the capital investment programmes of various services with planning for new development, to align delivery of growth, especially housing and economic growth, with the necessary infrastructure to support this. The baseline position will allow the Council and its partners in the Tamworth Strategic Partnership to continue to prioritise spending and address funding gaps over the lifetime of the Local Plan.
- 8.13 The IDP set out Appendix D will be an important element of ensuring the delivery of sustainable development, supported by the necessary services and facilities required. The IDP outlines future infrastructure requirements to support population changes, housing and employment growth as detailed in this document.
- 8.14 The IDP provides an indication of the potential costs and methods of funding the identified infrastructure through mainstream public funding, developer contributions and other sources. It also establishes effective working arrangements with infrastructure agencies to ensure that a dialogue is maintained beyond the scope of individual projects.
- 8.15 Where new development results in a need for new or improved infrastructure, contributions from developers will be sought to make the development acceptable in planning terms. In some cases the cumulative impact of individual applications may be considered when assessing infrastructure requirements. Contributions from a particular development will be fairly and reasonably related in scale and kind to the contribution to the cumulative impact arising from the applicable scheme.
- 8.16 Further work will be required to identify appropriate infrastructure to help deliver and mitigate the impacts of Tamworth related development located outside of its boundary. This may involve Tamworth, in partnership with Lichfield District Council, North Warwickshire Borough Council, infrastructure providers and landowners to bring forward infrastructure through future development plans, master plans and planning applications.

**This policy aims to address Strategic Spatial Priority SO6**

**CP 17: Infrastructure and developer contributions**

Planning permission for new development will only be granted if it is supported by appropriate infrastructure at a timely stage. Developer contributions will be sought where needs arise as a result of new development, the infrastructure delivery plan specifies the infrastructure required, when and where it will be needed in the plan and how it could be funded.

Key strategic infrastructure required to support development:

- a) improving quality, access and links to; the town centre and local and neighbourhood centres; green and blue infrastructure and the open space network; and public realm in accordance with policies SP2, SP3, SP6, SP7, SP8 CP3, CP9 and CP11
- b) provision of appropriate sport and recreation facilities and new and improved open space in accordance with policy CP8
- c) improving accessibility and links by means of public transport, cycleway and pedestrian access to, community facilities and open space to deliver strategic urban extensions and housing allocations in accordance with policies SP5, SP6, CP2 and CP3
- d) cross-boundary infrastructure to help deliver and mitigate the effects of Tamworth related future development.
- e) improvements to transport infrastructure, in accordance with policies SP4, SP5, SP6, SP9 and CP13
- f) climate change mitigation measures in accordance with policy CP14
- g) water management measures where required, in accordance with policy CP15

Key service and site-specific infrastructure required to support development are:

- h) Affordable housing, as set out in policy CP4
- i) new and expanded health facilities, in accordance with policies SP6 and CP16
- j) new and expanded school facilities, in accordance with policies SP6 and CP16
- k) emergency services related infrastructure, including police services, in accordance with CP16
- l) water supply and waste water drainage
- m) supporting service infrastructure.

**Question Thirty One**

Do you agree with policy CP17?

Do you think anything should be added, removed or changed?

**Question Thirty Two**

Do you have any comments on the draft Local Plan appendices?





**APPENDIX A  
Housing  
Trajectory**

ID	Site Name	Developable Site Area (Gross)	Total Capacity	Brownfield / Greenfield	FIRST 5 YEARS					SECOND 5 YEARS					THIRD FIVE YEARS					Total			
					2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027		2028	2029	2030
<b>URBAN AREA SITES</b>																							
341	Land south of St. Peter's Close Phase 2	0.47	17	Brownfield	0	0	8	9	0	0	0	0	0	0	0	0	0	0	0	0	0	17	
343 (with 344)	Land off Cottage Farm Road	1.5	48	Brownfield	0	0	16	16	16	0	0	0	0	0	0	0	0	0	0	0	0	48	
344 (with 343)	Derelict buildings south of B5404	0.17	6	Brownfield	0	0	6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	6	
347	Phoenix Special Purpose Machines, Hospital Street	0.31	18	Brownfield	0	0	9	9	0	0	0	0	0	0	0	0	0	0	0	0	0	18	
348	Norris Bros, Lichfield Street	0.2	20	Brownfield	0	0	10	10	0	0	0	0	0	0	0	0	0	0	0	0	0	20	
349	Arriva Bus Depot, Aldergate	0.39	40	Brownfield	0	0	0	0	0	0	0	0	0	0	13	13	14	0	0	0	0	40	
357	Northern Part of Beauchamp Employment Area	1.04	34	Brownfield	0	0	11	11	12	0	0	0	0	0	0	0	0	0	0	0	0	34	
376 (with 377)	Hyundai Garage, Lichfield Street	0.24	12	Brownfield	0	0	6	6	0	0	0	0	0	0	0	0	0	0	0	0	0	12	
377 (with 376)	Land/building off Wardle Street	0.11	4	Brownfield	0	0	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	4	
399	Coton's van Hire / Millfields House, Lichfield Road	0.34	12	Brownfield	0	0	6	6	0	0	0	0	0	0	0	0	0	0	0	0	0	12	
405 - has permission	Land off Overwood Road/Freasley Lane	1.19	29	Greenfield	0	9	10	10	0	0	0	0	0	0	0	0	0	0	0	0	0	29	
467	Fazeley Autocentre and Units behind	0.52	14	Brownfield	0	0	7	7	0	0	0	0	0	0	0	0	0	0	0	0	0	14	
488	Staffs County Council Care Home, New Road	0.5	16	Brownfield	0	0	0	0	0	0	0	0	0	0	8	8	0	0	0	0	0	16	
496	Seaton Hire Ltd and land to south, Wilnecote Lane	0.36	14	Brownfield	0	0	0	0	0	0	0	0	0	0	7	7	0	0	0	0	0	14	
507 (with 508 and 509)	Club, Spinning School Lane	0.15	12	Brownfield	0	0	0	0	0	0	0	0	0	0	6	6	0	0	0	0	0	12	
508 (with 507 and 509)	Magistrates Courts and Police Station	0.72	46	Brownfield	0	0	0	0	0	0	0	0	0	0	15	15	16	0	0	0	0	46	
509 (with 507 and 508)	Youth Centre, Albert Road	0.21	16	Brownfield	0	0	0	0	0	0	0	0	0	0	8	8	0	0	0	0	0	16	
521	Former railway goods yard, Wilnecote	0.86	30	Brownfield	0	0	10	10	10	0	0	0	0	0	0	0	0	0	0	0	0	30	
541	Adjacent to Tame Valley Alloys	0.73	26	Brownfield	0	0	0	0	0	0	0	0	0	0	8	9	9	0	0	0	0	26	
558	Factory, Basin Lane	0.3	14	Brownfield	0	0	7	7	0	0	0	0	0	0	0	0	0	0	0	0	0	14	
<b>Total</b>					0	9	110	101	38	0	0	0	0	0	65	66	39	0	0	0	0	428	
<b>STRATEGIC SITES</b>																							
406	Land north of Coton Lane		196	Greenfield	0	0	0	50	50	50	46	0	0	0	0	0	0	0	0	0	0	196	
602 / 679 / 680	Golf Course		1100	Greenfield	0	0	0	0	0	110	110	110	110	110	110	110	110	110	110	0	0	1100	
651	Anker Valley		500	Greenfield	0	0	0	0	75	75	75	75	75	75	50	0	0	0	0	0	0	500	
528 / 529	Dunstall Lane		723	Greenfield	0	0	0	0	0	70	70	70	70	70	70	70	70	70	93	0	0	723	
<b>Total</b>					0	0	0	50	125	305	301	255	255	255	230	180	180	180	203	0	0	0	2519

Year	Past Delivery																									Total
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	
	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030/31	
Completions (Gross)	0	0	0	0	0	0	0	62	62	62	62	62	61	0	0	0	0	0	0	0	0	0	0	0	0	371
Under Construction								0	9	110	101	38	0	0	0	0	0	0	65	66	39	0	0	0	0	428
Commitments								0	0	0	50	125	305	301	255	255	255	230	180	180	180	203	0	0	0	2519
Urban Area Sites	458	211	211	161	138	70	135	91	71	172	213	225	366	301	255	255	255	230	245	246	219	203	0	0	0	4731
Strategic Sites	6	13	6	7	3	1	1	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	127
Gross Supply	452	198	205	154	135	69	134	86	66	167	208	220	361	296	250	250	250	225	240	241	214	198	-5	-5	-5	4604
Demolitions and losses																										
Net Supply	170	170	170	170	170	170	170	170	170	170	170	170	170	170	170	170	170	170	170	170	170	170	170	170	170	4250
Net Requirement 4,250	282	28	35	-16	-35	-101	-36	-84	-104	-3	38	50	191	126	80	80	80	55	70	71	44	28	-175	-175	-175	354
Annual Surplus / Deficit	-112	-140	-175	-159	-124	-23	13	97	201	204	166	116	-75	-201	-281	-361	-441	-496	-566	-637	-681	-709	-534	-359	-184	-5461
Cumulative Surplus/Deficit	-112	-252	-427	-586	-710	-733	-720	-623	-422	-218	-52	64	-11	-212	-493	-854	-1295	-1791	-2357	-2994	-3675	-4384	-4918	-5277	-5461	-5461

## APPENDIX B – Proposed Housing Allocations

### This policy aims to address strategic spatial priority SO5

#### 341: Land South of St Peters Close Phase 2

The site is on brownfield land allocated for housing in the 2001-2011 Local Plan and contains business premises. The area is characterised by low density 1930-1970 private housing, with pre 1960 public housing nearby and. Outline planning consent has been granted for new housing immediately to the north. The design and layout of any development should respond to the local area.

Ideally the site should come forward as a comprehensive development with the site to the north so that the access can be designed for residential use and servicing.

A noise assessment should be carried out to assess the impact of noise from the nearby railway track and brickworks with mitigation measures provided if required.

The previous land use for industrial purposes has the potential to have caused contamination and a Preliminary Risk Assessment will be required, and site investigation, risk assessment and remediation may subsequently be required depending upon the findings of the Preliminary Risk Assessment.

### This policy aims to address strategic spatial priority SO5

#### 343/344: Land off Cottage Farm Road and Derelict buildings south of B5404

The site is on brownfield land, partially allocated for housing in the 2001-2011 Local Plan and contains vacant land, residential properties and business premises. The area is characterised by low density 1930-1970 and post 1970 private housing. The site is also located within a run-down corridor along a prominent and well-connected stretch of Watling Street with the potential for mixed use residential and retail or employment redevelopment.

The design and layout of any development should respond to the local area.

If access is provided via Cottage Farm Road, adequate visibility, geometry and control of land will need to be demonstrated. If access is provided via Dosthill Road opposite Appian Close, this may only be achievable for part of the development and is unlikely to be suitable to serve the whole site. If access is provided via Watling Street, the form of junction will need to be agreed, the position must not prevent access to site 521 and be located as far back from the signalised junction as possible. The site and access should be brought forward as one comprehensive development in the interest of

urban design.

A noise assessment will need to be carried out to assess the impact of noise from the nearby railway track with mitigation measures provided if required.

The ecology of the vacant part of the site will need to be assessed as it may contain species or green links of biodiversity value, which should be protected.

The site falls within 250m of a landfill site that is potentially producing landfill gas. A risk assessment should be carried out and any threats from landfill gas must be adequately addressed.

The previous land use of part of the site as a garage has the potential to have caused contamination and a Preliminary Risk Assessment will be required, and site investigation, risk assessment and remediation may subsequently be required depending upon the findings of the Preliminary Risk Assessment.

The site is greater than 1ha and located in Flood Zone 1 (Low Probability of Flooding). A site specific FRA would need to be prepared for the development focussing on the sustainable management of surface water.

### **This policy aims to address strategic spatial priority SO5**

#### **347: Phoenix Special Purpose Machines, Hospital Street**

This is an infill site in an edge of centre location within Tamworth occupied by a cluster of vacant single storey brick built employment units, situated within a residential area and surrounded by residential properties.

The site is partially within two Conservation Areas (Tamworth Town Centre CA and Hospital Street CA)

This part of the Hospital Street Conservation Area has the character of a small industrial village with its combination of modest terraces, shop and school. The neighbouring property, no.29, is recognised as being visually important in the streetscene due to its height. The scale of development should not compromise the character of the Conservation Area in this location and should respect and preserve the importance of no.29 within the streetscene.

Within the town centre conservation area, the site is situated within character zone 5 which includes Aldergate. Aldergate is a long curving street which forms the western side of the 'A' of the medieval street pattern. Views northwest through the mature trees across the Garden of Rest towards the listed buildings on Aldergate (adjacent to the site) are attractive, giving the impression of an enclosed square, which should be continued and preserved when developing the site.

The site is particularly visible from Aldergate and the siting, orientation, scale and design of new development will need to respect and enhance the character and setting of the adjacent listed buildings.

The surrounding area is residential with high usage of on road parking facilities; the access should be designed to deal with reduced achievable visibility from junctions. Internal layouts will also require consideration for servicing.

There is considerable potential for development within this area to impact upon significant archaeological remains relating to the entire developmental history of Tamworth. As such early consultation with the Historic Environment Record (HER) is advised. A Historic Environment Desk-Based Assessment will be required in order to understand the significance of heritage assets on the site, the potential for further archaeological remains to survive and to inform discussions regarding the scope of and scale of any further evaluation/mitigation and at what stage any archaeological evaluation should occur.

### **This policy aims to address strategic spatial priority SO5**

#### **348: Norris Bros, Lichfield Street**

This is an infill site close to the town centre with a historic use as garage and car sales showroom.

There are a number of Listed Buildings in the surrounding street scene and the majority of the site is within Tamworth Town Centre Conservation Area.

The site is within Character Zone 7 (Lichfield Street/Silver Street) of the Conservation Area which has a mixed character, generally retaining historic frontages, which include smaller two storey buildings towards the east and larger buildings to the west, primarily dating from the 18<sup>th</sup> and 19<sup>th</sup> centuries. The site boundary intersects a Grade II Listed Building and is also immediately adjacent to another Grade II Listed Building.

Development should be informed by the unique historic character of the area and should look to enhance the overall sense of place of this area of Tamworth. In particular, the development should look to keep a built up frontage, maintaining the scale of development either side and reducing the scale of new development to the rear of the site. Access arrangements should not compromise the position and overall character of new development.

If access to the site is provided off Lichfield Street then possible restrictions may be necessary to provide a suitable access due to on street parking to the west. Due to the high density anticipated a centralised access utilising a new/amended drop kerb should be considered.

The area has high archaeological potential and it should be noted that a Quaker burial ground is recorded to the west which may lie within the site. A Historic Environment Desk-Based Assessment will be required in order to understand the significance of heritage assets on the site, the potential for further archaeological remains to survive and to inform discussions regarding the scope of and scale of any further evaluation/mitigation and at what stage any archaeological evaluation should occur.

The previous land use has the potential to have caused contamination. A Preliminary Risk Assessment will be required and site investigation, risk assessment and remediation may subsequently be required depending upon the findings of the Preliminary Risk Assessment.

### **This policy aims to address strategic spatial priority SO5**

#### **349: Arriva Bus Depot**

The site operates as the bus depot for Arriva bus services and is occupied by a large single storey brick built building of a functional character and appearance.

The access to the site is within close proximity to the signal junction with Hospital Street and Albert Street. Depending on the traffic flows it may be possible to design a ghost right turn. Access from Church Lane is not suitable to support new development and an improved access should be provided.

There are Listed Buildings in the surrounding street scene and the site lies within the Tamworth Town Centre Conservation Area, within character zone 5 which includes Aldergate. Aldergate is a long curving street which forms the western side of the 'A' of the medieval street pattern. Views northwest through the mature trees across the Garden of Rest towards the listed buildings on Aldergate and the Philip Dix Centre on Corporation Street are attractive, giving the impression of an enclosed square, which should be continued and preserved when developing the site.

Any development should take account of the implications for the significance of these heritage assets, including their setting and positive opportunities for enhancing their significance and the character and appearance of the conservation area should also be considered.

In particular, the site is bound on one side by an attractive public garden, and the listed buildings are directly opposite on the Aldergate side. The creation of a continuous street frontage along Aldergate will be important. Development of this site should not exceed two storeys in height to respect the neighbouring scale and character.

The wall to the west of the site serving the public garden is at risk of instability when development takes place. This is an important feature of the public garden within the conservation area and appropriate measures will be

needed to ensure no harm is caused by the redevelopment of the site.

From Church Lane there are opportunities to improve the street scene with a sensitively designed development, in keeping with the design and materials of the conservation area.

The site is open to public vantage points from multiple locations and the treatment of side elevations and frontages to the exposed areas will be key.

The historic land use as a bus depot has the potential to have caused contamination and a Preliminary Risk Assessment will be required and site investigation, risk assessment and remediation may subsequently be required depending upon the findings of the Preliminary Risk Assessment.

### **This policy aims to address strategic spatial priority SO5**

#### **357: Northern Part of Beauchamp Employment Area**

The site is located on brownfield land and contains commercial premises. The site is located within a run-down corridor along a prominent and well-connected stretch of Watling Street with the potential for mixed use residential and retail or employment redevelopment. A recent high density housing development has recently been completed to the north.

The design and layout of any development should respond to the local area.

Hillmore Way and Leven Road to the north are not yet adopted, but may provide suitable access once they are adopted or with the landowners permission.

A Coal Mining Risk Assessment should be carried out in accordance with the requirements of the Coal Authority as the site is located approximately 24 metres from identified coalfield and probable past shallow mining activity.

The previous land use of the site for industrial purposes has the potential to have caused contamination and a Preliminary Risk Assessment will be required, and site investigation, risk assessment and remediation may subsequently be required depending upon the findings of the Preliminary Risk Assessment.

The site falls within 250m of a landfill site that is potentially producing landfill gas. A risk assessment should be carried out and any threats from landfill gas must be adequately addressed.

The site is greater than 1ha and located in Flood Zone 1 (Low Probability of Flooding). A site specific FRA would need to be prepared for the development focussing on the sustainable management of surface water.

The site is significantly at risk of surface water flooding during 1 in 30 year

and 1 in 200 year rainfall events. Site drainage and historical incidences of flooding should be investigated. Any development should ensure that surface water flow routes are managed within the site and also restrict the discharge of surface water to allowable discharge rates (if connecting to the public surface water sewer) or seek to reduce discharge rates towards Greenfield runoff rates.

The site is located nearby to Beauchamp Industrial Estate Local Wildlife Site, on which any proposed development should not have an adverse impact. Appropriate mitigation measures including a buffer zone and additional planting of native species will be required.

### **This policy aims to address strategic spatial priority SO5**

#### **376/377: Hyundai Garage, Lichfield Street and Land/building off Wardle Street**

This is an infill site with previous use as a car sales showroom and garage within close proximity to the town centre.

The site is adjacent to the Tamworth Town Centre conservation area and Grade II listed buildings. The site is adjacent to Character Zone 7 (Lichfield Street/Silver Street) of the conservation area. Lichfield Street is of mixed character, generally retaining historic frontages, which include smaller two-storey buildings towards the east end and larger buildings to the west, primarily dating from the 18<sup>th</sup> and 19<sup>th</sup> Centuries.

Potential implications for significance of these heritage assets, including their setting, should be taken into account. Positive opportunities for enhancing significance and the character and appearance of the conservation area should also be considered.

The site lies within the Tamworth Extensive Urban Survey (EUS) Historic Urban Character Area (HUCA) 13: Lichfield Road and The Leys, which is identified as having moderate archaeological potential principally associated with medieval and early post-medieval suburban development principally along Lichfield Street and away from the town's historic core. A Historic Environment Desk-Based Assessment will be required in order to understand the significance of heritage assets on the site, the potential for further archaeological remains to survive and to inform discussions regarding the scope of and scale of any further evaluation/mitigation and at what stage any archaeological evaluation should occur.

There are two access points to this site. The access onto Lichfield Street should be closed and access should be taken from Wardle Street.

The previous land use as a car garage has the potential to have caused contamination and a Preliminary Risk Assessment will be required, and site



investigation, risk assessment and remediation may subsequently be required depending upon the findings of the Preliminary Risk Assessment.

**This policy aims to address strategic spatial priority SO5**

**399: Coton's Van Hire/Millfields House, Lichfield Road**

This site is in two parts with the west being an area of greenfield land and an industrial unit with associated parking and yard in the eastern section. It is immediately adjacent to the Anker River to the south and fronts onto Lichfield Road (A51) to the north. To the west of the site are residential properties and opposite, to the north, are industrial units.

Use of the existing access to the site to serve new residential development would be in conflict with the nearby Cagarin industrial road. The provision of a suitable access in the form of a ghost right turn which also incorporates Cagarin should be considered. Improvements on the Lichfield Road may be required.

The site is greater than 1ha and largely situated within Flood Zone 3 and therefore the layout of development should be such that it avoids the parts of the site within this flood zone. A site specific FRA would need to be prepared for the development.

Part of this site is in Flood Zone 3b (the functional floodplain). Development in Flood Zone 3b is not permitted and the opportunity should be taken to restore the floodplain and improve the wildlife habitat at this site which has suffered from past habitat loss and loss of watercourse habitat buffer.

This site is in close proximity to Broad Meadow Local Nature Reserve and Site of Biological Importance. The impact on these sites should be fully considered and any development should incorporate appropriate mitigation measures including buffer zones and additional planting of native species.

The previous land use for industrial purposes has the potential to have caused contamination and a Preliminary Risk Assessment will be required, and site investigation, risk assessment and remediation may subsequently be required depending upon the findings of the Preliminary Risk Assessment.

**This policy aims to address strategic spatial priority SO5**

**467: Fazeley Autocentre and Units Behind**

This site is a small industrial area occupied by small brick built workshops and large areas of hardstanding.

A new access should be created and centralised on the frontage of the site

with the existing access arrangements formalised.

This site is located in Flood Zone 3 (High Probability of Flooding) in an area benefitting from existing flood defences. Part of the development is in Flood Zone 3b (the functional floodplain). Development in Flood Zone 3b should not be permitted. A site specific FRA would need to be prepared for the development addressing flood risk to the site.

The site is in close proximity to Tameside Local Nature Reserve and proposals should give full consideration to the impact on this and make mitigation measures as appropriate including buffer zones and additional planting of native species.

The previous land use for industrial purposes has the potential to have caused contamination and a Preliminary Risk Assessment will be required, and site investigation, risk assessment and remediation may subsequently be required depending upon the findings of the Preliminary Risk Assessment.

A Coal Mining Risk Assessment should be carried out in accordance with the requirements of the Coal Authority

#### **This policy aims to address strategic spatial priority SO5**

##### **488: Staffs County Council Care Home, New Road**

The site is located on brownfield land and contains a youth centre and public sector offices. The local area contains a mix of housing styles at low to medium density. The design of the development must take into account the setting and significance of the nearby grade II listed buildings and Wilnecote conservation area to the north. The frontage to Hockley Road will need to protect or enhance the setting of the listed manor house. Consideration should be given to the building line on the street and retaining the hedge and brick wall with coping at the street boundary.

The access point off Hockley Road would need to be improved to an adoptable standard if it is to be used to serve the development. A Transport Assessment should be undertaken for any proposed development, taking into consideration the A5 junction at Glascote Heath.

A Coal Mining Risk Assessment should be carried out in accordance with the requirements of the Coal Authority as the site is located 25 metres from identified coalfield.

The site is significantly at risk of surface water flooding during 1 in 30 year and 1 in 200 year rainfall events. Site drainage and historical incidences of flooding should be investigated. Any development should ensure that surface water flow routes are managed within the site and also restrict the discharge of surface water to allowable discharge rates (if connecting to the public surface water sewer) or seek to reduce discharge rates towards Greenfield

runoff rates.

**This policy aims to address strategic spatial priority SO5**

**496: Seaton Hire Ltd and land to south, Wilnecote Lane**

The site is located on brownfield and greenfield land and contains private open space and commercial premises. The area is characterised by medium to high density post 1970 private housing. The design and layout of any development should respond to the local area.

Access off Marlborough Way may not be acceptable. A speed survey would need to demonstrate that suitable visibility splays would be provided.

Fenn Street has known parking issues and the Fenn Street/Belgrave Road junction has visibility issues. The unadopted road access to Wilnecote Lane may have third party land issues and the width would need to be surveyed to ensure it is of an adoptable standard. Development could add to congestion at the A5 junction at Glascote Heath. All of these considerations must be addressed in the design of the access to the development.

The site is significantly at risk of surface water flooding during 1 in 30 year and 1 in 200 year rainfall events. Site drainage and historical incidences of flooding should be investigated. Any development should ensure that surface water flow routes are managed within the site and also restrict the discharge of surface water to allowable discharge rates (if connecting to the public surface water sewer) or seek to reduce discharge rates towards Greenfield runoff rates.

A Coal Mining Risk Assessment should be carried out in accordance with the requirements of the Coal Authority as the site is adjacent to identified coalfield and past shallow mine working.

**This policy aims to address strategic spatial priority SO5**

**507/508/509: Club, Spinning School Lane; Magistrates Courts and Police Station; Youth Centre, Albert Road**

This site is occupied by a number of buildings within Tamworth town centre, including the old Magistrates Court and Police Station (now vacant), a youth centre and a club.

The point of vehicular access into the site should ensure adequate visibility for egressing vehicles and avoid conflict with the access to the land use opposite (namely that of the parking area and proposed Shopping Centre). Adequate parking and servicing as well as pedestrian links into the site should be provided.

The loss of the youth centre and associated MUGA (509) will lead to the loss of sports facilities. These should be replaced in accordance with NPPF Par

74.

This site is located on/in close proximity to a scheduled monument (Saxon Defences, 1006088). The site is immediately adjacent to Tamworth Town Centre Conservation Area and adjacent to a number of Locally Listed Buildings. There is considerable potential for development within this area to impact upon significant archaeological remains relating to the entire developmental history of Tamworth. A Historic Environment Desk-Based Assessment required – also consult HER.

Any Planning Application should be supported by a Preliminary Risk Assessment to determine the previous site uses and identify the potential for any contamination to be present. Site investigation, risk assessment and remediation may subsequently be required depending upon the findings of the Preliminary Risk Assessment.

### **This policy aims to address strategic spatial priority SO5**

#### **521: Former railway goods yard, Wilnecote**

The site is located on vacant brownfield land with vegetation including mature trees. The area is characterised by low density 1930-1970 private housing. The site is also located within a run-down corridor along a prominent and well-connected stretch of Watling Street with the potential for mixed use residential and retail or employment redevelopment. The design and layout of any development should respond to the local area.

A transport assessment will be required and improvements to the access to achieve visibility splays and taking into consideration site 343\_344 opposite.

As the site is vacant, potential features of biodiversity value should be assessed at an early stage and taken into account in the design of any development.

A noise assessment will need to be carried out to assess the impact of noise from the nearby railway track with mitigation measures provided if required.

The previous use of the land as a railway goods yard has the potential to have caused contamination and a Preliminary Risk Assessment will be required, and site investigation, risk assessment and remediation may subsequently be required depending upon the findings of the Preliminary Risk Assessment.

The site falls within 250m of a landfill site that is potentially producing landfill gas. A risk assessment should be carried out and any threats from landfill gas must be adequately addressed.

The site is significantly at risk of surface water flooding during 1 in 30 year and 1 in 200 year rainfall events. Site drainage and historical incidences of flooding should be investigated. Any development should ensure that surface

water flow routes are managed within the site and also restrict the discharge of surface water to allowable discharge rates (if connecting to the public surface water sewer) or seek to reduce discharge rates towards Greenfield runoff rates.

The site is located nearby to Beauchamp Industrial Estate Local Wildlife Site, on which any proposed development should not have an adverse impact. Appropriate mitigation measures including a buffer zone and additional planting of native species will be required.

### **This policy aims to address strategic spatial priority SO5**

#### **541: Adjacent to Tame Valley Alloys**

The site is located on brownfield land and contains commercial premises. The area is characterised by low density post 1970 private sector housing. The design and layout of any development should respond to the local area.

The layout of any development must retain the right of way that borders the site.

A Coal Mining Risk Assessment should be carried out in accordance with the requirements of the Coal Authority as the site is located adjacent to identified coalfield.

The previous land use as a landfill site has the potential to have caused contamination and a Preliminary Risk Assessment will be required, and site investigation, risk assessment and remediation may subsequently be required depending upon the findings of the Preliminary Risk Assessment.

The site is significantly at risk of surface water flooding during 1 in 200 year rainfall events. Site drainage and historical incidences of flooding should be investigated. Any development should ensure that surface water flow routes are managed within the site and also restrict the discharge of surface water to allowable discharge rates (if connecting to the public surface water sewer) or seek to reduce discharge rates towards Greenfield runoff rates.

### **This policy aims to address strategic spatial priority SO5**

#### **558: Factory Basin Lane**

This site is occupied by a single storey brick built industrial building. Basin Lane has residential properties on the west side and small-scale industrial buildings on the east side, with the exception of the modern flatted development to the south of the site.

The former site of the Glascote basin (part line of the Coventry Canal network) lies to the south of the site. The line of the Glascote Works Railway also runs to the south of the site. There is the potential for further industrial

remains to be present across this site. A Grade II Listed Building is situated approximately 55ms SE of the site and a Locally Listed Building 110ms S/SE.

The land has previously been used for industrial purposes. Such land use has the potential to have caused contamination and any Planning Application should be supported by a Preliminary Risk Assessment, and site investigation, risk assessment and remediation may subsequently be required depending upon the findings of the Preliminary Risk Assessment.

A Coal Mining Risk Assessment should be carried out in accordance with the requirements of the Coal Authority



## Appendix C – Proposed Employment allocations

### This policy aims to address strategic spatial priority SO2 and SO3

#### EMP1: Land south of A5, Bitterscote South

The site is situated immediately south of the A5 and the A51, with the Birmingham and Fazeley Canal running alongside the western boundary.

The site is in close proximity to the Fazeley and Bonehill Conservation Area. Development should preserve or enhance the setting of the Conservation Area. The site falls within an 'area of built character' and any development of this site should respond to local character and history and reflect the identity of local surroundings and materials.

Before any development commences the site should be assessed under the Habitats Regulations Assessment. The Cannock Chase SAC and the River Mease SAC may be affected by the development of these potential sites.

The site is located opposite the Broad Meadow Local Wildlife Site and the River Tame. Any proposed development should not have an adverse impact on these features. Development should incorporate areas of open space and landscaping which could link to the area of floodplain and the river corridor to add to the wider Green Infrastructure network. Any landscaping areas should be planted with appropriate native species of local provenance and developed areas should incorporate sustainable drainage measures to control run off (these could include ponds and swales etc which may provide opportunities to incorporate biodiversity enhancement).

Any Planning Application should be supported by a Preliminary Risk Assessment to determine the previous site uses and identify the potential for any contamination to be present. Site investigation, risk assessment and remediation may subsequently be required depending upon the findings of the Preliminary Risk Assessment.

The site is partially located in Flood Zone 3 (High Probability of Flooding). Development in Flood Zone 3b (the functional floodplain) will not be permitted. A site specific FRA will be required.

The site is significantly at risk of surface water flooding during 1 in 30 year and 1 in 200 year rainfall events. Site drainage and historical incidences of flooding should be investigated. Any development should ensure that surface water flow routes are managed within the site and also restrict the discharge of surface water to allowable discharge rates (if connecting to the public surface water sewer) or seek to reduce discharge rates towards Greenfield runoff rates.

There is an ordinary watercourse crossing the site and its treatment will require Land Drainage Consent from the County Council. The risk of flooding to the site from the watercourse should be assessed where adequate hydraulic modelling is not available, to ensure the protection of the site, future occupants and off-site areas from flooding.



Any activities at the site that may have an impact on the operations and activities associated with the canal (e.g. surface water drainage arrangements, construction activities near embanked sections) should be discussed and agreed with the Canal and River Trust. Furthermore, investigation into the potential for flooding of the site from the canal (e.g. overtopping or breaching) will be required.

A Coal Mining Risk Assessment should be carried out in accordance with the requirements of the Coal Authority

There is a public right of way running through the site. The layout of any development must either retain this right of way or provide a suitable alternative as agreed with the County Council through the site.

A noise assessment will be required to demonstrate that the proposed employment use would not have a detrimental impact on the amenities of nearby residential properties.

### **This policy aims to address strategic spatial priority SO2 and SO3**

#### **EMP2: Cardinal Point**

The site is situated immediately north of the A5 and west of the A51 and the within an area of existing industrial development.

The site falls within an 'area of built character' and any development of this site should respond to local character and history and reflect the identity of local surroundings and materials.

The site is located opposite the Broad Meadow Local Wildlife Site and the River Tame. Any proposed development should not have an adverse impact on these features. Areas of open space and landscaping which could link to the area of floodplain and the river corridor to add to the wider Green Infrastructure network should be incorporated. Any landscaping areas should be planted with appropriate native species of local provenance and the developed areas should incorporate sustainable drainage measures to control run off (these could include ponds and swales etc which may provide opportunities to incorporate biodiversity enhancement).

Before any development commences the site should be assessed under the Habitats Regulations Assessment. The Cannock Chase SAC and the River Mease SAC may be affected by the development of these potential sites.

Any Planning Application should be supported by a Preliminary Risk Assessment to determine the previous site uses and identify the potential for any contamination to be present. Site investigation, risk assessment and remediation may subsequently be required depending upon the findings of the Preliminary Risk Assessment.

The site partially located in Flood Zone 3 (High Probability of Flooding). Development in Flood Zone 3b (the functional floodplain) will not be permitted. A site specific FRA will be required.

The site is significantly at risk of surface water flooding during 1 in 30 year and 1 in 200 year rainfall events. Site drainage and historical incidences of flooding should be investigated. Any development should ensure that surface water flow routes are managed within the site and also restrict the discharge of surface water to allowable discharge rates (if connecting to the public surface water sewer) or seek to reduce discharge rates towards Greenfield runoff rates.

### **This policy aims to address strategic spatial priority SO2 and SO3**

#### **EMP7: North of Bonehill Road, Part of Bonehill Road Employment Area.**

The site is a small section of green space at the roundabout where Ventura Park Road meets Meadow Road. The site is within an existing business park with large purpose built industrial units surrounding it.

The site falls within an 'area of built character' and any development of this site should respond to local character and history and reflect the identity of local surroundings and materials.

The site is located opposite the Broad Meadow Local Wildlife Site and the River Tame. Any proposed development should not have an adverse impact on these features. Areas of open space and landscaping which could link to the area of floodplain and the river corridor to add to the wider Green Infrastructure network should be incorporated. Any landscaping areas should be planted with appropriate native species of local provenance and the developed areas should incorporate sustainable drainage measures to control run off (these could include ponds and swales etc which may provide opportunities to incorporate biodiversity enhancement).

Before any development commences the site should be assessed under the Habitats Regulations Assessment. The Cannock Chase SAC and the River Mease SAC may be affected by the development of these potential sites.

The site is located within 50 metres of a tributary of the River Tame. Any Planning Application should be supported by a Preliminary Risk Assessment to determine the previous site uses and identify the potential for any contamination to be present. Site investigation, risk assessment and remediation may subsequently be required depending upon the findings of the Preliminary Risk Assessment.

The site is partially located in Flood Zone 3 (High Probability of Flooding). Development in Flood Zone 3b (the functional floodplain) will not be permitted. A site specific FRA will be required.

The site is significantly at risk of surface water flooding during 1 in 30 year and 1 in 200 year rainfall events. Site drainage and historical incidences of flooding should be investigated. Any development should ensure that surface water flow routes are managed within the site and also restrict the discharge of surface water to allowable discharge rates (if connecting to the public surface water sewer) or seek to reduce discharge rates towards Greenfield runoff rates.

**This policy aims to address strategic spatial priority SO2 and SO3**

**EMP8: Land adjacent to Relay Park**

The site is an area of green space off an existing established industrial estate situated close to the junction of the A5 with the M42.

The site falls within an 'area of built character' and any development of this site should respond to local character and history and reflect the identity of local surroundings and materials.

Green Infrastructure should be incorporated and should link to a wider GI network.

Before any development commences the site should be assessed under the Habitats Regulations Assessment. The Cannock Chase SAC and the River Mease SAC may be affected by the development of these potential sites.

Any Planning Application should be supported by a Preliminary Risk Assessment to determine the previous site uses and identify the potential for any contamination to be present. Site investigation, risk assessment and remediation may subsequently be required depending upon the findings of the Preliminary Risk Assessment.

The site is greater than 1ha and located in Flood Zone 1 (Low Probability of Flooding). A site specific FRA would need to be prepared for the development focussing on the sustainable management of surface water.

The site is significantly at risk of surface water flooding during 1 in 30 year and 1 in 200 year rainfall events. Site drainage and historical incidences of flooding should be investigated. Any development should ensure that surface water flow routes are managed within the site and also restrict the discharge of surface water to allowable discharge rates (if connecting to the public surface water sewer) or seek to reduce discharge rates towards Greenfield runoff rates.

A Coal Mining Risk Assessment should be carried out in accordance with the requirements of the Coal Authority.

**This policy aims to address strategic spatial priority SO2 and SO3**

**EMP9: Land adjacent to Centurion Park**

The site is an area of green space off an existing established industrial estate situated close to the junction of the A5 with the M42.

The site falls within an 'area of built character' and any development of this site should respond to local character and history and reflect the identity of local surroundings and materials.

Green Infrastructure should be incorporated and should link to a wider GI network.

Before any development commences the site should be assessed under the Habitats Regulations Assessment. The Cannock Chase SAC and the River Mease SAC may be affected by the development of these potential sites.

Any Planning Application should be supported by a Preliminary Risk Assessment to determine the previous site uses and identify the potential for any contamination to be present. Site investigation, risk assessment and remediation may subsequently be required depending upon the findings of the Preliminary Risk Assessment.

There is an ordinary watercourse crossing the site and its treatment will require Land Drainage Consent from the County Council. The risk of flooding to the site from the watercourse should be assessed where adequate hydraulic modelling is not available, to ensure the protection of the site, future occupants and off-site areas from flooding.

A Coal Mining Risk Assessment should be carried out in accordance with the requirements of the Coal Authority.

### **This policy aims to address strategic spatial priority SO2 and SO3**

#### **EMP10/EMP30/EMP43: Sandy Way 1 and Vacant Land off Sandy Way and Car Park off Sandy Way, Amington Employment Area**

The site is an area of green space off an existing established industrial estate situated on Sandy Way.

The site falls within an 'area of built character' and any development of this site should respond to local character and history and reflect the identity of local surroundings and materials.

Green Infrastructure should be incorporated and should link to a wider GI network.

Before any development commences the site should be assessed under the Habitats Regulations Assessment. The Cannock Chase SAC and the River Mease SAC may be affected by the development of these potential sites.

Any Planning Application should be supported by a Preliminary Risk Assessment to determine the previous site uses and identify the potential for any contamination to be present. Site investigation, risk assessment and remediation may subsequently be required depending upon the findings of the Preliminary Risk Assessment.

A Coal Mining Risk Assessment should be carried out in accordance with the requirements of the Coal Authority

There is a public right of way running along the western boundary of the site. This should be retained and maintained.

### **This policy aims to address strategic spatial priority SO2 and SO3**

#### **EMP26: Land Adjacent to Sandy Hill Business Park**

The site is an area of green space off an existing established Amington Industrial

Estate. The site is adjacent to the public golf course.

There is an indoor bowling and outdoor bowling green/facility immediately to the north of the site that should be protected from any direct or indirect negative impacts.

The site falls within an 'area of built character' and any development of this site should respond to local character and history and reflect the identity of local surroundings and materials.

Green Infrastructure should be incorporated and should link to a wider GI network.

Before any development commences the site should be assessed under the Habitats Regulations Assessment. The Cannock Chase SAC and the River Mease SAC may be affected by the development of these potential sites.

Any Planning Application should be supported by a Preliminary Risk Assessment to determine the previous site uses and identify the potential for any contamination to be present. Site investigation, risk assessment and remediation may subsequently be required depending upon the findings of the Preliminary Risk Assessment.

A Coal Mining Risk Assessment should be carried out in accordance with the requirements of the Coal Authority

There is a public right of way running through the site. The layout of any development must either retain this right of way or provide a suitable alternative as agreed with the County Council through the site.

### **This policy aims to address strategic spatial priority SO2 and SO3**

#### **EMP33: Site off Bonehill Road**

The site is an area of green space off an existing established industrial estate situated off Bonehill Road.

The proposed site falls within an 'area of built character' and any development of this site should respond to local character and history and reflect the identity of local surroundings and materials.

The site is located opposite the Broad Meadow Local Wildlife Site and the River Tame. Development should not have an adverse impact on these features. Areas of open space and landscaping which could link to the area of floodplain and the river corridor to add to the wider Green Infrastructure network should be incorporated. Any landscaping areas should be planted with appropriate native species of local provenance and the developed areas should incorporate sustainable drainage measures to control run off (these could include ponds and swales etc which may provide opportunities to incorporate biodiversity enhancement).

Before any development commences the site should be assessed under the Habitats Regulations Assessment. The Cannock Chase SAC and the River Mease SAC may be affected by the development of these potential sites.

Any Planning Application should be supported by a Preliminary Risk Assessment to determine the previous site uses and identify the potential for any contamination to be present which could pose a risk to 'Controlled Waters' receptors. Site

investigation, risk assessment and remediation may subsequently be required depending upon the findings of the Preliminary Risk Assessment.

Proposals for the drainage of surface or roof water into the ground will need to take into account the findings of the Preliminary Risk Assessment and any subsequent site investigation. If contamination is present and surface water is to be drained to ground then the contamination risk assessment will need to consider the additional infiltration from the surface and roof water system(s).

The site is greater than 1ha and partially located in Flood Zone 3 (High Probability of Flooding) and the Sequential Test will need to be applied. Development in Flood Zone 3b (the functional floodplain) will not be permitted. A site specific FRA will be required.







**Appendix D – Infrastructure Delivery Plan**

Physical Infrastructure Required	Strategic Spatial Priorities	Scheme	Outcome	Delivery Agencies	Priority for Planned Development	Cost	Existing Funding	Phasing	Funding Provision	Notes
<b>Transport</b>										
<b>Cycle and Pedestrian Links</b>	SO2 SO4 SO5 SO6 SO7 SO12	Ventura Park to Town Centre Local Transport Package: Cycling and Pedestrians	Improved surface treatment, lighting and signage to town centre leading to an increase in the number of trips made by foot or cycle	Staffordshire County Council, Tamworth Borough Council	Other	£2,500,000	£530,000 s106 £100,000 SCC	2006-2014 2015-2019	Developer Contributions Further bids for funding through Local Transport Plan (LTP), Local Enterprise Partnership (LEP) and Single Local Growth Fund (SLGF)	Toucan crossing installed across River Drive
		Anker Valley Local Transport Package: Cycling and Pedestrian Links	Links to railway station, town centre and education	Staffordshire County Council	Essential	£500,000 Footbridge over Derby line  £100,000 (Footpath improvement through station fields)		2015-2019	Developer Contributions	
		Additional Cycling and Pedestrian Links to Anker Valley	Links to railway station, town centre and education	Staffordshire County Council	Other	£600,000 (Cycle link to Amington)  £150,000 (Station access )		2020-2031	Developer Contributions	Essential if new development served by Gungate corridor exceeds 500 dwellings
		Railway Station to Town Centre Improvements	Links to railway station and town centre	Staffordshire County Council, Tamworth Borough Council	Other	£1,000,000		2015-2019 2020-2031	Developer Contributions Further bids for funding through LTP, LEP and SLGF	Detailed design undertaken
		Measures Relating to Post 16 Academy	Improved street lighting, cycle facilities, travel plan enhancement	Staffordshire County Council	Other	£150,000 for travel plan enhancement	£150,000 for travel plan enhancement	Complete	Developer Contributions	
		Borough Wide Links	More comprehensive cycle network linking residential areas to the town centre and employment areas	Staffordshire County Council	Other	Unknown		2006-2014 2015-2019 2020-2031	LTP and Developer Contributions Developer Contributions	
<b>Rail</b>	SO2 SO12	Water Orton Rail Corridor Enhancement	Turnback siding and crossover at Tamworth Enabling dedicated local service to Birmingham, increasing the percentage of commuters travelling by public transport Diversion of private car users commuting to Birmingham to Rail use	Network Rail, London Midland, Centro	Other	£30m	£3m CW LTB, £12m rail industry, £0.5m CENTRO.	2015-2019 2020-2031	Local Transport Board	Being promoted by Centro across the Region
		Tamworth Station Car Parking Capacity Increases	Car Park and public transport connection in Anker valley Diversion of private car users commuting to Birmingham to Rail use	Network Rail, London Midland	Other	£500,000 for Anker Valley Car Park		2020-2031	Developer Contributions	First phase of works to existing car park complete, Essential if new development served by Gungate Corridor exceeds 500 dwellings
		Platform Lengthening and Station Improvements at Wilnecote	Improve access and increase use of public transport	Network Rail	Other	Unknown		2015-2019 2020-2031	Rail Companies	
		Tamworth Station Improvements	Improve access and increase use of public transport	Network Rail, London Midland	Other	Unknown		Complete	Identified in the National Stations Improvement Programme	

Physical Infrastructure Required	Strategic Spatial Priorities	Scheme	Outcome	Delivery Agencies	Priority for Planned Development	Cost	Existing Funding	Phasing	Funding Provision	Notes
		Camp Hill Chord Line	Increase in capacity to central Birmingham stations. Improved connectivity and new journey opportunities.	Network Rail, Centro	Other	Unknown		2015-2019 2020-2031	Camp Hill lines chords in Network Rail SBP Route Plan April 2008 proposed strategy	
Bus	SO2 SO4 SO5 SO6 SO12	Ventura Park to Town Centre Local Transport Package: Bus	New bus stops, enhanced service, enhanced bus passenger information and infrastructure	Staffordshire County Council	Other	£200,000	£200,000	2006-2014 2015-2019	Developer Contributions	Necessary for the delivery of town centre regeneration.
		Real-Time Passenger Information for Bus Stops		Staffordshire County Council	Other	Unknown		2015-2019 2020-2031		Bus Service Review: There is scope for infrastructure improvements in Tamworth, with Real-Time Passenger Information being more of a priority, Ventura Park being the first place where such systems would be installed, looking to roll this out across more of Tamworth in future.
		Anker Valley Local Transport Package: Bus	Extended Route Service to new development	Staffordshire County Council	Other	£360,000		2015-2019	Developer Contributions	
		Dunstall Lane Bus Service	Extended Route Service to new development	Staffordshire County Council	Other	£360,000		2015-2019	Developer Contributions	
		Golf Course Bus Service	Extended Route Service to new development	Staffordshire County Council	Other	£360,000		2015-2019	Developer Contributions	
Canal	SO8	Enhanced Management, Access and Interpretation	Increased use of blue corridors Greater connectivity Improved awareness and understanding of biodiversity	British Waterways	Other	Unknown		2015-2019 2020-2031	British Waterways Developer Contributions where related to access or green infrastructure	
Road	SO2 SO3 SO5 SO6	Ventura Park to Town Centre Local Transport Package: Road	Roundabout junction signalisation, highway improvements, linked signals, urban traffic control Reduce impact of new development on local and strategic highway network Reduce congestion, improving bus journey times and reliability	Staffordshire County Council	Other	£60,000 amendments to islands £160,000 second exit from homebase Additional interventions being costed	£60,000 £160,000	2006-2014 2015-2019	LTP, Private Sector Developer Contributions	Roundabout signalisation complete. Second exit from Sainsburys complete Design for second exit from Homebase complete  Necessary for the delivery of town centre regeneration.
		A5(T) Junction Improvements at Stoneydelph and Mile Oak	Less congestion and queuing	Highways Agency	Other	Mile Oak: £1,349,230 Stoneydelph: £973,326		2006-2014 2015-2019	Developer Contributions and bids for additional funding via LEP	Development in adjoining authorities may also be required to contribute
		Anker Valley Local Transport Package: Road	Modifications to A513 and B5493 junction, Urban Traffic Control on Upper Gungate and Aldergate corridor	Staffordshire County Council	Essential	£2,000,000	£1,376,000	2015-2019	£1.376M of local pinch point funding secured  Developer Contributions	Pinch Point funding?
		Improved Signage to Town Centre Car Parks	Reduce congestion Town centre regeneration	Tamworth Borough Council, Staffordshire County Council	Other	Unknown		2015-2019		
		Electric Charging Points	Facilitate and increase usage of electric cars	Private Sector, Tamworth Borough Council	Other	Unknown		2020-2031	Tamworth Borough Council, Private Sector	
<b>Public Realm</b>										
Town Centre Public Realm	SO2 SO7 SO9 SO10 SO12	Public Realm Enhancements Focusing on Key Gateways and Corridors Gateways: College Campus Train Station South East Ladybridge Lichfield Street	Improved legibility to and within town centre alongside redevelopment of public and private development sites Downgraded highways infrastructure, minimised street clutter, maximised pedestrian movement and increases visibility of key strategic movement corridors	Tamworth Borough Council, Staffordshire County Council	Other	To be determined as part of early design Detailed design and costing for cultural qtr public realm £500k		2015-2019 2020-2031	LTP and Developer Contributions	

Physical Infrastructure Required	Strategic Spatial Priorities	Scheme	Outcome	Delivery Agencies	Priority for Planned Development	Cost	Existing Funding	Phasing	Funding Provision	Notes
		Corridors: Upper Gungate Victoria Road Bolebridge Street Ladybridge Lichfield Street	Flooring materials, pedestrian and vehicle signage, street furniture (bins, benches, planters, lighting etc.) coordinated, rationalised where appropriate and new signage installed, including Library, Civic Space & St Editha Square							
		Enhance Market	Provision of new stalls More regular markets	Tamworth Borough Council	Other	Nil		2006-2014 2015-2019	Tamworth Borough Council	New stalls have been introduced by the market operator and a programme of additional markets is being considered
<b>Employment Area Renewal</b>	SO3	Business Led Improvements to Key Traditional Employment Sites Across the Town	Enhancements to make them more attractive, accessible, visible and durable. Improvements such as New signage Soft and hard landscaping Additional parking Security lighting and fencing Building cladding	Southern Staffordshire Partnership	Other	£200,000		2015-2019 2020-2031	Private sector, developer contributions where appropriate, LEP	Bid for funding made by SSP
<b>Water and Drainage</b>										
<b>Water Resources and Supply</b>	SO6	Some Off-Site Water Mains Infrastructure	Development with required infrastructure	Severn Trent Water Ltd, South Staffs Water	Essential	Unknown		Unknown	Severn Trent Water South Staffs Water	Dependant on level of growth
		New Booster Pump at Glascode Booster Station		South Staffs Water	Essential	Unknown		Unknown	South Staffs Water	Dependant on level of growth
		Use of Warton Groundwater Unit for Further Water Extraction		South Staffs Water	Essential	Unknown		Unknown	South Staffs Water	
<b>Waste Water Collection and Treatment</b>	SO6	Improvements May be Required to Increase Capacity Within the Mains and Pumping Stations	Development with required infrastructure	Severn Trent Water Ltd	Essential	Unknown		Unknown	Severn Trent Water	
<b>Surface Water Drainage</b>	SO11	Implementation of Sustainable Drainage Systems Techniques in New Development	Reduced risk of flooding	Staffordshire County Council, Tamworth Borough Council, Developers	Essential	Unknown		2006-2014 2015-2019 2020-2031	Developers SCC SUDS Approving body maintenance funding arrangements to be confirmed by Government	Potential nil additional construction cost but unknown maintenance costs and arrangements
<b>Flood Defences</b>	SO11	New Flood Defences at Fazeley (Mayfair Drive and Brook End), New Embankment at Lichfield Road	New flood defences leading to reduced risk of flooding	Environment Agency	Other	Unknown £2.5m Lichfield Road	£2.5m	2006-2014 2015-2019	Environment Agency	The River Tame Flood Risk management Strategy contained several projects to reduce the risk of flooding and was subject to public consultation in 2009. An action plan with priorities is expected. Lichfield Road Works complete
		Investigation of Flooding and Flood Protection Works to Birmingham Fazeley Canal	Reduced flooding from River Tame	British Waterways, Environment Agency	Other	Unknown		2015-2019 2020-2031	Environment Agency	The River Tame Flood Risk management Strategy contained several projects to reduce the risk of flooding and was subject to public consultation in 2009. An action plan with priorities is expected.
<b>Waste</b>										
<b>Waste Recycling</b>	SO11	Household Waste Recycling Station	Sustainable reuse of resources	Warwickshire County Council	Other	£3.5m	£3.5m	Complete	Warwickshire and Staffordshire County Councils	
<b>Energy</b>										
<b>Renewable Energy Generation</b>	SO11	Possible Opportunities for Renewable Energy Generation Identified in the	Secure decentralised energy generation and reduced carbon emissions	Private Sector, Commercial Energy	Other	Nil		2015-2019 2020-2031	Private sector and commercial energy companies	Nil cost as funded by generation revenue

Physical Infrastructure Required	Strategic Spatial Priorities	Scheme	Outcome	Delivery Agencies	Priority for Planned Development	Cost	Existing Funding	Phasing	Funding Provision	Notes
		Staffordshire Renewable and Low Carbon Energy Study		Companies						

## **Appendix E – Car Parking Standards**

### **Introduction**

This Appendix sets down the recommended car parking standards for new developments within the District. Parking standards are an important element of the Council's land use/transportation policy.

### **Objectives**

The objective is to ensure that sufficient space is provided for the accommodation of parked vehicles having regard to the location, layout, size, shape, access needs and design quality of the space. The parking standards are intended to ensure that parked vehicles do not become either a safety hazard or environmental nuisance. In order to achieve the objective, it is essential that a car parking policy exists in order for the negotiations to be carried out with the developer in a consistent, constructive and clearly understood manner.

The developer will normally have to provide fully for the parking demand generated on or near the site of the development, particularly when new buildings are proposed. This requirement may not however be possible or desirable where redevelopment, refurbishment or conversions are proposed within the town centres or conservation areas when conservation and transportation policies need to be taken into account and the availability of public parking facilities assessed. In these circumstances the standards should be used in a positive and flexible manner as an aid to development. In central areas with good public transport links users may require less parking.

Where such development proposals do not make provision to the relevant parking standard then negotiations can be entered into to see if these could be achieved or even a suitable compromise reached where public safety will not be prejudiced.

It is recognised, however, that the parking requirements are but part of the overall assessment of the planning merits of the proposal and the outcome can be a balance between all these considerations.

The practical parking requirements for any particular development are likely to reflect a combination of the criteria listed below and need to be negotiated accordingly:

1. The nature of the use/type of use (largely reflected in the car parking standards themselves)
2. Location (town centre, conservation area, urban area, rural area, green field site)
3. Development type (new development, redevelopment, refurbishment, conversion)
4. Nearness to public parking areas/availability of on-street parking
5. Accessibility (the balance between public and private transportation)
6. Number of employees
7. Assessment of use of development by local populace/work force
8. Any special operational requirements
9. Levels of car ownership

## 10. Multiplicity of uses proposed and degree of combined usage

As a general principle, servicing provision should be based on the maximum number of vehicles likely to serve the development at any one time being able to manoeuvre with ease and to stand for loading and unloading without inconvenience to other users of the site, so as to ensure that:

- all service vehicles are accommodated off the public highway,
- all service vehicles enter and leave the site in forward gear,
- sufficient access is provided for emergency vehicles.

Sufficient manoeuvring and standing space is required within the site for the maximum number and size of vehicle likely to serve the development at any one time.

If areas within the facilities are convertible to another use having a higher parking standard requirement, the higher standard will be applied.

Where the use includes an element of residential use, the standards at C3 should be applied in addition to the above standards.

### **How to Use the Standards**

The standards relate, where possible, to uses defined in the Town and Country Planning Use Classes (Amendment) Order 2005. For any use not included in the standards, the number of parking spaces will be assessed and determined based on the individual merits of the scheme.

All standards are based on gross floor area by external measurements unless stated to the contrary. The term gross floorspace shall mean the total floorspace of a building, including such areas as service corridors, lifts and toilets.

Mixed uses will be assessed as a sum of the parking requirements of the individual elements of the scheme based on the standards, unless the timing of demand associated with individual uses can be shown to allow dual use of spaces. This includes ancillary uses such as office use within an industrial development or a bar open to non-residents within a hotel etc. In mixed developments where the main parking demands take place at different times eg daytime and evening, an element of dual use of parking spaces will be acceptable. Tandem spaces will only be acceptable where specifically for use by staff with similar working hours.

The standards apply to new development, extensions and changes of use. When considering an extension to an existing use, the standard will be applied only to the extension and any shortfall in parking provision for the existing building will not be required to be met. When considering a redevelopment or change of use, the level of parking provision will relate to the requirements of the development as a whole. Sufficient manoeuvring and standing spaces is required within the site for the maximum number and size of vehicle likely to serve the development at any one time.

If areas within the facilities are convertible to another use having a higher parking standard requirement, the higher standard will be applied.

Where the use includes an element of residential use, the standards at C3 should be applied in addition to the above standards.

The recommended standards are contained in the following schedule.

**Car Parking Standards**

<b>Development Type</b>	<b>Requirement</b>
<b>RETAIL/FOOD &amp; DRINK</b> A1. Retail *	Staff: 1 space per 100 sq.m. of gross floor space. Customers: 1 space per 20 sq.m. gross floor space
A2. Offices *	Staff & Visitors: 1 space per 20 sq.m. gross floor space
A3. Restaurants/Café *	Staff: 1 space per 100 sq.m. gross floor space Diners: 1 space per 5 sq.m. of dining area
A3. Transport Café *	Staff: 1 space per 100 sq.m. gross floor space Customers: 1 lorry space (artic) per 3 sq.m. dining area
A4. Public Houses *	Staff: 1 space per 100 sq.m. gross floor space Customers: 1 space per 5 sq.m. of public drinking area
A5. Hot Food Takeaway	1 space per 100 sq.m. 1 space per 3 sq.m. of waiting area
<b>INDUSTRIAL &amp; COMMERCIAL</b> B1. Offices *	1 space per 25 sq.m. up to 250 sq.m., then 1 space per 30 sq.m. (all gross floor space)
B2. Industry *	1 space per 25 sq.m. up to 250 sq.m., then 1 space per 50 sq.m. (all gross floor space)
B8. Warehouses *	1 space per 80 sq.m. gross floor space
<b>ACCOMMODATION/INSTITUTIONS</b> C1. Hotels	1 space per 3 employees employed at busiest time Guests: 1 space per bedroom
C1. Hostels	Staff: 1 space Residents and Visitors: 1 space for 2 residents
C2. Convalescent/nursing homes/elderly persons homes	Staff and out-patients: 1 space per 3 beds Visitors: 1 space per 2 beds
<b>RESIDENTIAL</b>	Where all parking is provided within the

C3. Traditional housing (local authority/private / Housing association)	<p>curtilage:  2 and 3 bed dwellings: 2 spaces per dwelling  4 and more bedrooms: 3 spaces per dwelling  Communal parking:  1 and 2 bed dwellings: 1.5 spaces per dwelling  3 and more bedrooms: 2 spaces per dwelling</p>
C3. Sheltered housing/communal housing of elderly	<p>Other Residents/Visitors: 1 car space per 3 dwellings/units of accommodation/bedroom  Staff: 1 space per 3 staff present at busiest time</p>
C3. Self-contained flats /apartments *	<p>Residents: 1 space per flat  Visitors: 1 space per 4 flats</p>
<b>OTHER</b> D1. Places of worship	1 space per 5 seats
D1. Museums/public halls/libraries/ art galleries/exhibition halls	<p>Staff: 2 spaces up to 300 sq.m. gross floor area  6 spaces above 300 sq.m. gross floor area  Visitors: 1 space per 30 sq.m. gross floor area</p>
D1. Clinics/GP Practices/Health Centres *	<p>Staff: 1 space per GP.  1 space for each other medical member of staff employed at busiest time  1 space for each 3 non-medical member of staff employed at busiest time  Visitors: 3 spaces per consulting room</p>
D1. Day nurseries	<p>1 space per member of teaching staff  1 drop-off space per 10 children</p>
D1. Primary/Secondary Schools *	<p>1 space per member of teaching staff  1 space per 3 member of non-teaching staff  A suitable part of the hard play area to be allocated and suitably constructed so it can be used by cars on school open days, etc</p>
D1. Colleges/adult training centres *	<p>1 space per member of teaching staff  1 space per 10 full-time equivalent students</p>



D2. Cinemas/Theatres	1 space per 5 seats
D2. Sports Centres *	Staff and visitors: 1 space per 2 persons staffing and using the premises at the busiest time
D2. Tennis, Golf, Bowling (Greens)	1 space per 3 sq.m. of indoor public floor area 2 spaces per court 1 space per lane of any driving range 2 spaces per golf hole
D2. Cricket, Football, Rugby	1 space per 3 sq.m. of public floor area of buildings 12 spaces and 1 space for a coach per pitch
Vehicle Service, Tyre, exhaust Garage *	3 car spaces per each service/repair bay 1 car space for every 40 sq.m. of gross floor area
Car sales	Staff: 1 space per 25 sq.m. Customers: 1 space per 40 sq.m. of gross sales floor area plus 1 space per 10 outside display places For ancillary workshop/storage areas and parts departments: 3 car spaces per each service/repair bay 1 car space for every 40 sq.m. of gross floor area
Car wash facilities	5 queuing spaces
Day care and adult training centres, day care centres for physically handicapped *	In particular centres for physically handicapped will require accommodation for special passenger vehicles with tail lift, etc. 1 space per member of staff at busiest time Visitors: 1 space for a unit of 5 persons
Stadia	1 space per 15 seats
Caravan sites	Occupiers: 1 space per caravan Visitors: 1 space per 5 caravans
Garden centres	Staff and customers: 1 space per 50 sq.m. sales area For café apply A3 standards
Marinas	1 space per 2 mooring berths

**APPENDIX F: MONITORING AND IMPLEMENTATION FRAMEWORK TABLE**

<b>Policy</b>	<b>Delivery Agency</b>	<b>Implementation</b>	<b>Indicator</b>	<b>Target</b>	<b>Contingency Planning</b>	<b>Data Source</b>
SP1: Spatial Strategy for Tamworth	The indicators, targets and contingency planning measures identified for the policies below collectively contribute to the delivery of SP1.					
SP2: Supporting Investment in Tamworth Town Centre	<ul style="list-style-type: none"> <li>• TBC</li> <li>• SCC</li> <li>• TSP</li> <li>• Developers</li> <li>• BEP</li> <li>• SSP</li> <li>• RSL's</li> <li>• HCA</li> <li>• English Heritage</li> <li>• Enterprise Partnerships</li> <li>• Local Employers and Businesses</li> <li>• Land owners</li> </ul>	<ul style="list-style-type: none"> <li>• CP1</li> <li>• Tamworth and Lichfield Economic Strategy (B.E.P)</li> <li>• Place Plan</li> </ul>	Amount of new comparison retail development located within the Town Centre boundary.	Target set in SP1	If no increase in floorspace occurs, improve partnership working and delivery with centre partners to ensure that centres continue to remain viable	In house monitoring
			Amount of new Office development located within of on the edge of Tamworth Town Centre	Increasing trend	If no increase in floorspace occurs, improve partnership working and delivery with centre partners to ensure that centres continue to remain viable	In house monitoring
			% of vacant retail floor space within Town centre	Decreasing trend	Improve partnership working and delivery with town centre partners	In house monitoring and health checks
			Amount of new town centre use floor space	Increasing trend	Improve partnership working and delivery with town centre partners	In house monitoring and health check
			% of A1 uses within primary frontages falling within area	75% of units to fall within A1 use class	Improve partnership working and delivery with town centre partners	In house monitoring and health checks
			Residential completions on previously developed land within the town centre	Increasing trend	Improve partnership working and delivery with town centre partners	In house monitoring and health checks
SP3: Supporting Investment in Local and Neighbourhood Centres	<ul style="list-style-type: none"> <li>• TBC</li> <li>• SCC</li> <li>• TSP</li> <li>• Developers</li> <li>• RSL's</li> <li>• HCA</li> </ul>	<ul style="list-style-type: none"> <li>• CP1</li> </ul>	Amount of retail floorspace (within 'A' use class within existing Local and Neighbourhood Centres	No loss of retail floorspace anticipated	If loss of floorspace occurs, improve partnership working and delivery with centre partners to ensure that centres continue to remain viable	In-house health checks

Policy	Delivery Agency	Implementation	Indicator	Target	Contingency Planning	Data Source
SP4: Sustainable Economic Growth	<ul style="list-style-type: none"> <li>TBC</li> <li>SCC</li> <li>TSP</li> <li>Developers</li> <li>BEP</li> <li>Highways Agency</li> <li>Enterprise Partnerships</li> <li>Local Employers and Businesses</li> <li>Land owners</li> <li>Education and Training providers</li> </ul>	<ul style="list-style-type: none"> <li>SP1, CP2</li> <li>Economic Strategy</li> <li>LEP Spatial/Economic Strategy</li> <li>Place Plan</li> </ul>	Total amount of additional floorspace and land by use class	Increasing trend	Work with enterprise partnerships, landowners and adjoining authorities to ensure delivery of suitable sites to meet needs of Tamworth.	In employment land monitoring
			Total number of employee jobs in the Borough	Increasing trend over 5 year period	Liaise with local business support groups through enterprise partnerships	Staffordshire County Council data In house monitoring
			Loss of employment land	No loss of strategic employment areas to alternative uses	Work with partners to develop a greater understanding of the market for employment land	Staffordshire County Council data In house monitoring Employment land monitoring Pre-application discussions Tamworth & Lichfield Economic Strategy & reviews
SP5: Housing	<ul style="list-style-type: none"> <li>TBC</li> <li>SCC</li> <li>TSP</li> <li>Developers</li> <li>RSL's</li> <li>Highways Agency</li> <li>Land Owners</li> <li>HCA</li> </ul>	<ul style="list-style-type: none"> <li>CP4, CP5, CP6, CP7</li> <li>Housing Strategy</li> <li>Local Investment Plan</li> <li>Strategic Housing Land Availability Assessment</li> <li>Planning applications</li> </ul>	Housing supply to be monitored in relation to the five year tranches in order to ensure there remains a flexible supply of developable and deliverable land for homes.	To demonstrate an annual 5 year supply of deliverable sites  A 10 year supply of developable sites	Work with landowners and developers, through agents forum, and identify blockages to deliverability. GBSLEP funding opportunities Continue to work with neighbouring authorities duty to co-operate agreements may need revisiting	In house monitoring & updated housing trajectory
			Total no of net additional dwellings in Tamworth	Meeting annual requirement of 170 dwellings	Work with landowners and developers, through agents forum, and identify blockages to deliverability. GBSLEP funding opportunities Continue to work with neighbouring authorities duty to co-operate agreements may need revisiting	In house monitoring & updated housing trajectory
SP6: Sustainable Urban Extension	<ul style="list-style-type: none"> <li>TBC</li> <li>SCC</li> <li>Landowners</li> <li>Developers</li> <li>Local transport operators</li> <li>English Heritage</li> <li>English Nature</li> <li>Environment Agency</li> <li>Wildlife Trust</li> <li>Network Rail</li> <li>Duty to Co-op</li> </ul>	<ul style="list-style-type: none"> <li>CP4,5,6,8,9,10,11,12</li> <li>Master plan</li> <li>Planning applications</li> </ul>	No.of housing completions		Work with landowners and developers, through agents forum, and identify blockages to deliverability. GBSLEP funding opportunities Continue to work with neighbouring authorities duty to co-operate agreements may need revisiting	In house monitoring

Policy	Delivery Agency	Implementation	Indicator	Target	Contingency Planning	Data Source
SP7: Regeneration Priority Areas	<ul style="list-style-type: none"> <li>TBC</li> <li>SCC</li> <li>TSP</li> <li>Developers</li> <li>Land Owners</li> <li>HCA</li> <li>RSL's</li> </ul>	<ul style="list-style-type: none"> <li>CP2,4,5,6,9,10,13 &amp; 15</li> <li>Locality Working Plans</li> <li>Economic Strategy</li> <li>Local Investment Plan</li> </ul>	The Local Plan has included a set out a more detailed monitoring framework and specific targets	Increasing number of homes	Work with Council's Housing department and TSP to address blockages to delivery.	In house monitoring
			% of properties achieving Decent Homes standard in Regeneration Priority Areas			
			Extent of deprivation in Tamworth relative to all areas nationally	Reduce No of Super output areas that fall within the most deprived 10-20% in England	Work with partners to target holistic initiatives to address socio-economic deprivation.	In house monitoring & government produced statistics
			% of Open Space classed as high quality	Increase in the amount of 'good' quality Open Space	Work with Council's Street scene department to address maintenance issues. Work with landowners to address issues in relation to private space.	In house monitoring
			Amount of previously developed land developed for uses set out in policy	Increasing trend	Work with landowners and developers, through agents forum, and identify blockages to deliverability	In house monitoring
Amount of vacant floorspace	Decreasing trend	Work with landowners and developers, through agents forum, and identify blockages to deliverability	In house monitoring			
SP8: Environmental Assets	<ul style="list-style-type: none"> <li>Natural England</li> <li>Tamworth Borough Council</li> <li>Staffordshire County Council</li> <li>Environmental Agency</li> <li>British Waters</li> <li>English Heritage</li> <li>Landowners</li> </ul>	<ul style="list-style-type: none"> <li>Green Infrastructure Study (GIS)</li> <li>CIL</li> </ul>	Net Count of good quality open spaces lost to development	No loss	Review GIS and Pre-Submission Discussions	In house monitoring

Policy	Delivery Agency	Implementation	Indicator	Target	Contingency Planning	Data Source
SP9: Sustainable Infrastructure	<ul style="list-style-type: none"> <li>• Bus operators</li> <li>• Network Rail</li> <li>• Developers</li> <li>• Tourism Attractions</li> <li>• Staffordshire County Council</li> </ul>	<ul style="list-style-type: none"> <li>• Development Management Policies</li> <li>• Developer Contributions</li> <li>• Local Transport Plan Funding</li> </ul>	Delivery of Local Transport Plan Priorities	N/A	<p>Effective Partnership Working with SCC to deliver priorities</p> <p>If improvements not delivered then facilitate more effective liaison with delivery partners and reassess funding</p>	Staffordshire County Council monitoring
CP1: Hierarchy of Centres	<ul style="list-style-type: none"> <li>• TBC</li> <li>• SCC</li> <li>• Developers/Land Owners</li> <li>• Enterprise Partnerships</li> </ul>	<ul style="list-style-type: none"> <li>• Development Management Process</li> <li>• LEP spatial/economic strategy</li> <li>• Design SPD</li> </ul>	Amount of new comparison retail development located within the Town Centre, Local and Neighbourhood Centres Boundaries	<ul style="list-style-type: none"> <li>• 20,000sq.m Gungate Redevelopment</li> <li>• 7,800 m2 comparison and 2,900 m2 convenience after 2021</li> </ul>	Due to the unpredictability of the retail market it is difficult to forecast completions.	In house monitoring and health checks
			Amount of vacant floorspace in the town centre, local centres and neighbourhood centres	Reduction in the amount of vacant floorspace in the town centre, local centres and neighbourhood centres.	improve partnership working and delivery with centre partners to ensure that centres continue to remain viable	In house monitoring and health checks
CP2: Economic Growth and Enterprise	<ul style="list-style-type: none"> <li>• TBC</li> <li>• SCC</li> <li>• TSP</li> <li>• Developers</li> <li>• BEP</li> <li>• Highways Agency</li> <li>• Enterprise Partnerships</li> <li>• Local Employers and Businesses</li> <li>• Land owners</li> <li>• Education and Training providers</li> </ul>	<ul style="list-style-type: none"> <li>• SP1, CP2</li> <li>• Economic Strategy</li> <li>• LEP Spatial/Economic Strategy</li> <li>• Place Plan</li> </ul>	Total amount of additional floorspace/land by use class	Increasing trend	Work with enterprise partnerships, landowners and adjoining authorities to ensure delivery of suitable sites to meet needs of Tamworth.	In house monitoring
			Total number of employee jobs in the Borough	Increasing trend over 5 year period	Liaise with local business support groups through enterprise partnerships	Staffordshire County Council data In house monitoring
			Loss of employment land	No loss of strategic employment areas to alternative uses	Work with partners to develop a greater understanding of the market for employment land	Staffordshire County Council data In house monitoring Pre-application discussions Tamworth & Lichfield Economic Strategy & reviews

Policy	Delivery Agency	Implementation	Indicator	Target	Contingency Planning	Data Source
CP3: Culture and Tourism	<ul style="list-style-type: none"> <li>TBC</li> <li>Destination Staffordshire</li> <li>SCC</li> <li>BEP</li> <li>Enterprise Partnerships</li> <li>Local Transport Operators</li> <li>British Waterways</li> <li>Staffordshire Wildlife Trust</li> <li>RSPB</li> <li>Adjoining Authorities</li> </ul>	<ul style="list-style-type: none"> <li>Development Management Process</li> <li><b>Design SPD</b></li> <li>LEP spatial/economic strategy</li> <li>Staffordshire LTP</li> </ul>	Number of tourism related jobs	Increase in number of tourism related jobs	If a decreasing trend occurs in any 5 year period then publish further guidance on promoting opportunities for tourism	In house monitoring Staffordshire County Council data
			Number of visitors recorded to tourism facilities	Annual increase in visitors recorded		In house monitoring Staffordshire County Council data
CP4: Affordable Housing	<ul style="list-style-type: none"> <li>TBC</li> <li>RSL's</li> <li>HCA</li> <li>Developer</li> </ul>	<ul style="list-style-type: none"> <li>Development Management Process</li> </ul>	Number of affordable housing completions	40 completions p.a	Less than an average of 40 units per annum over a 5 year period then review the threshold. Discuss with landowners and developers regarding viability	Residential Land monitoring reports
CP5: Housing Needs	<ul style="list-style-type: none"> <li>TBC</li> <li>SCC</li> <li>RSL's</li> <li>Developers</li> </ul>	<ul style="list-style-type: none"> <li>Development Management Process</li> <li>Housing Market Needs Assessment Update</li> <li>Design SPD</li> </ul>	% of completions by size and type	4% 1 bedroom 42% 2 bedroom 39% 3 bedroom 15% 4 bedroom	Adopt more proactive pre-application discussions with developers and then regularly assess the need for potential housing types, through housing market area assessment process and amend policy as appropriate to reflect any emerging increasing need for a particular type.	In house monitoring
CP6: Housing Density	<ul style="list-style-type: none"> <li>TBC</li> <li>Developers</li> </ul>	<ul style="list-style-type: none"> <li>Development Management Process</li> <li>Design SPD</li> <li>Design and Access Statement</li> </ul>	% residential completions at specified dph	40dph in town centre and sustainable locations or 30 dph in urban area, as set out in policy.	If lower in any 5 year period review.	In house monitoring
CP7: Gypsies and Travellers and Travelling Showpeople	<ul style="list-style-type: none"> <li>TBC</li> <li>SCC</li> <li>Neighbouring Authorities</li> <li>Land Owners</li> </ul>	<ul style="list-style-type: none"> <li>Development Management Process</li> </ul>	Number of additional pitches granted permission	1 additional pitch by 2028	If no sites are delivered, improve partnership working with authorities	In-house monitoring

CP8: Sport and Recreation	<ul style="list-style-type: none"> <li>TBC</li> <li>SCC</li> <li>National and Regional Bodies</li> <li>Developers</li> </ul>	<ul style="list-style-type: none"> <li>Development Management Process</li> <li>Indoor and Outdoor Sports Strategy</li> </ul>	% increase in participation	1% increase in participation per annum	Review quality, quantity, accessibility and level of use of Sport and Recreation facilities as part of review of Indoor and Outdoor Sports Strategy.	Indoor and Outdoor Sports Strategy
			Loss of playing pitches	No loss		
<b>Policy</b>	<b>Delivery Agency</b>	<b>Implementation</b>	<b>Indicator</b>	<b>Target</b>	<b>Contingency Planning</b>	<b>Data Source</b>
CP9: Open Space	<ul style="list-style-type: none"> <li>TBC</li> <li>SCC</li> <li>Developers/ Land Owners</li> </ul>	<ul style="list-style-type: none"> <li>Development Management Process</li> <li>Open Space Strategy</li> </ul>	The standard ha per 1000 population of publicly accessible open space	Maintaining the standard set out in the	Review quality, quantity, accessibility and level of use of open spaces as part of review of <b>Open Space strategy</b> .	In house monitoring
			Number of Parks achieving Green Flag status	All parks achieving Green Flag status	Work with partners to identify issues and opportunities to ensure parks qualify for Green Flag status	In house monitoring
CP10: Design of new development	<ul style="list-style-type: none"> <li>TBC</li> <li>SCC</li> <li>Developers/Land Owners</li> <li>Design Bodies</li> </ul>	<ul style="list-style-type: none"> <li>Development Management Process</li> <li>Design SPD</li> <li>Development Briefs</li> <li>Design and Access Statements</li> </ul>	Number of applications refused on design grounds	Decreasing trend	Increasing pre-application discussions and raising awareness of design issues	In house monitoring
CP11: Protecting the Historic Environment	<ul style="list-style-type: none"> <li>TBC</li> <li>SCC</li> <li>Developers/ Land Owners</li> <li>English Heritage</li> <li>Civic Society</li> <li>Amenity Bodies</li> </ul>	<ul style="list-style-type: none"> <li>Design SPD</li> <li>Development Management Process</li> <li>Conservation Management Plans</li> </ul>	Number of heritage assets at risk	Decrease in heritage assets at risk or no net increase in heritage assets.	If an increasing trend is shown over a 5 year period look at policy implementation relating to enabling development, CIL provisions and planning enforcement.	In house monitoring
			Number of planning applications resulting in a positive enhancement of a locally designated heritage asset	Relative increase in % year on year	If a decreasing trend is shown in a 5 year period then re-examine policy implementation including the possible use of article 4 directions.	Local list and in house monitoring
			Number of listed buildings re-used/brought back into use	Increasing trend	If no increase occurs work with landowners and look to promote Conservation Grant as an incentive.	In house monitoring review of Local List

CP12: Protecting and Enhancing Biodiversity	<ul style="list-style-type: none"> <li>TBC</li> <li>SCC</li> <li>Staffordshire Wildlife Trust</li> <li>Natural England</li> <li>Environment Agency</li> </ul>	<ul style="list-style-type: none"> <li>Green Infrastructure Strategy</li> <li>Development Management Process</li> </ul>	Change in areas of Biodiversity importance	No net reduction in areas designated for their intrinsic environmental value	If reduction demonstrated by 2017 Improve partnership working with delivery bodies.	In house monitoring
<b>Policy</b>	<b>Delivery Agency</b>	<b>Implementation</b>	<b>Indicator</b>	<b>Target</b>	<b>Contingency Planning</b>	<b>Data Source</b>
CP13: Delivering Sustainable Transport	<ul style="list-style-type: none"> <li>TBC</li> <li>SCC</li> <li>Highways Agency</li> <li>Transport</li> <li>Providers</li> <li>SCC</li> </ul>	<ul style="list-style-type: none"> <li>Staffordshire LTP</li> <li>Development Management Process</li> <li>S106/CIL</li> <li>Design SPD</li> </ul>	Travel Plans secured for major development	Increase in number of Travel Plans	Increasing pre-application discussions raising awareness of sustainable transport issues	In house monitoring Staffordshire County Council sourced data
CP14: Community facilities	<ul style="list-style-type: none"> <li>TBC</li> <li>SCC</li> <li>Emergency Services</li> <li>Third Sector</li> <li>Developers/Land Owners</li> </ul>	<ul style="list-style-type: none"> <li>Development Management Process</li> <li>S106/CIL</li> <li>County funding streams</li> </ul>	Provision and improvements of local facilities	Increase in the provision of local facilities	Improve partnership working with delivery bodies	In house monitoring
CP15 Sustainable Development and Climate Change Mitigation	<ul style="list-style-type: none"> <li>TBC</li> <li>Developers/Land Owners</li> </ul>	<ul style="list-style-type: none"> <li>Development Management Process</li> </ul>	development incorporating renewable energy generation		re examine policy implementation	
			% of residential development being conditioned to provide 10% onsite renewable energy generation	Increasing trend	If trend does not increase re examine policy implementation	In house monitoring
			Amount of off-site contribution secured	Increasing trend	Reduce threshold for off-site contribution	In house monitoring
			% of new development assessed as carbon zero	Increasing trend	If trend does not increase re examine policy implementation	In house monitoring
CP16: Water Management	<ul style="list-style-type: none"> <li>TBC</li> <li>EA</li> <li>SCC</li> <li>Seven Trent</li> <li>South Staffordshire Water</li> <li>Developers</li> </ul>	<ul style="list-style-type: none"> <li>SFRA</li> <li>Development Management Process</li> <li>Design SPD</li> </ul>	% of new developments incorporating SUDs	Increasing trend	If trend does not increase consider reviewing Design SPD to incorporate further guidance.	In house monitoring
			No of Planning Applications granted permission contrary to EA's Advice on flood defence grounds.	zero	If more than 3 PA re-assess EA's Role in Pre application stage.	In house monitoring



			Ecological status of River Tame, Anker & Bournebrook	Increase the rivers' ecological status to 'good' by 2015	Work with Environment Agency and Severn Trent Water to identify appropriate mitigation and promote the use of SuDS within development.	Environment Agency data
<b>Policy</b>	<b>Delivery Agency</b>	<b>Implementation</b>	<b>Indicator</b>	<b>Target</b>	<b>Contingency Planning</b>	<b>Data Source</b>
CP17: Infrastructure and Developer Contributions	<ul style="list-style-type: none"> <li>• SCC</li> <li>• Developers/Land Owners</li> <li>• Highways Agency</li> <li>• Transport Operators</li> <li>• RSL's</li> <li>• Enterprise Partnerships</li> </ul>	<ul style="list-style-type: none"> <li>• S106/CIL</li> <li>• Town Centre SPD</li> <li>• Development Management Process</li> </ul>	Timely delivery of infrastructure required to support the delivery of development	Development completed in a timely manner	If contributions are not being achieved review S106 / CIL	In house monitoring Staffordshire County Council data

## **APPENDIX G – Travel Plans**

### **Aims and Objectives of a Travel Plan**

A Travel Plan is a strategy to minimise the number of single car occupancy motor vehicles visiting a development, thereby reducing congestion and mitigating the impact of travel on the environment. A main objective is therefore to achieve a modal change from the car to more sustainable forms of transport. A Travel Plan should deliver sustainable transport objectives which seek to:

- a) Manage the demand for travel to a site
- b) Improve the availability and choice of travel mode to a site
- c) Reduce the need to travel (to and from the site)
- d) Reduce the number of vehicles attending the site, particularly single occupancy vehicles
- e) Reduce the costs associated with on-site parking provision and congestion
- f) Provide the absolute minimum possible car parking spaces on site
- g) Improve the safety and security of people who travel to the site
- h) Promote the increased use of cycling, walking and public transport and therefore healthier living
- i) Promote integration between different transport modes
- j) Promote co-ordination between developments on larger sites
- k) Make positive changes to attitudes in relation to the use of alternative transport modes
- l) Provide clear information to employees, customers and visitors on the alternative modes of transport to and from the site
- m) Improve accessibility for non-car users and the disabled
- n) Promote the development of a transport system which enhances the environment and supports a sustainable economy

### **Which Developments require a Travel Plan?**

The indicative thresholds contained within Appendix B of the Guidance on Transport Assessment (GTA) published March 2007 by the DfT and DCLG will largely be used to determine whether and what type of Travel Plan will be required. (See table overleaf).

Developments falling into column headed Travel Plan Threshold will require a Travel Plan to be submitted with the applications alongside the TA. The Travel Plan will be secured by a Section 106 Agreement.

Those developments falling in column headed Minimalist Travel Plan are likely to require a Minimalist Travel Plan secured by Grampian Condition.

### **Types of Travel Plan**

The form of the Travel Plan will largely be determined by the type of development, its location and accessibility to sustainable modes of travel. Indeed, the outcome of the TA will also affect the measures and outcomes to be achieved. Much also depends on the end user and whether these are known or not. Generally, Travel Plans fall into the following categories:

#### **Minimalist Travel Plans**

These are used for small-scale developments where the end user is known and where the transport implications are not substantial but nevertheless important to control. The emphasis for Minimalist Plans is on encouraging and promoting travel by sustainable modes for a period of about 5 years. Minimalist Plans are usually

secured by way of a Grampian planning condition. They will generally not involve modal split targets or remedies.

### Travel Plan Framework

These are used where Outline Planning consent is being sought and where the end-users are unknown. They provide a framework for individual Travel Plans.

### Measures and Outcomes Travel Plan

These involve more of a commitment to a travel plan and contain a range of measures or actions to be provided within an agreed timetable. In order to provide more comfort that the modal split/shift targets within the Travel Plan would be achieved the Travel Plan needs to include remedies if the targets are not met. Where Travel Plans include modal split/shift targets and/or outcome targets with remedies and there is a high degree of confidence that this will succeed in reducing car usage then it is reasonable to make an allowance for this in the trip rate used in the TA.

Physical or hard measures can be secured by way of a Grampian condition that will require a separate legal agreement with the County Council. Other measures within the Travel Plan can include; car parking management; the phasing of works or; the establishment of a Travel Plan Coordinator.

Survey and monitoring arrangements including monitoring fees are better dealt with by way of a S106 Obligation. These TPs are most effective where reviews/monitoring is linked with agreed targets/outcomes and where failure to meet these is to be remedied. Remedies are also controlled by a S106 Obligation relating to further specified measures or actions that may prove to be more effective.

### Residential Travel Plan

These focus on journeys originating from home to multiple and changing destinations. They should include targets based on trip rates with remedial measures.

Land use	Use/description	Travel Plan Threshold	Minimalist Travel Plan Threshold
Food retail (A1)	Retail sale of food goods to the public - food superstores, supermarkets, convenience food stores	>800 sq m.	>250 <800 sq m.
Non-food retail (A1)	Retail sale of non-food goods to the public; but includes sandwich bars-sandwiches or other cold food purchased and consumed off the premises, internet cafes	>1000 sq m.	>500 < 1000 sq m.

Financial and professional services (A2)	Financial services - banks, building societies and professional services, estate agents and employment services, betting offices, where services are provided to visiting members of the public	>2500 sq m.	>1000 <2500 sq m.
Restaurants and cafes (A3)	Restaurants and cafes - use for the sale of food for consumption on the premises	>2500 sq m.	>300 <2500 sq m.
Drinking Establishments (A4)	Use as a public house, wine bar or other drinking establishment	>600 sq m.	>300 <600 sq m.
Hot food takeaway (A5)	Use for the consumption on or off the premises	>500 sq m.	>250 <500 sq m.
Business (B1)	Offices other than in use class A2 (financial and professional), research and development, laboratories, studios and light industry	>2500 sq m.	>1500 > 2500 sq m.
General Industry (B2)	General Industry	>4000 sq m.	>2500 <4000 sq m.
Storage and Distribution (B8)	Storage and distribution centres, wholesale warehouses, distribution centres and repositories	>5000 sq m.	>3000 <5000 sq m.
Hotels (C1)	Hotels, boarding houses and guest houses	>100 bedrooms	>75 <100 bedrooms
Residential Institutions - hospitals, nursing homes(C2)	Used for the provision of residential accommodation and care to people in need of care	>50 beds	>30 <50 beds

Residential Institutions - residential education (C2)	Boarding schools and training centres	>150 students	>50 <150 students
Residential Institutions - hostels (C2)	Homeless shelters, accommodation for people with learning difficulties and people on probation	>400 residents	>250 <400 residents
Dwelling houses (C3)	Dwellings for individuals, families or not more than six people living together as a single household. Not more than six people living together includes students or young people sharing a dwelling and small group of homes for disabled or handicapped people living together in the community	>80 units	>50 <80 units
Non residential institutions (D1)	Medical and health services (Clinics, health centres, creches, day nurseries, day centres and consulting rooms), museums, public libraries, art galleries, exhibition halls, non-residential education and training, places of worship, religious instruction and church halls	>1000 sq m.	>500 <1000 sq m.

Assembly and leisure (D2)	Cinemas, dance and concert halls, sport halls, swimming baths, skating rinks, gymnasiums, bingo halls and casinos. Other indoor and sports and leisure uses.	>1500 sq m.	>500 <1500 sq m.
Stadia		>1500 seats	>500 <1500 seats

## APPENDIX H: Schedule of Designations

Schedule of Designations as identified in Tamworth Local Plan Policies Map and Town Centre Insert.

<b>Designation Type and Number</b>	<b>Designation Name</b>
<b>Site of Special Scientific Interest (SSSI)</b>	Alvecote Pools
<b>Site of County Biological Importance (SBI)</b>	Tamworth Golf Course (portion of)
SBI 2	Brindley Drive
SBI 3	Dosthill Quarries
SBI 4	Broad Meadow
SBI 5	Warwickshire Moor
SBI 6	Bolebridge (South of)
SBI 7	Fazeley
SBI 8	Tameside Nature Reserve
SBI 9	Beauchamp Industrial Park <sup>1</sup>
SBI 10	Dosthill Park
SBI 11	Amington Hall Fishponds
SBI 12	The Decoy
SBI 13	Hockley Clay Pit (West of)
SBI 14	Hodge Lane
SBI 15	Stonydelph Wet Woodland
SBI 16	Hockley (West of)
<b>Local Nature Reserve (LNR)</b>	Hodge Lane
LNR 2	Kettlebrook Park and Lakes
LNR 3	Tameside Nature Reserve
LNR 4	Dosthill Park
LNR 5	Warwickshire Moor
<b>Biodiversity Alert Site (BAS)</b>	Stotfold Barn Road
BAS 2	River Anker (Part of)
BAS 3	Kettlebrook
BAS 4	Hodge Lane LNR (East)
BAS 5	Dosthill Quarry Grassland
BAS 6	Coton House Farm (South of)
BAS 7	Dosthill Church Quarry
<b>Scheduled Ancient Monument (SAM)</b>	Saxon Defences
SAM 2	Medieval Deanery (Lower Gungate)
SAM 3	Saxon Defences
SAM 4	Tamworth Castle
<b>Conservation Area (CA)</b>	Town Centre Conservation Area
CA 2	Hospital Street Conservation Area
CA 3	Victoria Road/Albert Road Conservation Area
CA 4	Dosthill Conservation Area
CA 5	Amington Hall Conservation Area
CA 6	Wilnecote Conservation Area
CA 7	Amington Green Conservation Area

## APPENDIX I – Glossary

**Disclaimer:** The Glossary is neither a statement of law nor an interpretation of the law, and its status is only an introductory guide to planning terminology and should not be used as a source for statutory definitions.

<b>Accessibility</b>	The ability of everyone to conveniently go where they want.
<b>Affordable housing</b>	<p>Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.</p> <p>Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency.</p> <p>Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).</p> <p>Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.</p> <p>Homes that do not meet the above definition of affordable housing, such as “low cost market” housing, may not be considered as affordable housing for planning purposes.</p>
<b>Annual Monitoring Report (AMR)</b>	Sets out the Council's progress in terms of producing the Local Development Documents and in implementing policies. The monitoring period is from April to March.
<b>Biodiversity</b>	The whole variety of life encompassing all genetics, species and ecosystems, including plants and animals.
<b>CABE</b>	Commission for Architecture and the Built Environment. CABE is the government's advisor on architecture, urban design and public space.
<b>Capacity (Retailing term) Clusters</b>	Money available within the catchment area with which to support existing and additional floor space. Networks of specialised, creative, industrial or hi-tech businesses concentrated within a particular location whose co-location may enhance their competitive advantage.



<b>The Community Infrastructure Levy (CIL)</b>	This is a new levy that local authorities can choose to charge on new developments in their area. The money can be used to support development by funding infrastructure that the council, local community and neighbourhoods want.
<b>Comparison Goods</b>	The provision of items not obtained on a frequent basis. These include clothing, footwear, household and recreational goods
<b>Conformity</b>	In agreement with, accords and with the principles of something.
<b>Conservation Area</b>	Area of special architectural or historic interest, the character, appearance or setting of which it is desirable to preserve or enhance.
<b>Convenience Goods</b>	The provision of everyday essential items, including food, drinks, newspapers/ magazines and confectionary.
<b>Local Plan</b>	A Development Plan Document setting out the spatial vision and objectives of the planning framework for an area, linking into the community strategy.
<b>Density</b>	In the case of housing development, a measurement of either the number of habitable rooms per hectare or the number of dwellings per hectare.
<b>Development Plan Documents (DPDs)</b>	DPDs are local development documents that have Development Plan Document Status. Once they are adopted, development control decisions must be made in accordance with them unless material considerations indicate otherwise. The DPDs that planning authorities indicated must prepare include the Local Plan, site specific allocations of land and, where needed, action area plans.
<b>Designated sites</b>	Sites of conservation or landscape importance which will be protected from adverse impact of development. There are three main tiers of designated conservation sites, international, national and regional.
<b>Dwelling</b>	A self-contained building or part of a building used as a residential accommodation, and usually housing a single household. A dwelling may be a house, bungalow, flat, maisonette or residentially converted farm building.
<b>Employment uses</b>	Includes any uses or development that creates jobs
<b>Environment Agency</b>	This is a Public Body that is responsible for protecting and improving the environment of England and Wales, and for protecting communities from the risk of flooding and managing water resources. They are consulted throughout the plan making and decision making process in order to promote sustainable development.
<b>Existing Employment Areas</b>	These are the EMP areas shown in the proposal map for the Council's Local Plan.
<b>Evidence Base</b>	The information and data gathered by local authorities to justify the "soundness" of the policy approach set out in Local Development Documents, including physical, economic, and social characteristics of an area. It consists of consultation responses and the finding of technical studies.
<b>Flood Plain</b>	Generally flat lying areas adjacent to a watercourse, tidal lengths of a river or the sea where the water flows in times of flood or would flow but for the presence of flood defences.
<b>Greenbelt (Not to</b>	A designation for land around certain cities and large built up

be confused with the term greenfield)	areas, which aims to keep this land permanently open or largely undeveloped.
<b>Greenfield Land</b>	Land which has never been built on before or where the remains of any structure or activity have blended into the landscape over time
<b>Green corridor/wildlife corridor</b>	Green corridors can link housing areas with the national cycle network, town and city centres, places of employment and community facilities. They can help promote environmentally sustainable forms of transport such as walking and cycling within urban areas and can also act as vital linkages for wildlife dispersal between wetlands and countryside.
<b>Green Infrastructure</b>	A strategically planned and delivered network of high quality green spaces and other environmental features. It is designed and managed as a multifunctional resource capable of delivering a wide range of environmental and quality of life benefits for local communities. Green Infrastructure includes parks, open spaces, playing fields, woodlands, allotments and private gardens.
<b>Gypsy and Traveller Accommodation Assessment(GTAA)</b>	The Housing Act 2004 requires local authorities to undertake an assessment of the accommodation needs of gypsies and travellers. This assessment is used to inform the amount of land that should be identified by the planning system to meet the needs of gypsies and travellers.
<b>Indices of Multiple Deprivation</b>	This measures the level of deprivation within a specific geographic area (i.e. council wards). It assesses the level of deprivation from a whole range of sources such as income employment; health and disability; education; skills and training; housing and services; living environment and crime. It can useful for identifying areas in need of regeneration.
<b>Infill development</b>	Building on a relatively small site between existing buildings.
<b>Infrastructure Delivery Plan (IDP)</b>	The IDP identifies the necessary social, physical and green infrastructure required to support the new development proposed in the Local Plan for Tamworth up to 2028.
<b>Listed building</b>	A building of special architectural or historic interest, graded I (highest quality) II* or II.
<b>Local Centre</b>	Includes a range of small shops and perhaps limited services of a local nature, serving a small catchment. Sometimes also referred to as a local neighbourhood centre.
<b>Local Development Documents</b>	These include Development Plan Documents, which will form part of the statutory development plan and Supplementary Planning Documents, which do not form part of the statutory development plan. Local Development Documents together deliver the spatial planning strategy for the local planning authority's area and they may be prepared jointly between local planning authorities.
<b>Local Development Framework</b>	A non statutory term used to describe a folder of documents, which includes all the local planning authority's local development documents. The Local Development Framework will also comprise the statement of community involvement, the local development scheme and the annual

	monitoring report.
<b>Local Plan</b>	<p>The plan for the future development of the local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004.</p> <p>Current core strategies or other planning policies, which under the regulations would be considered to be development plan documents, form part of the Local Plan. The term includes old policies which have been saved under the 2004 Act.</p>
<b>Local Transport Plan</b>	A five year integrated transport strategy, prepared by local authorities in partnership with the community, seeking funding to help provide local transport projects. The plan sets out the resources predicted for delivery of the targets identified in the strategy. Local Transport Plans should be consistent with the policies and priorities set out in the Regional Transport Strategy.
<b>Masterplan</b>	A type of planning brief outlining the preferred usage of land and buildings, as a framework for planning applications.
<b>Mineral Safeguarding Area</b>	An area designated by Minerals Planning Authorities which covers known deposits of minerals which are desired to be kept safeguarded from unnecessary sterilisation by non-mineral development.
<b>Mixed use</b>	Provision of a mix of complementary uses, such as residential, community and leisure uses, on a site or within a particular area.
<b>Modal Split</b>	The number of journeys being made by each different transport type.
<b>National Planning Policy Framework (NPPF)</b>	<p>The NPPF sets out the Government's planning policies for achieving sustainable development, in terms of encouraging economic prosperity, social progress (i.e. increasing the delivery of homes and its supporting infrastructure such as schools, hospitals, roads, etc) and protecting the historic/natural environment (i.e. sites of biodiversity importance and conservation areas).</p> <p>The NPPF will guide the formulation of the Local Plan, which will contain policies that are generally consistent with the guidelines in the NPPF. In addition to this, the NPPF will also be a material consideration in planning decisions.</p>
<b>Open space</b>	All space is of public value, including not just land, but also areas of water, such as rivers, canals, lakes and reservoirs, which can offer opportunities for sport and recreation. They can also act as a haven for wildlife and are usually attractive.

<b>Plan, Monitor and Manage</b>	Approach to housing provision involving planning for an overall annual rate and distribution of housing, monitoring provision against targets and indicators and managing the process.
<b>Planning application</b>	A form plus plans submitted to the Council when development is proposed.
<b>Planning condition</b>	A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order.
<b>Planning obligation</b>	A legally enforceable obligation entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal.
<b>Previously Developed Land</b>	Previously developed land is that which is or was occupied by a permanent structure including the curtilage of the developed land and any associated fixed infrastructure. This excludes: land that has been or is occupied for forestry/agricultural buildings; private residential gardens; allotments; parks and recreational grounds.
<b>Primary and secondary frontages</b>	Primary frontages are likely to include a high proportion of retail uses. Secondary frontages provide greater opportunities for a diversity of uses.
<b>Primary shopping area</b>	Defined area where retail development is concentrated (generally comprising the primary and those secondary frontages which are contiguous and closely related to the primary shopping frontage).
<b>Regional Spatial Strategy</b>	<p>The Regional Spatial Strategy (RSS) sets out how a region should look in 15-20 years time and possibly longer. It identifies the scale and location of new housing in the region, shows areas for regeneration, growth and identifies smaller sub regions, specifies priorities for the environment, transport, infrastructure, economic development, agriculture, minerals and waste treatment and disposal.</p> <p>The Government is intending to abolish the RSS through the Localism Act . They are currently assessing the environmental impacts of this and are in the final stages of revoking it.</p>
<b>Renewable and low carbon energy</b>	Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).
<b>Retail Floorspace</b>	Total area of the property associated with all retail uses, usually measured in square metres
<b>Sequential approach</b>	A planning principle that seeks to identify, allocate or develop certain types of land before consideration of others. For example, brownfield housing sites before greenfield

	sites or town centre retail sites before out of centre sites.
<b>Sequential Test (Development)</b>	<p>A planning principle that encourages new development to take place in the most sustainable locations in terms of accessibility and reducing the need to travel by private car. Therefore, potential proposals are assessed (or sites are allocated), in accordance with the following preferences:</p> <ol style="list-style-type: none"> <li>1. locations in appropriate existing centres where sites or buildings for conversion are, or are likely to become, available within the plan period</li> <li>2. edge-of-centre locations, with preference given to sites that are or will be well connected to the centre</li> <li>3. out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are closest to the centre and have a higher likelihood of forming links with the centre.</li> </ol>
<b>Sequential Test (Flood Risk):-</b>	<p>In areas at risk of flooding, applicants are required to undertake a sequential test (as part of their Flood Risk Assessment), to demonstrate that a potential proposal is being situated on a site that has a low risk of flooding. Applications in areas at risk of flooding are assessed in accordance with the following preferences:</p> <p>Flood Zone 1: An area with low risk of flooding. This zone comprises land assessed as having a less than 1 in 1000 annual probability of river or sea flooding.</p> <p>Flood Zone 2: An area with a low to medium risk of flooding. This zone comprises land assessed as having between a 1 in 100 and 1 in 1000 annual probability of river flooding or between a 1 in 200 and 1 in 1000 annual probability of sea flooding.</p> <p>Flood Zone 3a: An area with a high probability of flooding. This zone comprises land assessed as having a 1 in 100 or greater annual probability of river flooding or a 1 in 200 or greater annual probability of flooding from the sea.</p> <p>Flood Zone 3b: This is an area within a functional floodplain. This zone comprises land where water has to flow or be stored in times of flood.</p>
<b>Site of Special Scientific Interest</b>	A site identified under the Wildlife and Countryside Act 1981 as an area of special interest by reason of any of its flora, fauna, geological or physiographical features (basically, plants, animals and natural features relating to the Earth's structure).
<b>Spatial Vision</b>	A brief description of how the area will be changed at the end of the plan period (10-15 years)
<b>Special Areas of Conservation</b>	Areas given special protection under the European Union's Habitats Directive, which is transposed into UK law by the Habitats and Conservation of Species Regulations 2010.
<b>Staffordshire Local Transport Plan</b>	The Transport Act 2000 requires all Highway Authorities to produce a five-year Local Transport Plan (LTP) which sets out a strategy and action plan for improving local transport.

	Staffordshire's second LTP ('LTP2') covering the period 2006/07 - 2010/11 was submitted to the Department for Transport on the 31st March 2006
<b>Strategic Housing Land Availability Assessment (SHLAA)</b>	A key component of the evidence base to support the delivery of sufficient land for housing to meet the community's need for more homes. These assessments are required by national planning policy, set out in the National Planning Policy Framework.
<b>Strategic Flood Risk Assessment (SFRA):</b>	Assessment of all forms of flood risk from groundwater, surface water, impounded water bodies, sewer, river and tidal sources, taking into account future climate change predictions. This allows Councils to use this information to locate future development primarily in low flood risk areas (Level 1 SFRA).
<b>Strategic Housing Market Assessment (SHMA)</b>	A technical study which assesses housing need and demand across a defined market area and which is used to inform housing and planning policies.
<b>Strategic Planning</b>	Wider ranging and longer term planning which establishes broad goals, strategies, principles and objectives for the wider region.
<b>Supplementary Planning Document (SPD)</b>	An SPD is a Local Development Document that may include a range of issues, thematic or site specific, and provides further detail of policies and proposals in a 'parent' Development Plan Document. They are capable of being a material consideration in planning decisions but are not part of the development plan.
<b>Sustainability Appraisal (SA)</b>	This examines the impacts of the Local Plan strategies/policies against a large number of economic, social and environmental sustainability objectives. It also provides an indication of what measures may need to be taken to minimise/eliminate any adverse impacts and promote sustainable development. The Planning Compulsory Purchase Act requires an SA to be undertaken for all Development Plan Documents throughout the plan making process.
<b>Sustainable Communities</b>	Places where people want to live and work, now and in the future.
<b>Sustainable Community Strategy</b>	This sets the overall strategic direction and long-term vision for the economic, social and environmental wellbeing of a local area – typically 10 to 20 years – in a way that contributes to sustainable development in the UK. It is prepared by a Local Strategic Partnerships which is made up of public, private and voluntary sector organisations. It identifies the key long term priorities for the area (i.e. Affordable housing, creating employment, tackling causes of social deprivations, etc) and how the LSP could work together to address these.
<b>Sustainable development</b>	A wider used definition drawn upon by the World Commission on Environment and Development in 1987 "development that meets the needs of the present without compromising the ability of future generations to meet their own needs"

<b>Sustainable Drainage Systems (SUDS)</b>	These systems endeavour to mimic the natural movement of water from a development, reducing flood risk, improving water quality and often providing attractive features that can make towns and cities more desirable places to live in and enhancing the quality of life.
<b>Transport Assessment</b>	A comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport and what measures will need to be taken to deal with the anticipated transport impacts of the development.
<b>Travel Plan</b>	A long-term management strategy for an organisation or site that seeks to deliver sustainable transport objectives through action and is articulated in a document that is regularly reviewed.
<b>Town centre uses</b>	According to the national Planning guidelines, the main town centre uses are: 1. retail development (including warehouse clubs and factory outlet centres) 2. leisure, entertainment facilities, and the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls) 3. offices, and 4. arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).
<b>USE Classes Order</b>	The Town and Country Planning (Use Classes) Order 1987 (as amended) puts uses of land and buildings into various categories known as 'Use Classes'.  The following list gives an indication of some of the types of uses which may fall within each use class.
<b>A1 Shops</b>	Town and Country Planning (Use Classes) Order 1987 (as amended) includes shops, retail warehouses, hairdressers, undertakers, travel and ticket agencies, post offices (but not sorting offices), pet shops, sandwich bars, showrooms, domestic hire shops, dry cleaners, funeral directors and internet cafés.
<b>B1 Employment Use</b>	Offices, research and development, light industry (in the Town and Country Planning Use Classes Order 1987 and its subsequent amendments).
<b>B2 Employment Use</b>	General Industrial (in the Town and Country Planning Use Classes Order 1987 and its subsequent amendments).
<b>B8 Employment Use</b>	Storage and distribution (in the Town and Country Planning Use Classes Order 1987 and its subsequent amendments).
<b>Non B Employment Uses</b>	A use commonly defined as including retail, tourism, leisure education, and health as set out by the Town and Country Planning Use Classes Order 1987 and its subsequent

	amendments.
<b>Vitality</b>	In terms of shopping, a centre that is capable of success or continuing effectiveness.
<b>Viability</b>	In terms of shopping, the capacity of a centre to grow or develop.
<b>Windfall Site</b>	A site not specifically allocated for development in a development plan, but which unexpectedly becomes available for development during the lifetime of the a plan. Most 'windfalls' are referred to in a housing context.





**Tamworth Borough Council  
Draft Local Plan 2006-2031  
Habitat Regulations Assessment**

**March 2014**

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## **1.0 Introduction and background**

### **Habitats Regulations Assessments of Local Development Plans**

- 1.2 A Habitats Regulations Assessment (HRA) is required under the UK Habitats Regulations in order to analyse the Local Plan and attempt to ascertain any potentially significant effects on internationally recognised sites of nature conservation interest (also known as 'Natura 2000' or European sites). These sites include Special Protection Areas (SPAs), designated under the Birds Directive<sup>2</sup>, Special Areas of Conservation (SACs), candidate SACs designated under the Habitats Directive<sup>3</sup> and wetland sites designated under the Ramsar Convention.

### **Tamworth Local Plan**

- 1.3 Tamworth Borough Council is preparing a new development plan for the borough, the Tamworth Local Plan 2006-2031. This will replace the current local plan 2001-2011 and once it is adopted, planning applications will be determined in accordance with its policies unless other material considerations, such as the National Planning Policy Framework, indicate otherwise.
- 1.4 The Tamworth Local Plan was submitted to the Planning Inspectorate for examination in November 2012. The Inspector raised a number of concerns relating to the soundness of the Plan and an exploratory meeting was held in February 2013 to discuss the work required to overcome the concerns. The Plan was subsequently withdrawn in March 2013.
- 1.5 Since the withdrawal of the Local Plan the work set out in the exploratory meeting has been completed and parts of the evidence base updated and refreshed where necessary to inform the draft Local Plan 2014. The Plan has been amended to extend the plan period to 2031 and the housing and employment land supply adjusted to take account of completions and commitments to 2013. New allocations have been made to accommodate 4250 dwellings and 18 hectares of employment land within the borough boundary.

### **Scope of the 2011/2012 Joint HRA**

- 1.6 Tamworth Borough Council and Lichfield District Council prepared a joint HRA in 2011 and updated it in 2012 for the Lichfield Draft Local Plan Strategy and Pre-submission Tamworth Local Plan. This assessed the impacts of relevant land use plans against the conservation objectives of European sites. The following European sites were identified using a 20km search around Tamworth Borough:

- Cannock Chase SAC – 20km+ from Tamworth Borough
- River Mease SAC – 1km from Tamworth Borough
- Ensor's Pool SAC – 15km from Tamworth Borough

- 1.7 The assessment determined whether the plans would adversely affect the integrity of the sites in terms of nature conservation objectives. Where negative effects were identified other options were examined to avoid any potential damaging effects. Appendix A sets out the special characteristics of the two SACs and the identified impacts of development (this is the same table as in the 2011 and 2012 HRAs).
- 1.8 The 2011/2012 assessments undertook screening of the European sites and concluded that the most likely effects were related to additional households and how these may increase traffic within close proximity to the sites or result in additional recreational pressure, causing an increase in air pollution, habitat disturbance, species disturbance and nutrient enrichment. However, for most of the sites the Tamworth Local Plan would result in no significant effects and no in-combination effects on the European sites identified.
- 1.9 The Cannock Chase SAC is more than 20km from the borough boundary but because it is influenced by visitors from a wide area it was considered that development in Tamworth could have an impact by adding to visitor pressures and air pollution from increased traffic. A specific scoping and screening report identified that there would be significant effects on the SAC. The next stage of separate appropriate assessment was therefore undertaken. It was concluded that the impact of pressures can be mitigated with appropriate levels of financial support. The withdrawn Local Plan included appropriate wording to Policy CP12 to mitigate against any adverse effects, which included a presumption against development that would have a direct or indirect adverse effect on the integrity of the SAC. Larger developments over 100 dwellings were required to provide Suitable Alternative Natural Green Spaces (SANGS) and financial contributions towards management, access and education.
- 1.10 The River Mease SAC is located in Lichfield District in close proximity to the Tamworth borough boundary. It is sensitive to localised agricultural run off, sedimentation and invasive species and is particularly vulnerable to pollution from development upstream through outflows from sewage treatment works which are already at capacity. The conclusion was that the impacts on the River Mease SAC arising from the Tamworth Local Plan would not be significant, however, that was based on the information known at the time and did not preclude further assessment work when more information became known.
- 1.11 Ensor's Pool is located approximately 15km from the borough boundary. Screening concluded that development would have no significant impact and that significant in-combination effects are unlikely to arise from implementing the local plan and other plans and proposals.

#### **Comments on the 2012 HRA**

- 1.13 The Council consulted on the Tamworth Pre-submission Local Plan in June 2012, the HRA was subject to consultation at the same time. Natural

England responded specifically on the HRA and the impact of the Plan on the two European sites; Appendix B contains their response.

- 1.14 Natural England supported Policy CP12 in terms of the mitigation measures and the statement that development would not be permitted that would have an adverse impact on the Cannock Chase SAC. Natural England advised that while the zone of influence was likely to contract to 15km large developments within or close to the zone of influence should address the issue of increased road traffic, continue to offer SANGs and require developer contributions. Uncertainty over potential impacts on the River Mease SAC should prompt further HRA assessment at the detailed stage and clarification was sought on whether the Local Plan is likely to contribute to these uncertainties.
- 1.15 Natural England did not make any references to Ensor's Pool SAC.

#### **Purpose of the 2014 HRA**

- 1.16 A further HRA is required because aspects of the Tamworth Local Plan have changed from its previous iteration and it is uncertain whether the previous conclusions are still valid. It considers whether the current Local Plan strategy is likely to lead to adverse effects on the Cannock Chase and responds to the concerns raised by Natural England that the Council needs to be certain of the impact of the Plan on the River Mease SAC.

## **2.0 Methodology**

2.1 The methodology described in the Habitats Regulations Assessment for Tamworth Borough and Lichfield District is still the correct approach, with progression through each stage indicating whether the next stage is required. The four main stages involved in appropriate assessment are set out below, the outcome of each stage indicates whether the next stage is required.

- Screening: Determining whether the plan (alone or in combination with other plans) is likely to have a significant effect on a European site
- Scoping: Preparation for the appropriate assessment (this stage aims to identify more precisely what impacts the appropriate assessment should cover to ensure that the appropriate assessment can be carried out. This stage is only required where the scoping exercise has indicated that there is a likely significant impact upon a European site.
- Appropriate assessment: Evaluating the evidence gathered on impacts and considering whether changes to the plan will be needed to ensure that it will not have an adverse impact on any European site.
- Assessment of alternative options: Where the plan is assessed as having an adverse effect, or risk of this, then alternative options should be assessed.
- Assessment of compensatory measures, where in light of an assessment of imperative reasons of overriding public interest, it is deemed that a plan should proceed.

2.2 The 2011/2012 assessment was primarily concerned with the first screening stage and involved gathering evidence and screening for likely impacts.

2.3 Screening was undertaken on both the Cannock Chase SAC and River Mease SAC. This concluded that the Tamworth Pre-submission Local Plan, in combination with other plans, could have significant effects on the Cannock Chase SAC. The appropriate assessment and Visitor Mitigation Report prepared by Footpath Ecology informed the re-drafting of Policy CP12 to include appropriate mitigation, including financial contributions towards management and education and the provision of Suitable Alternative Natural Green Space (SANGS).

2.4 With regard to the River Mease SAC the screening concluded that there would be no likely significant effects and for this reason, no further work was done beyond the screening report.

2.5 The 2014 assessment will consider the most up to date plans for Tamworth, Lichfield and North Warwickshire. It will also respond to comments from Natural England on the Pre- Submission consultation and more recent advice.



### 3.0 Consideration of Plans

#### Description of Tamworth Draft Local Plan 2006-2031

- 3.1 The Tamworth Draft Local Plan sets out the principles and policy direction for planning and development in the borough for the period 2006-2031. It is part of a portfolio of documents that together will form the local development framework for Tamworth. It covers a range of topic areas including housing, employment, retail, service centres, built heritage, green infrastructure, biodiversity and leisure. Policies ensure that appropriate supporting infrastructure is delivered and the borough's built and natural environments are protected and enhanced.
- 3.2 Since the withdrawal of the Local Plan in 2013 the Council has updated needs assessments for town centre uses, employment and housing and investigated the capacity of the borough to accommodate development through a series of technical, sustainability and availability assessments and also to reflect an extension of the plan period to 2031.
- 3.3 In respect of town centre uses/retail, there are no suitable sites within the existing town centre with the exception of the Gungate precinct redevelopment, which already has planning permission. The Plan does not therefore make any retail allocations. Employment sites with a capacity 18 hectares have been identified in Tamworth but it is likely that the remaining 14 hectares will have to be found outside the borough boundary.
- 3.4 The 2014 Draft Local Plan proposes a different strategy for growth to the withdrawn local plan and allocates additional strategic housing sites. A total of 25 sites have been allocated, 21 within the urban area and four greenfield strategic extensions at Anker Valley, Tamworth Golf Course, Coton Lane and Dunstall Lane. The Local Plan sets out to deliver at least 4,250 dwellings within the borough and a further 2,000 will have to be delivered outside of the borough, most likely in Lichfield and North Warwickshire. To date, both of these neighbouring authorities have planned to deliver 500 each, which leaves a shortfall of 1000. Further discussions will be required with Lichfield District Council and North Warwickshire Borough Council to determine the most sustainable and deliverable options.
- 3.5 The table below shows the difference in the assessed needs between the withdrawn and Draft Local Plan:

	<b>Withdrawn Local Plan</b>	<b>Draft Local Plan</b>
<b>Retail</b>	20,000m <sup>2</sup> comparison goods 1,600m <sup>2</sup> convenience goods	7,800 <sup>2</sup> comparison goods after 2021 2,900m <sup>2</sup> convenience goods after 2021
<b>Employment</b>	36ha employment land	32ha

	20,000m <sup>2</sup> office space	no specific office floor space requirement
<b>Housing</b>	5,500 dwellings	6,250 dwellings (4,250 to be allocated 2031)

- 3.6 The Draft Local Plan policies follow the same broad direction as previously and have been revised where necessary to reflect the updated needs assessments, updated and recently completed evidence and sustainability appraisal work. Appendix C reviews the policies in the Plan and comments on whether there are any likely effects on European sites as a result.

### **Consideration of in-combination test**

- 3.7 The Habitats Directive states that appropriate assessment of a plan should be undertaken if it would have a likely significant effect on a European site either individually or “in-combination”. It recognises that whilst a single plan on its own could result in likely or insignificant impacts, in combination with other plans in the same geographical area or linked in a relevant way, it could result in a significant cumulative effect. Such plans could include core strategies, local plans and their relevant development plan documents and local transport plans.
- 3.8 The following plans have been considered for likely in-combination effects.

### **Lichfield District Local Plan**

- 3.9 The Lichfield District Local Plan: Our Strategy sets out the vision, strategic priorities, spatial strategy, core policies and development management policies within Lichfield District. The Plan that was examined covered the period 2008 to 2028 and makes a number of strategic allocations; further land use allocations and more detailed area based policies will come forward in the future Lichfield District Local Plan: Allocations document. The HRA 2012 relates to the Our Strategy plan.
- 3.10 The examination into the Lichfield District Local Plan took place in June-July 2013. Following the hearing sessions the Council proposed a number of main modifications which relate to housing numbers, phasing, new strategic housing sites, the Cannock Chase SAC, extension to the plan period to 2029 and the need to work with other authorities in considering future housing need.
- 3.11 The main modifications were screened for likely significant effects on European sites. An addendum to the HRA was produced in January 2014 to accompany the Main Modifications consultation. The conclusion was that there are no likely significant effects that would result from any of the proposed main modifications. Minor modifications have also been proposed, and it was considered that none were likely to have any significant effects either directly or in combination.



## **North Warwickshire Core Strategy**

- 3.12 The Core Strategy contains a vision, strategic objectives and core policies for the Borough. It covers the period 2006-2028 and proposes delivery of 3650 dwellings over the plan period (which includes 500 to meet the needs of Tamworth Borough) and 70 hectares of employment land.
- 3.13 The hearing into the Core Strategy took place in January 2014. It was acknowledged that additional work will need to be undertaken in conjunction with Tamworth Borough Council and Lichfield District Council to identify sustainable and deliverable options to deliver Tamworth's unmet housing and employment needs.
- 3.14 The HRA screening of the North Warwickshire Core Strategy was undertaken in 2011. The River Mease and Cannock Chase SACs were two of a number of European sites considered as part of this exercise. As with Tamworth, development is most likely to take place in settlements that lie within the catchment of the River Anker not the River Mease and as such, no pathway should exist to impact water quality. Distance of likely development in North Warwickshire to the SAC was considered sufficiently remote to limit significant biological disturbance on habitats alone and in-combination with other plans. Impact on air quality from increased traffic in proximity to the SAC was considered to be minimal and was also screened out.
- 3.15 In relation to the Cannock Chase SAC it was considered that most recreation pressure would be generated from districts closer to the zone of influence of the SAC than North Warwickshire, which lies just outside the zone. Recreational effects alone or in combination with other plans or projects were therefore screened out. In-combination water quality effects were screened out and a contribution to increased traffic on roads was also deemed unlikely to be significant due to distance. Air pollution effects were screened out for this reason.
- 3.16 The conclusion was that although some policies in the Strategy had the potential to adversely impact European sites, more detailed consideration showed that significant effects are unlikely.
- 3.17 No other plans have been considered because they have not been reviewed or updated since 2012.

## **4.0 Consideration of recent advice**

### **River Mease SAC**

- 4.1 Natural England responded to the Tamworth Pre-submission Local Plan in July 2012 (please refer to Appendix B). Recent correspondence from Natural England in January 2014 advised the Council to satisfy itself that development proposed in the Borough would be unlikely to lead to likely significant effects on the River Mease SAC. An important factor to consider is whether development proposed in the Local Plan will discharge to sewage treatment works within the River Mease catchment as this could lead to phosphate levels exceeding limits. The email from Natural England is contained in Appendix B.
- 4.2 The Southern Staffordshire Water Cycle Study identified issues relating to the wastewater treatment works where the Mease is the receiving watercourse. However, the Mease is not the receiving watercourse for the Tamworth Wastewater Treatment Works, which discharges into the Tame. The River Tame then flows north to join the Trent about 500 metres upstream of where the Mease joins the Trent. Severn Trent Water in 2014 confirmed that the area within the Tamworth borough boundary does not interact with the River Mease. The advice concluded that any development within the borough will not affect the River Mease. The email from Severn Trent is contained in Appendix B.
- 4.3 Housing development within Lichfield District that is provided to meet Tamworth's needs may discharge into the River Mease, however, Policy NR8 of the Lichfield District Local Plan: Our Strategy mitigates negative impacts on the SAC. The HRA of the North Warwickshire Core Strategy concluded that development would discharge into the Anker rather than the River Mease catchment and therefore have no impact on the SAC.

### **Cannock Chase SAC**

- 4.4 The email from Natural England in January 2014 advised that the zone of influence has been reduced from 20km to 15km. Development proposed in the Tamworth Draft Local Plan will be outside the zone of influence for Cannock Chase SAC, therefore mitigation for recreational pressure will not be required and SANGS will no longer be necessary.

## **5.0 Conclusions and next steps**

- 5.1 Tamworth lies within the zone of influence for the River Mease SAC, however, recent advice from Severn Trent Water confirmed that no sewage and waste water from development in Tamworth currently or in the future would feed into the River Mease catchment. It is therefore very unlikely that development in Tamworth would lead to significant effects on the character of the SAC.
- 5.2 Tamworth was already outside the zone of influence for the Cannock Chase SAC prior to the re-drawing of the zone and now that it has contracted to 15km, it is further removed from the SAC and less likely to lead to recreational or traffic pressure or pollution.
- 5.3 The initial screening of policies which is set out in Appendix C concludes that it is unlikely that development in Tamworth would lead to significant effects on either of the SACs through impacts on their special characteristics. It is therefore recommended that the Local Plan removes references to both the River Mease SAC and Cannock Chase SAC.
- 5.4 Following the consultation on the Draft Local Plan the Council intends to produce a pre-submission publication Local Plan in summer 2014 for a further 6 week consultation, prior to submission to the Planning Inspectorate for examination.

## Appendix A Table of Natura 2000 sites potentially affected by the Tamworth Local Plan

Name of Site	Reason for Designation	Conservation Objectives	Approx Distance from Tamworth Borough boundary (to the nearest 100m)	Identified impacts
River Mease SAC	<p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site</p> <ul style="list-style-type: none"> <li>Water courses of plain to montane levels with the <i>Ranunculion fluitantis</i> and <i>Callitricho-Batrachion</i> vegetation</li> </ul> <p>Annex II species that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> <li>Spined loach <i>Cobitis taenia</i></li> <li>Bullhead <i>Cottus gobio</i></li> </ul>	<p>Maintain the river as a favourable Habitat for floating formations of water crowfoot (<i>ranunculus</i>) populations of bull head, spined loach and whiteclawed crayfish and the river and adjoining land as habitat for populations otter.</p>	Tamworth: 4500m	<p>The River Mease is an unusually semi-natural system in a largely rural landscape, dominated by intensive agriculture. Water quality and quantity are vital to the European interests, whilst competition for water resources is high. Diffuse pollution and excessive sedimentation are catchment-wide issues which have the potential to affect the site. SSSI assessment report undertaken in 2007 notes the site's adverse condition and identifies the following issues: drainage, invasive freshwater species, water pollution – agriculture/run-off, water pollution – discharge.</p>

	<p>Annex II species present as a qualifying feature, but not a primary reason for site selection</p> <ul style="list-style-type: none"> <li>• White-clawed (or Atlantic stream) crayfish <i>Austropotamobius pallipes</i></li> <li>• Otter <i>Lutra lutra</i></li> </ul>			
Cannock Chase SAC	<p>Annex I habitats that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> <li>• European dry heaths</li> </ul> <p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site</p> <ul style="list-style-type: none"> <li>• Northern Atlantic wet heaths with <i>Erica tetralix</i></li> </ul>	<p>Maintain in favourable condition Northern Atlantic wet heaths with <i>Erica tetralix</i> for which the area is considered to support a significant presence. European dry heaths for which this is considered to be one of the best areas in the United Kingdom.</p>	Tamworth >15,000m	<p>Visitor pressures include dog walking, horse riding, mountain biking and off-track activities such as orienteering, all of which cause disturbance and result in erosion, new track creation and vegetation damage.</p> <p>Bracken invasion is significant, but is being controlled. Birch and pine scrub, much of the latter from surrounding commercial plantations, is continually invading the site and has to be controlled. High visitor usage and the fact that a significant proportion of the site is Common Land, requiring Secretary of State approval before fencing can take place, means that the reintroduction of sustainable management in the form of livestock grazing has many problems. Cannock Chase overlies coal measures which have been deep-mined. Mining fissures continue to appear across</p>

				<p>the site even though mining has ceased and this is thought to detrimentally affect site hydrology. Furthermore the underlying Sherwood Sandstone is a major aquifer with water abstracted for public and industrial uses and the effects of this on the wetland features of the Chase are not fully understood.</p>
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## Appendix B Relevant Correspondence

**Letter from Natural England - response to Tamworth Local Plan Pre-submission Consultation**



Date: 20<sup>th</sup> July 2012  
Our ref: 55687  
Your ref:



Rob Mitchell  
Director, Communities Planning & Partnerships  
Marmion House  
Lichfield Street  
Tamworth  
Staffordshire  
B79 7BZ

Natural England  
Consultation Service  
Hornbeam House  
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T: 0300 060 3900

## **BY E-MAIL ONLY**

Dear Mr Mitchell

### **Tamworth Local Plan Pre-submission Consultation**

Thank you for consulting Natural England on the pre-submission publication of the Tamworth Local Plan, in your letter dated 8<sup>th</sup> June 2012.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Our main interests include biodiversity; geodiversity; landscape character and quality; green infrastructure; access to the countryside and other open space; the protection and enhancement of soils; and environmental land management.

We have provided comments below on those sections of the Local Plan of particular relevance to our remit. Overall we believe the Plan to be sound when considering whether it is justified, effective and consistent with national policy; however, we have identified a number of deficiencies within the Plan which may lead to it being considered unsound. We have therefore provided recommendations for the inclusion or strengthening of policy in relation to geodiversity, soils, protected species, landscape and green infrastructure. We have made additional recommendations where we believe this will provide further clarification of policy wording or supporting text.

### **Chapter 2: Background: Spatial Portrait, Vision and Objectives**

This section provides a useful overview of the priorities and challenges for development in Tamworth, including environmental constraints, recognising the need to balance growth with the need to protect and enhance the natural environment and green infrastructure. It also highlights the importance of ensuring that policies within the strategy do not contribute to or increase the effects of climate change.

We would suggest, for clarification, that this latter point alludes to the need for policies to positively contribute to climate change mitigation and adaptation, as sought through Policy CP14 Sustainable Development and Climate Change Mitigation.

The Vision includes an aspiration for an image of the borough as 'urban green'. This is rather disappointing and we would recommend that greater emphasis is placed on the significant environmental assets within the area, and to the objectives referred to elsewhere in Plan, to protect enhance and create additional informal multi-functional green spaces across the borough.

The Strategic Spatial Priorities appear appropriate for the delivery of sustainable development within the Borough. These seek to protect and enhances designated conservation sites, ecological networks and landscapes and improves access to green infrastructure. These also aim to promote sustainable transport and minimise and adapt to the effects of climate change, which is welcomed.

### **SP1 – A Spatial Strategy for Tamworth**

We welcome this policy which identifies that existing green belt, countryside and high quality open spaces will be retained and where possible enhanced. Proposals will promote sustainability by minimising and/or mitigating pressure on the natural environment and natural resources whilst also mitigating and/or adapting to climate change and pollution.

### **SP5 Housing**

This policy takes into account the lack of developable land within the borough and the need to accommodate future housing needs, including up to 4500 dwellings up to 2028. At least 1150 of these will be provided through a sustainable urban neighbourhood in the Anker Valley. The policy recognises the Anker Valley as a sensitive location with development requiring careful mitigation. We suggest that this policy should include reference the HRA findings and mitigation recommendations regarding potential impacts on Cannock Chase SAC.

### **SP6 Anker Valley Sustainable Urban Neighbourhood**

Related to the above we welcome that this policy identifies the need to protect, enhance and create blue and green infrastructure and create appropriate new habitats and linkages to existing sites of high biodiversity value. Perhaps this policy could recognise the presence of nationally and locally designated sites within the Anker Valley, including Alvecote Pools SSSI which is particularly sensitive to water mediated effects associated with development and to the effects of increased access. We note that Policy CP12 states that development will not be permitted that has a negative impact on the water quality of the Alvecote Pool SSSI, River Mease SAC and other important water based habitats, although please note our comments on Policy CP12 below.

## **Chapter 6 – A High Quality Environment**

Natural England generally welcomes the detail included in this chapter which aims to protect and enhance the natural environment, landscape and green infrastructure. We particularly welcome policies SP8, CP9 and CP12.

As identified in the Sustainability Appraisal, Policy SP8 Environmental Assets is linked to the Green Infrastructure Strategy and seeks to ensure that development makes efficient use of Tamworth's network of environmental assets, including the quality of existing open space through management and developer contributions. It also identifies that a number of projects can be implemented which make use of the existing network and address certain deficiencies, including a green network to create a

linear urban park between Glascote Heath and Stonydelph, restoring Broad Meadow SBI and increasing semi-natural space at Wiggington Park. We also welcome reference to the Central Rivers Initiative.

We would recommend that Policy SP8 refers to the statutory wildlife designations within the Borough, particularly Alvecote Pools SSSI, a nationally important site, although we note reference to this within CP12. Otherwise the policy makes good reference to the need to protect and enhance existing environmental assets and access to these, as well as the need to create additional areas and green linkages. Direct reference to achieving the aims and aspirations of the Green Infrastructure Strategy may provide clarity within this Policy. Please also see our additional comments on GI below.

We are generally satisfied with Policy CP12 Protecting and Enhancing Biodiversity, which references the need to protect and enhance statutory and non-statutory designated sites and wider biodiversity and to maintain green linkages. The policy recognises the multi-functionality of biodiversity sites, the importance of providing buffer zones around these and the value of green linkages for wildlife and people. We welcome reference to the Tamworth Phase 1 Habitat Survey and Biodiversity Opportunity Mapping Study as these will be important evidence documents to guide development.

The text and Policy CP12 would benefit from reference to compliance with NPPF requirements, particularly paragraphs 109 and 117. Reference could also be made to the Biodiversity Duty, as set out in the Natural Environment and Rural Communities Act, 2006 (the NERC Act). Section 40 of the Act requires all public bodies to have regard to biodiversity conservation when carrying out their functions.

We welcome that Policy CP12 will ensure opportunities are taken through planning conditions, obligations and community engagement to enhance biodiversity resource through habitat creation and restoration, particularly where it comprises BAP habitats.

We are pleased to note that development will not be permitted that has a negative impact on the water quality of the Alvecote Pool SSSI, River Mease SAC and other important water based habitats. It should be recognised that development proposals will need to demonstrate no adverse effect on the interest features of these areas. Additional impacts, such as through increased recreational pressure, may also need to be considered.

### Cannock Chase SAC

Natural England welcomes the stipulation that development will not be permitted where it can be demonstrated that it will have an adverse effect on Cannock Chase SAC; however, we would suggest that this is reworded to state that 'development will only be permitted where it can be demonstrated that there will be no adverse effect' – this is the specific test of the Habitats Regulations.

Further to the above, we are aware that Tamworth falls outside the 'zone of influence' identified for the SAC hence we welcome the focus on 'exceptions' i.e. that developments of over 100 will be required to submit an assessment that details how the likely recreation and visitor pressures on the SAC from development, as identified by ongoing work, are mitigated. We note that this may include contributions to habitat and access management and visitor infrastructure and other measures and provision of SANGS. With regard to this it is worth noting the following:

The principles around SAC mitigation as set out in Footprint Ecology's (FE) November 2009 report 'Cannock Chase Visitor Impact Mitigation Strategy' remain relevant.

A further batch of reports have been produced by FE during 2012 assessing the extent to which the proposals set out in the 2009 report might need to be amended following consideration of updated

visitor survey data (gathered during 2010-11). The outcomes from the current, ongoing assessment are not yet finalised.

As a result of the above Natural England would recommended use of the 2009 report as the baseline for work on strategic sites as part of your Local Plan work, with the following proviso:

- The zone of influence around the SAC is very likely to contract to 15km. The 2009 report (based on AONB visitor survey data from 2000) produced a zone of 19.3km (12 miles).
- For information - the zone is derived from consideration of the total visitor data and represents the area from within which 75% of visitors to the SAC have come. This approach is consistent with that adopted on other lowland heathland European designated sites (e.g. Thames Basin Heaths and Dorset Heaths) and is therefore regarded as robust. Note however that the 15km zone is derived from visitor survey data excluding mountain bikers. This is because the mountain bike visitors would otherwise skew the statistics owing to the long distances they travel to reach the SAC.

In terms of guidance for potential developers of large residential developments within or close to the zone of influence the following issues need to be addressed:

- To limit growth in road traffic associated with the development such as e.g. preparation of a travel plan, minimising provision of car parking spaces, providing high quality public transport alternatives and
- To deflect as many visitors originating from the development from Cannock Chase SAC through provision of onsite green space within the development and links to the wider surrounding countryside.

Natural England therefore advises that you refer to Section 5 of the FE 2009 report for guidance on the characteristics of land that might serve as an alternative to the SAC for specified types of user (Suitable Alternative Natural Green-space – SANG). Section 5.4 sets out criteria. Note that SANG are one tool in the toolkit and that developer contributions for measures other than SANG are likely to be required, for example :

- Despite best efforts to provide SANG the visitor data indicates that a residual proportion of visits to the SAC will persist. This must be addressed by means of developer contributions to support e.g. management measures on the SAC – signs, path works, habitat management etc, as well as suitable information provision on new development sites (e.g. through travel plans and info packs)
- We have concluded the scope for diverting mountain bike use is limited due to the special qualities of the SAC and AONB which draw these users to the locality.

### Geodiversity

This policy should be amended to include reference to the need to protect and enhance geodiversity, in line with the targets set in the Staffordshire Geodiversity Action Plan, which is cited in 6.40. This will be required to ensure that the Plan is sound and compliant with the NPPF.

### Protected species

Protected species have not been specifically mentioned in Policy CP12 or the supporting text. We would welcome a requirement for development to take appropriate steps to maintain the favourable conservation status of populations of protected species, in line with paragraph 117 of NPPF. This will be required to ensure that the Plan is sound and compliant with the NPPF.

### Green infrastructure

We note that the section on open space makes reference to the standards in the 2012 Open Space Review and Place Making and Planning Obligations SPDs. Green Infrastructure (GI) should be an

integral part of the creation of sustainable communities and the Local Plan can provide a useful starting point in the consideration of GI provision within new development. The requirement for local GI provision through development should be implicit within the Local Plan. This will ensure the Local Plan is compliant with paragraph 114 of the NPPF and will help ensure effective delivery of local scale GI.

One important function of GI is the provision of new opportunities for access to open space. Natural England's 'standards for accessible natural greenspace' ([ANGSt](#)) provides a set of benchmarks, which should be used to ensure new and existing housing has access to nature. More information can be found on Natural England's publication, '*Nature Nearby, Accessible Greenspace Guidance*' (March 2010), available on our [website](#), publication reference NE265. GI provision can also be important in helping to divert additional recreational pressure away from more sensitive sites.

The CABE Space Guidance '*Start with the Park*' (2005) outlines the importance of planning around green spaces, with consideration being given to the context of local landscape character and contribution to the wider GI network.

### Soils

The Plan does not really consider the protection and enhancement of soils through the development process. Perhaps this could be included within this Policy or Policy SP8. Where significant development of agricultural land is unavoidable, poorer quality land should be used in preference to that of higher quality, except where this would be inconsistent with other sustainability considerations. Paragraph 112 of the NPPF is relevant when considering the protection of **best and most versatile** (BMV) agricultural land.

Land quality varies from place to place and the Agricultural Land Classification (ALC) provides a method for assessing the quality of farmland to enable informed choices to be made about its future use within the planning system. It helps underpin the principles of sustainable development. Further information is provided on Natural England's [website](#).

We believe the Plan should be amended in accordance with the above to ensure it is compliant with the NPPF and can be considered sound.

### Landscape

The Plan does not address the need to protect and enhance landscapes, including local landscape character, natural and historic landscapes, to protect their natural beauty and amenity, wildlife and cultural heritage. We recommend reference to the Borough's Landscape Character Assessment and a requirement for developments to be informed by Landscape and Visual Impact Assessments where appropriate.

We also recommend reference to the European Landscape Convention. Further information is available on our website at:

<http://www.naturalengland.org.uk/ourwork/landscape/protection/europeanconvention/default.aspx#framework>.

We believe the Plan should be amended in accordance with the above to ensure it is compliant with the NPPF and can be considered sound.

## Public rights of way

Another area which this section of the Plan does not really address is designated rights of way such as PRow, bridleways and National Trails, although we note and welcome proposals to safeguard and improve green corridors and links. Development should seek to protect and enhance designated paths far as possible, with reference to the local ROWIP, and we believe the Local Plan should address this in order to comply with paragraph 75 of the NPPF, and be considered sound.

## **Chapter 7 – A Sustainable Town**

Again we welcome the general aspiration of this section to deliver sustainable infrastructure, transport, water management and climate change mitigation in Tamworth, particularly through policies SP9, CP13, CP14 and CP15. These appear to be in general conformity with NPPF requirements.

We note that the Plan has considered the details and recommendations of the Southern Staffordshire Surface Water Management Plan: Phase 1 & 2 and Policy CP15 seeks to minimise flood risk and pollution, to implement multi-functional SUDS and seek to meet WFD targets.

## **Chapter 8 - Monitoring and Implementation**

Monitoring indicators and targets in relation to open space and biodiversity should be set as net gains, given that policies seek to protect, enhance and create new habitats and GI where possible.

We welcome that developer contributions will be used to ensure that the necessary blue and green infrastructure is available to support development with contributions used to mitigate the adverse impacts of development. We note that the Council will, where appropriate, seek to secure such measures through planning obligations, and once adopted, through CIL.

## **Appendix 9 - Site Allocation Map**

Whilst we are reasonably satisfied that this includes all nationally and locally designated conservation sites, we would recommend that the local Wildlife Trust and Green Infrastructure Partnership are consulted regarding local wildlife sites and wider GI. We note that the SA identifies a safeguarded minerals site in north east of the borough is directly adjacent to both the Alvecote Pools SSSI and Decoy SBI and in close proximity to the River Anker BAS and that working this is likely to have a detrimental impact on the integrity of these important biodiversity sites. Natural England concurs with this view and advises that any proposals will need to be subject to detailed assessment to identify impacts and determine whether it is possible to mitigate adverse effects.

## **Sustainability Appraisal**

Natural England is generally satisfied with the detail, methodology and recommendations of this assessment and believe it meets the requirements of the SEA Regulations in assessing the effects of the Plan on environmental, social and economic objectives. The SA objectives being considered seem appropriate, although in light of our comments above, further clarification of impacts on issues such as geodiversity, soils, protected species, landscape and public rights of way may be required.

We note the assessment identified that Option 1 is the most sustainable, concentrating growth in the main urban area, reducing Greenfield land take.

Assessment of Policy SP1 identifies that this policy will direct development to the most sustainable locations, whilst delivering a new sustainable neighbourhood will help to minimise the loss of Greenfield land and make the best use of existing assets.

The assessment of Policy SP5 Housing Delivery identifies that most of the negative impacts such as increased pressure on water resources and air quality would be likely to arise wherever housing is located – we agree with this and suggest that recreational pressure may also result in negative impacts on the environment, including designated sites. This is borne out in the conclusions of the Habitats Regulations in relation to potential impacts on Cannock Chase SAC. Negative impacts on nationally and locally designated sites and wider biodiversity may also be likely. The SA should address this and identify mitigation requirements.

We note that the assessment of Policy SP6 Anker Valley identifies the potential negative impacts of this strategic housing allocation on biodiversity, due to the loss of a substantial area of greenspace which could affect local habitats. We note the positive impacts include provision of sustainable transport and GI and a well designed high quality place. Mitigation recommendations include careful planning to include an area of appropriate greenspace with the opportunity to deliver sustainable alternative biodiversity opportunity sites. The delivery of this mitigation should be assured through Policy SP6.

### **Habitats Regulations Assessment**

We understand that a Habitat Regulations Assessment for Lichfield District & Tamworth Borough was produced in consultation with Natural England in 2011, and this included an assessment of the impacts of the Tamworth Core Strategy on European sites. We are not aware that a separate HRA has been undertaken for the current Local Plan, hence we assume that the Local Plan does not differ from the earlier Core Strategy. If this is not the case Natural England wishes to be informed.

We are aware that the 2011 HRA identified potential recreational impacts on Cannock Chase SAC and that mitigation measures have been agreed. We believe this issue is satisfactorily addressed in the Local Plan.

We also understand that the 2011 assessment identified uncertainty with regards to potential impacts on the River Mease SAC – and recommended the need for further (HRA) assessment at the detailed stage. It is not clear, from the HRA or the Local Plan, whether the Tamworth Local Plan is likely to contribute to these uncertainties. Natural England requires clarification on this issue.

Overall Natural England welcomes the policies in the Tamworth Local Plan. However, we do have some concerns relating to the soundness of the Plan regarding the consideration of geodiversity, soils, landscape, protected species, green infrastructure and public rights of way. We have suggested amendments or additional wording which we consider will provide clarification and ensure compliance with national policies and ensure that the Plan can be considered sound. Natural England would be happy to provide comments on amendments if this would be helpful to the LPA.

I hope that these comments are helpful. For any correspondence or queries relating to this consultation only, please contact me using the details below. For all other correspondence, please contact the address above.

Yours sincerely

Janet Nuttall CEnv MIEEM  
Planning and Conservation Advisor  
Land Use Operations

Cambridge

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F: 0300 060 2115

[janet.nuttall@naturalengland.org.uk](mailto:janet.nuttall@naturalengland.org.uk)



## Email from Natural England regarding impact on SACs

**From:** Maguire, Sally (NE) [<mailto:Sally.Maguire@naturalengland.org.uk>]

**Sent:** 10 January 2014 16:01

**To:** Parry, Jane

**Subject:** RE: Natural England response to Pre-Submission Tamworth Local Plan ref. 55687

Dear Jane

As mentioned in our previous advice May 2013, we are not aware of a specific HRA having been undertaken nor is it visible on your website. You have mentioned that the 2012 HRA screening report concluded that there would be no significant effect of the Local Plan's policies on the River Mease SAC and no further AA work beyond the screening report is required. As previously mentioned we are not in a position to conclude no Likely Significant Effects (LSE) on the interest features of the River Mease SAC because we need further clarification on whether the Tamworth Plan is likely to lead to LSE on the River Mease SAC. An important factor to consider is whether development proposed in the Local Plan which will discharge to sewage treatment works within the River Mease catchment, as this could lead to phosphate levels exceeding limits.

We note that you have advised that Policy CP 12 set out below is being used as an avoidance measure in order to avoid LSE on the River Mease SAC. Natural England advises that this be made more robust and include wording relating to the interest features of the sites. You will also need to satisfy yourself that this policy will not conflict with other policies within the plan that encourages development coming forward as this may make the plan undeliverable.

"Development will not be permitted that has a negative impact on the water quality of the Alvecote Pool SSSI, River Mease SAC and other important water based habitats."

If planned development within the updated Local plan is outside the zone of influence (15km) for Cannock Chase SAC, mitigation for recreational pressure will not be required and hence SANGS will not be necessary.

Once Natural England is in receipt of the revised Local Plan with the accompanying HRA, we will be in a position to provide advice on the next steps.

Kind regards

Sally

Sally Maguire BSc MRTPI  
Lead Adviser  
Land Use Crewe Operations Team  
Natural England  
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[www.naturalengland.org.uk](http://www.naturalengland.org.uk)

**From:** Parry, Jane [<mailto:Jane-Parry@tamworth.gov.uk>]  
**Sent:** 19 December 2013 15:24  
**To:** Maguire, Sally (NE)  
**Subject:** FW: Natural England response to Pre-Submission Tamworth Local Plan ref. 55687

Dear Sally

I have been passed your details by Janet Nuttall as I understand you are dealing with my query below.

We would appreciate some advice, it's not an official consultation as such. Basically we would like to know what additional HRA work we need to do in terms of refreshing the screening report that was undertaken in 2011 and updated in 2012. The Local Plan will differ from that previously submitted and withdrawn in the following ways:

- The time period of the Plan is being extended from 2028 to 2030
- There will therefore be a slight increase in the quantum of development being planned for
- There will be different or additional strategic housing sites

Does the reduction in size of the zone of influence change the need to undertake this work as Tamworth will be further from the SACs?

Are SANGS still being recommended as necessary to deflect some of the recreational pressure from SACs?

Thank you.

Kind regards

Jane

Jane Parry  
Development Plan and Conservation Officer  
Tel: 01827 709278  
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Email: [Jane-Parry@tamworth.gov.uk](mailto:Jane-Parry@tamworth.gov.uk)  
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Tamworth Borough Council  
Marmion House  
Lichfield Street  
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B79 7BZ

**One Tamworth, Perfectly Placed.**

## Email from Severn Trent regarding the River Mease SAC

**From:** Haighton, Tom [mailto:Tom.Haighton@severntrent.co.uk]  
**Sent:** 30 January 2014 12:36  
**To:** Parry, Jane  
**Subject:** River Mease SAC

Jane,

Thank you for your e-mail. The area within Tamworth Borough Council boundary does not interact with the River Mease. The two rivers that run through the area are the River Anker and the River Tame.

All sewage flows in Tamworth drain to Tamworth Sewage Treatment works which is located to the North West of Tamworth, just North of the confluence of the River Anker and Tame.

As such, any development within Tamworth Borough Council will not affect the River Mease.

Kind Regards,

### **Tom Haighton**

Strategy Analyst - Sewer Capacity  
Planning & Performance, Waste Water Services  
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Mobile - +44 (0)7825 009387

[Sewer Flooding Strategy Community of Practice](#)

**From:** Parry, Jane [mailto:Jane-Parry@tamworth.gov.uk]  
**Sent:** 29 January 2014 14:56  
**To:** Haighton, Tom  
**Subject:** River Mease SAC

Dear Tom

Tamworth Borough Council is in the process of revising its Local Plan, in preparation for consultation on a draft in March. The 2012 Habitats Regulations Assessment will need to be refreshed to accompany the draft Local Plan and I was hoping you would be able to advise on a matter relating to the River Mease SAC.

Natural England have advised that we need to find out whether future development in Tamworth Borough will discharge into a sewerage treatment works within the River Mease catchment as this could lead to phosphate levels exceeding limits. If this is the case, what would Severn Trent recommend should be done to mitigate any potential harm?

I realise that you are undoubtedly very busy but I would appreciate some advice by the end of next week if at all possible. If you are not the correct person to deal with my enquiry, I would be grateful if you would forward this email to the relevant person.

Thank you in advance.

Kind regards

Jane Parry

Development Plan and Conservation Officer

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## Appendix C Screening: Initial appraisal of 2014 Tamworth Draft Local Plan

Policy Description	Different to 2012 Pre-submission Local Plan?	Remit of policy	Any likely significant effects on European sites anticipated as a result of the policy?
SP1: The spatial strategy for Tamworth	Yes, quantum of housing and employment reduced. Additional strategic housing extensions.	Provides a guide to how the spatial vision and strategic objectives will be achieved in practical terms. The role of the spatial strategy is to set out how much development there will be and broadly where it will go with the overall aim of focusing on the most sustainable and accessible locations and protecting and enhancing the best of the natural and built environments.	No. The strategy is based on delivering development in sustainable locations supplemented by improvements to the natural environment.  Tamworth lies outside the catchment of the River Mease.
SP2: Supporting investment in Tamworth Town	No	Reinforces town centre first for town centre uses, i.e. retail, leisure, culture/tourism and office development along with encouraging higher density residential and improved linkages within the town centre and to the out of centre retail areas. It also identifies the key gateway sites and introduces design and conservation principles.	No. The town centre lies outside the 15km zone of influence for Cannock Chase SAC and no allocations of over 100 dwellings are proposed.  Tamworth lies outside the catchment of the River Mease.
SP3: Supporting investment in local and neighbourhood centres	No	Sets out guidance for achieving environmental and accessibility improvements and where applicable and where applicable linked to delivering community regeneration objectives.	No. No large scale developments are proposed in the policy.
SP4: Sustainable economic growth	Yes, employment requirement reduced. Allocations also changed.	Identifies the employment land requirement and the strategic employment areas and allocations to meet part of employment need.	No.
SP5: Housing	Yes, reduction in housing	Sets out overall future housing needs and annual requirement to achieve a balanced delivery over the	No. All allocations lie outside the 15km zone of influence for Cannock Chase SAC

	numbers and new allocations within existing urban area	plan period to meet identified housing need. Includes criteria for achieving high quality development in sustainable locations	and no allocations of over 100 dwellings are proposed.  Tamworth lies outside the catchment of the River Mease.
SP6: Strategic Urban Extensions	Yes, reduction in extent of Anker Valley allocation and three additional strategic sites	Sets out housing numbers for each site, specific constraints and considerations and required infrastructure to ensure the creation of sustainable neighbourhoods.	No. All allocations lie outside the 15km zone of influence for Cannock Chase SAC Tamworth lies outside the catchment of the River Mease.
SP7: Regeneration Priority Areas	No	Identifies post war planned neighbourhoods and the Wilnecote Regeneration Corridor on the basis of high levels of deprivation and/or poor quality environment. Sets out a series of priorities under each area and commits the Council and its partners to work in partnership to deliver spatial interventions to improve the physical environment and deliver social and economic renewal.	No. The regeneration priority areas are located outside the 15km zone of influence for Cannock Chase SAC.
SP8: Environmental assets	Yes, new open space networks in all strategic housing allocations	Maps green and blue infrastructure and identifies a series of priority areas and schemes and policy principles to deliver enhancements and improvements. These include improving and enhancing the network of green linear linkages across the town and to the canal and river network.	No. The policy positively promotes the protection and enhancement of the green and blue infrastructure network.
SP9: Sustainable Tamworth	No	Identifies the supporting infrastructure required to deliver the sustainable pattern of growth identified in the strategy. It refers to key strategic locations for transport improvements including the A5 junctions, stations, cycle and pedestrian routes and general principles for improving accessibility. The policy also seeks to provide community facilities in sustainable	No. The policy seeks to enable better access to facilities through sustainable means and ensuring development is located in sustainable locations whilst tackling congestion. The emphasis on low carbon development and renewable energy should help mitigate against the effects of

		locations whilst promoting opportunities for zero carbon development, maximising opportunities for renewable energy generation and mapping the areas at risk of flood risk.	climate change.
CP1: Hierarchy of centres for town centre uses	Yes. Sets out hierarchy of centres and floorspace threshold for planning applications outside centres.	Reinforces the “centre first” approach for town centre uses and defines the hierarchy of centres. Sets out criteria for dealing with applications for town centre uses outside the centres including the sequential test and cumulative impact.	No. The policy preference is for town centre uses to be located in existing centres.
CP2: Employment areas	No	Policy defines the acceptable uses within the strategic employment areas and criteria for dealing with alternative uses within existing employment areas.	No. Not site specific and does not result in development directly.
CP3: Culture and Tourism	No	Supports tourism and cultural development, in particular in relation to the town centre. Supports development of linkages from the town centre to the railway station, out of centre retail parks and leisure facilities. Encourages use of canal and rivers as a tourism resource. Identifies supporting infrastructure hotels, transport and information.	No. Not site specific and does not result in development directly.
CP4: Affordable Housing	Yes	Establishes thresholds and the level of developer contributions towards the provision of affordable housing.	No. No direct impact identified, does not result in development directly.
CP5: Housing types	No	Will establish standards for new housing development including the size and type of units, specific types based on evidence arising from the housing needs study.	No. No direct impact identified, does not result in development directly.
CP6: Housing density	No	Contains a banded density target for particular borough wide locations including a higher density target for the centres and transport hubs and a lower	No. No direct impact identified, does not result in development directly.

		target for other urban locations.	
CP7: Gypsies, Travellers and Travelling Showpeople	Yes, target reduced	Identifies a need for one site but is not site specific. Establishes criteria for assessing applications for site proposals.	No. Not site specific and does not result in development directly.
CP8: Sport and recreation	No	Provides and promotes a network of high quality sport and recreation facilities across the borough to meet needs whilst aiming to protect existing features.	No. No direct impact identified, does not result in development directly.
CP9: Open space	Yes.	Seeks to promote an accessible multi functional open space network that functions for people and wildlife. Standards provided for new development and criteria provided to assess applications that would lead to loss of open space.	No. The policy seeks to protect and enhance the natural environment.
CP10: Design of new development	No	Introduces principles to achieve high quality buildings and places.	No. The policy relates to the existing built fabric.
CP11: Protecting the historic environment	No	Includes a list of principles to be considered when proposing development which impacts on the historic environment including listed buildings, conservation areas and scheduled monuments. Also considers non-designated assets.	No. The policy relates primarily to the existing built fabric.
CP12: Protecting and enhancing biodiversity	Yes, references to Cannock Chase SAC and River Mease SAC deleted	Aims to preserve sites and species, making a distinction between statutory and non-statutory sites. Reinforces links between habitats encourages habitat restoration and creation, with emphasis on community led initiatives.	No. The policy seeks to protect biodiversity.
CP13: Delivering sustainable transport	No	Sets out priority measures for improving accessibility and linkages, particularly by public transport, walking and cycling on a borough wide basis and to/from strategic development sites. Sets out criteria for the requirement for transport assessments and travel plans.	No. The policy does not propose development. It seeks the provision of sustainable transport opportunities and reduction in the use of the private car, which could have positive impacts on sites that are vulnerable to air borne pollution.
CP14: Sustainable	No	Supports measures to achieve zero carbon	No. No direct impact identified, does not



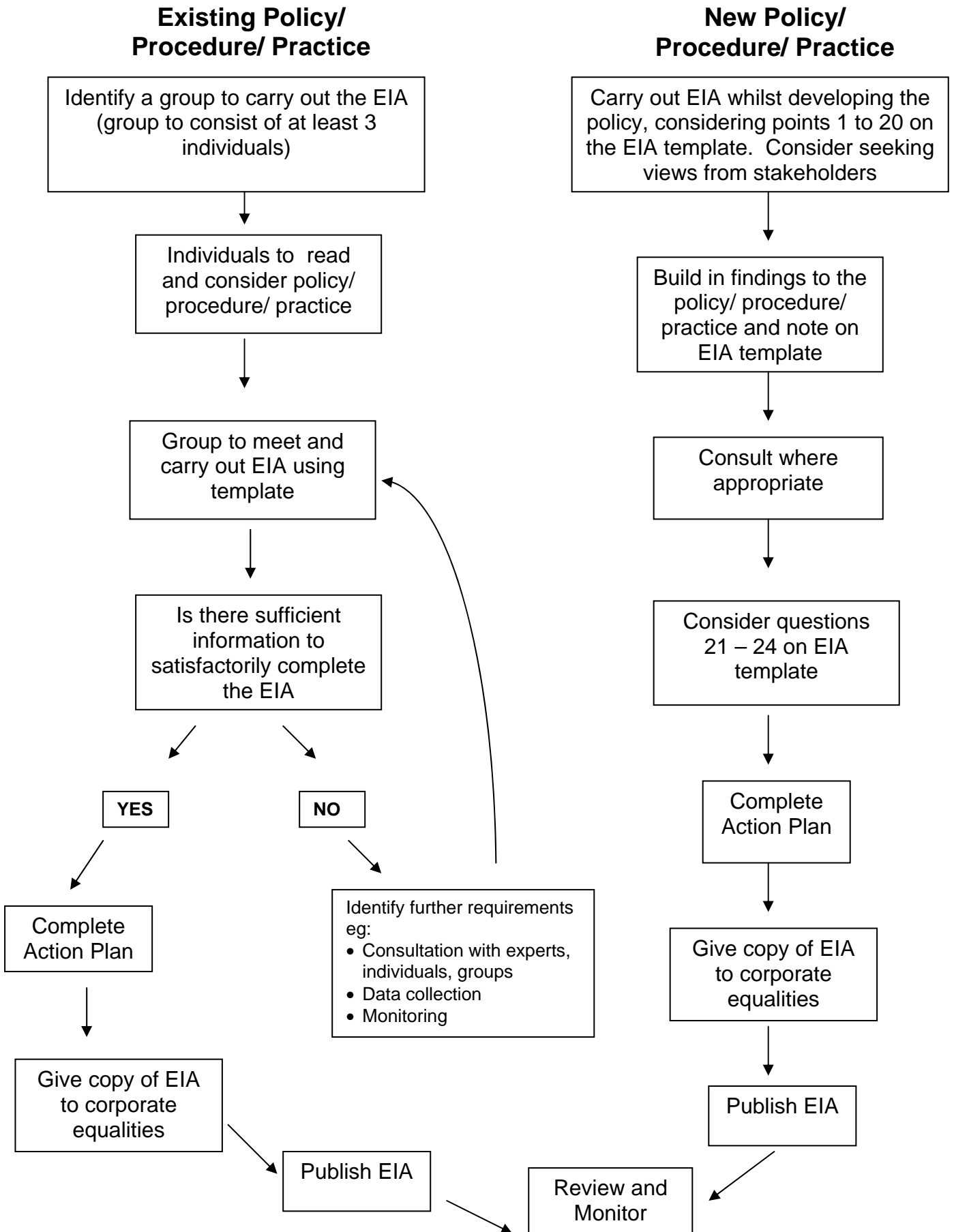
development and climate change mitigation		development including renewable energy proposals and resource management.	result in development directly.
CP15: Flood risk and water management	No	Requires new development to consider areas susceptible to fluvial and pluvial flooding including the application of SUDS and sustainable urban design.	No.
CP16: Community facilities	No	Sets out support for community facilities and infrastructure to be located in accessible locations. Encourages dual use of facilities to be considered where they are located in sustainable locations.	No. No direct impact identified, does not result in development directly.
CP17: Infrastructure and developer contributions	No	Includes the key infrastructure required to deliver the strategy and introduces the Infrastructure Delivery Plan.	No. The policy refers to the Infrastructure Delivery Plan which has identified strategic infrastructure requirements. These include water and sewerage which could protect water quality and quantity on sensitive sites.

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**Tamworth Borough Council  
Draft Local Plan 2006-2031  
Equality Impact Assessment  
February 2014**

# Equality Impact Assessment Procedure



# Equality Impact Assessment Template

<b>Name of policy/ procedure/ practice to be assessed</b>	<b>Tamworth Local Plan</b>		<b>Date of Assessment</b>	<b>February 2014</b>	
<b>Is this a new or existing policy/ procedure/ practice?</b>	<b>New Policy</b>	<b>Officer responsible for the Assessment</b>	<b>Anna Priestley</b>	<b>Department</b>	<b>Development Plan Team - Planning and Regeneration</b>
<b>1. Briefly describe the aims, objectives and purpose of the policy/ procedure/ practice?</b>	<p>The Local Plan is a key planning document that will provide the necessary framework for determining the scale of development until 2031, where it will broadly be located and the standard of quality that the development should achieve. It includes specific policies to address the key issues and challenges facing the Borough up to 2031 and seeks to -promote urban regeneration; improve access to jobs, health care, education, shops, leisure and community facilities, open space, sport and recreation;-focus development in existing centres and create sustainable, cohesive neighbourhoods.</p> <p>The Local Plan covers a range of topic areas, including housing, employment, green spaces, biodiversity, leisure and retail. The policies are set out within 4 over-arching chapters: a prosperous borough, stronger and vibrant neighbourhoods, a high quality environment and a connected and sustainable town. A Monitoring and Delivery chapter sets out how the policies will be monitored and delivered.</p> <p>Some of these policies will have little or no impact on equality issues. For example 'Flood Risk and Water Management' and 'Sustainable Development and Climate Change Mitigation' are key policies which affect the whole community and it is difficult to determine how these policies could affect different equality groups in a significant way. Equally, however, the broad objectives of the strategy and the strategy itself could have a positive impact on delivering equality objectives. For example, focusing investment in the network of existing centres will ensure that services, employment and facilities are accessible to the most deprived communities (which tend to include higher number of people with disabilities, older people, carers and recent arrivals from BME groups) thus resulting in an overall positive impact from an equalities perspective. Likewise, focusing co-ordinated interventions in a series of Regeneration Priority Areas should ensure that the most deprived neighbourhoods receive a co-ordinated approach to regeneration which not only improves the environment, housing stock and access to employment but also community facilities.</p> <p>As a result the Local Plan policies and allocations have been grouped into four key chapters based on the spatial strategy, to enable the assessment of key themes on different equality groups. These areas are:</p>				

	<ul style="list-style-type: none"> <li>• A Prosperous Town</li> <li>• Strong and vibrant neighbourhoods</li> <li>• A High Quality Environment</li> <li>• A Sustainable Town</li> </ul>										
<b>2. Are there any associated policy/ procedure/ practice which should be considered whilst carrying out this equality impact assessment?</b>	<p>The Local Plan policies and allocations have been subject to a Sustainability Appraisal/Strategic Environmental Assessment. This has ensured that sustainability issues, including equality related issues relating to health, education, community safety and aspiration are given full consideration in the preparation and adoption of refining policies.</p> <p>The Council's adopted Statement of Community Involvement (SCI) (which sets out how and when communities will be involved in the Local Plan production process) has been used to ensure that all sections of Tamworth's communities have had the opportunity to input into the production of the Local Plan. This document has recently been updated and the new version should be adopted early in 2014, in time for the new draft Local Plan consultation. However at the time of preparing this EIA the 2006 SCI is still in place,</p>										
<b>3. Who is intended to benefit from this policy/ procedure/ practice and in what way?</b>	All those who engage with the planning system and require planning guidance and advice, including members of the public, elected members, developers, private applicants.										
<b>4. What are the desired outcomes from this policy/ procedure/ practice?</b>	<p>The outcomes are set out under 26 separate policies summarised below:</p> <table border="1"> <thead> <tr> <th>Policy Description</th> <th>Remit</th> </tr> </thead> <tbody> <tr> <td>SP1: Spatial Strategy for Tamworth</td> <td>Provides a guide to how the spatial vision and strategic objectives will be achieved in practical terms. The role of the spatial strategy is to set out how much development there will be, broadly where it will go, when it will take place and who will deliver it. It emphasises the 'centres first' objective, spatial direction for delivering housing and employment needs whilst identifying key spatial priorities for infrastructure and environmental improvements.</td> </tr> <tr> <td>SP2: Supporting investment in Tamworth Town Centre</td> <td>Identifies opportunities for retail, leisure, culture/tourism &amp; office development along with encouraging higher density residential and improved linkages within the town centre and to the out of centre retail areas. It also identifies the key historic landmarks and introduces design and conservation principles.</td> </tr> <tr> <td>SP3: Supporting investment in local &amp; neighbourhood centres</td> <td>Sets out guidance for achieving environmental and accessibility improvements and where applicable linked to delivering community regeneration objectives.</td> </tr> <tr> <td>SP4: Sustainable economic growth</td> <td>Sets out the employment land requirement over the plan period and identifies the existing network of strategic employment areas along with a number of new</td> </tr> </tbody> </table>	Policy Description	Remit	SP1: Spatial Strategy for Tamworth	Provides a guide to how the spatial vision and strategic objectives will be achieved in practical terms. The role of the spatial strategy is to set out how much development there will be, broadly where it will go, when it will take place and who will deliver it. It emphasises the 'centres first' objective, spatial direction for delivering housing and employment needs whilst identifying key spatial priorities for infrastructure and environmental improvements.	SP2: Supporting investment in Tamworth Town Centre	Identifies opportunities for retail, leisure, culture/tourism & office development along with encouraging higher density residential and improved linkages within the town centre and to the out of centre retail areas. It also identifies the key historic landmarks and introduces design and conservation principles.	SP3: Supporting investment in local & neighbourhood centres	Sets out guidance for achieving environmental and accessibility improvements and where applicable linked to delivering community regeneration objectives.	SP4: Sustainable economic growth	Sets out the employment land requirement over the plan period and identifies the existing network of strategic employment areas along with a number of new
Policy Description	Remit										
SP1: Spatial Strategy for Tamworth	Provides a guide to how the spatial vision and strategic objectives will be achieved in practical terms. The role of the spatial strategy is to set out how much development there will be, broadly where it will go, when it will take place and who will deliver it. It emphasises the 'centres first' objective, spatial direction for delivering housing and employment needs whilst identifying key spatial priorities for infrastructure and environmental improvements.										
SP2: Supporting investment in Tamworth Town Centre	Identifies opportunities for retail, leisure, culture/tourism & office development along with encouraging higher density residential and improved linkages within the town centre and to the out of centre retail areas. It also identifies the key historic landmarks and introduces design and conservation principles.										
SP3: Supporting investment in local & neighbourhood centres	Sets out guidance for achieving environmental and accessibility improvements and where applicable linked to delivering community regeneration objectives.										
SP4: Sustainable economic growth	Sets out the employment land requirement over the plan period and identifies the existing network of strategic employment areas along with a number of new										



	employment sites allocations which will meet some of Tamworth's future Employment needs. The policy is supported by Appendix C which sets specific details for each of the allocated sites and the constraints/requirements that will need to be overcome in developing them.
SP5: Housing delivery	This policy sets out the overall future housing need release of land to achieve a balanced delivery over the plan period to meet identified housing need including the criteria for achieving high quality development in sustainable locations. The provision will be met through a mixture of sustainable urban extensions, housing site allocations (listed within this policy) and the remainder outside of the borough within Lichfield and North Warwickshire.
SP6: Strategic Urban Extensions	Includes a criteria based policy for delivering the four proposed strategic housing sites including the housing numbers and associated infrastructure required to deliver them.
SP7: Regeneration Priority Areas	Identifies Regeneration Priority Areas: Post War Social Housing areas, and the Wilnecote Corridor as a result of them demonstrating high levels of deprivation and/or a poor quality environment. Sets out a series of priorities to address in each area and commits the council and its partners to work in partnership to deliver spatial interventions to improve the physical environment and deliver social and economic renewal.
SP8: Environmental Assets	Maps green and blue infrastructure and identifies a series of priority areas and schemes and policy principles to deliver enhancements and improvements. These include improving and enhancing the network of green linear linkages across the town, and to the, canal and river network.
SP9: Sustainable Infrastructure	Identifies the strategic infrastructure, including transport, flood risk and climate change mitigation and community infrastructure to deliver the overall strategy.
CP1: Hierarchy of centres	Reinforces the 'centre first' approach to delivering identified future convenience and comparison retail need and defines the hierarchy of centres and sets out acceptable uses in each tier of centre. Sets out the approach to 'town centre use' proposals outside of centres including floor space thresholds as a basis to undertake impact assessments. Sets out restrictions on future retail and leisure expansion at out of town retail parks.
CP2: Employment Areas	This policy defines the acceptable uses within the employment areas- B1 (b,c), B2 & B8 and sets out the criteria to be met if alternative uses are proposed within them. The policy provides detail of environmental and accessibility improvements and encourages the use of renewable and low carbon energy technology.
CP3: Supporting growth in culture & tourism	Sets out support for tourism and culture led development; in particular related to the town centre and its proposed leisure zone. Identified supporting infrastructure including hotels and accessibility improvements including to Drayton Manor.

CP4: Affordable Housing	This policy establishes affordable housing need throughout the plan period. It sets out thresholds and the level of developer contribution towards the provision of affordable housing target.
CP5: Housing Types	The policy establishes standards for new housing development including the size, type and mix of units, based on evidence arising from the latest Housing Needs Study. Looks towards providing for the requirements of different groups within the population.
CP6: Housing density	This policy contains a banded density target for particular borough wide locations including a higher density target for centres, transport nodes and a lower target for elsewhere whilst respecting the local context
CP7: Gypsy & Traveller provision	Whilst not allocating specific sites, this policy establishes criteria for assessing applications for site proposals.
CP8: Sport & Recreation	This provides and promotes a network of high quality sport and recreation facilities across the borough to meet needs, whilst aiming to protect existing needed facilities.
CP9 Open Space	This seeks to protect the existing network of high quality open space across the borough and sets out criteria for assessing proposals which involve a loss of open space.
CP10: Design of new development	This policy introduces a number of principles to achieve high quality buildings and places.
CP11: Protecting the Historic Environment	This includes a list of principles to be considered when proposing development which impacts on the historic environment including listed buildings, Conservation Area & scheduled ancient monuments.
CP12: Protecting and enhancing biodiversity	This aims to preserve sites and species, reinforce links between habitats and ensure appropriate consideration to development depending on status of sites i.e. national and local. It also encourages habitat restoration and creation, with emphasis on community led initiatives.
CP13: Delivering Sustainable Transport	The policy sets out priority measures for improving accessibility and linkages, particularly by public transport, walking and cycling on a borough wide basis and to/from strategic development sites.
CP14: Sustainable Development and Climate Change Mitigation	This supports measures to achieve carbon zero development including renewable energy proposals and resource management.
CP15: Flood Risk and Water management	This policy requires new development to consider areas susceptible to fluvial and pluvial flooding including the application of SUDs and sustainable urban design.



	CP16: Providing and protecting community infrastructure	This sets out support for community facilities and infrastructure to be located in accessible locations and encourages dual use to be considered where appropriate in sustainable locations.
	CP17 Infrastructure & Developer Contributions	This policy includes the key infrastructure required to deliver the strategy and introduces the Infrastructure Delivery Plan
<b>5. What factors/ forces could contribute/ detract from the outcomes?</b>	Factors could include available budgets; changing political objectives, the current state of the economy; and suitable land availability.	
<b>6. Who are the main stakeholders in relation to the policy/ procedure/ practice?</b>	Everyone who works and lives in the borough will be affected by the proposals of the strategy, as will organisations and individuals who wish to promote development within the district.	

**7. Which individuals/ groups have been/ will be consulted with on this policy/ procedure/ practice?**

**Please explain**

The Borough Council has been working on the Local Plan (previously known as the Core Strategy) since 2006 and has produced a number of consultation documents, including the Issues and Options in 2008, an Option Report and a proposed Spatial Strategy, both in 2009, the specific Housing Policy document during early 2011.

The Tamworth Local Plan 2001-2011 was adopted in July 2006 and under the provisions of the Planning and Compulsory Purchase Act 2004, the policies remain in force for three years. The Secretary of State has confirmed which policies are saved in 2009.

The Council published its Local Plan in June 2012. Underpinning its spatial strategy for the borough is the need to balance growth with the protection of the borough's natural and built assets to ensure it will not have detrimental impact on the quality of life for Tamworth's communities. Further, it seeks to ensure that policies do not contribute to, or increase the effects of climate change (i.e. Flood Risk, Global Warming, loss of biodiversity, etc).

In November 2012 the Council submitted the 2006-2028 Local Plan for examination. The appointed Planning Inspector (David Vickery) had several areas of concern, notably over the lack of suitable land use allocations for housing, employment and town centre uses. To address these concerns the Council proposed to modify the Local Plan by making additional allocations. To do this, the Council would have needed to carry out a Sustainability Appraisal (SA) on all proposed sites and suitable alternatives. In February 2013 the Inspector called an Exploratory Meeting. The Inspector's note recommended the Council to withdraw the Local Plan from examination due to the high risk of a legal challenge over SA issues. The Inspector referenced the recent legal challenges over the Greater Norwich and Forest Heath adopted development plans.

Part of the work set out by the Council at the Exploratory Meeting was to include land use allocations for housing, employment and town centre uses within the Local Plan. Currently the Council is preparing an evidence base to support these allocations.

During this period the council has undertaken continuous consultation with the communities of Tamworth, along with other stakeholders including developers, landowners and infrastructure providers to identify and agree a series of issues and

	<p>options for delivering future development within the borough. This has included delivering stakeholder workshops, staffed public exhibitions at borough wide locations and presentations to individual groups across the borough. In addition to ensuring information was made available on the Council's website, permanent exhibitions on the Core Strategy were placed in the reception area of Marmion House and also at the library. During the production of the Local Plan a number of LDF newsletters have been produced and distributed to keep stakeholders up to date of the Core Strategy's progress.</p> <p>The new draft Local Plan will be subject to a 6 week consultation period whereby anyone with an interest in the plan will be invited to submit representations. As before, consultation will take place in a wide range of ways.</p> <p>An updated version of the Statement of Community Involvement (SCI) has been produced and consultation on this document took place in 2013. The SCI takes into account hard to reach groups and is to be adopted early in 2014 prior to the consultations on the Draft and Pre-submission publication Local Plan due to take place in 2014.</p> <p>The pre-submission Local Plan publication will also be subject to a 6 week consultation period whereby anyone with an interest in the plan will be invited to submit representations. However, at this stage, representations are limited to comments on the soundness and legal compliance of the Local Plan.</p>	
<p><b>8. Are there concerns that the policy/ procedure/ practice <u>could</u> have a differential impact on racial groups?</b></p>	<p>Y</p>	<p>No direct evidence base has been identified on which to make an assessment. Larger housing types may be required by certain BME communities but this will be reviewed by ongoing updates of Housing Needs Studies which, in turn, will determine the type of housing provided within the borough.</p> <p>Policy CP5 notes that all proposals for housing development should ensure that they meet the requirements of different groups within the population, where there is a proven need and demand and provide an appraisal of the local community context and housing need of that community</p>

<p><b>9. Are there concerns that the policy/ procedure/ practice <u>could</u> have a differential impact due to gender?</b></p>	<p><b>N</b></p>	<p>There is no direct evidence base on which to make an assessment.</p>
<p><b>10. Are there concerns that the policy/ procedure/ practice <u>could</u> have a differential impact due to them being transgender or transsexual?</b></p>	<p><b>N</b></p>	<p>There is no direct evidence base on which to make an assessment.</p>
<p><b>11. Are there concerns that the policy/ procedure/ practice <u>could</u> have a differential impact due to disability?</b></p>	<p><b>Y</b></p>	<p>The location of services, employment and retail could discriminate against access by those with physical and sensory disabilities. Likewise, the type and location of housing could also impact on access by people with physical and sensory disabilities and the level of provision and location of an adequate open space and sport and recreation opportunities could have a differential impact on people with mental health related disabilities.</p> <ul style="list-style-type: none"> <li>• <b>A Prosperous Borough</b> Focussing investment within the existing network of centres with their good accessibility by public transport offers a positive impact on those groups who rely on public transport. Ensuring sustainable economic growth has the potential to create employment opportunities for people suffering from mental health related disabilities through increasing opportunities for employment.</li> <li>• <b>Strong and Vibrant Neighbourhoods</b> Ensuring proposals for housing development meet the requirements of different groups within the population, where there is a proven need and demand and provide an appraisal of the local community context and housing need of that community should ensure disability related issues are capable of being addressed.</li> <li>• <b>A High Quality Environment</b> Ensuring a high quality network of publically accessible open space and access to sport and recreation facilities should ensure that requirements related to physical disabilities are addressed and that mental health related</li> </ul>

		<p>disabilities are considered through improving access to natural infrastructure.</p> <ul style="list-style-type: none"> <li>• A Sustainable Town</li> </ul> <p>Ensuring new development is located in sustainable locations adequately served by public transport could increase their overall accessibility to people with physical disabilities. Likewise, ensuring community facilities are located within existing centres or in accessible locations increases their accessibility. The requirement for travel plans should ensure disability related requirements are considered to improve their accessibility.</p>
<b>12. Are there concerns that the policy/ procedure/ practice <u>could</u> have a differential impact due to sexual orientation?</b>	<b>N</b>	<p>No data on sexual orientation exists as this is the only social identity factor omitted from the National Census. Equally no reliable data exists on sexual orientation that applies to Tamworth. It is therefore difficult to assess the impact of planning decisions and strategies on this equality group.</p>
<b>13. Are there concerns that the policy/ procedure/ practice <u>could</u> have a differential impact due to age?</b>	<b>Y</b>	<p>The Local Plan is based on population projections which anticipate an overall aging population which will have specific housing needs. Policy CP5 notes that all proposals for housing development should ensure that they meet the requirements of different groups within the population, where there is a proven need and demand and provide an appraisal of the local community context and housing need of that community.</p> <p>Staffordshire County Council Flexi Care Strategy estimates that the growth in population of those aged 65 and over between 2010 and 2030 will be 72% in Tamworth, the largest growth in Staffordshire. Flexi Care Housing provides an opportunity for people to live in their own accommodation with the security of care and support being available when needed. The Strategy identifies the level of units required to meet demand in Tamworth (823) and how many need to be available for rent or purchase. It will be important to meet the need of flexi care accommodation alongside any other specific needs identified.</p> <p>The link between older age and physical mobility requires services to be provided in accessible locations to avoid isolation and exclusion. The strategy of focusing services and community facilities in accessible, sustainable locations should ensure that older people remain able to access these services.</p> <p>The Local Plan also anticipates a growing younger population. For younger people ensuring services are located in accessible locations (through a</p>

		<p>means other than the private car) should ensure they have adequate access to schools, shops, sport and recreation, employment, health services.</p> <ul style="list-style-type: none"> <li>• A Prosperous Borough Focussing investment within the existing network of centres with their good accessibility by public transport offers a positive impact on those groups who rely on public transport. Ensuring sustainable economic growth has the potential to create employment opportunities for both older and younger people who may not have access to a private car.</li> <li>• Strong and Vibrant Neighbourhoods Ensuring proposals for housing development meet the requirements of different groups within the population, where there is a proven need and demand and provide an appraisal of the local community context and housing need of that community should ensure issues related to older people are capable of being addressed.</li> <li>• A High Quality Environment Ensuring a high quality network of publically accessible open space and access to sport and recreation facilities should ensure that all age groups have adequate access to open space.</li> <li>• A Connected and Sustainable Town Ensuring new development is located in sustainable locations adequately served by public transport could increase their overall accessibility to older and younger peoples. Likewise, ensuring community facilities are located within existing centres or in accessible locations increases their accessibility.</li> </ul>
<p><b>14. Are there concerns that the policy/ procedure/ practice <u>could</u> have a differential impact due to religious belief?</b></p>	Y	<p>Specific faith groups may require the provision of places of worship.</p> <p>Policy CP16: Community Facilities sets out support for community facilities, including places of worship, to be located in accessible locations and encourages dual use to be considered where appropriate in sustainable locations.</p> <p>Policy CP17 Infrastructure &amp; Developer Contributions sets out an expectation that where new development creates a requirement for new or improved physical, social and green infrastructure beyond existing</p>

		provision, developers will be expected to provide, or contribute to the additional requirement, which may include places of worship.
<b>15. Are there concerns that the policy/ procedure/ practice <u>could</u> have a differential impact on Gypsies/ Travellers?</b>	<b>Y</b>	Specific housing requirements associated with Gypsies, Travellers and Travelling Show People is an issue for planning policy to address. A policy is in place which underpins the provision of accommodation for Gypsies and Travellers. CP7: Provision for Gypsies and Travellers and Travelling Show People. Whilst not allocating specific sites, this policy establishes specific criteria for assessing applications for site proposals to ensure proposals deliver sustainable and appropriate sites in terms of both Gypsy and Traveller communities and the settled community.
<b>16. Are there concerns that the policy/ procedure/ practice <u>could</u> have a differential impact due to dependant/caring responsibilities?</b>	<b>N</b>	There is no direct evidence base on which to make an assessment.
<b>17. Are there concerns that the policy/ procedure/ practice <u>could</u> have a differential impact due to them having an offending past?</b>	<b>N</b>	There is no direct evidence base on which to make an assessment.

<p><b>18. Are there concerns that the policy/ procedure/ practice could have an impact on children or vulnerable adults?</b></p>	<p>Y</p>	<p>The Local Plan anticipates a growing younger population. For younger people, including children, ensuring services are located in accessible locations (through a means other than the private car) should ensure they have adequate access to schools, shops, sport and recreation, employment, health services.</p> <ul style="list-style-type: none"> <li>• A Prosperous Town Focussing investment within the existing network of centres with their good accessibility by public transport offers a positive impact on those groups who rely on public transport. Ensuring sustainable economic growth has the potential to create employment opportunities for both children and vulnerable adults who may not have access to a private car.</li> <li>• A High Quality Environment Ensuring a high quality network of publically accessible open space and access to sport and recreation facilities should ensure that all groups have adequate access to open space.</li> <li>• A Sustainable Town Ensuring new development is located in sustainable locations adequately served by public transport could increase their overall accessibility to children and vulnerable adults. Likewise, ensuring community facilities are located within existing centres or in accessible locations increases their accessibility.</li> </ul>
<p><b>19. Does any of the differential impact identified cut across the equality strands (e.g. elder BME groups)?</b></p>	<p>Y</p>	<p><b>The Local Plan's focus on locating access to services and facilities in sustainable locations increases their accessibility to different groups including older people and younger people, children, people with disabilities and potentially faith groups. In addition, ensuring adequate and appropriate housing provision which caters for the needs of different groups has a positive impact on people with disabilities and older people and potentially BME communities.</b></p>



<p><b>20. Could the differential impact identified in 8 – 19 amount to there being the potential for adverse impact in this policy/ procedure/ practice?</b></p>		<b>N</b>	<p>There are no adverse differential impacts identified. There are a number of positive differential impacts which re outlined above.</p>
<p><b>21. Can this adverse impact be justified:</b></p> <ul style="list-style-type: none"> <li>• on the grounds of promoting equality of opportunity for one group?</li> <li>• For any other reason?</li> </ul>	<b>Y</b>	<b>N</b>	N/A
<p><b>22. As a result of carrying out the equality impact assessment is there a requirement for further consultation?</b></p>		<b>N</b>	<p>The differential impacts are broadly positive or neutral. The implementation of the Local Plan's policies will be monitored against a number of indicators which are capable of being reviewed should any negative outcomes be identified. A further EqiA would accompany any subsequent review of the Local Plan.</p>
<p><b>23. As a result of this EIA should this policy/ procedure/ practice be recommended for implementation in its current state?</b></p>	<b>Y</b>		<p>Yes; the impact has revealed a broadly positive impact on the different equality strands.</p>

**PLEASE COMPLETE THE FOLLOWING ACTION PLAN FOR ALL IMPACT ASSESSMENTS**

# Equality Impact Assessment Action Plan

Complete the action plan demonstrating the changes required in order to meet TBC's commitment to equality and diversity. The action plan must contain monitoring arrangements, the publishing of results and the review period required for this policy.

ACTION/ ACTIVITY	RESPONSIBILITY	TARGET	PROGRESS
Ensure equality needs are capable of being considered in future Local Plan consultations. This will require consultation on the production of Development Plan Documents to continue to be in accordance with the SCI ensuring that all residents who wish to be involved in the preparation of DPDs can express their views.	Development Plans Manager	As set out in The Local Development Scheme and SCI.	
<p><b>Monitoring arrangements:</b> Through public consultation in accordance with the SCI. Includes consultation a wide number of community groups: statutory stakeholders; other agencies; service providers; business sector; local communities; developers and landowners.</p>		Data collected as and when consultations take place.	
<b>Publication:</b>			

<b>Review Period:</b> <b>EqIA will be updated prior to submission of the Local Plan.</b>		<b>Reviewed at each stage of Local Plan preparation</b>	

Expand as appropriate

Signed Anna Priestley – Development Plan Officer  
(Completing Officer).....

Date .....25/02/2014.....

Signed  
(Head of Department) .....Matthew Bowers.....

Date .....25/02/14.....

Signed  
Corporate Diversity/ Equality .....

Date .....

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**Tamworth Borough Council  
Draft Local Plan 2006-2031  
Health Impact Assessment**

**March 2014**

## Introduction

- 1.1 A Health Impact Assessment (HIA) assesses the potential impacts a plan, programme or policy on the health of the population and the distribution of those effects within the population (Department of Health, 2010). Whilst there is no statutory duty to undertake a HIA, it is considered best practice and provides a useful tool to inform decision making, furthermore because of the strategic nature of the documents within the Local Development Framework, specifically the Local Plan, it is considered that a HIA should be undertaken to ensure that health is embedded within the process.
- 1.2 The HIA of the Local Plan assesses the impacts of each individual policy against the identified health issues for Tamworth and identifies appropriate mitigation measures. Therefore the aim of this HIA is to assist the progression and decision making of the Local Plan.
- 1.3 There is no fixed method for undertaking a HIA however the method used in this assessment reflects the approach of the Sustainability Appraisal where health is already embedded within some of the sustainability objectives.
- 1.4 The HIA update has been carried out by the Development Plan Team with assistance from Tamworth's District Public Health Officer Lead.

### **1.0 Tamworth Local Plan 2006-2031**

- 1.1 The Tamworth Local Plan is an overarching document which sets the strategic direction and policy for Tamworth Borough looking forward to 2031. It identifies the overall strategy and framework for development including housing, employment, green spaces, biodiversity, leisure and shopping. The initial HIA was undertaken for the Tamworth Pre-submission Local Plan in 2012. The Local Plan was submitted to the Planning Inspectorate for examination in November 2012. The Inspector raised a number of concerns relating to the soundness of the Plan and an exploratory meeting was held in February 2013 to discuss the work required to overcome the concerns. The Plan was subsequently withdrawn in March 2013.
- 2.2 Since the withdrawal of the Local Plan the work set out in the exploratory meeting has been completed and parts of the evidence base updated and refreshed where necessary to inform the draft Local Plan 2014. The Plan has been amended to extend the plan period to 2031 and the housing and employment land supply adjusted to take account of completions and commitments to 2013. New allocations have been made to accommodate 4250 dwellings and 18 hectares of employment land within the borough boundary. An update of the HIA is necessary because of the changes to the Local Plan since 2012.

#### *Vision and Strategic Objectives*

- 2.3 The Local Plan is divided into a number of chapters. The first of which includes a spatial portrait and vision for the borough. It sets out the key characteristics of Tamworth and identifies the key issues and challenges facing the borough that the Local Plan seeks to address. The vision sets out the type of place Tamworth should become by 2031. It takes into account existing plans and strategies produced by both the council and its partners. The vision results in a set of 12 strategic objectives which are set out in

relation to the key themes to which they relate. Strategic Spatial Objective 7 makes an explicit reference to encouraging active and healthier lifestyles.

#### *Structure of the Local Plan*

- 2.4 The policy chapters include policies to guide how the spatial vision and strategic objectives; summarised in four over-arching chapters: a prosperous town, strong and vibrant neighbourhoods, high quality environment and a sustainable town, will be achieved in practical terms. The spatial strategy policies set out how much development there will be, broadly where it will go, when it will take place and who will deliver it. The Core Policies contained within each theme chapter seek to deliver the vision and strategic objectives and should be interpreted within the context of the spatial strategy policies.

#### *Wider Policy Framework*

- 2.5 The National Planning Policy Framework (NPPF) sets out the principles that should be embedded within Local Plans. Delivering sustainable development is the overarching aim of the document which focuses on economic, social and environmental role where specific reference is given to supporting strong, vibrant and healthy communities. These principles underpin the Local Plan.

#### *Local Policy Framework*

- 2.6 The Local Plan should be integrated with and deliver the strategic priorities of the Sustainable Community Strategy to promote the vision of 'One Tamworth, Perfectly Placed'.
- 2.7 The Tamworth Sustainable Community Strategy has been produced by the Tamworth Strategic Partnership, a multiagency partnership committed to improving the quality of life of local people. There are two strategic priorities underpinned by primary outcomes;

### **Strategic Priority 1**

To Aspire and Prosper in Tamworth

#### **Primary Outcome**

To create and sustain a thriving local economy and make Tamworth a more inspirational and competitive place to do business through:

- Raising the aspiration and attainment levels of young people
- Creating opportunities for business growth through developing and using skills and talent
- Promoting private sector growth and create quality employment locally
- Branding and marketing "Tamworth" as a great place to "live life to the full"
- Creating the physical and technological infrastructure necessary to support the achievement of this primary outcome.

### **Strategic Priority 2**

To be healthier and safer in Tamworth

#### **Primary Outcome**

To create a safe environment in which local people can reach their full potential and live longer, healthier lives through;

- Addressing the causes of poor health in children and young people;
- Improving the health and well being of older people by supporting them to live active, independent lives;
- Reducing the harm and wider consequences of alcohol abuse on individuals, families and society;
- Implementing 'Total Place' solutions to tackling crime and ASB in designated localities;
- Developing innovative early interventions to tackle youth crime and ASB; and
- Creating an integrated approach to protecting those most vulnerable in our local communities

2.8 The Sustainability Appraisal (SA), strongly linked to the Sustainable Community Strategy has been used to appraise and inform the development of the Local Plan. The appraisal uses 18 objectives to assess each policy of which health is already embedded both explicitly, through sustainability objective 6 "To encourage active and healthier lifestyles by providing accessible green infrastructure, including networks of paths and open spaces, and formal and informal sport and recreation facilities" and also implicitly in a number of objectives, for example 17 "To reduce the need to travel, reduce out-commuting and encourage sustainable modes of transport". To this end, although assessing the impact on health has already been considered as part of the SA process this Health Impact assessment focuses on the impacts in more depth and sits alongside the SA and the Equalities Impact Assessment (EIA).

2.9 The Local Plan has been subject to various stages of consultation, from Issues and Options to its present format. At all stages the community and stakeholders have been invited to make comments and help to shape the document. Therefore as part of this process factors related to health have been considered throughout the formulation of the plan.

### **3.0 Spatial Planning and Health**

3.1 Spatial Planning, through the Local Plan, can help create a healthy and sustainable community through ensuring the impacts upon the health of the population are integrated in planning. The link between how an area is planned and the health of its residents is well established and spatial planning cuts across different health determinants.

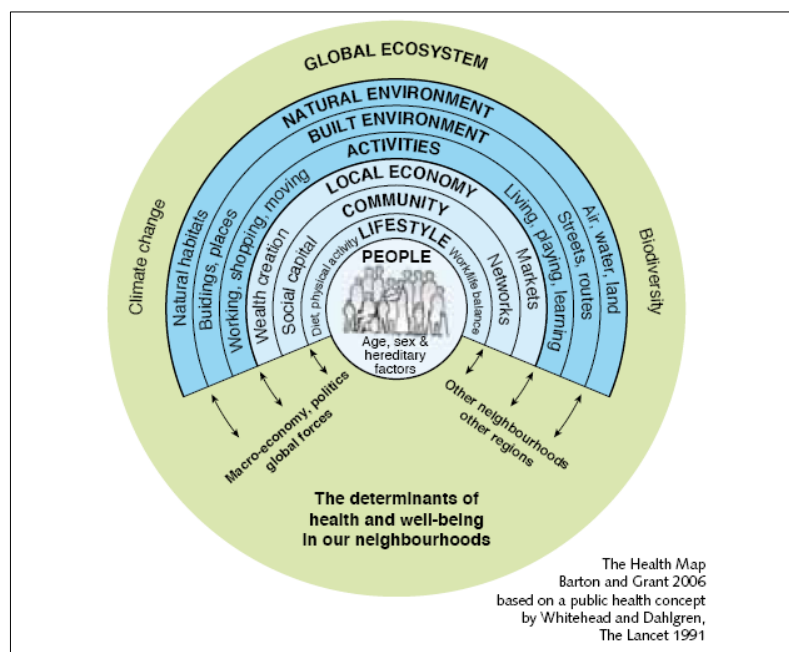
3.2 The most common link relates to the built form having an impact on active lifestyles which in turn impact on the prevalence of obesity and cardiovascular disease, commonly referred to as 'obesogenic environments'. One such example relates to creating an environment that support regular formal and informal exercise through the provision of suitable infrastructure and encouraging development in sustainable locations, which in turn reduces the reliance on the car and therefore encourages more informal recreation through walking and cycling.

3.3 However there is further evidence related to other health issues beyond obesity and physical activity, for example the link between access to open spaces and mental health. There is empirical evidence from both the US and the UK that supports the impact that a close proximity to open space can improve someone's level of health and wellbeing.



## 4.0 Health Determinants

- 4.1 To be able to assess the health impacts of the Local Plan, there is a need to identify health determinants in which to assess the policies against. Health determinants are the social, economic, environmental and cultural factors that indirectly influence health and well-being (Department of Health, 2010). Figure 1 illustrates the determinants of health in relation to settlements and neighbourhoods.



**Figure 1 Determinants of Health**

- 4.2 The Local Plan may not have an impact on all of these determinants. It is important to identify the main health issues for Tamworth, which can also be considered to relate to spatial planning, to ensure that the appropriate determinants are used in the assessment.

## 5.0 Tamworth's Community

- 5.1 The delivery of the Local Plan will affect Tamworth's community in a variety of ways. To fully understand how it will impact on the health of the community it is important to understand the demographic and health profile of Tamworth's residents.

### *Demographics*

- 5.2 The population of Tamworth in 2012<sup>1</sup> was 77,100 and is projected to grow by 11.6% by 2031, a total of 9,000 people. However numbers of young adults is forecast to reduce and growth will be concentrated in the older age groups.

<sup>1</sup> 2012 Mid-year estimates (source ONS)

### *Health*

- 5.3 The following section summarises the main health issues in accordance with the categories set out in the document entitled 'Public health issues by local authority' (South Staffordshire PCT, 2011). It is important to note that there will be some health issues and categories which are omitted from this summary, such as rates of teenage pregnancy within the infant health category, because it is not considered that planning has a causal link with this issue. Therefore this summary should not be taken as identifying the only health issues within Tamworth. In addition, whilst there are a number of different data sources for health statistics, this dataset provides the latest statistics and is regularly kept up to date which would enable effective monitoring of identified health issues/objectives in the future.

### *Life Expectancy*

- 5.4 Life expectancy is an important basis for understanding the health of an area. For Tamworth as a whole life expectancy in 2012 for both men and women was virtually the same as the Staffordshire and England average, 78.9 for men and 82.8 for women. However there is significant variation between the most deprived areas of Tamworth and in the least deprived areas, 5.6 years lower for men and 6.7 years lower for women. Consequently reducing health inequalities is a key issue for Tamworth.

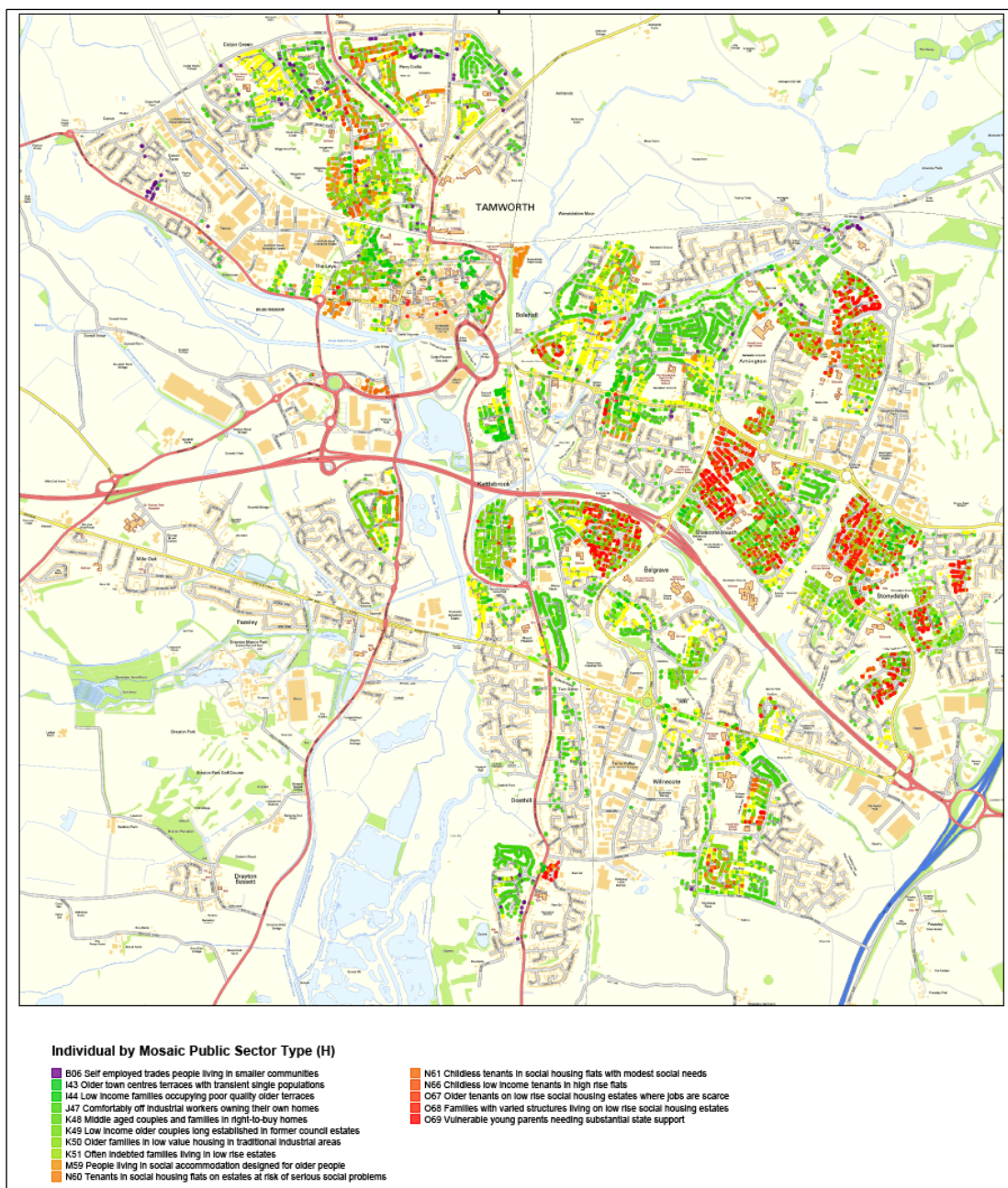
### *Mortality and Preventable Death*

- 5.5 The major causes of mortality and morbidity are cancer, respiratory diseases and circulatory disease. The population of Tamworth is relatively young so Tamworth performs relatively well against the England averages for these diseases. However, as the population ages they are likely to become more significant health issues. Over the last 10 years, all cause mortality rates for men have fallen and the early death rate from heart disease and stroke has fallen to and is similar to the England average. It is worth noting that whilst the premature mortality rate from circulatory diseases at 79 per 100,000 population is similar to the England average of 70 it is also the highest rate in Staffordshire (2007-09 data).

### *Lifestyle Risk Factors*

- 5.6 Lifestyle risk factors are made up of various indicators of which obesity, both childhood and adult, physical activity and diet all feature prominently. It is important to note that, in the absence of local survey data the data related to adult obesity and diet are based on synthetic estimates, i.e. the expected prevalence for an area based on national surveys and the areas characteristics (e.g. age, gender and deprivation levels) and as such should be treated with a degree of caution.
- 5.7 The levels of childhood obesity vary markedly to adult obesity when compared to the England average. The childhood obesity rate, at reception (23.4%) and year 6 (33.3%) is marginally higher than the England and Staffordshire rate, although this difference is not statistically significant.
- 5.8 In contrast, obesity rates amongst adults are estimated to be the highest in England 30.7% compared to an England rate of 24.2%, and a Staffordshire

rate of 26.7%. Figure 2 below demonstrates the estimated locations where obesity is considered to be the most prevalent (Experian, 2012).



**Figure 2 Expected locations where Obesity is prevalent by Mosaic Public Sector Type**

- 5.9 The rates of physical activity in Tamworth are lower than the England average, both for participating in at least 3 days per week of 30 minutes moderate participation (19% compared to 22%) and 10% for five days a week of 30 minutes moderate participation (10% compared to 11%). However this variation is not significantly lower although the rate is lower than most other Staffordshire authorities and the Staffordshire average, 21%.
- 5.10 Not with standing the reliability on synthetic estimates which impacts on the statistical validity of some of the data, there appears to be a correlation between the higher levels of obesity and the lower levels of participation, both of which are keys health issues to address.
- 5.11 Focusing on diet, Tamworth has a lower proportion of residents eating at least 5 portions of fruit and vegetables a day, 21% compared to 29% (England) and 26% (Staffordshire).

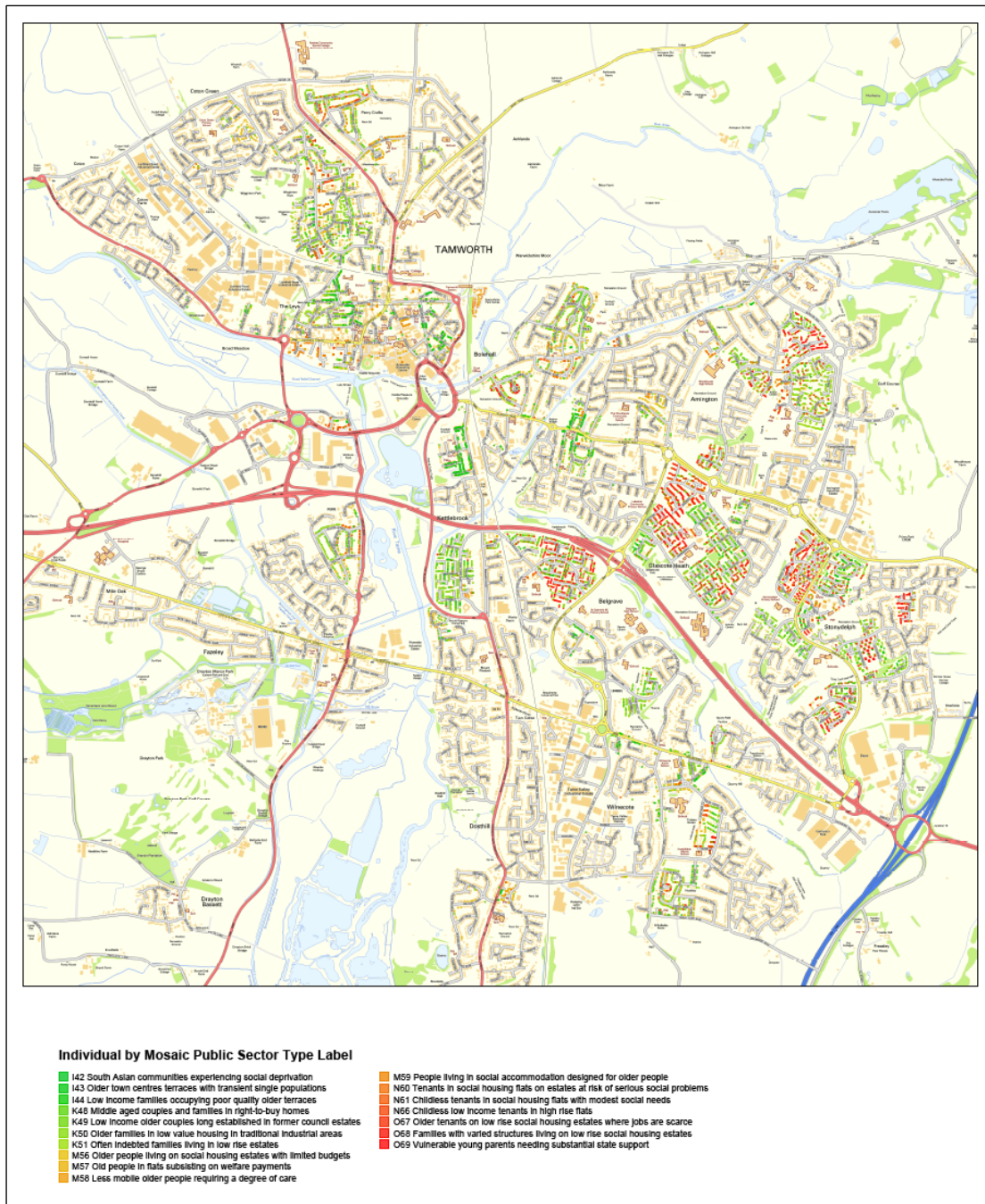
### *Mental Health and Wellbeing*

- 5.12 The Health Profile 2010 suggests that Tamworth has similar levels of mental health problems as England. It is estimated that between 26% and 31% of adults aged 16+ experience mental ill health of whom 23% attend primary care (13,900). GPs identify a disorder in 10% of these (6,000) and 2-3% are referred to mental health services (1,200 – 1,800). It is estimated that there are 466 people registered with severe mental health disorders, in Tamworth (0.56%)
- 5.13 Estimates of Mental Illness Needs, using the mental illness needs index suggest that Glascote and Bolehall have higher MINI needs than the rest of Tamworth, albeit based on data from 2000. 0.6% of people in Tamworth are identified on dementia registers a figure which correlates with the Staffordshire average and is marginally worse than the average for England.

### *Socio-Economic Status*

- 5.14 The index of multiple deprivation (IMD) is a nationally recognised measure for social deprivation. Furthermore as it can be mapped, it enables spatial patterns to be established which provides a greater understanding of health inequalities.
- 5.15 Figure 3, below shows the IMD for Tamworth, demonstrating that there are a number of wards where a proportion of the population feature in the higher levels of multiple deprivation.





**Figure 3 Areas of a higher level of Multiple Deprivation by Mosaic Public Sector Type**

5.13 It is clear that there is a clear correlation between the patterns of multiple deprivation to the estimated levels of obesity, low participation levels and lower life expectancy and therefore addressing these separate issues is critical to reducing health inequalities, which itself is a key issue.

## 6.0 Health Objectives

6.1 Prior to carrying out the health assessment it is important to establish the key health objectives for Tamworth. Based on the outlined health issues in Tamworth, the following health objectives have been identified which will form the basis of the appraisal process.

HO1 Reducing health inequalities within the borough

HO2 Improve diet and nutrition levels

- HO3 Reduce the risk of respiratory and circulatory diseases
- HO4 Reduce the level of obesity
- HO5 Increase the level of physical activity
- HO6 Improved mental health and wellbeing

6.2 Each objective has been assessed against the policies within the Local Plan. It is important to note that due to the structure of the Local Plan, with a series of core policies underpinning broader spatial policies that some policies have been assessed together as part of this appraisal to avoid repetition in the process. This appraisal is included in appendix 1. The only policy that has not been appraised is SP1, A Spatial Strategy for Tamworth because this is the over-arching policy and is considered too broad for the analysis required in this process. However as each policy or group of policies relate to it there is already a degree of analysis when considering this appraisal as a whole.

## 7.0 Health Impact Scoring

7.1 The Health Impact Appraisal has been carried out to reflect the SA scoring which is as follows;

Double Positive	++	2
Positive	+	1
No Impact	0	0
Single Negative	-	-1
Double Negative	--	-2

This reflects the scoring adopted as part of the Sustainability Appraisal and ensures a consistent approach between both documents.

7.2 The scoring is summarised in the matrix below (figure 5) and set out in full in Appendix 1. Appendix 1 assesses the likely impact of the local plan policies on health, alongside the likely impact without the policy for comparison purposes. A small number of changes have been made to the matrix. The first is to CP7 Gypsies, Travellers and Travelling Show People where it was considered that there is no direct link between the policy and the health objectives, therefore all of the impacts have been set to 0. SP6, which previously dealt with the Anker Valley Sustainable Urban Neighbourhood, had a single negative for HO1 reducing health inequalities, due to its location away from the most deprived areas and spin-off benefits, such as community facilities, may not have a direct impact on these areas. This has been changed to a single + because the new strategic allocations are more evenly distributed around the borough and the allocation on the eastern side of the borough is closer to the more deprived areas.

7.3 The matrix demonstrates that with the exception of CP7 Gypsies, Travellers and Travelling Show People and CP15, Flood Risk and Water Management, every other policy or combination of policies is considered, in general terms, to have a positive impact on health in the Borough. CP8 Sport and Recreation, and CP9 Open Space both scored highest (9 out of 12) and this is probably as a consequence of the clearer link that can be identified in relation to open space and participation in physical activity. Furthermore, this scoring reflects the correlation between three of the health objectives, HO3

(Reduce the risk of respiratory and circulatory diseases), HO4 (Reduce the level of obesity) and HO5 (increase the level of physical activity), in that they all relate to participation in physical activity and therefore policies where the link can clearly be made are not surprisingly going to achieve a better score. In this case both CP8 and CP9 achieve a score of 2 (++) for these three health objectives.

7.4 Policy SP2, Supporting Investment in Tamworth Town Centre and CP1 Hierarchy of centres for town centre uses obtained the next best score of 8 out of 12. Whilst this scored positively for each health objective, HO2 (Improved diet and nutrition) and HO6 (Improve mental health and wellbeing) both achieved a score of 2. This demonstrates the important role that the town centre can have on these factors and the market and strong public realm were key feature in this.

7.5 Other notable scores related to SP7 Regeneration Priority Areas and CP16, Community Infrastructure, both of which scored 7 out of 12 overall and 2 for reducing health inequalities because they focus on supporting the deprived areas shown in figures 2 and 3. This correlation can be demonstrated by comparing the spatial diagram (regeneration priority areas indicated in purple) with the map showing the areas that feature the higher levels in the index of multiple deprivation, shown below in figure 4.

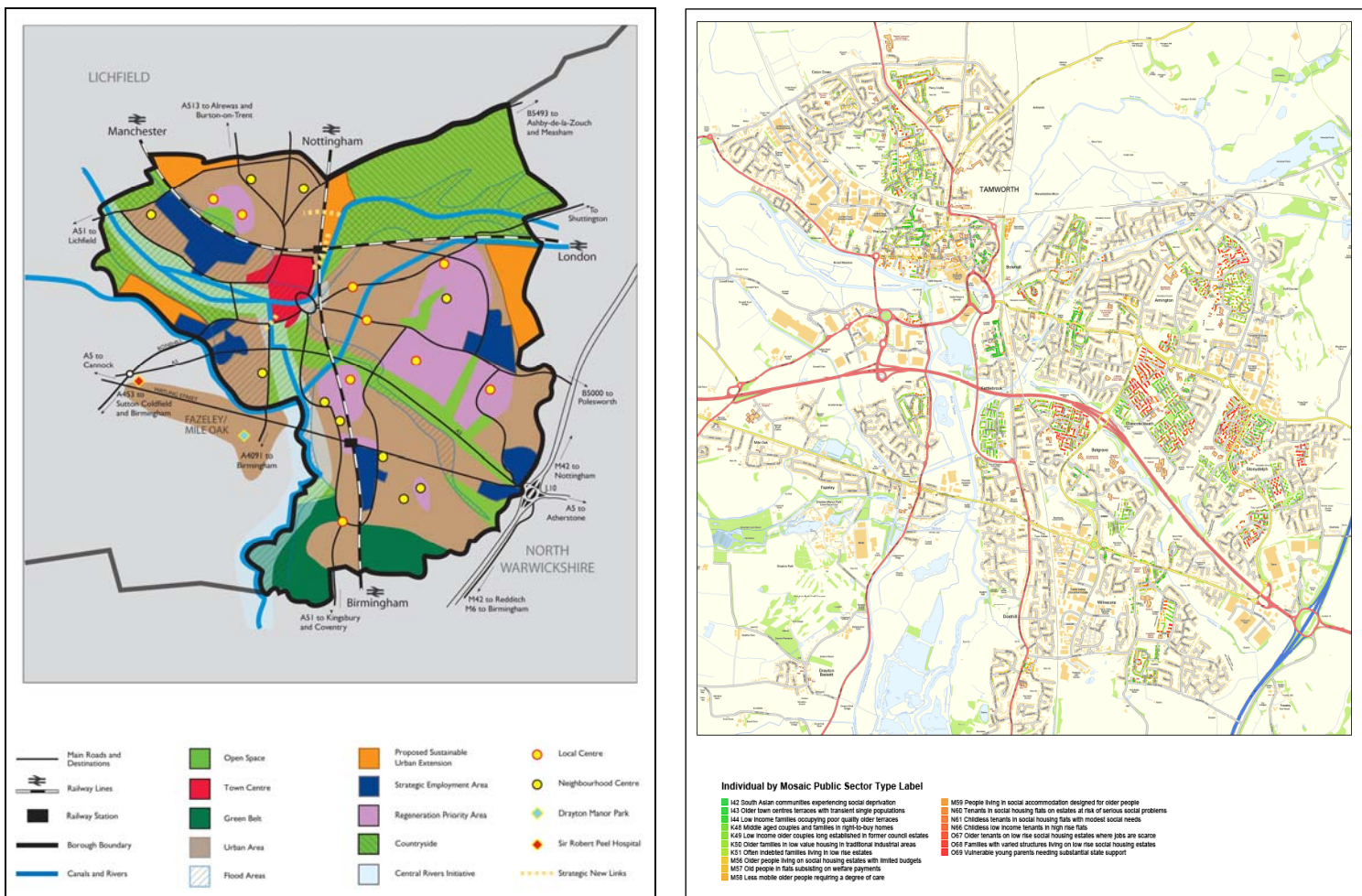


Figure 4 Spatial Diagram and Map showing Index of Multiple Deprivation



Policy	Health Objective						Total Score
	HO1	HO2	HO3	HO4	HO5	HO6	
SP2 Supporting Investment in Tamworth Town Centre and CP1 Hierarchy of centres for town centre uses	+	++	+	+	+	++	8
SP3 Supporting Investment in Local and Neighbourhood Centres and CP1 Hierarchy of centres for town centre uses	+	+	+	+	+	+	6
SP4 Sustainable Economic Growth and CP2 Employment Areas	+	0	+	+	+	+	5
CP3 Culture and Tourism	0	0	+	+	+	+	4
SP5 Housing, CP4 Affordable Housing, CP5 Housing Types and CP6 Housing Density	+	+	+	+	+	+	6
SP6 Strategic Urban Extensions	+	+	+	+	+	+	6
SP7 Regeneration Priority Areas	++	+	+	+	+	+	7
CP7 Gypsies, Travellers and Travelling Show people	0	0	0	0	0	0	0
SP8 Environmental Assets	+	0	+	+	++	+	5
CP8 Sport and Recreation	+	0	++	++	++	++	9
CP9 Open Space	+	0	++	++	++	++	9
CP10 Design of new development	0	0	0	0	0	+	1
CP11 Protecting the Historic Environment	0	0	0	0	0	+	1
CP12 Protecting and enhancing biodiversity	0	0	+	+	+	+	4
SP9 Sustainable Tamworth and CP13 Delivering Sustainable Transport	+	0	+	+	+	0	4
CP14 Sustainable Development and Climate Change Mitigation	+	0	+	+	+	0	4
CP15 Flood Risk and Water Management	0	0	0	0	0	0	0
CP16 Community Infrastructure	++	+	+	+	+	+	7

Figure 5 Matrix summarising the appraisal results

## **8.0 Conclusions**

- 8.1 It is evident that the policies contained within the Local Plan contribute to improving the health of Tamworth's population in that they broadly support the different health objectives established for the borough. Furthermore policies related to promoting the town centre, sustainable travel, protecting and enhancing the existing network of open space, sport and recreation facilities and regenerating deprived neighbourhoods are identified through the assessment as being of particular importance in meeting these health objectives. This will need to be considered in the decision making process where applicable.
- 8.2 This is the first time that a health impact assessment has been carried out and the assessment process may change in future to reflect demographic changes and internal processes. The correlation between the three health objectives relating to physical activity and policies on open space and sport and recreation which achieve a better score is logical and obvious. Consequently, there may be potential to revise and combine some of the objectives for future health impact assessments to provide a more balanced process.
- 8.3 This assessment has captured a snap shot in time. However it will only be possible to establish the full health impacts through analysis of the delivery of the Local Plans policies, hence the importance of monitoring the health impacts.
- 8.4 This appraisal has purely focused on spatial planning which is one component of health. Many factors play a role in keeping a person healthy from good employment and decent housing to eating well and having good social networks. This wide range of issues means that many services play an important role in keeping a person healthy and well. The Healthy Tamworth initiative aims to provide a comprehensive approach to addressing health inequalities within Tamworth through effective partnership working.

## Appendix 1: Health Impact Policy Appraisal

### SP2 Supporting Investment in Tamworth Town Centre and CP1 Hierarchy of centres for town centre uses

Policy Score		Score without policy		Mitigation
Rating	Commentary/Explanation	Rating	Commentary/Explanation	
HO1: Reducing health inequalities within the borough				
+	Promoting the role of the town centre, which is the most accessible location by a variety of transport modes from around the Borough, will increase equal access to a variety of services, facilities and employment opportunities including medical services and leisure facilities which are located in the town centre.	-	Without supporting a vibrant town centre there will be limited opportunities for equal access to a variety of services, facilities and employment which in turn will make public transport less viable. Therefore facilities will become more disparate or cease to exist, thus making them difficult to access for more deprived groups with limited access to the private car which will worsen health inequalities within the Borough.	
HO2: Improve diet and nutrition levels				
++	Promoting the town centre as a retail centre, including its market, will increase the range of fresh produce available to improve diet and nutrition. Furthermore, access to medical services will provide information on diet and nutrition.	-	Not supporting the town centre as a retail centre could lead to a reduction in the viability of the market which will restrict access to a range of fresh produce.	
HO3: Reduce the risk of respiratory and circulatory diseases				

+	<p>Promoting the town centre with its unique network of leisure facilities and green spaces will encourage cardiovascular activity. Furthermore, reducing reliance on the private car by virtue of its accessibility by sustainable transport modes will reduce CO2 emissions and contribute to improving air quality.</p>	-	<p>Not supporting the town centre may reduce the viability of its network of leisure facilities, leading to potential closure through lack of investment thus reducing opportunities for cardiovascular activity. Alternative locations to the town centre of an equivalent scale such as out of town gyms, are more heavily reliant on the private car which will generate increased CO2 emissions and reduce air quality. However there remains a significant network of green space, further enhanced through the close proximity to the countryside, which does provide opportunities for informal recreation and a limited network of leisure facilities situated on school sites which provide opportunities to participate locally.</p>
HO4: Reduce the level of obesity			
+	<p>Promoting the town centre with its unique network of leisure facilities, green spaces and strong public realm, will encourage cardiovascular activity through informal and formal exercise, which in turn should contribute to reduced levels of obesity.</p>	-	<p>Not supporting the town centre may reduce the viability of its network of leisure facilities, leading to potential closure through lack of investment thus reducing opportunities for cardiovascular activity. Alternative locations to the town centre of an equivalent scale are more heavily reliant on the private car and have limited public realm which do not support informal recreation through cycling and walking which may contribute to increased levels of obesity. However there remains a significant network of green space, further enhanced through the close proximity to the countryside, which does provide opportunities for informal recreation and a limited network of leisure facilities situated on school sites which provide opportunities to participate locally.</p>
HO5: Increase the level of physical activity			

+	Promoting the town centre with its unique network of leisure facilities, green space and strong public realm will encourage cardiovascular activity through informal and formal exercise.	-	Not supporting the town centre may reduce the viability of its network of leisure facilities thus reducing cardiovascular activity. Alternative locations to the town centre of an equivalent scale are more heavily reliant on the private car and have limited public realm which do not support informal recreation through cycling and walking.	
HO6: Improve mental health and wellbeing				
++	A strong town centre that is highly accessible by a variety of transport modes, will increase interaction, reduce isolation and provide support services to help people suffering from mental illness. The varied environment with the natural features of the Anker and Tame Rivers and open spaces will offer a peaceful and calming environment and help to relieve stress. A strong town centre with an attractive historic setting will provide a positive experience.	-	Lack of investment in the town centre will reduce its vibrancy and consequently the number of visitors., There will be limited scope for interaction between people through less people visiting and accessing shops, services and facilities which would in turn increase feelings of isolation. A less vibrant town centre with limited access by public transport reduces the potential for people to access the varied environment and thus benefit from the potential associated benefits for stress relief.	
<b>Final Health Impact Assessment Score</b>				
8		-6		

**SP3 Supporting Investment in Local and Neighbourhood Centres and CP1 Hierarchy of centres for town centre uses**

Policy Score		Score without policy		Mitigation
Rating	Commentary/Explanation	Rating	Commentary/Explanation	
HO1: Reducing health inequalities within the borough				
+	Local and neighbourhood centres offer access by a variety of modes. Promoting their role will increase equal access to a variety of services and facilities including medical services, particularly for deprived communities.	-	Without a strong network of local and neighbourhood centres there will be limited access to services and facilities through sustainable transport modes. This network is of particular benefit to deprived communities reliant on these centres and this would worsen health inequalities.	
HO2: Improve diet and nutrition levels				
+	Promoting the role of local and neighbourhood centres, in particular their retail role, will provide access to information and support services in relation to diet and nutrition through access to schools and medical services.	-	Without a strong network of local and neighbourhood centres there will be limited access to information and support services in relation to diet and nutrition, in particular for those who have no access to the private car.	
HO3: Reduce the risk of respiratory and circulatory diseases				
+	Promoting the local and neighbourhood centres which are accessible by walking and cycling will encourage cardiovascular activity through informal exercise. Accessing the centres by sustainable transport modes will reduce reliance on the private car, reduce CO2 emissions and contribute to improving air quality around the Borough.	-	Without a strong network of local and neighbourhood centres people will be reliant on the private car to access services and facilities further from where they live. This will not increase cardiovascular activity and will generate increased levels of CO2 emissions which will reduce air quality in the Borough. However through retention of the existing network of green space there will remain some opportunities for informal recreation.	
HO4: Reduce the level of obesity				

+	Promoting the local and neighbourhood centres which are accessible by walking and cycling will encourage cardiovascular activity through informal exercise. Strong local and neighbourhood centres will have facilities to accommodate exercise classes thereby promoting formal recreation. Increasing participation in exercise will help to reduce levels of obesity.	-	Without a strong network of local and neighbourhood centres people will be reliant on the private car to access services and facilities. This will not increase cardiovascular activity through informal recreation and therefore will not help to reduce obesity through exercise. Furthermore those who do not have access to the private car will be less likely to access facilities which are not situated locally and therefore less likely to participate. However through retention of the existing network of green space there will remain some opportunities for informal recreation.	
HO5: Increase the level of physical activity				
+	Promoting the local and neighbourhood centres which are accessible by walking and cycling will encourage cardiovascular activity through informal exercise. Strong local and neighbourhood centres will have facilities to accommodate exercise classes, thereby promoting formal recreation.	-	Without a strong network of local and neighbourhood centres people will be reliant on the private car to access services and facilities. This will not increase cardiovascular activity through informal recreation and therefore will not increase the amount of exercise. Furthermore those who do not have access to the private car will be less likely to access facilities which are not situated locally and therefore less likely to participate. However through retention of the existing network of green space there will remain some opportunities for informal recreation.	
HO6: Improve mental health and wellbeing				
+	Strong local and neighbourhood centres will help increase interaction and reduce isolation. Medical services and community hubs located in local and neighbourhood centres will provide support services to help people suffering from mental illness.	-	Without a strong network of local and neighbourhood centres there will be limited scope for increased interaction which will increase isolation. Furthermore there will be less access to support services to help people suffering from mental illness.	

<b>Final Health Impact Assessment Score</b>			
6		-6	



**SP4 Sustainable Economic Growth and CP2 Employment areas**

Policy Score		Score without policy		Mitigation
Rating	Commentary/Explanation	Rating	Commentary/Explanation	
HO1: Reducing health inequalities within the borough				
+	Promoting the network of strategic employment areas will provide equal access to employment opportunities throughout the Borough , thereby reducing deprivation and health inequalities.	-	Without a strong network of strategic employment areas spread throughout the Borough there will be limited equal access to employment opportunities. This will increase deprivation and health inequalities as people will have to travel further to access employment opportunities.	
HO2: Improve diet and nutrition levels				
0	No direct impact	0	No impact	
HO3: Reduce the risk of respiratory and circulatory diseases				
+	Promoting the network of strategic employment areas and improving access by sustainable transport to the employment areas will increase informal recreation through the use of sustainable modes of transport such as walking and cycling, thus increasing cardiovascular activity. Reducing reliance on the private car will help to improve air quality through reducing CO2 emissions.	-	Without a strong network of strategic employment areas accessible throughout the Borough via a variety of sustainable transport modes such as walking and cycling, people will be reliant on the private car to access employment opportunities which will reduce the likelihood of informal recreation. Furthermore increased reliance on the car will lead to an increase in CO2 emissions thus reducing air quality.	
HO4: Reduce the level of obesity				

+	Promoting the network of strategic employment areas and improving access by sustainable transport to the employment areas will increase informal recreation through the use of sustainable modes of transport such as walking and cycling.	-	Without a strong network of strategic employment areas accessible throughout the Borough via a variety of sustainable transport modes such as walking and cycling, people will be reliant on the private car to access employment opportunities. This will reduce the likelihood of informal recreation and therefore not help to reduce obesity.	
HO5: Increase the level of physical activity				
+	Promoting the network of strategic employment areas and improving access by sustainable transport to the employment areas will increase informal recreation through the use of sustainable modes of transport such as walking and cycling.	-	Without a strong network of strategic employment areas accessible throughout the Borough via a variety of sustainable transport modes such as walking and cycling, people will be reliant on the private car to access employment opportunities. This will reduce the likelihood of informal recreation and therefore not improve the level of physical activity.	
HO6: Improve mental health and wellbeing				
+	Promoting the strategic employment areas and sustainable economic growth should reduce unemployment and possibly promote more independence and self esteem.	-	Without a strong network of strategic employment areas and sustainable economic growth there could be increased unemployment which could in turn lead to increased depression related to lower self-esteem and independence.	
<b>Final Health Impact Assessment Score</b>				
5		-5		

### SP4 Sustainable Economic Growth and CP3 Culture and Tourism

Policy Score		Score without policy		Mitigation
Rating	Commentary/Explanation	Rating	Commentary/Explanation	
HO1: Reducing health inequalities within the borough				
0	No direct impact	0	No direct impact	
HO2: Improve diet and nutrition levels				
0	No direct impact	0	No impact	
HO3: Reduce the risk of respiratory and circulatory diseases				
+	Promoting leisure and cultural facilities will increase opportunities for formal recreation. Regenerating and restoring the river and canal corridors will promote opportunities for informal recreation through walking and cycling.	-	A reduction in leisure and cultural facilities through lack of investment will reduce opportunities for formal recreation. Furthermore through a lack of investment in regeneration and restoring the river and canal corridors there will be limited opportunities for informal recreation through walking and cycling.	
HO4: Reduce the level of obesity				
+	Promoting leisure and cultural facilities will increase opportunities for formal recreation. Regenerating and restoring the river and canal corridors will promote opportunities for informal recreation through walking and cycling. Increasing participation in exercise will help to reduce levels of obesity.	-	A reduction in leisure and cultural facilities through lack of investment will reduce opportunities for formal recreation. Furthermore through a lack of investment in regeneration and restoring the river and canal corridors there will be limited opportunities for informal recreation through walking and cycling. Collectively this will lead to a reduction in participation which could lead to an increase in obesity.	
HO5: Increase the level of physical activity				

+	Promoting leisure and cultural facilities will increase opportunities for formal recreation. Regenerating and restoring the river and canal corridors will promote opportunities for informal recreation through walking and cycling.	-	A reduction in leisure and cultural facilities will reduce opportunities for formal recreation. Furthermore through a lack of investment in regeneration and restoring the river and canal corridors there will be limited opportunities for informal recreation through walking and cycling. Collectively this will lead to a reduction in participation.	
HO6: Improve mental health and wellbeing				
+	Promoting cultural facilities and the tourism offer will increase opportunities for social interaction and reduced isolation. Restoring the river/canal corridor will provide a calming and peaceful environment to help reduce stress.	-	A reduced cultural and tourism offer will limit opportunities for interaction and thus not help to reduce isolation.	
<b>Final Health Impact Assessment Score</b>				
4		-4		

**SP5 Housing, CP4 Affordable Housing, CP5 Housing Types and CP6 Housing Density**

Policy Score		Score without policy		Mitigation
Rating	Commentary/Explanation	Rating	Commentary/Explanation	
HO1: Reducing health inequalities within the borough				
+	Providing high quality housing, which is suitable and available for everyone, will reduce health inequalities by improving living conditions. Providing housing in sustainable locations, which support the town centre and network of local and neighbourhood centres, will enable access to medical services.	-	Without providing high quality housing which is suitable and available for everyone health inequalities will worsen as deprived communities only have access to poor quality accommodation. Furthermore through not promoting housing in sustainable locations there will be reduced access to the town centre and the network of local and neighbourhood centres and there associated medical services.	
HO2: Improve diet and nutrition levels				
+	Affordable rents would free up funds that could be spent on high quality food.	0	No impact	
HO3: Reduce the risk of respiratory and circulatory diseases				
+	Providing high quality housing, which is suitable and available for everyone, will improve living conditions and reduce the incidence of respiratory disease. Promoting housing in sustainable locations will promote informal recreation through the use of sustainable modes of transport, including cycling and walking, which will increase cardiovascular activity.	-	Through not promoting housing in sustainable locations there will be limited scope for promoting informal recreation through sustainable modes of transport such as cycling and walking and therefore limited increases in cardiovascular activity.	
HO4: Reduce the level of obesity				

+	Promoting housing in sustainable locations will promote informal recreation through the use of sustainable modes of transport, including cycling and walking, which in turn will help to reduce obesity.	-	Through not promoting housing in sustainable locations there will be limited scope for promoting informal recreation through sustainable modes of transport such as cycling and walking and therefore limited impact on reducing obesity.	
HO5: Increase the level of physical activity				
+	Promoting housing in sustainable locations will promote informal recreation through using sustainable modes of transport including cycling and walking.	-	Through not promoting housing in sustainable locations there will be limited scope for promoting informal recreation through sustainable modes of transport such as cycling and walking.	
HO6: Improve mental health and wellbeing				
+	Providing suitable housing to meet the needs of different groups will improve mental health and wellbeing by reducing instances of people living in unsuitable, possibly overcrowded accommodation. Furthermore it will help to reduce homelessness which has strong links to depression.	-	Though not promoting suitable housing to meet the needs of different groups instances of people living in unsuitable, possibly overcrowded accommodation alongside homeless could increase. Thus having a negative impact on mental health and wellbeing.	
<b>Final Health Impact Assessment Score</b>				
6		-5		

### SP6 Strategic urban extensions

Policy Score		Score without policy		Mitigation
Rating	Commentary/Explanation	Rating	Commentary/Explanation	
HO1: Reducing health inequalities within the borough				
+	Focusing a significant amount of housing development in several strategic locations, with sustainable links to the town centre could improve health .	0	Not possible to quantify effects.	It will be important to ensure that the sustainable links link to the existing network of green infrastructure which will enable access to the wider community. Policy SP7, through focusing on the regeneration priority areas is considered to address health inequalities by focusing on the more deprived areas of the Borough.
HO2: Improve diet and nutrition levels				
+	The strategic urban extensions will have access to the town centre via sustainable linkages. This will help to promote the town and support the viability of its services, including the market. This will support access to fresh produce and information services related to diets.	0	No impact	
HO3: Reduce the risk of respiratory and circulatory diseases				

+	The strategic urban extensions will have access to the town centre via sustainable linkages. This will reduce reliance on the private car, thus mitigating increased air pollution associated with new development which is heavily reliant on this mode. Providing access to open space within the site and links to the wider countryside will encourage informal recreation.	0	Not possible to quantify effects.	
HO4: Reduce the level of obesity				
+	The strategic urban extensions will have access to the town centre via sustainable linkages, in particular walking and cycling, which will encourage active lifestyles. Providing access to open space within the site and links to the wider countryside will encourage informal recreation. Both will contribute to increased activity and help to reduce obesity.	0	Not possible to quantify effects.	
HO5: Increase the level of physical activity				
+	The strategic urban extensions will have access to the town centre via sustainable links, in particular walking and cycling, which will encourage active lifestyles. Providing access to open space within the site and links to the wider countryside will encourage informal recreation.	0	Not possible to quantify effects.	
HO6: Improve mental health and wellbeing				



+	The strategic urban extensions will feature networks of well planned open space, community facilities and access to the open countryside. This infrastructure will provide opportunities for social interaction and help reduce isolation. Natural and semi natural spaces will provide areas where people can experience a peaceful and calming environment.	0	Not possible to quantify effects.	
<b>Final Health Impact Assessment Score</b>				
6		0		

### SP7 Regeneration Priority Areas

Policy Score		Score without policy		Mitigation
Rating	Commentary/Explanation	Rating	Commentary/Explanation	
HO1: Reducing health inequalities within the borough				
++	Focusing regeneration, including improvements to open space, enhancing local community facilities and services and improving accessibility to employment, key services and the town centre in the post war planned neighbourhoods, which predominantly suffer the poorest health, will help to reduce health inequalities.	-	Without focusing regeneration in the most deprived communities which suffer the poorest health i.e. the post war planned neighbourhoods there will not be investment in open space, community facilities and services and therefore health inequalities could worsen.	
HO2: Improve diet and nutrition levels				
+	Improving the network of local and neighbourhood centres within the post war planned neighbourhoods through regeneration initiatives to support viability will enable access to community hubs and medical services with information on diet and nutrition.	-	Without focusing regeneration via improving the network of local and neighbourhood centres within the post war planned neighbourhoods there will be reduced access to community hubs and medical services with information on diet and nutrition.	
HO3: Reduce the risk of respiratory and circulatory diseases				
+	Promoting improvements to the network of open space within the post war planned neighbourhoods will provide opportunities for informal recreation and therefore increase cardiovascular activity. Improving connectivity to surrounding areas and accessibility by sustainable modes of transport to employment areas and the town centre will reduce the reliance on the private car and reduce CO2 emissions, thus helping to improve air quality.	-	Without improvements to the network of open space within the post war planned neighbourhoods there will be a reduction in the potential to increase informal recreation and therefore reduce the potential for increased cardiovascular activity.	
HO4: Reduce the level of obesity				

+	Promoting improvements to the network of open space, improving connectivity with the surrounding areas and promoting the use of sustainable transport modes within the post war planned neighbourhoods will provide opportunities for informal recreation, thus helping to increase exercise activity which in turn should help reduce obesity.	-	Without improvements to the network of open space within the post war planned neighbourhoods there will be a reduction in the potential to increase informal recreation and therefore reduce the potential for increased exercise which could lead to increase in levels of obesity.	
HO5: Increase the level of physical activity				
+	Promoting improvements to the network of open space, improving connectivity with the surrounding areas and promoting the use of sustainable transport modes within the post war planned neighbourhoods will provide opportunities for informal recreation, thus helping to increase activity	-	Without improvements to the network of open space within the post war planned neighbourhoods there will be a reduction in the potential to increase informal recreation and therefore reduce the potential for increased exercise	
HO6: Improve mental health and wellbeing				
+	Focusing regeneration in the post war planned neighbourhoods will improve mental health and wellbeing in the medium to long term by improving open space and community facilities which will increase social interaction. Improving community facilities within local and neighbourhood centres will provide access to support services to help people suffering from mental illness. However, there may be a short term negative impact as part of the regeneration, such as where people may have to be placed in temporary accommodation.	-	Without focusing improvements to open space and community facilities within the post war planned neighbourhoods their role in increasing social interaction will be limited. Furthermore without improving community facilities there may limited opportunities to provide access to support services to help people suffering from mental illness	
<b>Final Health Impact Assessment Score</b>				
7		-6		

### CP7 Gypsies, Travellers and Travelling Show people

(Without an allocation it is difficult to assess the impacts however the following table makes an assessment in relation to the criteria set out in the policy)

Policy Score		Score without policy		Mitigation
Rating	Commentary/Explanation	Rating	Commentary/Explanation	
HO1: Reducing health inequalities within the borough				
0	No impact	0	No impact	
HO2: Improve diet and nutrition levels				
0	No impact	0	No impact	
HO3: Reduce the risk of respiratory and circulatory diseases				
0	No impact	0	No impact.	
HO4: Reduce the level of obesity				
0	No impact	0	No impact	
HO5: Increase the level of physical activity				
0	No impact	0	No impact	
HO6: Improve mental health and wellbeing				
0	No impact	0	No impact	
<b>Final Health Impact Assessment Score</b>				
0		0		

### SP8 Environmental Assets

Policy Score		Score without policy		Mitigation
Rating	Commentary/Explanation	Rating	Commentary/Explanation	
HO1: Reducing health inequalities within the borough				
+	Promoting Tamworth's network of green and blue infrastructure will provide opportunities for informal and formal recreation for residents throughout the Borough and thus help to reduce health inequalities.	-	Without protecting and promoting Tamworth's network of green and blue infrastructure there will not be sufficient opportunities for informal and formal recreation which could increase health inequalities with people in deprived communities unable to access areas for recreation.	
HO2: Improve diet and nutrition levels				
0	No impact	0	No impact	
HO3: Reduce the risk of respiratory and circulatory diseases				
+	Promoting Tamworth's network of green and blue infrastructure will provide opportunities for informal and formal recreation, thus promoting cardiovascular activity.	-	Without protecting Tamworth's network of green and blue infrastructure there will be reduced opportunities for informal and formal recreation thus reducing cardiovascular activity.	
HO4: Reduce the level of obesity				
+	Promoting Tamworth's network of green and blue infrastructure will provide opportunities for informal and formal recreation, which should help to reduce obesity.	-	Without protecting Tamworth's network of green and blue infrastructure there will be reduced opportunities for informal and formal recreation which could lead to an increase in the level of obesity.	
HO5: Increase the level of physical activity				
++	Promoting Tamworth's network of green and blue infrastructure will provide increased opportunities for informal and formal recreation.	-	Without protecting Tamworth's network of green and blue infrastructure there will be reduced opportunities for informal and formal recreation which could lead to a reduction in someone's ability to participate in exercise.	

HO6: Improve mental health and wellbeing			
+	Promoting Tamworth's network of green and blue infrastructure will provide opportunities for both social interaction and experience of a peaceful and calming environment to help relieve stress.	-	Without protecting Tamworth's network of green and blue infrastructure there will be reduced opportunities for social interaction and experience of a peaceful and calming environment to help relieve stress.
<b>Final Health Impact Assessment Score</b>			
6		-5	

### CP8 Sport and Recreation

Policy Score		Score without policy		Mitigation
Rating	Commentary/Explanation	Rating	Commentary/Explanation	
HO1: Reducing health inequalities within the borough				
+	Providing facilities for sport and recreation, in particular through a new community use leisure centre in an accessible location, alongside protecting existing facilities and promoting the dual use of school sites, will enable opportunities for participation in sport for all groups and will in turn help to reduce health inequalities.	--	Without providing sufficient facilities for sport and recreation accessible to all groups of the community including not providing a community use leisure centre or securing the dual use of school sites health inequalities will worsen as deprived communities cannot access facilities.	
HO2: Improve diet and nutrition levels				
0	No impact	0	No impact	
HO3: Reduce the risk of respiratory and circulatory diseases				
++	Providing facilities for sport and recreation, in particular through a new community use leisure centre, protecting existing facilities and promoting the dual use of school sites will promote cardiovascular activity.	-	Without providing appropriate facilities for sport and recreation the level of cardiovascular activity will decrease.	
HO4: Reduce the level of obesity				
++	Providing facilities for sport and recreation, in particular through a new community use leisure centre, protecting existing facilities and promoting the dual use of school sites will promote opportunities for formal recreation which should help to reduce obesity.	-	Without providing appropriate facilities for sport and recreation the level of participation in exercise will decline which could lead to an increase in the level of obesity.	
HO5: Increase the level of physical activity				

++	Providing facilities for sport and recreation, in particular through a new community use leisure centre, protecting existing facilities and promoting the dual use of school sites will promote formal recreation which will have a direct impact on someone's ability to participate in exercise.	-	Without providing appropriate facilities for sport and recreation the level of participation in exercise will decline	
HO6: Improve mental health and wellbeing				
++	Providing opportunities for formal recreation, through participation in team based sports and exercise classes should promote social interaction and reduce isolation. It may also extend an individual's support network which could improve their mental health and wellbeing.	-	Without providing appropriate facilities for sport and recreation there may be a reduction in participation in team based sports which could increase isolation and reduce an individual's support network which could harm their mental health and wellbeing.	
<b>Final Health Impact Assessment Score</b>				
9		-6		



### CP9 Open Space

Policy Score		Score without policy		Mitigation
Rating	Commentary/Explanation	Rating	Commentary/Explanation	
HO1: Reducing health inequalities within the borough				
+	Promoting a multi-functional and diverse network of accessible open space will provide equal opportunities to access open space.	-	Without providing sufficient open space accessible to all groups of the community this will lead to worsening health inequalities as deprived communities cannot access open space and the opportunities for informal recreation. Furthermore though not delivering an Urban Park to the East of the Borough this will not provide an improved environment with greater facilities which will not promote different forms of recreation in an accessible location close to some of the existing regeneration priority areas.	
HO2: Improve diet and nutrition levels				
0	No impact	0	No impact	
HO3: Reduce the risk of respiratory and circulatory diseases				
+	Promoting opportunities for informal recreation through protecting and enhancing the network of sport and recreation facilities will help to promote cardiovascular exercise.	-	Without providing sufficient open space providing opportunities for sport and recreation the level of cardiovascular activity will decrease.	
HO4: Reduce the level of obesity				
++	Promoting opportunities for informal recreation through protecting and enhancing the network of sport and recreation facilities will help to promote exercise which should reduce the level of obesity.	-	Without providing a network of accessible open space to promote formal and informal participation in exercise the rate of participation will decline which could lead to an increase in the level of obesity.	
HO5: Increase the level of physical activity				

++	Promoting opportunities for informal recreation through protecting and enhancing the network of sport and recreation facilities will have a direct impact in promoting the level of physical activity through informal and formal recreation.	-	Without providing a network of accessible open space to promote formal and informal participation in exercise the rate of participation will decline.	
HO6: Improve mental health and wellbeing				
++	Providing access to a multi-functional and diverse network of open spaces should improve health and wellbeing by providing opportunities for social interaction, such as at the urban parks. Access to natural green spaces will enable people to experience a peaceful and calming environment which may help to reduce stress related illness.	-	Without providing a network of open space there may be a reduction in social interaction which could impact on mental health and wellbeing through increased isolation. Furthermore there will be limited opportunities to access natural spaces and associated benefits relating to relief of stress.	
<b>Final Health Impact Assessment Score</b>				
9		-5		

**CP10 Design of new development**

<b>Policy Score</b>		<b>Score without policy</b>		<b>Mitigation</b>
Rating	Commentary/Explanation	Rating	Commentary/Explanation	
HO1: Reducing health inequalities within the borough				
0	No impact	0	No Impact	
HO2: Improve diet and nutrition levels				
0	No impact	0	No Impact	
HO3: Reduce the risk of respiratory and circulatory diseases				
0	No Impact	0	No Impact	
HO4: Reduce the level of obesity				
0	No Impact	0	No Impact	
HO5: Increase the level of physical activity				
0	No Impact	0	No Impact	
HO6: Improve mental health and wellbeing				
+	Through good design, in particular promoting active frontages and high quality public realm, new development should improve health and wellbeing by helping to facilitate social interaction. In addition good design could enable greater civic pride and sense of place which may improve health and wellbeing.	-	Without promoting good design there could be development which does not help to facilitate social interaction, for example if it is inward facing or has poor quality public realm. Also poor design could reduce a sense of place and civic pride with could have a negative impact on health and wellbeing.	
<b>Final Health Impact Assessment Score</b>				
1		-1		

**CP11 Protecting the historic environment**

<b>Policy Score</b>		<b>Score without policy</b>		<b>Mitigation</b>
Rating	Commentary/Explanation	Rating	Commentary/Explanation	
HO1: Reducing health inequalities within the borough				
0	No impact	0	No impact	
HO2: Improve diet and nutrition levels				
0	No impact	0	No impact	
HO3: Reduce the risk of respiratory and circulatory diseases				
0	No Impact	0	No impact	
HO4: Reduce the level of obesity				
0	No Impact	0	No impact	
HO5: Increase the level of physical activity				
	No Impact	0	No impact	
HO6: Improve mental health and wellbeing				
+	Protecting the historic environment should enable greater civic pride and sense of place which may improve health and wellbeing.	-	Without protecting the historic environment there may be reduced sense of place and civic pride which could have a negative impact on health and wellbeing.	
<b>Final Health Impact Assessment Score</b>				
1		-1		

**CP12 Protecting and enhancing biodiversity**

Policy Score		Score without policy		Mitigation
Rating	Commentary/Explanation	Rating	Commentary/Explanation	
HO1: Reducing health inequalities within the borough				
0	No impact	0	No impact	
HO2: Improve diet and nutrition levels				
0	No impact	0	No impact	
HO3: Reduce the risk of respiratory and circulatory diseases				
+	Protecting and enhancing the network of sites of biodiversity value, many of which are located close to residential areas, will promote opportunities for informal recreation which should help to promote cardiovascular activity. Furthermore, it will reduce reliance on the car for accessibility which should improve air quality.	-	Without protecting and enhancing the network of biodiversity value there will be reduced opportunities for informal recreation and cardiovascular activity. Furthermore it may increase use of the private car as people travel further to access equivalent areas, this could lead to increased CO2 emissions and poorer air quality.	
HO4: Reduce the level of obesity				
+	Protecting and enhancing the accessible network of sites of biodiversity value will promote opportunities for informal recreation which should help to reduce the level of obesity.	-	Without protecting and enhancing the network of sites of biodiversity value there may be less opportunities for informal recreation which could increase the level of obesity.	
HO5: Increase the level of physical activity				
+	Protecting and enhancing the accessible network of sites of biodiversity value will promote opportunities for informal recreation and thus help to increase the level of physical activity.	-	Without protecting and enhancing the network of sites of biodiversity value there may be less opportunities for informal recreation.	
HO6: Improve mental health and wellbeing				

+	Protecting and enhancing the accessible network of sites of biodiversity value will provide a calming and peaceful environment to help reduce stress.	-	Without protecting and enhancing the network of sites of biodiversity value there will be reduced opportunities to access a calming and peaceful environment.	
<b>Final Health Impact Assessment Score</b>				
4		-4		

### SP9 Sustainable Tamworth and CP13 Delivering Sustainable Transport

Policy Score		Score without policy		Mitigation
Rating	Commentary/Explanation	Rating	Commentary/Explanation	
HO1: Reducing health inequalities within the borough				
+	Promoting development that encourages the use of sustainable transport modes should provide equal access to services and amenities for all residents and therefore reduce health inequalities.	-	Without promoting development that encourages the use of sustainable transport modes there will be limited access to services and amenities for all residents which could increase health inequalities.	
HO2: Improve diet and nutrition levels				
0	No impact	0	No impact	
HO3: Reduce the risk of respiratory and circulatory diseases				
+	Promoting sustainable transport modes, in particular walking and cycling, should encourage informal recreation which should increase the amount of cardiovascular activity. Furthermore, reducing the reliance on the private car should reduce CO2 emissions and therefore improve air quality.	-	Without promoting sustainable transport modes such as walking and cycling there will be less opportunities for informal recreation and therefore a reduction in cardiovascular activity. Furthermore this could increase reliance on the private car which could increase CO2 emissions and reduce air quality.	
HO4: Reduce the level of obesity				
+	Promoting sustainable transport modes, in particular walking and cycling, should encourage informal recreation which should help to reduce obesity.	-	Without promoting sustainable transport modes such as walking and cycling there will be less opportunities for informal recreation which could increase levels of obesity.	
HO5: Increase the level of physical activity				
+	Promoting sustainable transport modes in particular walking and cycling should encourage informal recreation therefore increasing the level of physical activity.	-	Without promoting sustainable transport modes such as walking and cycling there will be less opportunities for informal recreation.	

HO6: Improve mental health and wellbeing			
0	No impact	0	No impact
<b>Final Health Impact Assessment Score</b>			
4		-4	



### CP14 Sustainable Development and Climate Change Mitigation

Policy Score		Score without policy		Mitigation
Rating	Commentary/Explanation	Rating	Commentary/Explanation	
HO1: Reducing health inequalities within the borough				
+	Promoting development that encourages the use of sustainable transport modes should provide equal access to services and amenities for all residents and therefore reduce health inequalities.	-	Without promoting development that encourages the use of sustainable transport modes there will be limited access to services and amenities for all residents which could increase health inequalities.	
HO2: Improve diet and nutrition levels				
0	No impact	0	No impact	
HO3: Reduce the risk of respiratory and circulatory diseases				
+	Promoting sustainable transport modes, in particular walking and cycling, should encourage informal recreation and increase the amount of cardiovascular activity. Furthermore, reducing reliance on the private car should reduce CO2 emissions and therefore improve air quality.	-	Without promoting sustainable transport modes such as walking and cycling there will be less opportunities for informal recreation and therefore a reduction in cardiovascular activity. Furthermore this could increase reliance on the private car which could increase CO2 emissions and reduce air quality.	
HO4: Reduce the level of obesity				
+	Promoting sustainable transport modes, in particular walking and cycling, should encourage informal recreation which should help to reduce obesity.	-	Without promoting sustainable transport modes such as walking and cycling there will be less opportunities for informal recreation which could increase levels of obesity.	
HO5: Increase the level of physical activity				
+	Promoting sustainable transport modes, in particular walking and cycling, should encourage informal recreation therefore increasing the level of physical activity.	-	Without promoting sustainable transport modes such as walking and cycling there will be less opportunities for informal recreation.	

HO6: Improve mental health and wellbeing			
0	No impact	0	No impact
<b>Final Health Impact Assessment Score</b>			
4		-4	

**CP15 Flood Risk and Water Management**

<b>Policy Score</b>		<b>Score without policy</b>		<b>Mitigation</b>
Rating	Commentary/Explanation	Rating	Commentary/Explanation	
HO1: Reducing health inequalities within the borough				
0	No impact	0	No impact	
HO2: Improve diet and nutrition levels				
0	No impact	0	No impact	
HO3: Reduce the risk of respiratory and circulatory diseases				
0	No impact	0	No impact	
HO4: Reduce the level of obesity				
0	No impact	0	No impact	
HO5: Increase the level of physical activity				
0	No impact	0	No impact	
HO6: Improve mental health and wellbeing				
0	No impact	0	No impact	
<b>Final Health Impact Assessment Score</b>				
0		0		

### CP16 Community Facilities

Policy Score		Score without policy		Mitigation
Rating	Commentary/Explanation	Rating	Commentary/Explanation	
HO1: Reducing health inequalities within the borough				
++	Providing suitable accessible community facilities, including health and education, will help to reduce health inequalities by enabling equal access to healthcare facilities.	-	Without providing suitable community facilities across the Borough there could be increased health inequalities as people are unable to access healthcare facilities.	
HO2: Improve diet and nutrition levels				
+	Providing access to education and health facilities should help to improve diet and nutrition levels by enabling people to access information on healthy diet and nutrition.	-	Without providing access to education and health facilities diet and nutrition levels could worsen as people do not have access to information on healthy diet and nutrition.	
HO3: Reduce the risk of respiratory and circulatory diseases				
+	Encouraging access by sustainable modes of transport to community facilities should increase informal recreation. The opportunity for formal recreation within schools and community facilities, for example through the use of sports facilities or exercise classes within community centres, should increase which should increase the level of cardiovascular activity.	-	Without providing an accessible network of community and school facilities with associated facilities for informal and formal recreation rates of cardiovascular activity will decline.	
HO4: Reduce the level of obesity				

+	Encouraging access by sustainable modes of transport to community facilities should increase informal recreation. The opportunity for formal recreation within schools and community facilities, for example through the use of sports facilities or exercise classes within community centres should increase, This could reduce levels of obesity.	-	Without providing an accessible network of community and school facilities with associated facilities for informal and formal recreation there will be less opportunities for participation which could increase rates of obesity.	
HO5: Increase the level of physical activity				
+	Encouraging access by sustainable modes of transport to community facilities should increase informal recreation. The opportunity for formal recreation within schools and community facilities, for example through the use of sports facilities or exercise classes within community centres should increase. This should increase the level of participation in exercise.	-	Without providing an accessible network of community and school facilities with associated facilities for informal and formal recreation there will be less opportunities for participation in physical activity.	
HO6: Improve mental health and wellbeing				
+	Providing access to health and education facilities will enable people to access support services to help improve mental health and wellbeing.	-	Without an accessible network of health and education facilities there will be less opportunities to access support services which will not help to improve mental health and wellbeing.	
<b>Final Health Impact Assessment Score</b>				
7		-6		

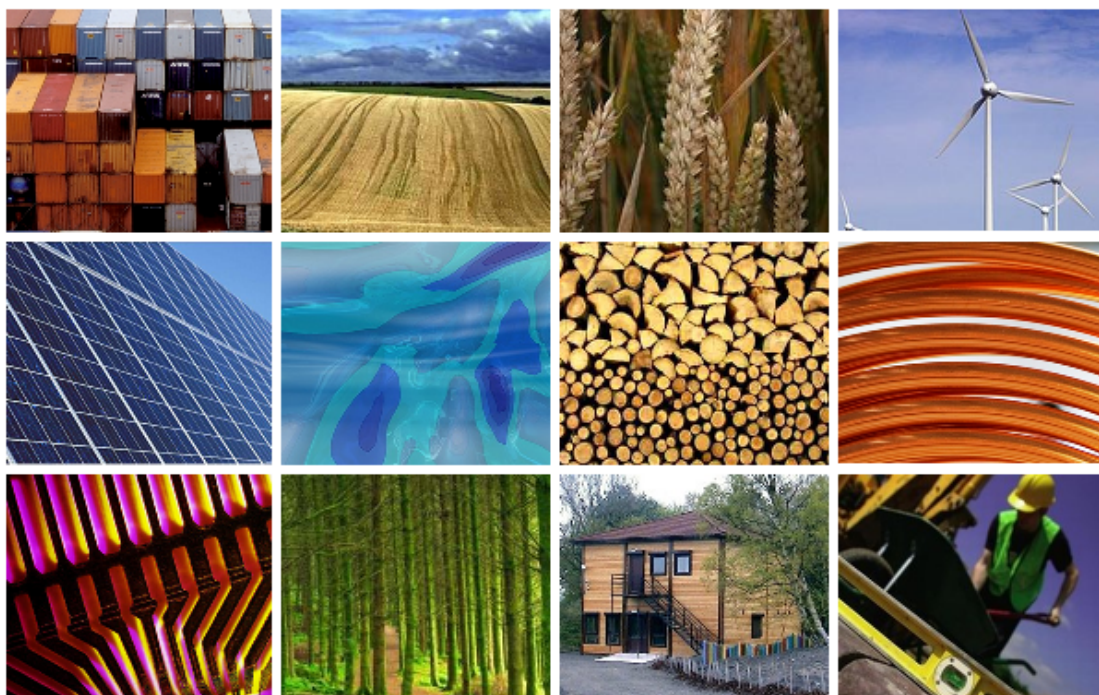
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Tamworth Borough Council

# Sustainability Appraisal of the Draft Tamworth Local Plan

## Final Report

February 2014



# Quality Management

URSUS Consulting Ltd has quality systems which have been assessed and approved to BS EN IS9001:2000 (certificate number GB2002687).

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**ANNEX F: APPRAISAL OF OPTIONS**

# 1 SUMMARY AND OUTCOMES

## 1.1 NON-TECHNICAL SUMMARY

### 1.1.1 Outline of Tamworth draft Local Plan

The Tamworth Draft Local Plan sets out the spatial planning strategy for the Borough over the period 2006-2031 in terms of the type of development required to meet local community and business needs, its scale and location as well as the policies that will apply to ensure that development is sustainable. It contains a vision and a series of strategic spatial objectives. It also includes policies to ensure that appropriate supporting infrastructure is delivered and the area's built and natural environment is protected and enhanced.

The Tamworth Local Plan has been prepared in compliance with the National Planning Policy Framework (NPPF).

Where considered relevant, working in partnership with neighbouring authorities to discharge the duty to co-operate has resulted in cross-boundary issues being addressed. Both Lichfield District Council and North Warwickshire District Council are also in the process of developing their own Local Plans and these have yet to be adopted.

The Tamworth Local Plan is expected to be adopted by 2015 and will replace the existing Local Plan (Adopted in 2006/07)<sup>1</sup>. Further detailed guidance will be included in a limited number of Supplementary Planning Documents which will support the implementation of the Plan. Once it is adopted, planning applications will be determined in accordance with the Local Plan unless other material considerations (including the NPPF) indicate otherwise.

### 1.1.2 Current State of Sustainable Development in Tamworth

The following table describes the current relevant aspects of sustainable development in Tamworth, and predicts how these might evolve without implementation of the Plan.

**Table 1.1: Summary of baseline data**

Issue	Key Findings	Likely Evolution Without the Plan
Population	In 2011 the resident population of Tamworth was recorded as 76,895. It has been estimated that the population of Tamworth will increase to 81,895 by 2021, an increase of 6.5%, with most of the increase occurring among the over 64 age group.	It is uncertain how population might change without implementation of the Local Plan.
Housing	Tamworth has a high housing waiting list and a low level of affordable housing supply that has not met the backlog of housing need. More small homes are needed as are homes for the elderly.	It is less likely that housing of the right type will be delivered, or that enough affordable housing will be provided.

<sup>1</sup> Tamworth Borough Council - Local Plan 2006-2011 (Adopted July 2006 and Policies Saved in July 2011)

Issue	Key Findings	Likely Evolution Without the Plan
Deprivation	There are several small areas that face issues of deprivation in Tamworth.	There may not be delivery of enough employment land to provide sufficient jobs. Employment and community facilities are unlikely to be in the right locations to address deprivation.
Health	Levels of health are similar to the national average. However, there are some small pockets of health deprivation. Adult obesity rates are high and rates of physical activity are low.	Without implementation of the Plan, it is possible that health levels will decline.
Open space	At a Borough wide level there is sufficient open space within the Borough, although certain specific parts of the Borough need better provision.	It is unlikely that additional open space will be provided where it is needed, and it is likely that more open space would be lost.
Economy	Many of Tamworth's traditional firms have closed down over the last 20 years. Still heavily influenced by the manufacturing sector, service industries now also play an important role.	There may not be delivery of enough employment land to provide sufficient jobs, and sites may not be provided in the right locations to meet sectoral needs.
Employment	Tamworth has a low unemployment rate. However, pockets of unemployment are concentrated in certain areas of the town.	There may not be delivery of enough employment land to provide sufficient jobs, and this may not be well-located for areas of higher unemployment.
Education and qualifications	Schools in Tamworth generally perform below the national average, with high levels of people having no qualifications at all and a very low percentage with high-level qualifications.	The level of education and qualifications is likely to remain unchanged. It is possible that insufficient additional school places will be provided.
Historic assets	Tamworth retains a range of important historic buildings, monuments and Conservation Areas, which need to be protected. It has high archaeological potential.	It is more likely that historic assets would be devalued or lost, and more likely that new developments would fail to incorporate measures to enhance the setting of historic assets.
Ecology	Tamworth has two Sites of Special Scientific Interest, mostly in an unfavourable condition, and there are three other SSSIs nearby in Warwickshire. There are five Local Nature Reserves, 16 Sites of Biological Importance and five Biodiversity Alert Sites. There are also three sites of international importance near Tamworth.	It is unlikely that opportunities for creating or enhancing ecological networks will be realised, and action at a landscape scale is unlikely to be taken. Designated sites are likely to come under increasing pressure from development or may be lost or devalued.
Water quality	There are high levels of nutrient pollution in the two rivers downstream of Tamworth.	Water quality is likely to continue to improve.
Water supply and wastewater treatment	There is enough water available to meet annual housing growth of 145 dwellings per annum (dpa) if fitted with water efficiency measures, but there is insufficient resource to meet higher development scenarios, namely 159.5 dpa and 188.5 dpa. Tamworth wastewater treatment works will require	The effect of not having the Local Plan on water supply and wastewater infrastructure is uncertain.

Issue	Key Findings	Likely Evolution Without the Plan
	improvements in order to accommodate the proposed development.	
Air quality	Although Tamworth currently has no Air Quality Management Areas, nitrogen dioxide might exceed air quality standards at the A5 Dosthill, Two Gates Crossroads.	The likely future change in air quality without implementation of the Plan is uncertain.
Flood risk	Tamworth has been classified as having a high probability of fluvial flood risk and a medium probability of residual flooding from the overtopping/breaching of flood defences. A significant proportion of Tamworth's land is at risk of flooding.	The likely change in flood risk without implementation of the Plan is uncertain.
Climate change	Emissions of carbon dioxide are fairly low in Tamworth. However, the amount of renewable energy generated in Tamworth is low.	Opportunities to further reduce emissions of greenhouse gases would be lost.
Waste	Tamworth has achieved a moderately high recycling rate due to improvements in recent years.	Recycling rates are likely to rise and the amount of waste landfilled is expected to fall.
Land and soil	There is a shortage of developable open space in Tamworth. There are mineral reserves of potential value. The town is surrounded by agricultural land, much of which is of relatively poor quality but some is higher quality. Tamworth has a Regionally Important Geological/Geomorphological Site.	Without the Plan it is possible that more developments would come forward on greenfield land than on previously developed land within the urban area.
Retail	There are concerns that the town centre's vitality and viability could decline in the short term as it faces strong competition from the retail parks	Without the Plan, it is likely that the town centre's vitality and viability will reduce further, leading to continued decline.
Leisure and culture	Existing leisure provision in Tamworth is generally adequate to meet the needs of local residents. However, there is a need for a new swimming pool and sports hall, and additional cafés and restaurants. Tamworth has a range of cultural/leisure attractions.	It is less likely that the additional sports facilities would be provided and less incentive to improve the café and restaurant provision in the town centre.
Transport	There is a dependence on the car to travel to work and a high level of out-commuting. Tamworth has good connections to the national road and rail transport networks and is well-served by a local bus network. There is congestion during the morning peak on Ashby Road heading into Tamworth.	Transport infrastructure is likely to improve through measures in the Local Transport Plan.

### 1.1.3 Characteristics of Areas Likely to be Significantly Affected

Tamworth is a very small borough (approximately 12 square km) compared with boroughs and districts in surrounding areas. The boundaries are fairly tightly drawn around the developed

urban area with only a limited amount of undeveloped green space around the town that sits within the Borough boundary. The draft Local Plan proposes significant amounts of non-urban green space for development, up to the boundary of Tamworth Borough, as well as policies which affect the Borough as a whole and specific parts of the Borough, such as Regeneration Priority Areas. As such, the areas likely to be significantly affected can be considered to be the Borough as a whole. The characteristics of the Borough are set out in detail in Annex B and summarised in Section 5.3. The characteristics of specific allocated sites are set out in Annexes C and D.

#### 1.1.4 Problems Relating to Areas of Particular Environmental Importance

There are three sites of international nature conservation importance within 20km of Tamworth. These sites have been designated as Special Areas of Conservation (SAC) under the Habitats Directive<sup>1</sup> and have problems as follows:

- Ensors Pool SAC: vulnerable to pollution and non-native species;
- River Mease SAC: diffuse pollution, excessive sedimentation, invasive freshwater species and urban discharge;
- Cannock Extension Canal SAC: maintaining a balanced level of boat traffic and surface run-off.

#### 1.1.5 The Appraisal Framework

Various environmental, social and economic issues have been identified through reviewing a wide variety of plans and strategies, collecting baseline information and identifying sustainability issues and problems. These issues have informed the development of the sustainability appraisal framework, which consists of a set of sustainable development policy objectives (sustainability objectives) as set out in **Table 1.2**.

These objectives were identified from a review of plans, strategies and sustainable development objectives established at international, national, regional, sub-regional and local levels. The sustainable development objectives identified in the review are set out in detail in Annex A. Each of these has been considered and it has been ensured that all relevant policy objectives are covered by the objectives in the sustainability appraisal framework. This framework has been used to appraise the various elements of the Local Plan, assessing the likely sustainability effects of the Local Plan by appraising the extent to which the Local Plan is consistent with or supports each policy objective.

**Table 1.2: Sustainability Objectives**

	Objectives
1.	To meet the housing needs of the whole community, providing affordable, decent, appropriate and sustainably constructed homes in accessible locations.
2.	To encourage the efficient use of land and soil.
3.	To reduce deprivation, including health and income deprivation.
4.	To ensure equal access to community services and facilities.
5.	To encourage equal access to education, jobs and training.

<sup>1</sup> Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora

6.	To encourage active and healthier lifestyles by providing accessible green infrastructure, including networks of paths and open spaces, and formal and informal sport and recreation facilities.
7.	To make communities safer by reducing crime, fear of crime and anti-social behaviour.
8.	To encourage a diverse and competitive economy that will provide sustainable economic growth.
9.	To protect and enhance historic assets.
10.	To encourage high quality and locally distinct places, spaces, buildings and landscapes.
11.	To conserve and enhance biodiversity and geodiversity, sites of nature conservation value and ecological networks.
12.	To minimise flood risk.
13.	To reduce energy consumption by encouraging energy efficiency and use of renewable energy sources.
14.	To encourage the reduction, re-use and recycling of waste and water.
15.	To protect and improve environmental quality including in relation to air, water, land and noise.
16.	To make Tamworth town centre the heart of the borough by creating a vibrant and attractive environment.
17.	To reduce the need to travel, reduce out-commuting and encourage sustainable modes of transport.
18.	To make best use of the existing transport infrastructure and seek improvements to reduce congestion and improve safety.

### 1.1.6 The Likely Significant Effects of the Draft Local Plan

The Draft Local Plan has a clear and strong focus on meeting the housing needs of all sections of the community. It seeks to provide affordable, high quality homes of a mix of types to meet a range of needs, and requires these to be sustainably designed and constructed in safer communities. The Plan promotes energy efficiency and the generation of renewable and low carbon energy in new developments. Water efficiency is to be maximised in developments, and development must support the Tamworth Waste Strategy to reduce waste and increase recycling.

A clear aim is to provide homes in accessible locations to minimise the need to travel and maximise the use of sustainable modes of transport. By promoting development in the town centre, the Plan will help to make use of existing transport infrastructure, and it also seeks improvements to sustainable transport infrastructure which will help to reduce congestion and improve safety. It will also support the accessibility of community facilities and services and supports the creation of a vibrant and attractive town centre.

The Draft Local Plan encourages the creation and improvement of green and blue<sup>1</sup> infrastructure links to encourage cycling and walking throughout the Borough, and particularly between the town centre and other neighbourhoods and to the countryside beyond. As well as promoting sustainable transport choices to reduce reliance on the car and promote active and healthy

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<sup>1</sup> 'Blue' infrastructure refers to water based assets such as rivers, lakes, ponds, canals, flood plains, drainage systems, important for communities, wildlife, amenity, flood risk management and climate change adaptation.

lifestyles, these networks will also contribute to strengthening a distinct identity for Tamworth, and may help to facilitate the movement of species and assist in reducing flood risk. They will also contribute to creating an attractive urban landscape. Healthy lifestyles will also be encouraged through the provision of new formal and informal recreation facilities and the protection and enhancement of open spaces.

The Plan affords strong protection to the Borough's historic assets, promotes their enhancement and requires development to be sympathetic to these assets. This will help to create an attractive urban landscape, and support the town's tourism offer, leading to increased job opportunities and a stronger economy.

The Draft Local Plan encourages economic growth, which should help to reduce deprivation by increasing job opportunities in Tamworth, particularly if done in conjunction with increasing education and training provision in deprived areas. The improvement of access to community services should assist in this. A direct aim of the Plan is to reduce out-commuting, although this may be increased by the improvement of links to Birmingham and other inter-urban routes.

By focusing development in the Borough's centres and promoting employment uses on existing employment sites, the Plan will help to promote the reuse of previously developed land and reduce the use of greenfield land and agricultural land, thereby indirectly helping to protect soils and habitats to support biodiversity. An efficient use of land will be supported by the requirement for medium-high density development. The emphasis in Tamworth has been to bring forward as much brownfield land as possible for development, nevertheless over three quarters of the area of the allocated new employment sites are on greenfield land.

The Plan explicitly requires the protection of biodiversity and geodiversity, and promotes opportunities to enhance biodiversity through habitat creation and restoration. It also requires development to create and reinforce links between existing biodiversity sites and with semi-natural habitats. By requiring the protection and enhancement of open spaces and green infrastructure including network features, the Plan may help to conserve and enhance biodiversity and ecological networks, but this is dependent on the quality of the open spaces and the nature of any enhancement work.

The Plan addresses flood risk by requiring proposals for development in flood risk areas to provide a Flood Risk Assessment and to include mitigation measures. Development will be resisted in these areas where appropriate and necessary and the Plan states that development will be expected to be located outside areas at high risk of flooding. Development must not increase the risk of flooding elsewhere and a policy is included to manage and reduce flood risk. Site allocations require flood risk to be assessed and appropriately managed to reduce risk.

The Plan explicitly requires the protection of water quality and requires the quality of canals and rivers to be enhanced. The enhancement of blue infrastructure will help to support this policy. Air quality will be protected and enhanced by promotion of sustainable transport infrastructure. Improving junctions on the A5 may help to increase the flow of traffic at these junctions, which may help to reduce air pollution or may increase it if traffic levels rise as a result. By requiring the protection and enhancement of biodiversity, the Plan is likely to contribute to the improvement of environmental quality in relation to air, water and land. It may also make a



contribution to reducing noise through the protection and enhancement of open spaces and reducing reliance on the private car.

### 1.1.7 Mitigation Measures

Through the sustainability appraisal process, a number of recommendations for mitigating the predicted significant adverse effects of the Local Plan have been implemented. These are set out in the following table. All recommendations have been accepted and there are no residual mitigation recommendations for the vision and policies contained in the Plan.

**Table 1.3: Mitigation recommendations**

<b>Policy</b>	<b>Recommended mitigation</b>
Vision	<p>Extend the aim to achieve safer living conditions to new housing development.</p> <p>Include a commitment to conserving and enhancing biodiversity and geodiversity in the vision.</p> <p>Include a commitment to reduce flood risk and promote climate change mitigation and adaptation.</p> <p>Include a commitment to promoting the efficient use of resources.</p> <p>Include a clearer commitment to improving the quality of the environment across the Borough.</p> <p>Include a commitment to promoting sustainable modes of transport.</p> <p>Include a commitment to improving infrastructure for sustainable transport modes.</p>
CP8	<p>Include a focus on areas of deprivation to address the needs of deprived areas for access to sport and recreation facilities.</p>
CP9	<p>Include requirements to support informal recreation in open spaces where appropriate.</p> <p>Promote opportunities to increase connectivity of open spaces and secure biodiversity gains.</p> <p>Promote opportunities to use open space provision to reduce flood risk.</p> <p>Require measures to promote walking and cycling in open spaces, through provision of infrastructure, improved connectivity and safety measures.</p>
CP11	<p>Require regard to be had to the findings of the Extensive Urban Survey.</p>
SP9	<p>Require developments to incorporate measures to reduce flood risk where there are appropriate opportunities.</p> <p>Promote energy efficiency measures in retro-fitting of existing development.</p> <p>Include supporting text to indicate how the efficient use of land is to be achieved.</p>
CP15	<p>Require developments to capitalise on opportunities for creating/protecting accessible recreational green space.</p> <p>Require developments to capitalise on opportunities for improvement in biodiversity value.</p>

There are a number of residual recommendations for mitigating predicted adverse impacts which have not yet been incorporated within the draft Local Plan. These relate to:

- Site allocations (recommendations set out in Annexes C and D);
- Strategic Spatial Objectives (recommendations set out in Section 8.3).

### 1.1.8 Alternatives

Alternatives to the proposed Local Plan have been developed, for the following policy areas:

- Spatial strategy, or directions of growth;
- Levels of housing growth;
- Amounts of employment land;
- Percentage of affordable housing required.

The alternatives, or options/scenarios, which have been developed are set out in the following table.

**Table 1.4: Summary of spatial options**

<b>Spatial option</b>	<b>Sites to deliver option</b>	<b>Approximate capacity</b>
1	Urban area and Anker Valley	900
2	Urban area, Anker Valley, golf course	2000
3	Urban area, Anker Valley, green belt sites	1800
4	Urban area, Anker Valley, Dunstall Lane	1600
5	Urban area, Anker Valley, Coton Lane	1090
6	Urban area, Anker Valley, golf course, Dunstall Lane, Coton Lane, green belt sites	3790
7	Urban area, Anker Valley, golf course, Dunstall Lane, Coton Lane	2890

**Table 1.5: Housing growth scenarios**

<b>Scenario</b>	<b>Dwellings per annum</b>	<b>Growth 2006-2031</b>
A	264	6600
Aa	240	6000
Ab	258	6450
B	263	6575
C	249	6225
D	257	6425
E	283	7075
F	283	7075
H	248	6200
I	219	5475
J	200	5000
Draft Plan	250	6250

**Table 1.6: Employment growth scenarios**

Scenario	Gross employment land requirements (ha)
1) Experian Baseline	21.02
2) Regeneration/Policy On	32.91
3a) Short Term Past Take Up	48.51
3b) Long Term Completion Rates	66.49
4) Labour Supply (250 dpa)	27.82
5) Labour Supply (latest household projections)	30.16

**Table 1.7: Affordable housing scenarios**

Scenario	Level of affordable housing provision
1	20%
2	25%
3	30%

The reasons why these options/scenarios were selected are set out in Section 9 of this report.

### 1.1.9 How the Assessment was Undertaken

The sustainability appraisal determined the likely effects arising from the Draft Local Plan. This applied largely to the vision, objectives and policies, to a series of options and to the site allocations. The appraisal was done by assessing each element of the Plan against the appraisal objectives in turn and making a largely qualitative assessment, with reference also to the baseline data from the Scoping Report.

In reporting the results of the appraisal, the following symbols have been used to indicate the broad nature of the predicted effect:

- + effect likely to be positive
- effect likely to be negative
- 0 no significant effect
- ? effect unknown

If the appraisal objective was not relevant to the element of the Plan being appraised, no symbol is given.

Multiple symbols have been used (e.g. ++) to indicate a different scale of impact over time, or where the impacts of an option are *substantially* better or worse than others.

The effects were also rated for their significance in terms of the importance for achieving each appraisal objective. Effects were rated as high, medium or low significance, taking account of a number of factors. The factors were:

- the expected scale of the effects or the degree to which the effects are likely to contribute to the achievement of the sustainability objective in the Borough overall;
- the certainty or probability that the effect is likely to occur as a consequence of the Local Plan;
- whether the effects would be permanent or reversible;
- whether the effect will occur as a direct result of the Local Plan or not, in other words whether the Plan is key for achieving or controlling effects;
- whether the effect is more strongly dependent on other interventions or other factors; and
- how important the objective is to the scope of the Plan.

The sustainability appraisal has also assessed the likely significant cumulative effects of the Local Plan in its entirety and in combination with other relevant plans and projects, and considered the interrelationship between effects. The conclusions of this are set out in Chapter 10.

A number of difficulties were encountered in undertaking the appraisal:

- *Availability and reliability of data.* It is almost impossible to quantify effects with total certainty, and the quality of available data could in some situations lead to spurious accuracy, which should be avoided.
- *Uncertainty.* A number of assumptions underpin the housing growth and employment scenarios, which introduce an element of uncertainty about their likely effect if implemented.
- *Significance.* There are very few agreed sustainability thresholds or constraints, as little work has been done in the UK on this issue. Because of this, it is not always possible to assess the significance of any impacts with certainty.

Despite these limitations and uncertainties, it is still possible to draw conclusions about the overall effects that will result from the Local Plan to 2031.

### **1.1.10 Monitoring Recommendations**

The sustainability appraisal has developed a set of recommendations for monitoring the predicted and unforeseen impacts of implementation of the Local Plan as proposed. These are set out as a series of indicators related to the sustainability appraisal framework based on the likely and possible impacts of the draft Local Plan. The recommended indicators should be incorporated into the Annual Monitoring Report for the Local Plan and are set out in Chapter 11.

## **1.2 STATEMENT ON THE DIFFERENCE THE PROCESS HAS MADE**

To date, the sustainability appraisal has had a number of inputs into the process of developing the Local Plan. As well as informal discussions with officers of Tamworth Borough Council, the appraisal has made formal inputs into the selection and refinement of sites, development management policy for specific sites and the drafting of policy.

Chapter 7 provides more information on how the appraisal has influenced the selection of sites and drafting of development management policy for specific sites.

The following changes have been made to the vision and policies of the Local Plan as a result of the findings and recommendations of the sustainability appraisal.

**Table 1.8: Changes to Vision and Policies of the Draft Local Plan**

Vision	<ul style="list-style-type: none"> <li>• Includes a commitment to conserving and enhancing biodiversity and geodiversity.</li> <li>• Includes a commitment to flood risk management and reduction and climate change resilience.</li> <li>• Ensures that all resources are used efficiently.</li> <li>• Seeks to protect and improve the quality of the environment across the Borough.</li> <li>• Seeks to encourage sustainable modes of transport and improve transport infrastructure.</li> <li>• Extends the aim to create safer communities to new housing development as well as existing.</li> </ul>
Policy CP8	<ul style="list-style-type: none"> <li>• Include a focus on need for sport and recreation in areas of deprivation</li> </ul>
Policy CP9	<ul style="list-style-type: none"> <li>• Promotes recreation for health improvement through protection and use of open spaces.</li> <li>• Promotes biodiversity improvement, flood risk reduction and walking and cycling in open spaces.</li> </ul>
Policy CP11	<ul style="list-style-type: none"> <li>• Developments are required to have regard to the findings of the Extensive Urban Survey</li> </ul>
Policy SP9	<ul style="list-style-type: none"> <li>• Energy efficiency is to be maximised in new and existing development</li> <li>• Development should reduce flood risk where appropriate</li> </ul>
Policy CP15	<ul style="list-style-type: none"> <li>• Requires capitalization of opportunities to provide accessible green space and improve biodiversity in Sustainable Drainage Systems</li> </ul>

## **2 INTRODUCTION**

### **2.1 OVERVIEW**

This report sets out the findings and conclusions of a Sustainability Appraisal (SA) of the modified Local Plan for Tamworth. Once adopted, the Local Plan will replace the current Tamworth Local Plan 2001-2011 in setting out policies and proposals to guide the future development of the area.

Sustainability Appraisal is a systematic process undertaken during the preparation of the Local Plan. Carrying out a Sustainability Appraisal will help Tamworth Borough Council to assess whether, and to what extent, emerging policies and proposals impact upon environmental, social and economic conditions. It also provides a means of identifying and addressing any adverse effects that draft policies and proposals might have and making recommendations for mitigating potential adverse effects or capitalising on opportunities for benefits.

### **2.2 BACKGROUND**

The Local Plan once adopted will be an important part of the development plan; it sets out the Council's vision, strategic objectives and set out specific land use allocations for future development for Tamworth.

Tamworth Borough Council has been in the process of producing a Local Plan since November 2006. Over the subsequent six years, substantial progress was made in developing the draft Local Plan, culminating in submission of the 2006-2028 Local Plan for examination in November 2012. As an integral part of the development of the Local Plan, Council officers carried out a Sustainability Appraisal (SA) of the emerging Local Plan, beginning with the publication of a Scoping Report in 2007 and followed by various iterations of the appraisal of effects of the Plan and publication of SA Reports at the appropriate stages in the Plan development.

The Planning Inspector appointed for the examination had several areas of concern, notably over the lack of suitable land use allocations for housing, employment and town centre uses. To address these concerns the Council proposed to modify the Local Plan by making additional allocations as well as a series of other amendments to the submission Local Plan. In February 2012 the Inspector called an Exploratory Meeting, following which he issued a note recommending that the Council withdraw the Local Plan from examination due to concerns over the potential lack of soundness. The Inspector also referenced recent legal challenges over the Greater Norwich and Forest Heath adopted development plans in relation to Sustainability Appraisal.

A resolution to withdraw the Tamworth Local Plan was made on the 19th March 2013 by decision of the Full Council. Since then, the Council has worked on a modified Local Plan to address the concerns identified through the examination process. The Council has made modifications to the previous Submission Local Plan, in part to add newly allocated sites for housing and employment development and to make amendments and additions to Plan policies. The Council intends to re-submit the Plan for examination in 2014.

The Council has commissioned URSUS Consulting Ltd to undertake a Sustainability Appraisal of the modified Local Plan, including the appraisal of allocated sites. As part of the process, an updated

Scoping Report was published for consultation in September 2013<sup>1</sup>. A number of comments were received on the content of the Scoping Report, as a result of which some additions and amendments have been made to the baseline data, the policy review, the key issues for Tamworth and the SA appraisal objectives.

## **2.3 SUSTAINABILITY APPRAISAL**

The overall aim of the Sustainability Appraisal (SA) process is to help to ensure that the Local Plan makes an effective contribution to the pursuit of 'sustainable development'. The most widely used definition of this concept is "development that meets the needs of the present without compromising the ability of future generations to meet their own needs"<sup>2</sup>.

SA seeks to ensure that the goal of sustainable development, as set out in the 2005 UK Strategy for Sustainable Development<sup>3</sup>, is achieved. This states that:

"The goal of sustainable development is to enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generations. For the UK Government and the Devolved Administrations, that goal will be pursued in an integrated way through a sustainable, innovative and productive economy that delivers high levels of employment; and a just society that promotes social inclusion, sustainable communities and personal wellbeing. This will be done in ways that protect and enhance the physical and natural environment, and use resources and energy as efficiently as possible.

### **2.3.1 Links between Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)**

In 2001 the EU adopted the Strategic Environmental Assessment Directive (SEA) that made environmental assessment mandatory for certain plans and programmes prepared by public authorities. This Directive applies to plans and programmes that are likely to have a significant effect upon the environment, including issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage and landscape. The provisions of the SEA Directive apply to the Tamworth Local Plan.

The Planning and Compulsory Purchase Act 2004 requires local authorities to carry out an SA of all emerging Local Development Documents. As the guidance<sup>4</sup> explaining this requirement makes clear, SA and SEA are similar processes that involve a comparable series of steps. The main difference is that SEA focuses on environmental effects, whereas SA is concerned with the full range of environmental, social and economic matters. The SA process takes the SEA Directive and its requirements fully into account.

### **2.3.2 Preparing the Sustainability Appraisal**

SA forms an integral part of the preparation process of Development Plan Documents (DPDs) as the diagram below shows.

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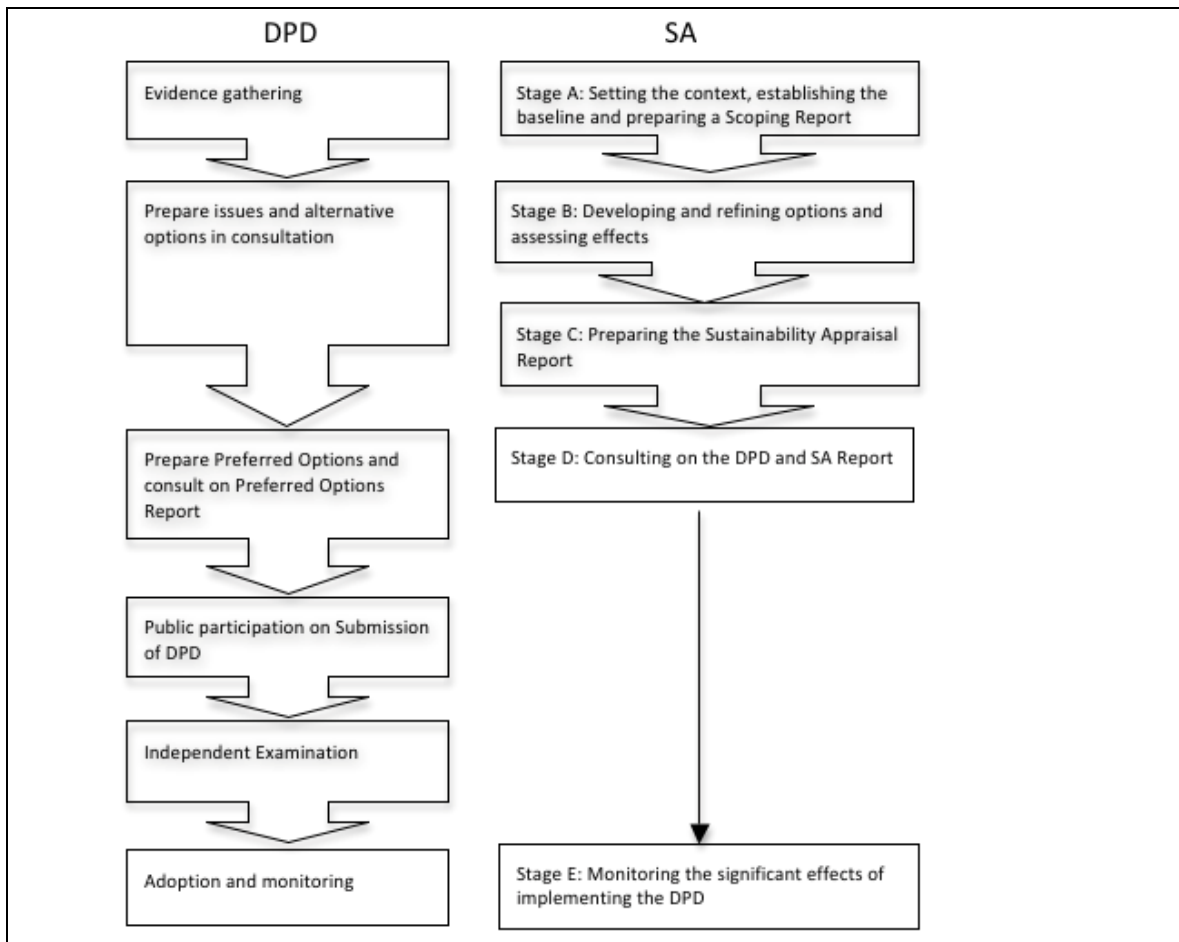
<sup>1</sup> Local Development Framework Sustainability Appraisal Scoping Report, Tamworth Borough Council, April 2007

<sup>2</sup> Our Common Future (Brundtland Commission, 1987)

<sup>3</sup> Securing the Future, Defra, March 2005

<sup>4</sup> Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (ODPM, 2005)

**Figure 1.1: The Development Plan preparation process**



The process of preparing an SA is made up of stages and specific tasks as detailed in Government guidance<sup>1</sup>. This SA Report covers the second two stages of the process, Stages B and C, which include the following tasks. Stage A was the scoping stage, which was undertaken from August to November 2013 and is covered in a Scoping Report<sup>2</sup> published in September 2013.

**Table 2.1: Stages of SA covered by this report**

Stage B	Developing and refining options and assessing effects
Task B1	Testing the Local Plan objectives against the SA framework
Task B2	Developing the Local Plan options
Task B3	Predicting the effects of the Local Plan
Task B4	Evaluating the effects of the Local Plan
Task B5	Considering ways of mitigating adverse effects and maximising beneficial effects
Task B6	Proposing measures to monitor the significant effects of implementing the Local Plan
Stage C	Preparing the Sustainability Appraisal Report
Task C1	Preparing the SA Report

<sup>1</sup> Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (ODPM, 2005)

<sup>2</sup> Sustainability Appraisal of Local Plan: Scoping Report, URSUS Consulting Ltd, September 2013



This SA Report sets out the results of stages B and C, which have been carried out between October 2013 and February 2014, and includes an appraisal of the draft policies, proposed development allocations, spatial options, housing growth scenarios, employment land scenarios and affordable housing scenarios.

## **2.4 OUTLINE OF CONTENTS OF THE TAMWORTH DRAFT LOCAL PLAN**

The Tamworth Draft Local Plan sets out the spatial planning strategy for the Borough over the period 2006-2031 in terms of the type of development required to meet local community and business needs, its scale and location as well as the policies that will apply to ensure that development is sustainable. It also includes policies to ensure that appropriate supporting infrastructure is delivered and the area's built and natural environment is protected and enhanced.

The Local Plan includes the following:

- A Spatial Portrait, a Vision and Strategic Spatial Priorities
- A Spatial Strategy for Tamworth
- Strategic Policies covering:
  - Town Centre uses including retail, and Employment including office
  - Housing
  - High quality natural and built environment
  - Sustainability
- Land use allocations:
  - Housing
  - Employment
- Proposals for monitoring and implementation

## **2.5 LINKS TO OTHER PLANS AND POLICIES**

The government has published the National Planning Policy Framework (March 2012), which sets out planning policies for achieving sustainable development. Emphasis has been placed on the importance of ensuring that Local Plan policies contribute to achieving sustainable development, in terms of promoting sustainable economic growth. The Tamworth Local Plan has been prepared in compliance with the National Planning Policy Framework (NPPF).

It should be noted that, as part of the Government's ongoing reform of the planning system, the West Midlands Regional Spatial Strategy (WMRSS)<sup>1</sup> has been revoked under the Localism Act 2011. The Local Plan reflects the NPPF requirement for a locally-derived evidence base, particularly in relation to future housing need. Where considered relevant, working in partnership with neighbouring authorities to discharge the duty to co-operate has resulted in cross-boundary issues being addressed. Both Lichfield District Council and North Warwickshire Borough Council are also in the process of developing their own Local Plans and these have yet to be adopted.

The Tamworth Local Plan is expected to be adopted by 2015 and will replace the existing Local Plan (Adopted in 2006/07)<sup>2</sup>. Further detailed guidance will be included in a limited number of

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<sup>1</sup> West Midlands Regional Spatial Strategy: Phase Two Revision (2008)

<sup>2</sup> Tamworth Borough Council - Local Plan 2006-2011 (Adopted July 2006 and Policies Saved in July 2011)

Supplementary Planning Documents which will support the implementation of the Plan. Once it is adopted, planning applications will be determined in accordance with the Local Plan unless other material considerations (including the NPPF) indicate otherwise.

### 3 METHODOLOGY

#### 3.1 THE APPRAISAL FRAMEWORK

The SA has tested the draft Local Plan against a framework of objectives that reflect relevant sustainable development policy objectives. This framework was developed in the Scoping Report in September 2013, and was subsequently amended following public consultation. This was informed by a review of policies, plans and programmes relevant to the Tamworth Local Plan and by the collection of baseline data for Tamworth, building on the earlier work undertaken for the previous Scoping Report in 2007. These two activities enabled the identification of key issues for Tamworth, and the drawing up of a series of policy objectives for achieving sustainable development in Tamworth.

The review of policies, plans and programmes is set out in Annex A, and the baseline economic, social and environmental conditions in Tamworth are set out in Annex B.

Table 3.1 sets out the framework of objectives that has been used to appraise the Local Plan.

**Table 3.1: Sustainability Objectives**

	Objectives	Env.	Soc.	Eco.	SEA topic
1.	To meet the housing needs of the whole community, providing affordable, decent, appropriate and sustainably constructed homes in accessible locations.		✓		
2.	To encourage the efficient use of land and soil.	✓	✓	✓	Material assets
3.	To reduce deprivation, including health and income deprivation.	✓	✓	✓	Population, human health
4.	To ensure equal access to community services and facilities.		✓		
5.	To encourage equal access to education, jobs and training.		✓	✓	
6.	To encourage active and healthier lifestyles by providing accessible green infrastructure, including networks of paths and open spaces, and formal and informal sport and recreation facilities.	✓	✓		Human health, fauna, flora, landscape
7.	To make communities safer by reducing crime, fear of crime and anti-social behaviour.		✓		
8.	To encourage a diverse and competitive economy that will provide sustainable economic growth.			✓	
9.	To protect and enhance historic assets.	✓	✓	✓	Material assets, cultural heritage
10.	To encourage high quality and locally distinct places, spaces, buildings and landscapes.	✓	✓	✓	Material assets, cultural heritage, landscape
11.	To conserve and enhance biodiversity and	✓	✓	✓	Biodiversity,

	Objectives	Env.	Soc.	Eco.	SEA topic
	geodiversity, sites of nature conservation value and ecological networks.				fauna, flora
12.	To minimise flood risk.	✓	✓	✓	Climatic factors, water
13.	To reduce energy consumption by encouraging energy efficiency and use of renewable energy sources.	✓	✓	✓	Climatic factors, material assets
14.	To encourage the reduction, re-use and recycling of waste and water.	✓	✓	✓	Soil, water, landscape
15.	To protect and improve environmental quality including in relation to air, water, land and noise.	✓	✓	✓	Air, water, soil, human health
16.	To make Tamworth town centre the heart of the borough by creating a vibrant and attractive environment.	✓	✓	✓	Material assets, cultural heritage
17.	To reduce the need to travel, reduce out-commuting and encourage sustainable modes of transport.	✓	✓	✓	Climatic factors, air, water, human health
18.	To make best use of the existing transport infrastructure and seek improvements to reduce congestion and improve safety.	✓	✓	✓	Climatic factors, air, water, human health

## 3.2 APPRAISAL METHODOLOGY

The appraisal determined the likely effects arising from the Draft Local Plan. This applied largely to the vision, objectives and policies, to a series of options and to the site allocations. The appraisal was done by assessing each element of the Plan against the appraisal objectives in turn and making a largely qualitative assessment, with reference also to the baseline data from the Scoping Report.

In reporting the results of the appraisal, the following symbols have been used to indicate the broad nature of the predicted effect:

- + effect likely to be positive
- effect likely to be negative
- 0 no significant effect
- ? effect unknown

If the appraisal objective was not relevant to the element of the Plan being appraised, no symbol is given.

Multiple symbols have been used (e.g. ++ ) to indicate a different scale of impact over time, or where the impacts of an option are *substantially* better or worse than others.

The effects were also rated for their significance in terms of the importance for achieving each appraisal objective. Effects were rated as high, medium or low significance, taking account of a number of factors. The factors were:

- the expected scale of the effects or the degree to which the effects are likely to contribute to the achievement of the SA objective in the Borough overall;
- the certainty or probability that the effect is likely to occur as a consequence of the Local Plan;
- whether the effects would be permanent or reversible;
- whether the effect will occur as a direct result of the Local Plan or not, in other words whether the Plan is key for achieving or controlling effects;
- whether the effect is more strongly dependent on other interventions or other factors; and
- how important the objective is to the scope of the Plan.

The assessment of significance is indicated in the tables in this report by colour:

	Not relevant
	No significance
	Medium significance
	High significance

The tables make an assessment of effects over short, medium and long-term timeframes. For this purpose, the SA has assumed the short term to be the first five years of implementation of the Plan, the medium term to be the remaining years of the Plan and the long term to be beyond the life of the Plan. The SA has also assessed the likely significant cumulative effects of the Local Plan in its entirety and in combination with other relevant plans and projects, and considered the interrelationship between effects. The conclusions of this are set out in Chapter 10.

### 3.3 DIFFICULTIES ENCOUNTERED

A number of difficulties were encountered in undertaking the appraisal:

- *Data.* A common problem affecting SA is the availability and reliability of data. Although data has been collected to illustrate a number of the conditions and trends relevant to the SA of the Local Plan, some data sets are more useful than others, and some data sets are known to be old, incomplete or unreliable. In some cases, no data is available. It is therefore almost impossible to quantify effects with total certainty, and the quality of available data could in some situations lead to spurious accuracy, which should be avoided.
- *Uncertainty.* A number of assumptions underpin the housing growth and employment scenarios, which introduce an element of uncertainty about their likely effect if implemented. In particular, the type of residents (e.g. age profile) who might occupy new dwellings and the type of employment (e.g. sector) opportunities that might be created both affect the nature of impacts that might result, but are somewhat uncertain. While the Local Plan aims to influence the choices people make about where and how they live and work, ultimately it has little control over behaviours.
- *Significance.* There are very few agreed sustainability thresholds or constraints, as little work has been done in the UK on this issue, although the idea of ‘living within

environmental limits' is increasingly being operationalised. Because of this, it is not always possible to assess the significance of any impacts with certainty.

Despite these limitations and uncertainties, it is still possible to draw conclusions about the overall effects that will result from the Local Plan to 2031.

### 3.4 COMPLIANCE WITH THE SEA DIRECTIVE AND REGULATIONS

The Local Plan is subject to the requirements of the European Union's Directive on the Environmental Assessment of Certain Plans & Programmes 2001/42/EC (the SEA Directive) and the domestic legislation through which the Directive has been transposed into law in England and Wales (the Environmental Assessment of Plans & Programmes Regulations 2004 – Statutory Instrument 2004 No. 1633).

The SA of the Local Plan was designed and undertaken so as to meet the legal requirements for the environmental assessment of plans. Throughout the report the term 'Sustainability Appraisal' should be interpreted as encompassing the SA process as required under the Planning & Compulsory Purchase Act 2004 and the Strategic environmental assessment process as required under the European Directive and domestic Regulations on the environmental assessment of plans and programmes.

The following table indicates the components of the SA Report that make up the Environmental Report, as required by domestic and European law on the environmental assessment of plans.

**Table 3.2 Summary Requirements of SEA Directive and Compliance of SA Report**

<b>Requirements for Environmental Report</b>	<b>Component of SA Report</b>
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2.4 and 2.5
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Section 5 and Annex B
c) The environmental characteristics of areas likely to be significantly affected;	Section 5.4 and Annexes B, C and D
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	Section 5.5
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	Chapter 4 and Annex A

<b>Requirements for Environmental Report</b>	<b>Component of SA Report</b>
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Chapter 7, Section 8.2.1, Section 9.2.2, Section 9.3.3, Section 9.4.2, Chapter 10
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Table 8.2, Annexes C and D
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Section 9.2.1, Section 9.3.1, Section 9.4.1, Section 9.5.1, Chapter 3
i) a description of measures envisaged concerning monitoring in accordance with Art. 10;	Chapter 11
j) a non-technical summary of the information provided under the above headings	Section 1.1

Annex A sets out the results of the review of policies, plans and programmes that are relevant to the Tamworth Local Plan. This review has identified the environmental, social and economic policy objectives that define sustainable development policy in the context of Tamworth Borough. The findings of the review have been assessed to ensure that all relevant policy objectives are covered by the SA appraisal framework, so that in undertaking the SA, the Local Plan is tested against all relevant policy objectives to appraise whether and to what extent the Local Plan will achieve or support the achievement of those objectives.

The review of the plans and strategies included in Annex A has highlighted the following issues that need to be considered when drawing up the Sustainability Appraisal framework:

- Access to opportunities, services and facilities<sup>1</sup>;
- To protect and enhance the natural environment and biodiversity and maintain and improve landscape character;
- To protect and enhance access to open spaces;
- Limiting and adapting to climate change;
- Reduce crime and the fear of crime;
- Tackle deprivation;
- Promote a diverse and competitive economy;
- Create employment opportunities;
- Importance of education, skills and training;
- Health including such diverse issues as promoting healthy lifestyles and reducing health inequalities;
- Promote good design and local distinctiveness;
- Provide affordable, decent and sustainably constructed homes that meet the needs of all sections of the community;
- Ensure that resources including energy, water, land and soil are used efficiently;
- Protect and enhance the historic and cultural environment;
- Transport including such diverse issues as reducing the need to travel, promoting alternative modes of transport, locating development in accessible locations, reducing congestion, improving the transport infrastructure and improving road safety;
- Improve the quality of the environment including in relation to air, water, land and noise;
- Protect the vitality and viability of centres;
- Reduce waste and promote recycling; and
- Reduce flood risk

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<sup>1</sup> Defined as services and access to venues for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.



## 5 STATE OF SUSTAINABLE DEVELOPMENT IN TAMWORTH

### 5.1 PURPOSE

This section describes the significant features and conditions within Tamworth relevant to sustainable development policy and objectives. It provides an overview of the state of the environment, society and the economy in the Borough in the period preceding the development and publication of the Draft Local Plan. The full baseline information which was used to compile this summary is given in Annex B.

The aim of this section of the report is to highlight any significant issues or problems that are affecting Tamworth's economy, its people, or its environment and to outline the way in which the state of the environment, society and the economy might change in the future. The purpose is to set the context within which activities arising out of the Local Plan will take place, so that the significant sustainability issues and the way that those activities might interact with those issues can be better understood. It also enables the SA and the process of developing the Local Plan to identify and focus on those issues that are significant. Moreover, baseline information provides the benchmark against which the effects of policies can be assessed and monitored.

This section of the report incorporates the environmental baseline information requirements that are specified in Schedule 2(6) of the Environmental Assessment of Plans & Programmes Regulations 2004.

### 5.2 DIFFICULTIES IN COLLECTING DATA

There are substantial amounts of data available to populate a sustainability baseline for Tamworth. However, in some instances specific data relating to Tamworth was not available. In such cases, where possible, data for the West Midlands region or the country as a whole have been used to indicate the likely situation in Tamworth. In some cases, no data could be found to describe the baseline situation. In particular, there is little data on likely future trends for many issues.

### 5.3 SUMMARY OF SIGNIFICANT ISSUES AND PROBLEMS IDENTIFIED

The significant issues that have been identified from a review of the baseline are summarised in the following table. The table also sets out an assessment of how these aspects are likely to evolve in the future without implementation of the Local Plan.

**Table 5.1: Summary of baseline data**

Issue	Key Findings	Likely Evolution
Population	In 2011 the resident population of Tamworth was recorded as 76,895. It has been estimated that the population of Tamworth will increase to 81,895 by 2021, an increase of 6.5%, with most of the increase occurring	It is uncertain how population might change without implementation of the Local Plan. Without a 5-year supply of land for housing, fewer homes might be built in Tamworth, but it is also

Issue	Key Findings	Likely Evolution
	among the over 64 age group.	possible that developments will still come forward to meet the need for new housing.
Housing	The housing waiting list in Tamworth has been consistently high since 1996/97, albeit with a decline over the past few years. A generally low level of affordable housing supply that has not been sufficient to address the backlog of need has accompanied this. More small homes are required in the future and consideration needs to be given to the needs of an ageing population.	It is uncertain how the provision of housing might change without implementation of the Local Plan. Without a 5-year supply of land for housing, fewer homes might be built in Tamworth, but it is also possible that developments will still come forward to meet the need for new housing. Without the Plan it is less likely that housing of the right type will be delivered, or that enough affordable housing will be provided.
Deprivation	There are several small areas that face issues of deprivation in Tamworth. A number of these areas are concentrated in the Glascote ward. Low income, education and training, lack of employment opportunities and high crime rates are the main problems.	Without implementation of the Local Plan, there may not be delivery of enough employment land to increase job opportunities in Tamworth sufficiently. It is also unlikely that employment opportunities and community facilities will be developed in locations to meet the needs of deprived communities.
Health	Levels of health are similar to the national average. However, there are some small pockets of health deprivation. Obesity rates amongst adults are estimated to be the highest in England, and rates of physical activity are lower than the national average.	Without implementation of the Plan, it is possible that health levels will fall even lower as opportunities to promote cycling and walking will be lost, and it is less likely that new recreational facilities will be delivered to support more active lifestyles.
Open space	A review of open space provision in 2011 showed that at a Borough wide level there is sufficient open space within the Borough, although certain specific parts of the Borough need better provision.	It is unlikely that additional open space will be provided where it is needed, and it is likely that more open space would be lost without the protection afforded by the Plan.
Economy	Many of Tamworth's traditional firms have closed down over the last 20 years. However, while Tamworth remains heavily influenced by the manufacturing sector, service industries such as transport, communication and distribution now also play an important role.	Without implementation of the Local Plan, there may not be delivery of enough employment land to increase job opportunities in Tamworth sufficiently. It is also less likely that the sites would be in the right place to meet the needs of certain sectors (e.g. offices, logistics)
Employment	Tamworth has a low unemployment rate. However, pockets of unemployment are concentrated in certain areas of the town which also experience other forms of deprivation, particularly Glascote and Amington.	Without implementation of the Local Plan, there may not be delivery of enough employment land to increase job opportunities in Tamworth sufficiently. It is also unlikely that employment opportunities will be

Issue	Key Findings	Likely Evolution
		developed in locations to meet the needs of communities with higher unemployment.
Education and qualifications	Schools in Tamworth generally perform below the national average, with high levels of people having no qualifications at all and a very low percentage with high-level qualifications.	The level of education and qualifications is likely to remain unchanged without implementation of the Plan. However, it is possible that insufficient additional school places will be provided, and the opportunity to take a strategic approach to the provision of new school places will be lost.
Historic assets	Tamworth has grown rapidly since the 1960s and is now characterised by modern development. However, it is also an historic town that was once the capital of the Kingdom of Mercia. Tamworth still retains a range of important historic buildings and monuments, which need to be protected. There is also high potential for below-ground archaeological deposits to survive as well as for the extant historic buildings to retain earlier fabric. There are seven Conservation Areas within Tamworth	Without implementation of the Plan, it is more likely that historic assets would be devalued or lost, and the historic character in the Borough eroded. It is more likely that new developments would fail to incorporate measures to enhance the setting of historic assets.
Ecology	Tamworth has two Sites of Special Scientific Interest (SSSI) at Alvecote Pools and Meadows, and there are three others nearby in Warwickshire. Most of the Alvecote Pools SSSI is categorised as having an unfavourable but recovering status. The Borough has five Local Nature Reserves 16 Sites of Biological Importance and five Biodiversity Alert Sites (BAS). There are also sites of international importance near Tamworth: Ensors Pool SAC, River Mease SAC, Cannock Extension Canal SAC.	Without the Plan, it is unlikely that opportunities for creating or enhancing ecological networks will be realised, and action at a landscape scale is unlikely to be taken. Designated sites are likely to come under increasing pressure from development or may be lost or devalued.
Water quality	Two rivers, the Tame and the Anker, flow through the borough. Within and downstream of the borough, levels of nitrates are classed as 'very high' and phosphates are 'excessively high'. There is therefore a need to improve the nutrient status of surface waters through the Borough.	Water quality is likely to continue to improve without implementation of the Plan as a result of other positive policies on water quality, most notably the Water Framework Directive.
Water supply and wastewater treatment	According to South Staffordshire Water's Final Water Resource Management Plan, there is enough water available to meet annual housing growth of 145 dwellings per annum (dpa) with efficiency measures, but there is insufficient resource within the supply area to meet the higher scenarios for development considered, namely 159.5 dpa and 188.5 dpa, especially the higher of these two scenarios. Tamworth wastewater treatment works will require quality	The effect of not having the Local Plan on water supply and wastewater infrastructure is uncertain. The most likely effect is that development will not be well-planned or well-timed, which could make it difficult to meet the infrastructure needs of new development. It is also likely that developments would come forward on sites that are not well-suited to making the best use of existing infrastructure

Issue	Key Findings	Likely Evolution
	improvements in order to accommodate the proposed development.	or place additional strains on networks.
Air quality	Although Tamworth currently has no Air Quality Management Areas, nitrogen dioxide might exceed the standards at the A5 Dosthill, Two Gates Crossroads.	The likely future change in air quality without implementation of the Plan is uncertain. The likely location of development is unknown and therefore future travel patterns are uncertain. Improvements to sustainable transport infrastructure may still be delivered through other plans and programmes and therefore car travel may still reduce.
Flood risk	Tamworth has been classified as having a high probability of fluvial flood risk and a high consequence of fluvial flooding. The Borough is also identified as having a medium probability of residual flooding from the overtopping/breaching of flood defences, with a high predicted consequence. A significant proportion of Tamworth's land is at risk of flooding.	The likely change in flood risk without implementation of the Plan is uncertain. The NPPF contains policy guidance on managing flood risk in relation to development, although with climate change the risk of flooding is likely to increase nevertheless.
Climate change	Emissions of carbon dioxide are fairly low in Tamworth compared with the rest of Staffordshire and England as a whole, and have declined in recent years. However, the level of renewable energy generated in Tamworth is low compared to Staffordshire as a whole.	Without implementation of the Plan, opportunities to further reduce emissions of greenhouse gases will be lost, such as the creation of accessible green infrastructure networks, creation of sustainable transport infrastructure and generation of renewable energy within development.
Waste	Tamworth has achieved a moderately high recycling rate due to improvements in recent years. In 2011/12 49% of waste collected by Tamworth Borough Council was sent for recycling, compared to an average of 42% for England as a whole.	Waste management is likely to continue to improve in Tamworth, through the implementation of the Waste Strategy. Recycling rates are likely to rise and the amount of waste landfilled should fall.
Land and soil	A significant part of Tamworth Borough is already urbanised, and there is a shortage of developable open space. Tamworth has in the past been an important area for mineral extraction, and still contains mineral reserves of potential value. The town is surrounded by agricultural land, much of which is of relatively poor quality but some is higher quality. Tamworth has a Regionally Important Geological/Geomorphological Site at Dosthill Church Quarry.	It is uncertain how land use might change without implementation of the Local Plan. Without a 5-year supply of land for housing, fewer homes might be built in Tamworth, but it is also possible that developments will still come forward to meet the need for new housing. Without the Plan it is possible that more developments would come forward on greenfield land than on previously developed land within the urban area.
Retail	Tamworth town centre consists of a large number of small retail units, which are largely	Without the Plan, it is likely that the town centre's vitality and viability will

Issue	Key Findings	Likely Evolution
	occupied by small independent or specialist retailers rather than large national multiple chain retailers. A number of out of town centre retail parks are situated close to the town centre and occupy a larger retail floor space than the town centre. There are concerns that the town centre's vitality and viability could decline in the short term as it faces strong competition from the retail parks	reduce still further, leading to continued decline.
Leisure and culture	Existing leisure provision in Tamworth is generally adequate to meet the needs of local residents. However, there is an identified requirement for a new swimming pool and sports hall. There is also a need for additional café and restaurant provision in the town centre. Tamworth has a range of attractions including the Snowdome, Tamworth Castle, the Assembly Rooms and Arts Centre and Arts Centre, and shops in the town centre and at Ventura Retail Park.	Without implementation of the Plan, it is less likely that the additional sports facilities would be provided and less incentive to improve the café and restaurant provision in the town centre.
Transport	There is a dependence on the car to travel to work. A large proportion of the workforce out-commute from Tamworth to their employment. Tamworth has good connections to the national road and rail transport networks and is well-served by a local bus network. There is congestion during the morning peak on Ashby Road heading in to Tamworth.	Transport infrastructure is likely to improve without the Local Plan through measures in the Local Transport Plan and the Town Centre Masterplan. Walking and cycling is likely to increase, and safety will improve. Schemes will encourage commuting by public transport rather than car, and the highway network will be managed to reduce congestion.

The baseline information has been analysed in order to identify a number of key sustainability issues affecting Tamworth. This has then been compared with the outcomes identified through the policy review, to ensure that the appraisal framework also covers the key sustainability issues arising from the policy review.

**Table 5.2** lists the key sustainability issues that have been identified.

**Table 5.2: Sustainability issues for Tamworth**

1.	A growing and ageing population
2.	Lack of affordable and specialist housing
3.	Limited supply of land and buildings for future development
4.	Deprivation hotspots
5.	Inequalities including health and employment
6.	Health problems associated with obesity and low levels of physical activity
7.	Need to protect and enhance parks and open/green spaces
8.	Need to support diverse and competitive economy
9.	Below average qualifications
10.	An historic environment that needs protecting

11.	Important natural habitats and open spaces that need conserving and enhancing
12.	High flood risk in parts of the borough
13.	Need to tackle pollution, especially water quality
14.	Low levels of renewable energy generation
15.	A town centre in need of improvement
16.	Meeting the leisure, cultural, community and recreational needs of Tamworth, especially those of children and young people
17.	A high proportion of local people travel to work by car
18.	A high proportion of local people out-commute for work
19.	Localised traffic congestion
20.	Accessibility and availability of sustainable modes of transport
21.	Maintaining and enhancing landscape and townscape character

#### 5.4 CHARACTERISTICS OF AREAS LIKELY TO BE SIGNIFICANTLY AFFECTED

Tamworth is a very small borough. The boundaries are fairly tightly drawn around the developed urban area with only a limited amount of undeveloped green space around the town that sits within the Borough boundary. The draft Local Plan proposes significant amounts of non-urban green space for development, up to the boundary of Tamworth Borough, as well as policies which affect the Borough as a whole and specific parts of the Borough such as Regeneration Priority Areas. As such, the areas likely to be significantly affected can be considered to be the Borough as a whole. The characteristics of the Borough are set out in detail in Annex B and summarised in Section 5.3. The characteristics of specific allocated sites are set out in Annexes C and D.

#### 5.5 AREAS OF PARTICULAR ENVIRONMENTAL IMPORTANCE

There are three sites of international nature conservation importance within 20km of Tamworth. These sites have been designated as Special Areas of Conservation (SAC) under the Habitats Directive<sup>1</sup> and are as follows:

- Ensors Pool SAC, which is 19.5km away from the centre of Tamworth;
- River Mease SAC, which is 4.5km from the nearest part of Tamworth Borough and 8km from the centre of Tamworth;
- Cannock Extension Canal SAC, which is 19km away from the centre of Tamworth.<sup>2</sup>

Cannock Chase SAC is over 20km from Tamworth.

##### 5.5.1 River Mease SAC

The River Mease is an unusually semi-natural system in a largely rural landscape dominated by intensive agriculture. Water quality and quantity are vital to the European interests, whilst competition for water resources is high. Diffuse pollution and excessive sedimentation are catchment-wide issues which have the potential to affect the site. The SSSI assessment report undertaken in 2007 notes the site's adverse condition and identifies the following issues: drainage, invasive freshwater species, water pollution – agriculture/run-off, water pollution –

<sup>1</sup> Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora

<sup>2</sup> MAGIC Interactive Mapping, <http://magic.defra.gov.uk/>

discharge. Significant new development could take place within the catchment as a result of new housing and employment development in North-West Leicestershire, South Derbyshire and East Staffs which may impact upon water quality and quantity. The continuing creation of the National Forest will lead to further catchment wide changes in land use.

The quality and importance of the SAC is based on the following species and habitats:

- Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitriche-Batrachion* vegetation for which the area is considered to support a significant presence
- *Austropotamobius pallipes* for which the area is considered to support a significant presence.
- *Cobitis taenia* for which this is one of only four known outstanding localities in the United Kingdom.
- *Cottus gobio* for which this is considered to be one of the best areas in the United Kingdom.
- *Lutra lutra* for which the area is considered to support a significant presence.

### 5.5.2 Cannock Extension Canal SAC

The population of *Luronium natans* in this cul-de-sac canal is dependent upon a balanced level of boat traffic. If the canal is not used, the abundant growth of other aquatic macrophytes may shade-out the *Luronium natans* unless routinely controlled by cutting. An increase in recreational activity would be to the detriment of *Luronium natans*. Existing discharges of surface water run-off, principally from roads, cause some reduction in water quality.

The quality and importance of the SAC is based on the following species:

- *Luronium natans* for which this is considered to be one of the best areas in the United Kingdom.

### 5.5.3 Ensor's Pool SAC

The crayfish population has developed in a flooded brick-pit that has been abandoned for fifty years. The area was unmanaged and was used as *de facto* public open space. The crayfish would be vulnerable to pollution and introduction of non-native crayfish, through uncontrolled access. To address this, since 1995 the area has been leased by Nuneaton and Bedworth Borough Council and is managed as a Local Nature Reserve.

The quality and importance of the SAC is based on the following species:

- *Austropotamobius pallipes* for which this is considered to be one of the best areas in the United Kingdom.

### 5.5.4 Cannock Chase SAC

Much of Cannock Chase falls within a popular and well-used Country Park. Visitor pressures include dog walking, horse riding, mountain biking and off-track activities such as orienteering, all of which cause disturbance and result in erosion, new track creation and vegetation damage. Bracken invasion is significant, but is being controlled. Birch and pine scrub, much of the latter from surrounding commercial plantations, is continually invading the site and has to be controlled. High visitor usage and the fact that a significant proportion of the site is Common Land, requiring Secretary of State approval before fencing can take place, means that the reintroduction of sustainable management in the form of livestock grazing has many problems. Cannock Chase overlies coal measures which have been deep-mined. Mining fissures continue

to appear across the site even though mining has ceased and this is thought to detrimentally affect site hydrology. Furthermore the underlying Sherwood Sandstone is a major aquifer with water abstracted for public and industrial uses and the effects of this on the wetland features of the Chase are not fully understood.

The quality and importance of the SAC is based on the following species and habitats:

- Northern Atlantic wet heaths with *Erica tetralix* for which the area is considered to support a significant presence.
- European dry heaths for which this is considered to be one of the best areas in the United

### 5.5.5 Habitats Regulations Assessment

A Habitats Regulations Assessment was carried out in 2012<sup>1</sup> to investigate the potential impacts of development arising from the emerging Lichfield and Tamworth Local Plans. This concluded that no significant impacts were likely on the River Mease SAC, the Cannock Extension Canal SAC or Ensor's Pool SAC from the development of 2900 homes within Tamworth. However, it did conclude that there may be effects on the Cannock Chase SAC arising from strategic allocations within Tamworth i.e those of over 100 dwellings, and advised that these will need to incorporate a visitor impact strategy.

An email communication from Natural England to Tamworth Borough Council on 10<sup>th</sup> January 2014 advised that the updated Local plan is outside the zone of influence (15km) for Cannock Chase SAC and concluded that mitigation for recreational pressure will not be required and hence alternative recreational green space will not be necessary. It further advised that it could not be concluded that no likely significant effects will occur to the River Mease SAC and asked for a Habitats Regulations Assessment to be carried out.

The Southern Staffordshire Water Cycle Study has identified issues relating to the wastewater treatment works where the Mease is the receiving watercourse. However, the Mease is not the receiving watercourse for the Tamworth Wastewater Treatment Works, which discharges into the Tame. The River Tame then flows north to join the Trent about 500m upstream of where the Mease joins the Trent. An email from Severn Trent Water on 30 January 2014 confirms that the area within Tamworth Borough does not interact with the River Mease.

The HRA has been updated to reflect the changes from the withdrawn Local Plan and also the recent information and positions from Natural England and Severn Trent Water.

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<sup>1</sup> Habitat Regulations Assessment: Lichfield District & Tamworth Borough, May 2012



## 6 APPRAISAL FRAMEWORK

### 6.1 INTRODUCTION

The purpose of developing the SA framework is to provide a means by which the sustainability of policies or proposals contained in the Local Plan can be appraised in a formal and systematic manner. The SA framework consists of a set of sustainability objectives with which the Local Plan should comply or which it should support where possible. The framework is thereby used as a tool with which assesses the likely sustainability effects of the Local Plan, by appraising the extent to which the Local Plan complies with or supports each policy objective.

### 6.2 METHODOLOGY

Various environmental, social and economic issues have been identified through reviewing a wide variety of plans and strategies (Task A1), collecting baseline information (Task A2) and identifying sustainability issues and problems (Task A3). These issues have informed the development of the sustainability objectives.

### 6.3 OUTCOMES

The sustainability objectives are listed in **Table 6.1** below. The purpose of the Sustainability Appraisal is to ensure that the policies and proposals contained in a Local Development Document contribute to the pursuit of sustainable development. To achieve this, the sustainability objectives need to deal with environmental, social and economic issues and problems. To ensure that the sustainability objectives cover environmental, social and economic issues, they have been categorised into these three strands of sustainable development. However, many (if not most) of these objectives do not fit neatly into one category, but straddle two or all three. Each objective has also been assessed against the SEA Directive to ensure that all environmental topics referred to in the SEA Directive are covered.

**Table 6.1: Sustainability Objectives**

	Objectives	Env.	Soc.	Eco.	SEA topic
1.	To meet the housing needs of the whole community, providing affordable, decent, appropriate and sustainably constructed homes in accessible locations.		✓		
2.	To encourage the efficient use of land and soil.	✓	✓	✓	Material assets
3.	To reduce deprivation, including health and income deprivation.	✓	✓	✓	Population, human health
4.	To ensure equal access to community services and facilities.		✓		
5.	To encourage equal access to education, jobs and training.		✓	✓	

6.	To encourage active and healthier lifestyles by providing accessible green infrastructure, including networks of paths and open spaces, and formal and informal sport and recreation facilities.	✓	✓		Human health, fauna, flora, landscape
7.	To make communities safer by reducing crime, fear of crime and anti-social behaviour.		✓		
8.	To encourage a diverse and competitive economy that will provide sustainable economic growth.			✓	
9.	To protect and enhance historic assets.	✓	✓	✓	Material assets, cultural heritage
10.	To encourage high quality and locally distinct places, spaces, buildings and landscapes.	✓	✓	✓	Material assets, cultural heritage, landscape
11.	To conserve and enhance biodiversity and geodiversity, sites of nature conservation value and ecological networks.	✓	✓	✓	Biodiversity, fauna, flora
12.	To minimise flood risk.	✓	✓	✓	Climatic factors, water
13.	To reduce energy consumption by encouraging energy efficiency and use of renewable energy sources.	✓	✓	✓	Climatic factors, material assets
14.	To encourage the reduction, re-use and recycling of waste and water.	✓	✓	✓	Soil, water, landscape
15.	To protect and improve environmental quality including in relation to air, water, land and noise.	✓	✓	✓	Air, water, soil, human health
16.	To make Tamworth town centre the heart of the borough by creating a vibrant and attractive environment.	✓	✓	✓	Material assets, cultural heritage
17.	To reduce the need to travel, reduce out-commuting and encourage sustainable modes of transport.	✓	✓	✓	Climatic factors, air, water, human health
18.	To make best use of the existing transport infrastructure and seek improvements to reduce congestion and improve safety.	✓	✓	✓	Climatic factors, air, water, human health

## 7 APPRAISAL OF SITES

### 7.1 METHODOLOGY

The housing and employment sites that have been identified and allocated in the draft Local Plan have been subject to SA. The sites have been appraised against the SA objectives in the appraisal framework and an assessment made of the likely significant effects of development at each site. Recommendations have been made for ways in which the predicted negative effects could be mitigated and for capitalising on opportunities for benefits.

The SA of sites has been an iterative process. Tamworth Borough Council officers provided a long list of potential sites in August 2013 and these were appraised against the appraisal framework. A paper was prepared in October 2013 setting out the results of the appraisal and making mitigation recommendations where possible. Following this, the list of sites was refined and some sites were dropped from further consideration, either because of likely deliverability or because the SA had identified some issues which were either insurmountable or sufficiently negative as to not justify allocation of the site.

In undertaking the SA of sites, reference has been made to publicly available data on local conditions in the vicinity of sites. The SA has also drawn on representations received by Tamworth Borough Council in the recent consultation on sites with selected stakeholders including Environment Agency, Staffordshire County Council (Environmental Specialists, Education, Highways, Flood Drainage), Highways Agency, Natural England, Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP) and adjoining local authorities.






The remaining sites have been allocated in the draft Local Plan and development management policy has been drafted for each site to address the predicted effects. The sites have then been subject to further SA in late 2013 and early 2014 to take into account the effect that the mitigation contained within the development control policies would have on the likely significant effects to improve the impact of development. The findings of this second SA of sites are set out in detail in Annex C, and summarised **Table 7.1** and **Table 7.2** below.

Annex C also shows the results of the SA of the sites which have been dropped from further consideration, including the green belt sites. It should be noted that in Annex C, the sites which have been dropped from further consideration do not generally perform as well in the appraisal as the sites which have been allocated. There are two reasons for this. Firstly, in many cases the sites have been rejected in part precisely because they do not perform as well in sustainability terms and generally have more significant constraints on them. Secondly, development management policy has been drafted for the allocated sites to address the predicted effects and therefore mitigation has been built into the policy. No mitigation has been developed for the sites which have been rejected.

The main issues that have arisen are in relation to the historic environment, flood risk, biodiversity, water supply, loss of greenfield land and sports provision.

For almost all the allocated sites, some residual recommendations are made for mitigating adverse effects, addressing uncertainties or for capitalising on opportunities for benefits. Details of these are given in Annex C.

Colour has been used in **Table 7.1** and **Table 7.2** and in the tables in Annexes C and D. This has the following meaning:

Colour	Meaning
	Development likely to result in major positive impacts.
	Development likely to result in minor positive impacts.
	No impacts or neutral impacts
	Development could result in minor adverse impacts, or mitigation could be possible to allow development to proceed.
	Development could result in major adverse impacts and mitigation may not be possible.

**Table 7.1: Summary of Sustainability Appraisal of housing sites**

Site ID	341	343	344	347	348	349	357	376	377	399	405	467	488	496	507	508	509	521	541	558	DL	CL	GC	AV
Housing	++	++	++	++	++	++	++	+	+	++	++	+	++	+	+		++	++	++	+	++	++	++	++
Land use	++	-	++	++	++	++	++	++	++	++	-	++	++	+/-	++		++	-	++	++	-	-	-	-
Deprivation																								
Access to services and facilities																								
Access to education, jobs and training																								
Active lifestyles																								-
Crime																								
Diverse and competitive economy																								
Historic assets				+	+	+	+	+	+													--	-	
High quality places						+				-												-	-	-
Biodiversity										+	?											-	-	-
Flood risk		?		?		?					?		?						?	?		?	-	-
Energy																								
RRR waste and water																								--
Air, water, land, noise	?	?	?	?	?	?	?	?	?	?	?							?	?	?	?	?	?	--
Town centre																								
Travel		++	++	++		++	++				-				++	++	++	++					-	
Transport infrastructure																								

**Table 7.2: Summary of SA of employment sites**

SA objective	Site ID	EMP1	EMP2	EMP7	EMP8	EMP9	EMP10	EMP26	EMP30	EMP33	EMP34
Housing											
Land use		--	--	-	--	++	-		=	--	++
Deprivation											
Access to services and facilities											
Access to education, jobs and training							+		+		+
Active lifestyles											-
Crime											
Diverse and competitive economy		++	+	+	+	+	+	+	+	+	+
Historic assets		+									
High quality places											
Biodiversity		?	?	?	+	+	+	+	+	?	-/+
Flood risk											
Energy											
RRR waste and water											
Air, water, land, noise		?	--	?	?	?	?	?	?	?	?
Town centre											
Travel											
Transport infrastructure		?			?	?					

A number of cumulative impacts have been identified where development at two or more sites could have impacts which when acting together are likely to be significant. These are described in the following table.

**Table 7.3: Cumulative impacts arising from allocated sites**

Issue	Sites	Likely significant impacts
Sewage treatment capacity	All	Whilst comparison of current measured dry weather flow against the consented dry weather flow indicates that there is significant hydraulic capacity this sewage works there is some concern regarding the capacity of the filter process. However should additional treatment capacity be required to accommodate the significant levels of development being proposed to the north of Tamworth then no issues are envisaged in dealing with future growth demand.
Air quality	344, 354, 357, 504, 521, 547, 589, 600, 606, 693	Could reduce air quality at Two Gates crossroads.
Sewerage infrastructure capacity	343, 399, 344, 341, 357, 496, 507, 508, 509, 521	May have an impact on the current capacity of the sewer network. Hydraulic modelling will be required to assess the impacts of proposed developments.
	347, 348, 349, 488, 558	May affect known sewer flooding problems downstream.
Historic assets	394, 528, 529	The proposed allocations may have a cumulative impact on the Hopwas Conservation Area and two listed bridges to the south.
Biodiversity	DL, CL, GC, AV, 405, EMP1, EMP2, EM7, EMP33	Surveys should be carried out to determine whether water voles or otters are present.
Flood risk	DL, CL, GC, AV	Could collectively have an impact on flood risk through loss of large amounts of permeable land. However, there is no evidence to indicate how much greenfield land could be lost without any adverse effects on flood risk.

## 8 APPRAISAL OF POLICY

### 8.1 METHODOLOGY

The appraisal determined the likely effects arising from the draft Local Plan. This applied largely to the vision, objectives and policies and to a series of options. This was done by assessing each element of the Plan against the appraisal objectives in turn and making a largely qualitative assessment, with reference also to the baseline data from the Scoping Report.

In reporting the results of the appraisal, the following symbols have been used to indicate the broad nature of the predicted effect:

+	effect likely to be positive
-	effect likely to be negative
0	no significant effect
?	effect unknown

If the appraisal objective was not relevant to the element of the Plan being appraised, no symbol is given.

Multiple symbols have been used (e.g. ++) to indicate a different scale of impact over time, or where the impacts of an option are *substantially* better or worse than others.

The effects were also rated for their significance in terms of the importance for achieving each appraisal objective. Effects were rated as high, medium or low significance, taking account of a number of factors. The factors were:

- the expected scale of the effects or the degree to which the effects are likely to contribute to the achievement of the SA objective in the Borough overall;
- the certainty or probability that the effect is likely to occur as a consequence of the Local Plan;
- whether the effects would be permanent or reversible;
- whether the effect will occur as a direct result of the Local Plan or not, in other words whether the Plan is key for achieving or controlling effects;
- whether the effect is more strongly dependent on other interventions or other factors; and
- how important the objective is to the scope of the Plan.

The assessment of significance is indicated in the tables in this report by colour:

	Not relevant
	No significance
	Medium significance
	High significance



The findings of the appraisal are set out in detail in Annex E. The table below summarises those findings for the draft Plan’s vision and policies.

**Table 8.1: Summary of appraisal of vision and policies**

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
V	+	0	+	+	+	+	+/0	+	+	+	+	+	?	+	+	+	?/+	+
SP1	+	+	+	+	+	+	+	+	+	+	+	+	?	?	+	+	+/?	+
SP2	+	+	+	+	+	+	+	+	+	+	?	0	0	0	+/?	+	+/?	+/?
SP3	+	+	+	+	+	+	+	+		+	?				+		+	+
CP1	+	+	+	+	+		+	+	0	+	0				+	+	+	+
SP4		+/-	+		+	+		+	0		+	+			+	+	+/-	+
CP2	+	+	+		0	+		+	+		+	+	+	+	+		+/?	+
CP3		+		+	+	+	+	+	+	+	+	0			+	+	+	+
SP7	+	+	+	+	+	+	+	+		+	?		+		+		+	+
CP4																		
CP5	+																	
CP6	+	+								+								
CP7	+			+		+				0					0		+	+
SP8		+				+			+	+	+	+			+		+	
CP8		+	+	+		+												
CP9		+				+				+	+	+			+		+	+
CP10	+						+	+	+	+					+		0	
CP11								+	+	+						+		
CP12						+				+	+	+			+			
SP9	+	+	+	+	+	+		+			0	+	+	0	+/?	+	+/-	+
CP13	+					+	+	+		0					+	+	+/0	+
CP14	+	+				+							+	+	+	+	+	
CP15		+				+					+	+			+	+		
CP16			+	+	+			+									+	

**8.2.1 Description of Effects**

The Local Plan has a clear and strong focus on meeting the housing needs of all sections of the community. It seeks to provide affordable, high quality homes of a mix of types to meet a range of needs, and requires these to be sustainably designed and constructed. The Plan promotes energy efficiency and the generation of renewable and low carbon energy in new developments. Water efficiency is to be maximised, and development must support the Tamworth Waste Strategy to reduce waste and increase recycling. Developments must be designed to create safer communities, which should help to support a reduction in crime and may go a little way to reduce anti-social behaviour although this is also driven by a range of other factors.

A clear aim is to provide homes in accessible locations to minimise the need to travel and maximise the use of sustainable modes of transport. By promoting development in the town centre, the Plan will help to make use of existing transport infrastructure, and it also seeks improvements to sustainable transport infrastructure which will help to reduce congestion and

improve safety. It will also support the accessibility of community facilities and services through promoting development in the town centre, and supports the creation of a vibrant and attractive town centre. The provision of sustainable transport choices is also promoted in the Strategic Urban Extensions, as is the provision of community facilities and services to ensure accessibility and reduce the need to travel.

In supporting sustainable transport improvements, the Local Plan encourages the creation and improvement of green and blue infrastructure links to encourage cycling and walking throughout the Borough, and particularly between the town centre and other neighbourhoods and to the countryside beyond. Such links are also required within new developments. As well as promoting sustainable transport choices to reduce reliance on the car and promote active and healthy lifestyles, these networks will also contribute to strengthening a distinct identity for Tamworth, and may help to facilitate the movement of species and assist in reducing flood risk. They will also contribute to creating an attractive urban landscape. Healthy lifestyles will also be encouraged through the provision of new formal and informal recreation facilities and the protection and enhancement of open spaces.

The second aspect of Tamworth's distinct identity is its historic environment. The Plan affords strong protection to its historic assets and promotes their enhancement, and requires development to be sympathetic to those assets. This again will help to create an attractive urban landscape, and will support the town's tourism offer, leading to increased job opportunities and a stronger economy.

The Local Plan encourages economic growth by protecting the Strategic Employment Areas and allocating new areas for economic development that are accessible by sustainable modes of transport. This should help to reduce deprivation by increasing job opportunities in Tamworth, particularly if done in conjunction with increasing education and training provision in deprived areas. This will help to reduce income deprivation and should also indirectly support a reduction in health deprivation. The improvement of access to community services should assist in this. By targeting regeneration areas for housing and economic development, the Plan will directly address deprivation and help to improve the urban environment. A direct aim of the Plan is to reduce out-commuting, although this may be increased by the improvement of links to Birmingham and other inter-urban routes.

The Plan explicitly requires development to make an efficient use of land. By focusing development in the Borough's centres and promoting employment uses on existing employment sites, the Plan will help to promote the reuse of previously developed land and reduce the use of greenfield land and agricultural land, thereby indirectly helping to protect soils. An efficient use of land will be supported by the requirement for medium-high density development. The emphasis in Tamworth has been to bring forward as much brownfield land as possible for development, nevertheless over three quarters of the area of the allocated new employment sites are on greenfield land.

The Plan explicitly requires the protection of biodiversity and geodiversity, and promotes opportunities to enhance biodiversity through habitat creation and restoration. It also requires development to create and reinforce links between existing biodiversity sites and with semi-natural habitats. By requiring the protection and enhancement of open spaces and green infrastructure including network features, the Plan may help to conserve and enhance

biodiversity and ecological networks, but this is dependent on the quality of the open spaces and the nature of any enhancement work.

The Plan addresses flood risk by requiring proposals for development in flood risk areas to provide a Flood Risk Assessment and to include mitigation measures. Development will be resisted in these areas where appropriate and necessary and the Plan states that development will be expected to be located outside areas at high risk of flooding. Development must not increase the risk of flooding elsewhere and policy is included to manage and reduce flood risk. Site allocations require flood risk to be assessed and appropriately managed to reduce risk.

The Plan explicitly requires the protection of water quality and requires the quality of canals and rivers to be enhanced. The enhancement of blue infrastructure will help to support this policy. Air quality will be protected and enhanced by promotion of sustainable transport infrastructure. Improving junctions on the A5 may help to increase the flow of traffic at these junctions, which may help to reduce air pollution or may increase it if traffic levels rise as a result. By requiring the protection and enhancement of biodiversity, the Plan is likely to contribute to the improvement of environmental quality in relation to air, water and land. It may also make a contribution to reducing noise through the protection and enhancement of open spaces and reducing reliance on the private car.

## 8.2.2 Mitigation

The following recommendations have been made for changes to the vision and policies in order to mitigate predicted adverse effects of the draft Plan, or to capitalise on opportunities for benefits. All these recommendations have been taken on board and incorporated into the Draft Local Plan. There are no outstanding recommendations for the vision and policies of the Plan.

**Table 8.2: Mitigation recommendations**

<b>Policy</b>	<b>Recommended mitigation</b>
Vision	<p>Extend the aim to achieve safer living conditions to new housing development.</p> <p>Include a commitment to conserving and enhancing biodiversity and geodiversity in the vision.</p> <p>Include a commitment to reduce flood risk and promote climate change mitigation and adaptation.</p> <p>Include a commitment to promoting the efficient use of resources.</p> <p>Include a clearer commitment to improving the quality of the environment across the Borough.</p> <p>Include a commitment to promoting sustainable modes of transport.</p> <p>Include a commitment to improving infrastructure for sustainable transport modes.</p>
CP8	<p>Include a focus on areas of deprivation to address the needs of deprived areas for access to sport and recreation facilities.</p>
CP9	<p>Include requirements to support informal recreation in open spaces where appropriate.</p> <p>Promote opportunities to increase connectivity of open spaces and secure biodiversity gains.</p> <p>Promote opportunities to use open space provision to reduce flood risk.</p> <p>Require measures to promote walking and cycling in open spaces, through provision of infrastructure, improved connectivity and safety measures.</p>
CP11	<p>Require regard to be had to the findings of the Extensive Urban Survey.</p>
SP9	<p>Require developments to incorporate measures to reduce flood risk where there are</p>

Policy	Recommended mitigation
	<p>appropriate opportunities.</p> <p>Promote energy efficiency measures in retro-fitting of existing development.</p> <p>Include supporting text to indicate how the efficient use of land is to be achieved.</p>
CP15	<p>Require developments to capitalise on opportunities for creating/protecting accessible recreational green space.</p> <p>Require developments to capitalise on opportunities for improvement in biodiversity value.</p>

### 8.3 COMPATIBILITY CHECK OF OBJECTIVES

Government guidance recommends that the SA should undertake a compatibility analysis between the objectives of the Local Plan and the SA appraisal objectives. This has been done and the results are set out in Table 8.4 below.

The purpose of this exercise is to determine whether the objectives of the Local Plan will contribute to sustainable development, and to identify any potential incompatibilities between the objectives of the Plan and sustainable development policy objectives. To do this, the Plan objectives have been compared with each of the SA appraisal objectives and an assessment made of the likelihood that the Plan will contribute to the achievement of each objective for sustainable development.

**Table 8.3: Strategic spatial objectives of draft Local Plan**

SO1	Making the most efficient and sustainable use of the Borough's limited supply of land and recognising that an element of future development will be provided by neighbouring authorities.
SO2	To make Tamworth Town Centre a priority for regeneration to create a safe and attractive place for residents, businesses and visitors by strengthening and diversifying the town centre offer, optimising retail, leisure and housing development opportunities and increasing its liveability and by making the most of the town's tourism and cultural offer, thus creating a positive image for the borough.
SO3	Working in partnership with economic stakeholders to create a diverse local economy, including regeneration of employment areas and provide appropriate education and training that will provide local job opportunities that will reduce the need for residents to travel outside of the Borough.
SO4	To facilitate the provision of convenient and accessible services and community infrastructure across the Borough, particularly in the most deprived neighbourhoods where initiatives that provide additional support, information and services to residents will be encouraged and supported.
SO5	To provide a range of affordable, adaptable and high quality housing that meets the needs of Tamworth residents.
SO6	To ensure that appropriate infrastructure, including ICT, is in place to support the delivery of development across the borough.
SO7	To encourage active and healthier lifestyles by providing a network of high quality, accessible green and blue linkages and open spaces and formal indoor and outdoor recreation facilities that meet identified need and link neighbourhoods to each other and the wider countryside.
SO8	To protect and enhance statutory and non-statutory areas of nature conservation, ecological networks and landscape value on the doorstep of Tamworth residents, for their biodiversity, geological, historical and visual value and for the opportunities they provide for education and

	leisure.
SO9	To protect and enhance historic assets by ensuring that proposals for change respect the historic character of the borough including street layout, surviving historic buildings, street furniture, archaeology and open spaces.
SO10	To create safe, high quality places that deliver sustainable neighbourhoods and reflect Tamworth's small-scale and domestic character using a blend of traditional and innovative design techniques.
SO11	To minimise the causes and adapt to the effects of climate change by encouraging high standards of energy efficiency, sustainable use of resources and use of low carbon/renewable energy technologies.
SO12	To promote sustainable transport modes for all journeys by improving walking, cycling and public transport facilities throughout the Borough and to neighbouring areas and beyond.

**Table 8.4: Compatibility of strategic spatial priorities with SA objectives**

SA Objective	Strategic Spatial Priorities											
	SO1	SO2	SO3	SO4	SO5	SO6	SO7	SO8	SO9	SO10	SO11	SO12
1.					✓					✓	✓	
2.	✓	✓										
3.			✓	✓								
4.				✓								
5.			✓	✓								
6.							✓	✓				✓
7.		✓								✓		
8.		✓	✓									✓
9.									✓			
10.		✓			✓		✓	✓	✓	✓		✓
11.							✓	✓			✓	
12.							?	?			?	
13.											✓	
14.					?					?	✓	
15.							?	✓		?		✓
16.		✓							✓			✓
17.	✓	✓	✓	✓		✓	✓			✓		✓
18.		✓	✓			✓	✓					✓

No incompatibilities between SA objectives and the Strategic Spatial Priorities were found. Almost all the SA objectives were addressed in the Strategic Spatial Priorities, ensuring that the Local Plan will support the SA objectives. Only in the case of the objective to minimise flood risk was there no clear indication that this would be a priority for the Local Plan. Strategic Spatial Priorities SO7, SO8 and SO11 may indirectly contribute to reducing flood risk, but there is no explicit objective to do so. Priority SO11 seeks to minimise the causes and adapt to the effects of climate change, and this could be enhanced by including a reference to the need to minimise flood risk, particularly as it is a significant issue for Tamworth.

## 9 APPRAISAL OF OPTIONS

### 9.1 INTRODUCTION

The SA is required to appraise the impacts of the Local Plan and of reasonable alternatives to it. In developing the Local Plan, a number of different types of options have been considered. These fall into the following categories:

- Spatial options;
- Housing growth scenarios;
- Employment scenarios;
- Affordable housing scenarios

Within each group of options or scenarios, several different options/scenarios have been developed. Each of these has been appraised against the SA objectives of the appraisal framework. A description of the options/scenarios, the reasons for selecting the alternatives dealt with and the findings of the appraisal are set out in the following sections.

### 9.2 SPATIAL OPTIONS

#### 9.2.1 Description of Spatial Options

The following options have been developed as alternatives to the proposed spatial strategy. These spatial options select different combinations of sites to deliver the new housing development, resulting in different approaches to locating development around the Borough.

##### **Option 1: Urban area and Anker Valley**

This option was chosen as it was the proposed strategy within the withdrawn Local Plan and was in line with the adopted Local Plan. This option is the 'baseline' and subsequent options for appraisal are built on this.

##### **Option 2: Urban area, Anker Valley and the Golf Course**

This builds on option 1 and is seen as expanding the borough to the east. It was agreed at a Cabinet meeting of the Council in May 2013 to look at options of disposal for the Golf Course, one option being for housing development. Therefore this is a reasonable option to consider. The Golf Course is close to existing employment areas. It is removed from the Town Centre, but sustainable transport linkages have the potential to be improved.

##### **Option 3: Urban area, Anker Valley and green belt locations**

This is seen as expanding the borough to the south. Green belt has been considered as there is active promotion of some sites from landowners. The sites are detached from the town centre and no large employment areas are close by. There are biodiversity and geodiversity sites within the Green Belt, as well as landfill and mineral safeguarding sites and in many areas the topography of the land would be very challenging to develop.

##### **Option 4: Urban area, Anker Valley and Dunstall Lane**

This is seen as expanding the borough to the west. Dunstall Lane has historic planning permission for employment use that was implemented but never completed. The NPFF states that employment land not coming forward should be considered for future housing options. This area is close to existing employment areas, retail destination and the town centre. Sustainable transport linkages have the potential to be improved by utilising existing public rights of way, cycle ways and making best use of the bus service serving the nearby retail parks.

**Option 5: Urban area, Anker Valley and Coton Lane**

This is seen as expanding the borough to the north west. Coton Lane is a site actively promoted and would fill the urban area to the Borough boundary. It would allow for housing development which is close to existing employment areas and also close to the town centre.

**Option 6: Urban area, Anker Valley, Golf Course, green belt sites, Dunstall Lane and Coton Lane**

This is seen as expanding the borough in all directions.

**Option 7: Urban area, Anker Valley, Golf Course, Dunstall Lane and Coton Lane**

This option would retain the green belt, as the infrastructure requirements on green belt sites are high and other sites are better located in relation to employment areas and the town centre. The green belt sites generally performed relatively poorly in the appraisal of sites.

The options are summarised in the following table.

**Table 9.1: Summary of spatial options**

<b>Spatial option</b>	<b>Sites to deliver option</b>	<b>Approximate capacity</b>
1	Urban area and Anker Valley	900
2	Urban area, Anker Valley, golf course	2000
3	Urban area, Anker Valley, green belt sites	1800
4	Urban area, Anker Valley, Dunstall Lane	1600
5	Urban area, Anker Valley, Coton Lane	1090
6	Urban area, Anker Valley, golf course, Dunstall Lane, Coton Lane, green belt sites	3790
7	Urban area, Anker Valley, golf course, Dunstall Lane, Coton Lane	2890

**9.2.2 Description of Effects of Spatial Options**

All options will result in the permanent loss of greenfield agricultural land, and some will mean the loss of green belt land, both of which are likely to affect the setting of Tamworth. Options 1, 4 and 5 would minimise the impact on landscapes.

Biodiversity is likely to be adversely affected by development. The greater the land-take, the greater the pressure on biodiversity, both through habitat loss and through the effects of human activity on habitats that are not lost. All the SUE sites have constraints and have the potential for adverse impacts on biodiversity. The green belt sites have particularly significant biodiversity constraints, therefore options 3 and 6 perform particularly poorly on biodiversity.

Loss of greenfield land could also contribute to adverse effects on flood risk, by reducing the area of permeable land in Tamworth and increasing the rate of run-off from the land. With increasing land-take, it is possible that with development of more sites, adverse effects on flood risk could be experienced, but there is no data to judge this with any degree of certainty.

The development of the golf course site would involve the loss of formal recreational facilities, which does not support the objective of promoting active lifestyles. However as the decision to close and dispose of the golf course has been made, this loss is inevitable and the facilities will be lost regardless.

The higher the housing numbers, the more possible it becomes that adverse impacts will be seen on historic assets, particularly the setting of assets if not the assets themselves. There are opportunities to enhance historic assets in the urban area, but the Dunstall Lane site has the potential for adverse impacts on designated and undesignated historic assets, and the golf course has the potential for adverse impacts on undesignated industrial period assets (the Amington Colliery complex, a disused brick works site, the line of the Amington and Glascoate Colliery Railway and the line of the Coventry Canal). Options 1, 3 and 5 minimise the risk to historic assets.

Developing the green belt sites may risk further deterioration of air quality at the Dosthill Road/Watling Street junction because of the increased traffic using Dosthill Road. In addition, several of the SUE sites have the potential to affect known sewer flooding problems, and the green belt sites risk problems with capacity and pumping. For the green belt sites, major investment in water infrastructure is likely to be required. Options 1 and 5 present least risk of adverse environmental impacts while options 3 and 6 present the greatest.

The more sites that are allocated on the edge of Tamworth, the more this would lead to increased travel distances to access town centre facilities and services. Delivery of high levels of housing growth is also likely to increase the need for out-commuting. Option 6 performs least well in terms of reducing the need to travel. The green belt sites are likely to increase congestion on the A51 and a new road may be required to address this.

None of the options would deliver Tamworth's identified need for affordable housing. There is a slight difference between the options in that the higher the overall level of housing growth the more affordable housing would be provided, but the difference between the options is minimal and none of the options is significantly better than any others. The higher the overall level of housing growth, the more progress would be made towards meeting Tamworth's overall level of housing need.

## **9.3 HOUSING GROWTH SCENARIOS**

### **9.3.1 Description of Housing Growth Scenarios**

Consultancy firm Nathaniel Lichfield & Partners (NLP) was appointed by the three southern Staffordshire Councils of Cannock Chase District, Lichfield District and Tamworth Borough to undertake a study into the future population, household projections and housing needs of the area.



The purpose of the study was to set out the potential scale of future housing requirements in the three local authorities, based upon a range of housing, economic and demographic factors, trends and forecasts. This sought to provide the Councils with evidence on the future housing requirements of their districts to help them plan for future growth and make informed policy choices through the development plan preparation process. NLP produced a report<sup>16</sup> setting out the findings of the study in May 2012.

NLP developed 12 scenarios for future housing requirements according to three factors, which were agreed with the three Councils as follows:

- Demographic Factors (Scenarios A-E) – what projections of natural change, migration and headship rates will mean for future levels of household growth;
- Economic Factors (Scenarios F-H) – what levels of housing are needed to sustain different estimates of employment change; and,
- Housing Factors (Scenarios I-J) – how past trends of delivery are likely to be reflected in future household growth.

The various forecasts for Tamworth range from a low of 200 dwellings per annum (dpa) based on Scenario J (RSS Phase Two Panel Report), to a high of 507 dpa based on Scenario G (Past Trends Job Growth). There is a cluster around the 240-280 dpa mark.

The scenarios developed by NLP were as follows. These show the number of dpa which would be required to be provided, and a total for the 22-year period 2006-2028.

#### *Demographic Factors*

- **A – Baseline Scenario: 5,817 dwellings or 264 dpa**  
This scenario involves projecting net in-migration across the period 2011-28 using the 2008 ONS sub-national population projections, and using the ONS 2008 vacancy rate to convert households into dwellings. This reflects trends seen in the past decade.
- **Aa - Baseline Scenario Sensitivity Test (ASMigR 5yr): 5,271 dwellings or 240 dpa**  
Separate Age Specific Migration Rates were calculated for both in and out domestic migration, based upon the age profile of migrants to and from Tamworth over the previous five years.
- **Ab - Baseline Scenario Sensitivity Test (ASMigR 10yr): 5,666 dwellings or 258 dpa**  
As Scenario Aa above, but using a longer time period (10 years) to calculate the Age Specific Migration Rates.
- **B - Baseline Scenario HSSA Vacancy Rates: 5,795 dwellings or 263 dpa**  
Whilst the Baseline scenario used the 2008 ONS vacancy rate to convert households into dwellings, a sensitivity test was run using 2011 HSSA vacancy returns for each authority.
- **C - Zero Net Migration: 5,468 dwellings or 249 dpa**  
This scenario examined the consequences of taking forward migration rates on an equalised

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<sup>16</sup> Southern Staffordshire Districts Housing Needs Study and SHMA Update Final Report, Nathaniel Lichfield and Partners, May 2012

basis, so that net in/out migration is zero at both domestic and international levels (i.e. an identical number of people move into the area as leave the three districts).

- **D - Changes in the Institutional Population Constant Share: 5,658 dwellings or 257 dpa**  
The ONS forecasts suggest that the proportion of people in institutions (predominantly care/nursing homes in the 75+ age group) will decline, so for this option the proportion of residents 'not in households' was held constant.
- **E - 2008-based ONS/CLG Scenario: 6,231 dwellings or 283 dpa**  
The ONS 2008-based sub-national population projections (SNPP) are the most recent demographic projections published by ONS. Following these, CLG have published 2008-based household estimates, which use the SNPP to estimate future household growth in each local authority.

#### *Economic Factors*

- **F - Forecast Job Growth Scenario: 6,220 dwellings or 283 dpa**  
An economic-led scenario based upon the baseline forecasting models for the three districts provided by GHK. This scenario models the necessary demographic change to achieve a resident labour force in Cannock Chase, Lichfield and Tamworth to support these workplace jobs and subsequently the housing requirement associated with this.
- **G - Past Trends Job Growth Scenario: 11,150 dwellings or 507 dpa**  
The past trends scenario calculated a ten year historic trend using ABI data from 1998 to 2007/08 (2 digit SIC sectors).
- **H - Static Employment Growth Scenario: 5,445 dwellings or 248 dpa**  
This economic scenario examined the housing implications of a static level of job creation between 2011-2028 to reflect ongoing economic uncertainties, with migration figures adjusted accordingly.

#### *Housing Factors*

- **I - Past Dwelling Completion Rates: 4,818 dwellings or 219 dpa**  
The past rate of delivery of dwellings ostensibly provides a proxy for realisable demand for housing development. Numbers are based on the past ten years of net housing delivery.
- **J - Regional Strategy Requirement: 4,400 dwellings or 200 dpa**  
Although the Localism Act 2011 makes provision for the abolition of Regional Strategies, the housing requirements contained within them (and the process undertaken to arrive at them) still continue to provide a benchmark and remain, arguably, a valid indicator of local requirements. Figures are taken from the Report of the EiP Panel for the West Midlands Regional Spatial Strategy Phase Two Revision.

The NLP report ruled out scenarios F and G as unrealistic for Southern Staffordshire, partly because they would require a step-change in housing delivery rates over recent years, and partly because of land constraints including environmental designations, flood risk and green belt. For Tamworth, scenario F is the same as scenario E which was not ruled out as unrealistic, therefore it is prudent to retain scenario F for appraisal. However, scenario G is undeliverable due to the

lack of available sites even with the green belt sites (see option 6 of the spatial options) and therefore it is discounted as an unreasonable alternative.

In May 2013, NLP produced an update to the assessment of housing need for South Staffordshire<sup>17</sup>. This tested the ongoing validity of the housing requirements identified in the original Southern Staffordshire Housing Needs study in the light of recently released demographic data and population projections. Having modelled the latest CLG household projections and related statistics on vacancy rates, unemployment and commuting, it considered that the original ranges of between 240-265 dwellings per annum for Tamworth remain within an acceptable margin of tolerance despite changes to the growth forecasts.

The preferred option for the Tamworth Local Plan is 6250 new dwellings over 25 years or 250 dwellings per annum. This represents the total housing need for Tamworth, not the target for the Local Plan which is 4250 new dwellings within Tamworth Borough. The additional 2000 dwellings are to be sought outside the Borough.

The draft Local Plan indicates that since 2006, there have been a total of 1,347 (net) new homes delivered, an additional 29 dwellings were under construction and there is a further 371 with planning permission as of 1 April 2013. This reduces the number of homes to be delivered by 2031 by 1,747.

The options (scenarios) taken forward for appraisal are therefore as follows.

**Table 9.2: Housing growth scenarios**

Scenario	Dwellings per annum	Growth 2006-2031	Minus 1747	Difference from draft Plan
A	264	6600	4853	+350
Aa	240	6000	4253	-250
Ab	258	6450	4703	+200
B	263	6575	4828	+325
C	249	6225	4478	-25
D	257	6425	4678	+175
E	283	7075	5328	+825
F	283	7075	5328	+825
H	248	6200	4453	-50
I	219	5475	3728	-775
J	200	5000	3253	-1250
Draft Plan	250	6250	4503	

### 9.3.2 Assumptions

The draft Local Plan identifies that sites allocated within Tamworth Borough could deliver 2900 dwellings, and therefore under all the housing scenarios all allocated sites would need to be developed. The Plan identifies a need for 2000 additional dwellings to be provided outside of Tamworth Borough to meet Tamworth's needs. According to the Lichfield Plan, 1000 dwellings

<sup>17</sup> Implications of the 2011-based CLG Household Projections: Lichfield, Tamworth and Cannock Chase Housing Requirement Update, Nathaniel Lichfield and Partners, May 2013

are to be provided to the north of Tamworth, of which 500 are to meet Tamworth’s needs. North Warwickshire’s Local Plan states that 500 dwellings to meet Tamworth’s needs will be provided within North Warwickshire, distributed across the borough. Both local plans are currently in examination and therefore these figures and locates are subject to possible change. It is therefore hoped that the further 1,000 dwellings to meet Tamworth’s needs will be provided within either North Warwickshire, Lichfield or within the wider Greater Birmingham and Solihull Local Economic Partnership area (GBSLEP).

At this stage it is not known where any development over and above the target of 4,250 might be located within Tamworth. To meet additional housing needs above the draft Local Plan’s target for 4,250 dwellings, further land for development will need to be allocated. It is possible that the Dunstall Lane site might be extended or that the capacity of Anker Valley increased if a suitable transport package is proposed; a less sustainable option would be to release land from the green belt. Therefore no assumptions can be made about the likely location of additional growth and the likely spatial impacts are uncertain.

It is further assumed that to meet a target set by one of the other scenarios (A to J) which is lower than that in the draft Local Plan, all sites will still be developed and less housing would be sought in neighbouring authorities.

The following capacities have been assumed.

**Table 9.3: Site capacities**

Sites	Approximate capacities
Urban area	400
Anker Valley	500
Golf course sites	1100
Dunstall Lane sites	700
Coton Lane	190
Green belt sites	900 – split between several sites

### 9.3.3 Summary of Findings

All the housing growth scenarios would result in the permanent loss of greenfield and agricultural land. The higher the housing numbers the greater the area of greenfield land that will be lost. Delivering a higher target than in the draft Local Plan may result in the loss of green belt land, which would affect the setting of Tamworth. There would be the same loss of accessible green space under each of the housing growth scenarios.

Loss of greenfield land could contribute to adverse effects on flood risk, by reducing the area of permeable land in Tamworth, Lichfield and North Warwickshire and increasing the rate of run-off from the land. However, the likelihood and significance of effects are uncertain. There are various policies in the Draft Local Plan to mitigate flood risk, which will help to reduce the likelihood of any adverse effects.

Biodiversity is likely to be adversely affected by development. The higher the housing target, the greater the pressure on biodiversity, both through habitat loss and through the effects of human activity on habitats that are not lost. All the Strategic Urban Extension sites have constraints and have the potential for adverse impacts on biodiversity. The green belt sites have particularly significant biodiversity constraints. There are various policies within the Draft Local Plan that address biodiversity impacts and promote enhancements where possible, which will help to reduce the likelihood of adverse effects.

The higher the housing numbers, the more possible it becomes that adverse impacts will be seen on historic assets, particularly the setting of assets if not the assets themselves. Historic landscapes may come under pressure for development with higher housing numbers, including one of the green belt sites.

With the highest housing growth scenarios, it becomes more likely that major investment in water infrastructure will be required, and there is greater potential for adverse impacts on air quality.

Higher housing targets are likely to increase the need to travel because the additional growth could not be accommodated within the urban area. A higher housing target is also likely to increase the level of out-commuting.

None of the scenarios would deliver Tamworth's identified need for affordable housing.

## **9.4 ECONOMIC SCENARIOS**

### **9.4.1 Description of Economic Scenarios**

Tamworth Borough Council commissioned Nathaniel Lichfield and Partners to undertake stage 2 of their Employment Land Review for the Borough. Stage 2 specifically looks at demand for new employment land. This Employment Land Review<sup>18</sup> developed a number of scenarios for demand, based on baseline data for Tamworth, local planning policy, past trends and economic aspirations. The following scenarios were developed.

- **Scenario 1) Experian Econometric Model Job Growth: Baseline**

The latest local area based econometric job forecasts were obtained for Tamworth Borough from Experian Business Strategies in September 2013. These are widely recognised as a valuable input and can indicate the broad scale and direction of economic growth in different sectors to help assess future employment space requirements. Experian's sub-regional economic model takes account of the existing economic structure of each Local Authority (broken down by economic sector) and the historical relationship between the regional performance of an industry and the performance observed at the Local Authority level. The forecasts of job growth by sector reflect recent trends and economic growth projections at national and regional level, and how economic sectors in Tamworth have fared relative to the West Midlands region's growth in the past. These forecasts also reflect the current post-recession economic climate. They are not constrained by either labour supply or land availability.

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<sup>18</sup> Employment Land Review – Stage 2, Nathaniel Lichfield and Partners, December 2013

- **Scenario 2) Job Growth: Regeneration/Policy On**

An alternative, job-based estimate of future needs was compiled which was termed the Regeneration, or 'Policy-On', scenario. Tamworth Borough Council has formed an alliance with the Greater Birmingham and Solihull LEP. The priorities of Tamworth Borough Council reflect those of both LEPs in that there is a focus on a growth in business and professional services, environmental and building technologies and general manufacturing in order to build upon the town's employment strengths and to minimise outward commuting.

- **3a) Short Term Past Take Up Continues**

This scenario simply assumes that future development rates of employment space up to 2030 will be similar to those that have occurred in Tamworth over the last 11 years (the period for which a more detailed breakdown of B-class uses is available). As this period covered both strong economic growth and recession, it could provide a reasonable basis for future planning.

- **Scenario 3b) Long Term Completion Rates**

This demand estimate is also based broadly on past completion rates in the Borough, but with adjustments to reflect the potential for higher growth based on longer term past trends, stretching back to 1997/1998.

- **Scenario 4) Draft Local Plan Housing Target (250 dpa)**

This scenario estimates the employment space requirement that would result from anticipated housing and hence population growth in Tamworth, since this could impact upon the Borough's ability to attract businesses and future job growth.

- **Scenario 5) Labour Supply Based on CLG 2011-based (interim) household projections**

In May 2013 NLP undertook a partial update<sup>19</sup> to the 2012 Housing Needs Study discussed above to model the implications of the latest 2011-based (interim) CLG household projections. The baseline scenario incorporated updated Sub-National Population Projections data alongside revised data on commuting, headship rates and unemployment. The revised baseline projection indicated population growth of 7,685 over the period of 2011-30; associated household growth of 4,665 and a housing requirement of 255 dpa (259 dpa 2011-28). The number of jobs associated with this growth equalled 520, or 27 per annum.

The preferred option for the Draft Local Plan for employment land requirements is 32 hectares, of which 18 hectares would be sought within the Borough boundary and 14 hectares would be sought outside the Borough. This was chosen because it was felt to provide enough employment land to be in balance with the housing growth target. Furthermore it provides a good fit with regeneration policy and allows a proactive approach to bringing new business into the Borough. This amount of employment land is considered to be sufficiently close to scenario 2 (regeneration/policy on) not to merit separate appraisal as an option.

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<sup>19</sup> NLP (May 2012): Implications of the 2011-based CLG Household Projections – Lichfield, Tamworth and Cannock Chase Housing Requirement Update

NLP estimated gross employment land requirements for offices, industry and logistics associated with each of these scenarios, and this is set out in the following table.

**Table 9.4: Employment scenarios**

Scenario	Gross employment land requirements (ha)
1) Experian Baseline	21.02
2) Regeneration/Policy On	32.91
3a) Short Term Past Take Up	48.51
3b) Long Term Completion Rates	66.49
4) Labour Supply (250 dpa)	27.82
5) Labour Supply (latest household projections)	30.16

#### 9.4.2 Overall Findings of Appraisal of Employment Scenarios

By seeking higher amounts of employment land, scenario 3b, and to a lesser extent scenario 3a, will indirectly provide the greatest potential for economic growth, although achieving economic growth is also dependent on a range of other factors.

However, seeking to provide a high amount of employment land is likely to have a range of negative effects. All scenarios will result in the permanent loss of greenfield land on the allocated sites. It is likely that with a higher employment land requirement, additional sites will be needed beyond the Borough boundary. Although the location of such sites is unknown, it is possible that additional greenfield land will be lost within other local authorities. The loss of greenfield land has uncertain implications for flood risk, by reducing the amount of permeable land and increasing run-off rates. The higher the employment land requirement, the greater the pressure on biodiversity, both directly through habitat loss and indirectly through the effects of human activity on habitats that are not lost.

Scenario 2 seeks to minimise outward commuting from Tamworth, thereby reducing the need to travel. Provision of a lower employment land requirement than scenario 2 could therefore increase outward commuting. A higher employment land requirement than scenario 2 is likely to promote outward commuting as the draft Plan indicates that it is unrealistic that additional sites could be found within the Borough. The contribution to climate change and poor air quality will therefore be minimised with scenario 2.

### 9.5 AFFORDABLE HOUSING SCENARIOS

#### 9.5.1 Description of Scenarios

Tamworth Borough Council has developed nine different scenarios for affordable housing. These were drawn up in a client-side workshop on 20<sup>th</sup> February 2014 and are set out in a report<sup>20</sup> of a viability assessment for Tamworth including housing viability assessment. Three different levels of affordable housing are proposed, and within each of those three levels are three different proposals for the type of affordable housing to be provided. The three levels of affordable housing are 20%, 25% and 30%. The three types of affordable housing are social

<sup>20</sup> Tamworth Borough Council Whole Plan Viability Assessment, February 2014

rented, intermediate and shared ownership. The reason these scenarios were chosen is because they represent a range of viable and practical approaches to affordable housing provision.

The SA has appraised the three different scenarios of levels of affordable housing provision, but not the different types of affordable housing because this will not produce any different results when examined against the appraisal framework. The options for affordable housing appraised in the SA are therefore as set out in the following table.

**Table 9.5: Affordable housing scenarios**

Scenario	Level of affordable housing provision
1	20%
2	25%
3	30%

### **9.5.2 Overall Findings of Appraisal of Affordable Housing Scenarios**

None of the scenarios would meet the identified need for 183 affordable homes per annum. Scenario 3 would provide the highest level of affordable homes per annum (83 dpa) and therefore is the best performing scenario. This will help to improve access to housing for poorer members of the community and may indirectly help to improve equality of access to employment.



## 10 CUMULATIVE EFFECTS AND INTERRELATIONSHIP BETWEEN EFFECTS

### 10.1 CUMULATIVE EFFECTS

The SEA Directive requires assessment of an additional level of impacts in addition to straightforward direct impacts. These are specified as “secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative”. The following approach has been taken to identifying such impacts.

A number of different types of impact are set out in European Commission guidance:

- separate developments causing the same impact – cumulative;
- different impacts acting together on a receptor e.g. air pollution and land take – cumulative;
- plan impacts which give rise to other indirect impacts – secondary; and
- different impacts which together give rise to yet another impact – cumulative and secondary.

There is therefore a need to consider both secondary and cumulative impacts in the appraisal. Secondary impacts were considered as an integral part of the main appraisal work, and this is indicated in the appraisal matrices in Annexes C to F where impacts are either direct or indirect i.e. secondary. Certain other attributes are common to all types of impact: these are timescales (i.e. short, medium and long-term impacts), reversibility (i.e. permanent or temporary impacts) and whether the impacts are positive or negative. These attributes were also all considered as integral aspects of impact assessment, and this is similarly indicated in the appraisal matrices in Annexes C to F. Cumulative impacts are discussed in this section of the SA Report.

There are two types of situation that could give rise to cumulative impacts:

- the same effect arising from two or more different sources; and
- different effects where there is a relationship between the effects and potentially an interaction.

Synergistic effects are a type of cumulative impact. These are effects where the cumulative impact may be greater or smaller than the sum of the separate effects.

Cumulative impacts were considered in the appraisal in two ways:

- the potential for different developments to give rise to the same type of effect; and
- the potential for interaction between different types of effect.

In order to assess the cumulative impacts arising from all potential developments under the Local Plan, the appraisal considered the overall effect of the Local Plan as a whole on each of the SA objectives. The results of this are set out above in Chapter 8.

The appraisal then considered the potential for effects arising from other plans and programmes which in combination with effects arising from the Local Plan may give rise to significant

impacts. The results of the review of other plans and programmes and their potential to give rise to cumulative effects is set out below.

The six key plans/projects that could give rise to significant cumulative impacts together with the Tamworth Local Plan are:

- North Warwickshire Core Strategy
- Lichfield District Local Plan: Strategy
- Local Enterprise Partnership Strategy for Growth
- High Speed Rail
- A Strategy for the A5
- Staffordshire Local Transport Plan

Each of these is summarised below, and an assessment made of the potential contribution to significant cumulative effects in combination with the Tamworth Local Plan.

### **10.1.1 North Warwickshire Core Strategy**

The Core Strategy<sup>21</sup> seeks to develop a broad distribution pattern for development, with the majority of development being directed to the Main Towns, in order to achieve vibrant sustainable communities within a sustainable pattern of development. The result is that, Atherstone with Mancetter and Polesworth with Dordon, are the Market Towns where the majority of development will be directed.

Development for employment, housing (including affordable housing), services and other facilities will be permitted within the development boundaries of the Market Towns of Atherstone with Mancetter and Polesworth with Dordon. It is expected that over the plan period, more than 50% of the housing and employment requirements will be provided in or adjacent to the Market Towns and their associated settlements.

Between 2006 and 2028 at least 3,800 dwellings (net) will be developed. The delivery of 500 units to meet Tamworth's needs from the total 3800 units will not commence until at least 75% of the 1150 proposed at Anker Valley Sustainable Urban Neighbourhood and 75% of the remaining Tamworth housing target are completed, or by 2022 whichever represents the later date.

Polesworth & Dordon will deliver 440 new dwellings over the Plan period. The broad location of growth will be to the south and east of the settlements subject to there being no unacceptable environmental impacts from surface mining and that viable and practicable coal reserves are safeguarded. 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 proposals will be expected to be limited in size and maintain the separation between the urban area of Tamworth and the settlements of Polesworth and Dordon.

The Core Strategy also makes reference to Birch Coppice Business Park, on the site of the former Birch Coppice Colliery to the south of Dordon, which is a large logistics site. Birch Coppice Phase

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<sup>21</sup> Core Strategy Submission Version, North Warwickshire Borough Council, February 2013

2 is under construction, located south of the A5 near Dordon. In addition, MIRA Technology Park, an Enterprise Zone, south along the A5 will be coming on stream within the next year or so with a number of associated junction improvements on the A5. This is north of Nuneaton on the A5. There is also the Birmingham Intermodal Freight Terminal (BIFT) at Birch Coppice. It will also have a waste transfer recycling centre run by Warwickshire County Council, catering for wider than local needs.

#### *Contribution to cumulative effects*

It is likely that all the developments identified above will contribute to an increase in traffic on the A5 and using junction 10 of the M42. However, this is not predicted to give rise to cumulative effects in combination with the Tamworth Local Plan, particularly in view of the commitments in A Strategy for the A5 (see below).

### **10.1.2 Lichfield District Local Plan**

The Local Plan: Strategy<sup>22</sup> identifies a Broad Development Location to the north of the Anker Valley allocation, north of the B5493 and east of the railway line linking Tamworth with Burton-on-Trent. In the Broad Development Location identified to the north of Tamworth, a sustainable, safe, well designed mixed use development of approximately 1,000 dwellings will be delivered by 2029 including:

1. A range of housing in accordance with development management policies and having regards to needs arising within Tamworth Borough;
2. Provision for open space, sport and recreation facilities and incorporating playing pitches, amenity green space, equipped play, allotments;
3. Landscaping and green infrastructure provision including the retention of quality hedgerows and significant trees, and their incorporation into the landscape, and the allowance for significant tree canopy cover;
4. A clear strategy for delivering links to Tamworth, and showing how these will be incorporated into an integrated open space and green infrastructure network;
5. Protection of local areas and habitats of biological interest;
6. The provision of public transport to serve the site: all development should be within 350m of a bus stop;
7. The provision of pedestrian and cycling routes throughout the site, linking to the green infrastructure network and to settlements, services and facilities beyond the site boundaries including safe crossing points;
8. Vehicular access that is integrated with the Anker Valley and Amington links proposed within Tamworth Borough;
9. The provision and maintenance of sustainable drainage systems and flood mitigation measures;
10. Adherence to all other policies in the Local Plan.

The development shall cause no coalescence with Wigginton village and shall not commence prior to essential infrastructure being delivered at an appropriate stage.

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<sup>22</sup> Lichfield District Local Plan: Strategy (EIP Changes), Lichfield District Council, January 2014

Further consideration of land to the North of Tamworth Borough will be considered through the Local Plan Allocations document.

#### *Contribution to cumulative effects*

The Sustainability Appraisal of the Lichfield District Local Plan: Strategy predicts a range of effects for the development north of Tamworth which could make a contribution to cumulative effects in combination with development at Anker Valley. There will be a negative impact upon maintaining a diverse and attractive landscape with development north of Tamworth, although the policy requires the retention of significant trees and an allowance for significant tree canopy cover, and so effects should be mitigated to an extent. It is recommended that the Anker Valley site takes a similar approach to be compatible with surrounding countryside.

There is potential to positively increase the number and diversity of biodiversity habitats. However there is greater potential for harm to the watercourse. Development of the Anker Valley site is likely to result in adverse impacts on biodiversity, including on waterways. It is recommended that the policy on Strategic Urban Extensions be amended to require development at this site to protect and enhance biodiversity.

### **10.1.3 Local Enterprise Partnership Strategy for Growth**

The Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP) produced a Strategy for Growth<sup>23</sup> in May 2013. The strategy indicates that GBSLEP wants to significantly improve the quality and reliability of connectivity both within the LEP, and from the LEP to the region/nation/world. Road, rail, air and digital connectivity are seen as being key components of the mix and there is a belief that they need to work effectively together better to connect people to jobs and businesses to markets. The strategy aims to cut congestion and uncertainty over travel times, and reduce the average time taken for people to get to their place of work, or to visit for business or leisure tourism.

To achieve this, the GBSLEP will commit to the creation of a new Strategic Alliance of local LEPs to ensure the wider travel to work area is supported by strong transport governance. Working with Birmingham Airport they will increase route development east and west. They will develop the means to ensure improved digital connectivity is available for urban and rural locations, and focus on reducing journey times for employees and businesses. Championing HS2, they will ensure a complementary package of investments to ensure the wider LEP geography will be connected to this key development.

The focus will be around targeting areas of greatest potential economic benefit, and accelerating development within them aligned to sector and skills plans; the flagship programmes being the City Centre Enterprise Zone (EZ) and Enterprise Belt (EB) with the M42 Economic Gateway (junction 6 of the M42) at its heart. EB aims to create the framework for the creation of over 25,000 jobs through the lifetime of the EB. Action for the M42 Economic Gateway include:

- Early and bold investment in local connectivity, including new modes of rapid transit to create a genuinely connected network

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<sup>23</sup> Delivering Growth, Greater Birmingham and Solihull Local Enterprise Partnership, May 2013

- Investing in green infrastructure as a vital economic asset
- Targeting investment in Junction Six of the M42 to facilitate the growth of Birmingham Airport, the NEC and Birmingham Business Park.
- Delivering managed growth around four key locations, namely North Solihull, Solihull Town Centre, Blythe Valley Business Park and the Hub which includes the NEC, airport, Birmingham Business Park and the proposed High Speed Rail station.

GBSLEP will prioritise raising the quality of life for all the LEP's residents, with access to high quality and locally responsive cultural programmes, recognising and enhancing the LEP's considerable and varied natural assets and different local centres. Through the Creative City Partnership GBSLEP will encourage participation in the full breadth of the LEP's cultural offer, building a strong shared sense of identity and purpose and increasing engagement in civic life.

#### *Contribution to cumulative effects*

The improvement of transport infrastructure combined with investment enterprise in Birmingham and Solihull is likely to increase the level of out-commuting from Tamworth in combination with the Local Plan's aim to improve transport links to Birmingham. The emphasis on the difference of local centres and encouraging cultural participation will add to efforts in Tamworth to create a strong local identity and vibrant and attractive town centre.

#### **10.1.4 High Speed Rail**

The UK Government's preferred route for HS2 comes close to Tamworth on two stretches of rail. The first (Phase One) runs from near junction 9 of the M42 and travels north near Middleton, passes about 2km west of Hopwas and skirts the eastern edge of Lichfield. The second (Phase 2) broadly follows the line of the M42 from the M6 Toll towards Ashby de la Zouch, largely within a cutting. The second branches off this. The nearest stations will be at Birmingham and Birmingham Interchange.

HS2 Ltd have produced a fact sheet<sup>24</sup> for the Birmingham area, which projects travel times at 49 minutes to London, 49 minutes to Manchester and 57 minutes to Leeds. It also predicts the creation of 40,400 jobs in Phase One construction, operation and maintenance and in station development. The fact sheet predicts that HS2 will make cities like Birmingham even more attractive places to locate, with people able to live there and work in the East Midlands, Sheffield, Manchester or Leeds, or to commute to Birmingham from further away. HS2 is predicted to free up capacity on the West Coast Main Line, providing the opportunity to operate more frequent local services through Tamworth.

HS2 Ltd are working with Birmingham to ensure that HS2 generates more opportunities for people and businesses in the Midlands.

The Environmental Statement for Phase 1 of HS2<sup>25</sup> predicts a variety of impacts for the section through Drayton Bassett, Hints and Weeford. Construction and operation of the project in this area are not likely to result in any adverse residual effects on air quality, socio- economics, land

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<sup>24</sup> Birmingham and Interchange: Connections to London, Manchester, Leeds and Beyond, HS2 Ltd, July 2013

<sup>25</sup> London-West Midlands Environmental Statement, HS2 Ltd, November 2013

quality or water resources and flood risk. Similarly, no likely adverse residual effects have been identified as arising during operation for agriculture, forestry and soils, community or ecology. However, there will be agricultural land lost, including high quality agricultural land. Thirteen residential properties will be demolished, and some residents will experience amenity effects during construction and operation, due to noise and visual effects. Users of the Heart of England Way, which passes through Drayton Bassett will be affected as a result of noise and visual effects and increased traffic associated with construction. In the Hints area, residents of Brockhurst Lane will be subject to an isolation effect during the construction period due to the temporary closure of the road connecting the area to the rest of the Hints community and to schools at Whittington and Lichfield. In the Weeford area, construction works at Watling Street will give rise to a temporary amenity effect on the residents of five properties, as a result of increases in construction traffic and views of construction activities. During operation, noise and visual effects will affect the setting of Hints Village, Horsley Brook Farm, Buck's Head Farm, Ingleyhill Farm, Roundhill Wood.

Archaeological assets will be permanently removed and non-designated built heritage assets will be demolished. Some historic landscape features will be severed and permanently removed including hedgerows at the Middleton Estate boundary and ancient woodland lost, primarily at the Rookery and Roundhill Wood.

The temporary presence of construction works and changes to the existing landform and vegetation patterns will significantly affect the character and appearance of the local landscape. During operation, the effect of the project on the character and appearance of the local landscape will substantially reduce over time as mitigation planting matures. Significant effects will remain in some parts of the local landscape due to the presence of engineered landforms, infrastructure and overhead line equipment. During operation the Hints cutting, Milditch Wood embankment and the Gallows Brook and Black Brook viaducts will continue to affect views in the local area. The visual effects of the project will reduce over time as planting matures.

An increase in traffic during construction will lead to additional congestion and delays at the junctions of the A38 London Road/A453 Tamworth Road/A446 London Road, the A38/A5148/A5206 London Road and the A5/A5127 Birmingham Road/A5148.

During construction, increases in traffic will affect pedestrians, cyclists and horse riders using some local roads including Drayton Lane, Watling Street, the A453 and Flats Lane. Two public rights of way will be temporarily diverted. Construction vehicles will operate alongside four public rights of way which will affect the enjoyment of these routes. Nine public rights of way will be permanently realigned, causing increases in journey times.

The Sustainability Statement for HS2 Phase 2<sup>26</sup> predicts that noise impacts are likely to affect residents at villages along the route including Kingsbury, while an estimated six dwellings would need to be demolished at Whateley. River crossings would require an elevated alignment, and at these locations impacts would be more likely. For example, the crossing of the Tame Valley near Kingsbury and of the Anker Valley near Polesworth would result in some visual impacts at country parks in these locations, although the route was aligned here to ensure that direct impacts on Alvecote Pools SSSI would be avoided.

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<sup>26</sup> Sustainability Statement, Temple-ERM, July 2013

### *Contribution to cumulative effects*

Although there will be noise, disturbance, loss of amenity, congestion, adverse impacts on historic assets and adverse impacts on landscapes and views from HS2, there is no indication that this will give rise to cumulative effects in conjunction with the Local Plan. However, by freeing up capacity on local railways, HS2 will have positive cumulative effects with the Tamworth Local Plan by making it easier to support a shift to sustainable modes of transport.

#### **10.1.5 A Strategy for the A5**

Existing levels of traffic along certain parts of the route are heavy throughout the day, particularly around Cannock, Lichfield, Tamworth, Nuneaton/Hinckley and Magna Park. Without suitable investment, planned housing and employment growth along this section of the A5 will exacerbate these congestion issues, as well as creating new pressure points.

The objectives of the strategy<sup>27</sup> are therefore:

- To ensure that the A5 is fit for purpose in terms of its capacity and safety, both now and in the future.
- To allow the A5 to play its full and proper role in supporting and facilitating economic activity and growth at a local and national level.
- To promote and facilitate access to leisure and tourism within the area covered by the strategy.
- To assist in identifying priority improvements along the A5 corridor that are needed to facilitate and enable growth, reduce congestion, improve safety, improve air quality and deliver a sustainable transport system.
- To reduce, where possible, the impact of traffic on communities along the A5.

There are known capacity issues at the Muckley Corner and Wall Island junctions to the south east of Lichfield, and in the Dordon/Grendon area between Tamworth and Atherstone. The traffic flow on the A5 to the west of junction 10 of the M42, there are in excess of 22,000 vehicles per day.

### *Contribution to cumulative effects*

When implemented, the strategy is likely to give rise to improvements in congestion on the A5, which will support the housing and employment growth proposed in the Tamworth Local Plan, although this is not expected to lead to cumulative effects with the Local Plan.

#### **10.1.6 Staffordshire Local Transport Plan**

The Staffordshire Local Transport Plan<sup>28</sup> (LTP) has a range of objectives:

- Supporting growth and regeneration

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<sup>27</sup> A Strategy for the A5 2011-2026, A5 Transport Liaison Group, February 2012

<sup>28</sup> Staffordshire Local Transport Plan 2011, Staffordshire County Council, March 2011

- Maintaining the highway network
- Making transport easier to use and places easier to get to
- Improving safety and security
- Reducing road transport emissions and their effects on the highway network
- Respecting the environment

It also identifies a number of challenges to achieving these objectives which the LTP seeks to address:

- Provide opportunities for residents to access jobs, training and education.
- Help businesses access suppliers, markets and a workforce.
- Enable economic growth without causing congestion.
- Maintain the current condition of the highway network and its infrastructure.
- Keep the highway safe and serviceable whilst achieving value for money.
- Reduce social exclusion faced by residents.
- Make 'access for all' a key consideration when planning new housing and employment sites, services and facilities.
- Improve the skills of all road users.
- Improve the current road safety record.
- Tackle crime, fear of crime, and anti-social behaviour on the highway network.
- Improve the resilience of the highway network to events that pose safety threats to highway users.
- Reduce emissions from road transport.
- Respond to current and future climatic conditions.
- Improving health and quality of life
- Encourage active travel.
- Maximise opportunities for transport to positively contribute towards people's quality of life.
- Minimise the impact of transport on the environment.
- Enhance the environment through the management and maintenance of the highway network.

The draft strategy<sup>29</sup> for Tamworth identifies the following priorities for the Borough:

- Accommodate development at Anker Valley
- Manage congestion, particularly at Ventura Park
- Support investment in the town centre that complements Ventura Park
- Improve public transport provision to the West Midlands
- Support A5(T) junction capacity and safety improvements
- Encourage sustainable travel

#### *Contribution to cumulative effects*

In combination with the Tamworth Local Plan, the LTP will help to improve access to education, training and jobs, will reduce congestion and improve air quality, encourage a shift to more sustainable forms of transport and support improvements to transport infrastructure, tackle deprivation and enable economic growth.

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<sup>29</sup> Draft Tamworth Borough Integrated Transport Strategy 2011-2026, Staffordshire County Council, November 2011



## 10.2 INTERRELATIONSHIP BETWEEN EFFECTS

The SEA Directive requires the appraisal to consider the interrelationship between the significant effects of the Local Plan. This has been done as an integral part of the appraisal of the policies and options, and examples of this can be found throughout chapters 7 to 9 and Annexes C to F of this report. The main interrelationships found through the appraisal are highlighted below.

Protection and enhancement of green spaces and connectivity will be of benefit to human health and quality of life, encouraging active lifestyles and helping to promote sustainable travel by encouraging people to walk or cycle rather than using the car. It can also help to support biodiversity protection and improvement by ensuring connectivity and protection of green and blue infrastructure. This will also help to protect landscape quality and the setting of Tamworth.

Protection and enhancement of historic features and assets will contribute to maintaining landscape quality in Tamworth, contributing to preserving its distinctive quality and supporting tourism and the visitor economy.

Reducing the amount of waste needing treatment and disposal will help to reduce air emissions from the transport and management of waste, including greenhouse gas emissions, although it may reduce the amount of renewable energy generated from waste. It may also encourage more prudent use of natural resources by reusing waste as a resource and reducing the amount of virgin resources consumed.

Changes in air quality can have significant consequences for human health and biodiversity, and improvements in air quality arising from more sustainable transport patterns will benefit human health and vulnerable species and ecosystems. Changes in water quality also have the potential to significantly affect species and ecosystems. By promoting water efficiency, the Local Plan will help to ensure prudent use of natural resources and help to safeguard water quality, with benefits for ecosystems. It will also benefit the economy by reducing the cost of water treatment.

Flood risk reduction will help to protect and enhance water quality by reducing the risk of overload of the sewerage system. It will also have economic benefits by protecting homes and businesses from having to deal with the financial consequences of flooding.

By locating most new development near to the urban area, the Local Plan will promote the use of sustainable modes of travel, which will reduce the reliance on the private car. This in turn will have benefits in terms of improved air quality and reduced congestion, which will lead to improved health and road safety. It will also help to promote more active lifestyles with the associated health benefits, and support accessibility to services and facilities.

# 11 MONITORING

## 11.1 PROPOSALS FOR MONITORING

As required by the SEA Directive, a number of recommendations are made for indicators to monitor the likely significant impacts of the Local Plan. These are set out in Table 11.1 corresponding to the relevant impacts identified and summarised in the preceding chapters of this report.

One of the aims of monitoring as specified by the SEA Directive is to identify unforeseen adverse effects in order to be able to take appropriate remedial action. To enable this to be done, recommendations are also made in Table 11.1 for monitoring potential sustainability impacts that are not expected to occur as foreseen by the appraisal.

An Annual Monitoring Report will be produced to monitor the implementation of the Local Plan, and the recommendations given below for monitoring should be incorporated within this.

**Table 11.1: Monitoring Recommendations**

Sustainability Objectives	Recommended indicators
1. To meet the housing needs of the whole community, providing affordable, decent, appropriate and sustainably constructed homes in accessible locations.	Housing completions Number of affordable homes completed Building for Life assessments Net additional Gypsy and Traveller pitches Number of new dwellings suitable for elderly people
2. To encourage the efficient use of land and soil.	Total amount of additional employment land on previously developed land Housing completions on previously developed land Hectares of open space lost
3. To reduce deprivation, including health and income deprivation.	Number of people in Super Output Areas in the lowest 20% ranked in health sub-domain Number of people in Super Output Areas in the lowest 20% ranked in material well-being sub-domain
4. To ensure equal access to community services and facilities.	Number of people not within 1km of: <ul style="list-style-type: none"> <li>• GP</li> <li>• Post office</li> <li>• Supermarket</li> </ul>
5. To encourage equal access to education, jobs and training.	Unemployment rate Number of people in Super Output Areas in the lowest 20% ranked in education sub-domain
6. To encourage active and healthier lifestyles by providing accessible green infrastructure, including networks of paths and open spaces, and formal and informal sport and recreation facilities.	Length of new cycle paths Length of new public footpaths Number and type of new sport facilities Loss of playing pitches Loss of accessible open space

<b>Sustainability Objectives</b>	<b>Recommended indicators</b>
7. To make communities safer by reducing crime, fear of crime and anti-social behaviour.	Number of crimes, by category
8. To encourage a diverse and competitive economy that will provide sustainable economic growth.	New employment floorspace Number of visitors to town centre attractions
9. To protect and enhance historic assets.	Number of listed building and conservation area consent applications and outcome
10. To encourage high quality and locally distinct places, spaces, buildings and landscapes.	Number of planning applications in the Green Belt
11. To conserve and enhance biodiversity and geodiversity, sites of nature conservation value and ecological networks.	Change in areas of biodiversity importance Length of new green/blue infrastructure networks
12. To minimise flood risk.	Number of planning permissions granted contrary to Environment Agency advice on flooding Number of properties flooded per annum
13. To reduce energy consumption by encouraging energy efficiency and use of renewable energy sources.	MW of new renewable energy generating capacity Electricity and gas consumption per capita
14. To encourage the reduction, re-use and recycling of waste and water.	Amount of waste generated by waste stream % of municipal waste recycled Per capita water consumption
15. To protect and improve environmental quality including in relation to air, water, land and noise.	Number of AQMAs Number of planning permissions granted contrary to Environment Agency advice on water quality Hectares of agricultural land lost, by grade
16. To make Tamworth town centre the heart of the borough by creating a vibrant and attractive environment.	Total amount of completed floorspace for town centre uses in the town centre Total amount of completed floorspace for town centre uses outside the town centre Vacant retail floorspace in the town centre
17. To reduce the need to travel, reduce out-commuting and encourage sustainable modes of transport.	Number of bus routes Length of new cycle paths Length of new public footpaths Number of out-commuters Number of people travelling more than 5km to work Travel to work by mode
18. To make best use of the existing transport infrastructure and seek improvements to reduce congestion and improve safety.	Number of new bus services Number of road traffic accidents Normalised delay on key roads

## **12 NEXT STEPS**

### **12.1 OVERVIEW OF PROCESS**

The next stages of the process are outlined in Figure 1.1 in Section 2.3.2.

The SA forms an integral part of the preparation of the Local Plan. It will continue to be prepared alongside the Local Plan and consultation on the SA will be part of the wider consultation on the Local Plan itself.

Following receipt of consultation comments on the Draft Local Plan and the SA, any necessary amendments will be made to either document, and a submission version of the Local Plan will be produced. This will be subject to further SA. Both the submission Local Plan and the revised SA will be issued for public consultation. It is currently expected that this will be produced sometime during summer 2014.



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13 March 2014

**Report of the Portfolio Holder Operations And Assets**

Local Authority Mortgage Rate for Mortgages granted under Housing Act, 1985

**EXEMPT INFORMATION**

None

**PURPOSE**

The purpose of this report is, in accordance with Section 438 of the Housing Act 1985, for Members to make the statutory declaration of the local authority mortgage interest rate from 1 April 2014 to 30 September 2014.

**RECOMMENDATIONS**

**Cabinet endorse the statutory declaration of interest to remain unchanged at 4.72%.**

**EXECUTIVE SUMMARY**

In accordance with Section 438 of the Housing Act 1985 with effect from 1 June 2012 the Authority interest charged on Council mortgages has been 4.72%.

**RESOURCE IMPLICATIONS**

There are no significant resource implications.

**LEGAL/RISK IMPLICATIONS BACKGROUND**

None

**SUSTAINABILITY IMPLICATIONS**

None

**BACKGROUND INFORMATION**

Authorities are required to charge whichever is the higher of:

1. The standard national rate, which is set by the Secretary of State, or
2. The applicable local average rate based on the Authority's own borrowing costs and a small percentage (0.25%) for administration.

The Council currently has a portfolio of 3 mortgages with a total amount outstanding of £35,654.90.

The standard national rate last declared by the Secretary of State after taking into account rates charged by building societies is 3.13%.

The applicable local average rate for Tamworth Borough Council is the Council's local average rate 4.47% plus 0.25% being 4.72%.

The mortgage interest rate that will be applied from 1 April 2014 will be 4.72% as it is the higher of the standard national rate and the local average rate.

#### **REPORT AUTHOR**

Michael Buckland tel. 01827 709523, [michael-buckland@tamworth.gov.uk](mailto:michael-buckland@tamworth.gov.uk)

#### **LIST OF BACKGROUND PAPERS**

Housing Act 1985

#### **APPENDICES**



13<sup>TH</sup> MARCH 2014**REPORT OF THE PORTFOLIO HOLDER FOR OPERATIONS & ASSETS****Consideration of the Grant of Landlords Permission to erect a Bronze Statue within the Castle Grounds****EXEMPT INFORMATION**

Nil

**PURPOSE**

To enable Cabinet to consider an application to erect a bronze statue within the scheduled monument area of the Castle Grounds

**RECOMMENDATIONS**

It is recommended that Cabinet grant landlords consent to the applicant, subject to the Council having copies of all necessary approvals from statutory bodies, and the Council being indemnified against any future costs that may arise from the proposed statue being located within the curtilage of the grounds.

**EXECUTIVE SUMMARY**

A letter has been received from Councillor John Garner, outlining a proposal to have a bronze statue of a Saxon Warrior commissioned and following discussion there has been a request made to the Director of Assets & Environment that the Council consider granting landlords consent to have this statue erected in the upper lawn area of the castle grounds, at a position as yet to be determined.

The aim of this report is to secure consent from the Council to erect the statue, which will also act as confirmation to any funders who may be involved with this project there is suitable permission in place for the statue to be displayed in a prominent public position.

Assurances have been given that all necessary approvals will be sought prior to there being any works commenced on Council property, and there will need to be a formal agreement entered into by the Council and Mr Garner clearly outlining these responsibilities.

**RESOURCE IMPLICATIONS**

There are no direct cost implications to the Council arising from this report

**LEGAL/RISK IMPLICATIONS BACKGROUND**

Mitigation of future costs will be ensured by a clear legal agreement set up prior to the statue being erected

## **SUSTAINABILITY IMPLICATIONS**

### **BACKGROUND INFORMATION**

#### **REPORT AUTHOR**

Andrew Barratt, Director (Assets & Environment)

### **LIST OF BACKGROUND PAPERS**

#### **APPENDICES**

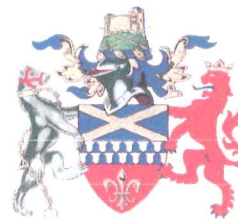
Appendix one – Copy letter received for the application

REC 5/2/14

**BOROUGH OF TAMWORTH**

*Councillor John Garner*

*The Worshipful Mayor of Tamworth*



Marmion House  
Lichfield Street  
Tamworth  
Staffs  
B79 7BZ  
Tel: 01827 709709  
Fax: 01827 709271

**5<sup>th</sup> January 2014**

**Mr Andrew Barratt**

**Director, Assets & Environment**

**Tamworth Borough Council**

**Marmion House**

**Lichfield Street**

**Tamworth**

**B79 7BZ**

**Dear Mr Barratt**

***Re; Ancient Monuments and Archaeological Areas Act 1979.  
Tamworth Castle. Tamworth. Staffordshire. County Monument No:  
ST2***

***I am in the process of providing an 8ft Bronze Statue of a Saxon  
Knight which will be created and manufactured by Mr Peter Walker  
(address) and will be placed identified on the Ancient Monument at  
the base of Tamworth Historic Castle, (See Drawings) The method  
of placing the Statue will be done in accordance and guidance of  
English Heritage.***

***The Statue to be known as the "SPIRIT" will make a statement of  
the importance of Tamworth past, present and Future. In addition  
to the Statue there will be display boards giving a detailed historical  
and as near as possible biographical outline of the history of this  
Ancient Royal Capital of Mercia/England 410AD – 1066 and  
beyond.***

***The purpose of this application is to enable me to create a funding  
stream where a number of parties have shown interest. Coupled with***

*the Statue it is my intention to create a Educational Foundation Trust which will both research and develop and retain systems that will preserve skills from this period needed to protect the many fine historic items and in some cases buildings that are in danger through lack of maintenance falling further into Disrepair is the way I would describe it.*

*I have the support of English Heritage through Mr Ian George (Inspector of Ancient Monuments) who guidance has been sought. The process of sighting the Statue and the exuviations will be carried by some form of Archaeologist team, Yet to be engaged but as it will take at least a further 18months to 2 years to fund and make the Statue this is not seen as an issue.*

*Once all the necessary agreements have been made and the necessary funding streams in place The site can be prepared and the Statue manufacture will commence which will take in the region of 18<sup>th</sup> months allowing the site to be fully investigated and prepared.*

*The final part is to prepare the un-veiling ceremony which will carefully plan and executed. It proposed to purchase a suitable large flag in the Mercian design for the unveiling ceremony day. And just maybe there a special guest to do that unveiling*

*Yours Faithfully*



*Cllr John A Garner*

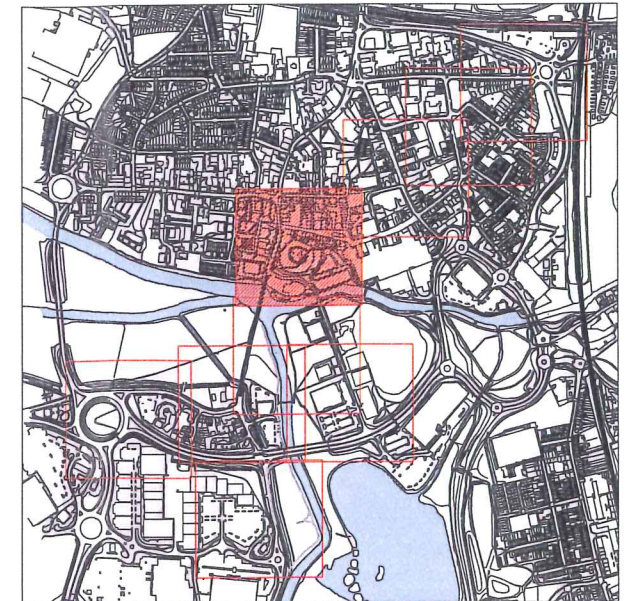
*The Worshipful Mayor of Tamworth*

*"One Tamworth Perfectly Placed*





KEY PLAN (NTS)



Re-paving of this junction, removal of guardrail, new lighting & street furniture and creation of raised table as a traffic calming measure

Silver Street & Holloway improvements kept to a minimum as street quality is already high. Pavement re-surfaced with sandstone flags & natural stone kerbs with white light street lighting to match feature lighting elsewhere. Pedestrian finger post signs located at key junctions

Footpath re-orientated to provide clear legible link to back of Market Street. Area of old path re-instated as turf. Existing feature wall removed and replaced with new seats

Limited area of car parking retained adjacent to bridge where less visible. Asphalt carpark with setts defining parking bays

Footpath created on line of old road and designated for cycle and pedestrian use only

New area of park land created on this prime south facing spot with views down the River Tame. Existing mature trees retained, new footpaths created and benches installed. Potential to create play area/boules in central space





## ENGLISH HERITAGE

WEST MIDLANDS REGION

Cllr John A Garner  
The Worshipful Mayor of Tamworth  
Tamworth Borough Council  
Marmion House  
Lichfield Street  
TAMWORTH  
B79 7BZ

Direct line: 0121 625 6859

Your ref.:

Our ref.: AA/90956/2

[ian.george@english-heritage.org.uk](mailto:ian.george@english-heritage.org.uk)

10<sup>th</sup> December 2013

Dear Councillor Garner

**Re.: Ancient Monuments and Archaeological Areas Act 1979  
Tamworth Castle, Tamworth, Staffordshire  
County Monument No.: ST 2**

I am writing following our recent meeting at the Town Hall to discuss the establishment of the Spirit Foundation Trust.

I am keen to offer what support I can to help guide the Trust. I understand there is a proposal to erect a sculpture of a Saxon warrior in the grounds of Tamworth Castle. As these grounds have long been a pleasure ground for the people of Tamworth I can see this would be a welcome addition to their public entertainment. Clearly the siting of the sculpture will need to be carefully planned and any impact upon buried archaeological remains suitably mitigated. Scheduled Monument Consent prior to installation will be required.

The wider ambition of the Trust to develop traditional building and conservation skills is certainly something that English Heritage will be keen to support. We have been working in partnership with the Heritage Lottery Fund to ensure work in this area. If I can help facilitate any of this work I certainly shall.

Please do not hesitate to contact me if you wish to discuss this matter further. In the meantime I would like to take the opportunity to wish you a very Merry Christmas.

Yours sincerely,

Ian K George  
Inspector of Ancient Monuments

cc. Mr J Gunn, Development Control Manager, Tamworth Borough Council

13<sup>TH</sup> MARCH 2014**REPORT OF THE PORTFOLIO HOLDER FOR ENVIRONMENT AND WASTE  
MANAGEMENT****Declaration of an Air Quality Management Area (AQMA) At The Two Gates  
Crossroads, Tamworth****EXEMPT INFORMATION**

Nil

**PURPOSE**

To enable Cabinet to consider the declaration of an Air Quality Management Area (AQMA) in the Two Gates Crossroads area and to implement the consultation process on the detailed assessment report as is required under the legislation.

**RECOMMENDATIONS**

That Cabinet:-

- a) Endorse the detailed assessment report attached to this report at **Appendix 1**.
- b) Endorse the consultation process shown at **Appendix 2** on the declaration an Air Quality Management Area (AQMA) in the Two Gates Crossroads area.
- c) Authorise the Director of Assets & Environment in consultation with the Portfolio Holder for the Environment and Waste Management, to conclude this matter having regard to feedback received as part of the consultation in particular the extent of the boundary to the declared area.

**EXECUTIVE SUMMARY**

In November 2013, a detailed assessment report was received from our consultants engaged to review on-going breaches of the annual mean nitrogen dioxide (NO<sub>2</sub>) concentrations that have been identified from the detailed air quality monitoring operations undertaken by the Environmental Protection Team. A copy of this report is at **Appendix 1**.

This report recommends that based on the available monitoring data, Tamworth Borough Council should consider declaring an Air Quality Management Area (AQMA) along Dosthill Road and on Tamworth Road close to the Two Gates junction.

Members will be aware the Council undertakes a very detailed assessment of air quality within the Borough and has identified breaches of nitrogen dioxide NO<sub>2</sub> concentrations along Dosthill Road; and on Tamworth Road close to the Two Gates junction. Traffic congestion may be a contributing factor for the exceedences. Relevant receptors that may be affected by air quality standards not being achieved includes people living along Dosthill Road; and on Tamworth Road.

Where, as a result of an air quality review, it appears that any air quality standards or objectives are not being achieved, or are not likely within the relevant period to be achieved, within the area of Tamworth Borough Council, the Local Authority shall by order designate an Air Quality Management Area (AQMA).

Before the AQMA is declared, there is a requirement to consult with both affected residents and statutory consultees as part of this process, and draft letters are attached at **Appendix 2** along with a frequently asked questions sheet that will also be sent out with the letters, and made available on the Councils website. In particular, as part of this consultation, opinion on the extent of the boundaries of any possible Air Quality Management Areas should be sought as part of the consultation.

Following the consultation, a decision will be needed on the designation of an AQMA by an order in a proscribed format. If an Order is made, a further air quality assessment will have to be produced within 12 months. In addition, an Action Plan must be produced within 18 months of the Order being made. The purpose of the Action Plan is to identify appropriate measures to prevent further degradation of air quality and to reduce the level of nitrogen dioxide in the AQMA so that air quality meets the required standard.

## **RESOURCE IMPLICATIONS**

Cabinet has previously approved £10K in December 2012 part of which has been used to commission the report in the Background papers and seek expert advice. At present all known costs can be met within this existing resource, however a report will be brought before Cabinet if the need for unanticipated additional resource arises.

## **LEGAL/RISK IMPLICATIONS BACKGROUND**

Schedule 11 of the Environment Act 1995 requires a local authority to consult with a range of statutory consultees and other stakeholders in matters relating to Air Quality including Detailed Assessments and the subsequent need to designate an Air Quality Management Area.

In accordance with DEFRA's guidance, air quality issues are expected to be dealt with in a corporate and multi disciplinary way within the Council. Tamworth Borough Council must ensure that what is proposed has the support of and is actively endorsed by all parts of the Council.

Should the Council, for any reason, decide not to support the recommendations of the consultants report, the Secretary of State may issue a direction to require the Council to implement the recommendations (Environment Act 1995 s 85 (4) (g)).

Declaration of an AQMA may affect people's property and could be viewed as a negative e.g. blight. The designation of an AQMA is a legislative requirement and is not an optional process. AQMA's are not subject to land searches and many other councils have declared AQMA's and to the best of our knowledge there have been no reported effects on property values. The consultation will inform those affected of current problems and provide the opportunity for co-operation to seek an improvement.

There is a requirement to advertise the declaration in the local media and seek



consultation with property owners and occupiers that live within the AQMA.

**Equality and Diversity Implications** Service delivery is not affected by the report.

### **SUSTAINABILITY IMPLICATIONS**

If improvements to air quality can be achieved, this will benefit people with chronic lung illness, who tend to be elderly and children who are also more vulnerable to air pollution.

### **BACKGROUND INFORMATION**

Members were advised of the local air quality and approved funding of £10K to undertake detailed assessment of air quality at Cabinet dated 26 September 2012.

### **REPORT AUTHOR**

Stephen Lewis, Head of Environmental Health, Andrew Barratt, Director (Assets & Environment)

### **LIST OF BACKGROUND PAPERS**

1. Yim SHL and Barrett SRH. [Public Health Impacts of Combustion Emissions in the United Kingdom](#). Environmental Science and Technology, 2012, 46 (8), pp 4291–4296. [Massachusetts Institute of Technology \(MIT\)](#)
2. Tamworth Local Air Quality Report 2011-12, Cabinet Report 26 September 2012.

### **APPENDICES**

1. Detailed Assessment of Air Quality at the Two Gates Crossroads, Tamworth, Report for Tamworth Borough Council Ricardo-AEA/R/ED58885, dated 6 November 2013.
2. Draft consultation letters and Air Quality Frequently Asked Questions (FAQ).

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# **Detailed Assessment of Air Quality at the Two Gates Crossroads, Tamworth**

Tamworth Borough Council

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**Report for** Tamworth Borough Council

Ricardo-AEA/R/ED58885

Issue Number 2

Date 06/11/2013

**Customer:**

Tamworth Borough Council

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**Date:**

06 November 2013

**Signed:**

## Executive summary

Ricardo-AEA have been commissioned by Tamworth Borough Council to undertake a Detailed Assessment of Air Quality for The Two Gates Crossroads area in Tamworth. The assessment has been undertaken to investigate the potential scale and extent of exceedances of Air Quality Objectives in the study area. This Detailed Assessment will allow Tamworth Borough Council to decide whether or not an Air Quality Management Area is required at the location.

The modelling study, which has used the most recent traffic, monitoring and meteorological data for a calendar year of 2012 has indicated that annual mean NO<sub>2</sub> concentrations in excess of the objective are occurring at locations where relevant human exposure is present.

The exceedance area encompasses six residential properties on Dosthill Road; and one on Tamworth Road close to the Two Gates junction.

**In light of this Detailed Assessment of Air quality which is based on the available monitoring data from 2012, Tamworth Borough Council should consider declaring an Air Quality Management Area at this time to include all areas of exceedance of the annual mean NO<sub>2</sub> objective predicted in this study.**

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## Model Verification

- Appendix 1 Traffic Data
- Appendix 2 Meteorological dataset
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# 1 Introduction

Ricardo-AEA has been commissioned by Tamworth Borough Council to undertake a Detailed Assessment of Air Quality at the Two Gates Crossroads in Tamworth. The assessment has been undertaken to investigate the scale and extent of potential exceedances of the UK Air Quality Objectives for nitrogen dioxide (NO<sub>2</sub>) within the study area. The Detailed Assessment will allow Tamworth Borough Council to establish if an Air Quality Management Area is required at this location.

## 1.1 Policy Background

The Environment Act 1995 placed a responsibility on UK Government to prepare an Air Quality Strategy (AQS) for England, Scotland, Wales and Northern Ireland. The most recent version of the strategy (2007) sets out the current UK framework for air quality management and includes a number of air quality objectives for specific pollutants.

The 1995 Act also requires that Local Authorities “Review and Assess” air quality in their areas following a prescribed timetable. The Review and Assessment process is intended to locate and spatially define areas where the AQS objectives are not being met. In such instances the Local Authority is required to declare an Air Quality Management Area (AQMA), carry out a Further Assessment of Air Quality, and develop an Air Quality Action Plan (AQAP) which should include measures to improve air quality so that the objectives may be achieved in the future. The timetables and methodologies for carrying out Review and Assessment studies are prescribed in Defra’s Technical Guidance - LAQM.TG(09).

Table 1 lists the objectives relevant to this assessment that are included in the Air Quality Regulations 2000 and (Amendment) Regulations 2002 for the purposes of Local Air Quality Management (LAQM).

**Table 1: NO<sub>2</sub> Objectives included in the Air Quality Regulations and subsequent Amendments for the purpose of Local Air Quality Management**

Pollutant	Air Quality Objective	
	Concentration	Measured as
Nitrogen dioxide	200 µg.m <sup>-3</sup> not to be exceeded more than 18 times a year	1 hour mean
	40 µg.m <sup>-3</sup>	annual mean

## 1.2 Locations where the objectives apply

When carrying out the review and assessment of air quality it is only necessary to focus on areas where the public are likely to be regularly present and are likely to be exposed over the averaging period of the objective. Table 2 summarises examples of where air quality objectives for NO<sub>2</sub> should and should not apply.

**Table 2: Examples of where the NO<sub>2</sub> Air Quality Objectives should and should not apply**

Averaging Period	Pollutant	Objectives <i>should</i> apply at ...	Objectives <i>should not</i> generally apply at ...
Annual mean	NO <sub>2</sub>	All locations where members of the public might be regularly exposed. Building façades of residential properties, schools, hospitals, care homes etc.	Building facades of offices or other places of work where members of the public do not have regular access. Hotels, unless people live there as their permanent residence. Gardens of residential properties. Kerbside sites (as opposed to locations at the building façade), or any other location where public exposure is expected to be short term
1-hour mean	NO <sub>2</sub>	All locations where the annual mean objective applies.  Kerbside sites (e.g. pavements of busy shopping streets).  Those parts of car parks and railway stations etc. which are not fully enclosed.  Any outdoor locations to which the public might reasonably be expected to have access.	Kerbside sites where the public would not be expected to have regular access.

## 1.3 Purpose of this Detailed Assessment

This study is a Detailed Assessment, which aims to assess the magnitude and spatial extent of any exceedances of the NO<sub>2</sub> objectives at locations where relevant human exposure may occur within the study area in Tamworth.

## 1.4 Overview of the Detailed Assessment

The general approach taken to this Detailed Assessment was:

- Collect and interpret data from previous Review and Assessment reports.
- Collect and analyse recent traffic, monitoring, meteorological and background concentration data for use in a dispersion modelling study.
- Use dispersion modelling to produce numerical predictions of NO<sub>2</sub> concentrations at points of relevant exposure.
- Use dispersion modelling to produce contour plots of NO<sub>2</sub> concentrations;



- Recommend if Tamworth Borough Council should declare an AQMA at any location within the study area in Tamworth and suggest its spatial extent.
- The modelling methodologies provided for Detailed Assessments outlined in Defra Technical Guidance LAQM.TG(09)<sup>1</sup> were used throughout this study.

## 1.5 Previous review and assessment work to date

### Progress report 2007 and Progress Report 2008

Following recommendations made in Tamworth Borough Council's 2006 Updating and Screening assessment, measurement of NO<sub>2</sub> concentrations commenced in Dosthill Road near the Two Gates junction in 2007.

The Progress Report 2007 concluded that the site at Dosthill Road may exceed the AQS objective for annual mean NO<sub>2</sub> concentrations in 2007 based on the limited data available at that time.

The progress Report 2008 concluded that the measured NO<sub>2</sub> annual mean of 39µg.m<sup>-3</sup> in 2007 was not in excess of the 40 µg.m<sup>-3</sup> objective therefore it was not required to proceed to a Detailed Assessment at that time; however based on the measured annual mean being close to the objective, three additional diffusion tube were deployed at other sites close to the junction at the start of 2008.

### 2009 Updating and Screening assessment

The annual mean NO<sub>2</sub> concentrations measured during 2008 at some of the Two Gates crossroads exceeded the annual mean objective. These were not however at points of relevant exposure; when the annual mean concentration was calculated at the nearest receptors using the nitrogen dioxide fall off with distance calculator it was found that NO<sub>2</sub> annual mean objective was not exceeded. Based on the 2008 measurements it was concluded that there was no requirement to conduct a Detailed Assessment at that time.

### Progress report 2010 and Progress report 2011

From the 2009 and 2010 diffusion tube measurements, Tamworth Borough Council concluded that there was no requirement at that time to conduct a Detailed Assessment.

### Updating and Screening assessment 2012

Based on an annual mean NO<sub>2</sub> concentration in excess of the 40 µg.m<sup>-3</sup> objective at the diffusion tube site on Dosthill road; and the site being is a similar distance from the road as the nearby row of residential properties; the report concluded that a Detailed Assessment of NO<sub>2</sub> was required at the Two Gates Crossroads.

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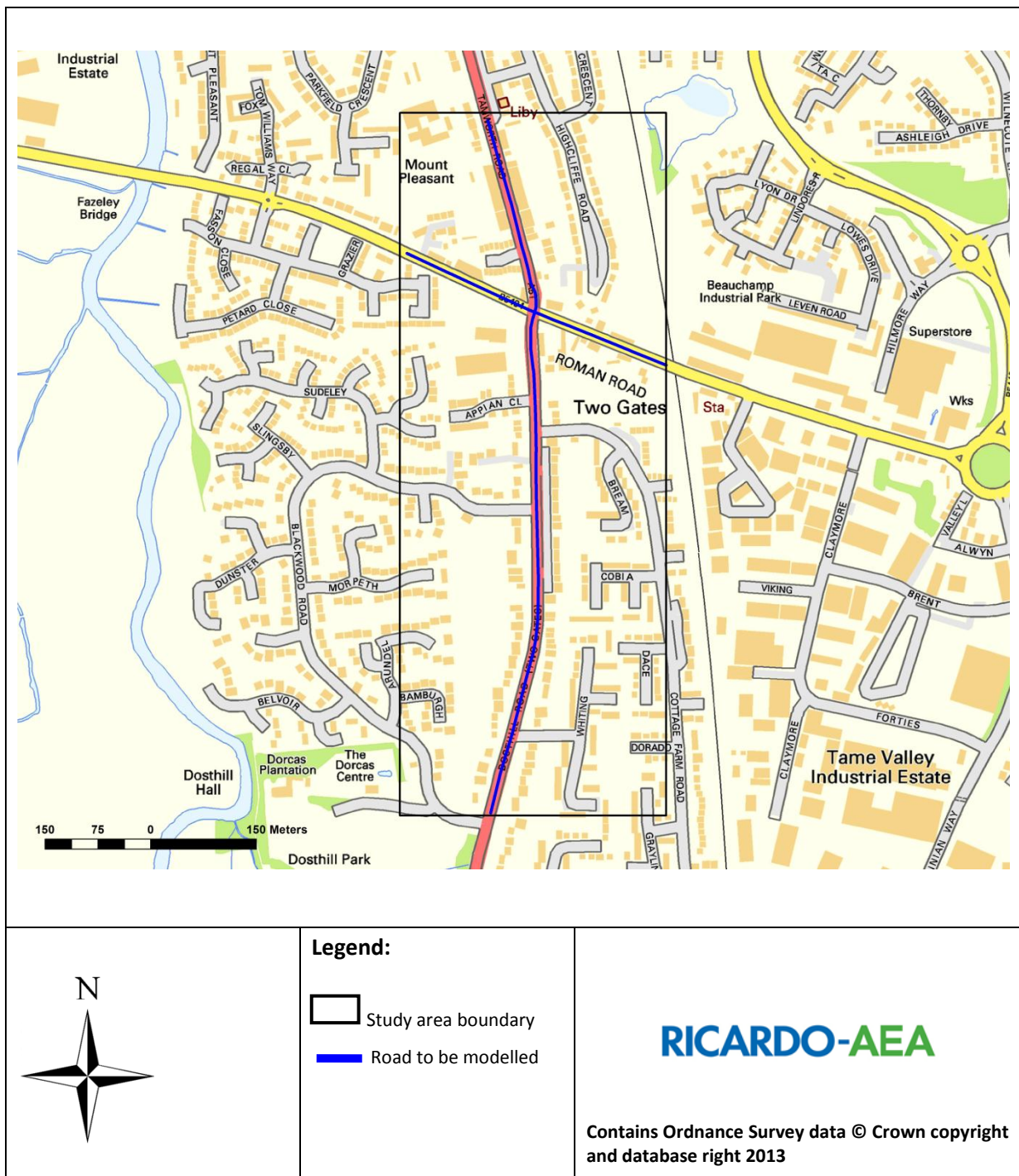
<sup>1</sup> Local Air Quality Management Technical Guidance LAQM.TG(09), Defra, 2009

## 2 Detailed Assessment study area

The borough of Tamworth is located 14 miles (22km) north-east of Birmingham in the West Midlands. It lies immediately north-west of the busy M42 motorway and south of the A38 Trunk Road. The study location covered in this assessment is located within the area known locally as “Two Gates Crossroads” where the A51 and B5404 roads intersect. The junction is known to become busy during peak traffic periods and in recent years annual mean NO<sub>2</sub> concentrations in excess of the 40µg.m<sup>-3</sup> objective have been measured at nearby roadside diffusion tube sites.

The study area mainly comprises of residential properties on the roads approaching the junction with some commercial properties present at the junction. This assessment will consider road traffic emissions where relevant exposure is present close to the road. The study area, including the roads modelled and the extent of the detailed assessment is presented in Figure 1 below. The size of the study area is approximately 370m by 1 km.

Figure 1: Detailed Assessment Study Area



## 3 Information used to support this assessment

### 3.1 Maps

Ordnance Survey based GIS data of the model domain and a road centreline GIS dataset were used in the assessment. This enabled accurate road widths and the distance of the housing to the kerb to be determined in ArcMap.

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### 3.2 Road traffic data

#### 3.2.1 Average flow, speed and fleet split

Traffic count data collected by Staffordshire County Council were used for the assessment; this included annual counts with 24-hr resolution for the roads being modelled. Vehicle classification split data was not available for all of the roads modelled; the fleet split from a nearby DfT count location was applied to all roads modelled.

Appendix 1 summarises all of the traffic flow data used and the road links modelled.

It should be noted that traffic patterns in urban locations are complex and it is not possible to fully represent these in atmospheric dispersion models. By attempting to describe these complex traffic patterns using quite simple metrics (AADT, average speed and vehicle split composition) a degree of uncertainty is introduced into the modelling.

#### 3.2.2 Congestion

The Two Gates crossroads junction is known to become busy during peak traffic periods. During congested periods average vehicle speeds reduce when compared to the daily average; the combination of slower average vehicle speeds and more vehicles lead to higher pollutant emissions during peak hours; it's therefore important to account for this when modelling vehicle emissions to estimate pollutant concentrations.

No queue observation data from traffic surveys was available for the assessment. As an alternative indicative method of observing local traffic patterns, real time traffic flows were observed a number of times using the traffic layer on Google maps<sup>2</sup>. The observations indicated that traffic becomes regularly congested or slow moving during the morning/evening and late afternoon/evening inter-peak periods on all of the intersecting roads at locations close to the junction.

The TG(09) guidance states that the preferred approach to representing the resulting increase in vehicle emissions during these peak periods is to calculate the emission rate for the affected roads for each hour of the day or week, on the basis of the average speeds and traffic flows for each hour of the day. The hourly specific emission rates can then be used to calculate a 24-hr diurnal emission

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<sup>2</sup> Google (2013) [www.maps.google.co.uk](http://www.maps.google.co.uk)

profile which can be applied to that section of road. In this case an annual average diurnal profile of traffic flow across the study area was available from local count data but no hourly speed measurement data was available. Peak periods in traffic flow were accounted for in the model by applying the diurnal traffic flow profile to the average hourly emission rate. To account for speed reductions during congested period, average speeds were reduced at road sections where traffic congestion commonly occurs.

### 3.2.3 Emissions factors

The most recent version of the Emissions Factors Toolkit<sup>3</sup> (EFT V5.2c Jan 2013) release) was used in this assessment to calculate pollutant emissions factors for each road link modelled. The calculated emission factors were then imported in to the ADMS-Roads model.

Parameters such as traffic volume, speed and fleet composition are entered into the Eft, and an emissions factor in grams of NO<sub>x</sub>/kilometre/second is generated for input into the dispersion model. In the latest version of the Eft, NO<sub>x</sub> emissions factors previously based on DFT/TRL functions have been replaced by factors from COPERT 4 v8.1. These emissions factors were published in May 2011 through the European Environment Agency and are widely used for the purpose of calculating emissions from road traffic in Europe.

The latest version of the EFT also includes addition of road abrasion emission factors for particulate matter; and changes to composition of the vehicle fleet in terms of the proportion of vehicle km travelled by each Euro standard, technology mix, vehicle size and vehicle category.

Vehicle emission projections are based largely on the assumption that emissions from the fleet will reduce as newer vehicles are introduced. Any inaccuracy in the emissions factors contained in the EFT will be unavoidably carried forward into this modelling assessment.

## 3.3 Ambient monitoring

Tamworth Borough Council currently undertakes monitoring of NO<sub>2</sub> within the immediate study area at four roadside diffusion tube sites; background NO<sub>2</sub> concentrations are also measured at other nearby diffusion tube sites in Tamworth. Further details of these monitoring locations and recent measured concentrations are provided in Section 4.

## 3.4 Meteorological data

Hourly sequential meteorological data (wind speed, direction etc.) for 2012 from the Birmingham Airport site was obtained from a third party supplier and used for the modelling assessment. The meteorological measurement site is located approximately 19 km to the south of the study area and has good data quality for the period of interest.

Meteorological measurements are subject to their own uncertainty which will unavoidably carry forward into this assessment.

## 3.5 Background concentrations

Background NO<sub>x</sub> concentrations for a dispersion modelling study can be accessed from either local monitoring data conducted at a background site or from the Defra background maps<sup>4</sup>. The Defra background maps are the outputs of a national scale dispersion model provided at a 1km x 1km resolution and are therefore subject to a degree of uncertainty.

<sup>3</sup> [http://laqm1.defra.gov.uk/documents/tools/EFT\\_Version\\_4\\_2.zip](http://laqm1.defra.gov.uk/documents/tools/EFT_Version_4_2.zip)

<sup>4</sup> Defra (2012) <http://laqm1.defra.gov.uk/review/tools/background.php> (accessed September 2012)

In this case there is an urban background diffusion tube site located at 12 Brookside Way in Tamworth, which is located approximately 1.4 km west of the study area. NO<sub>2</sub> concentrations measured at this site are considered to be representative of the NO<sub>2</sub> attributable to local background sources in the area. An NO<sub>2</sub> annual mean concentration of 24 µg.m<sup>-3</sup> was measured during 2012 at this site. Using the Defra NO<sub>x</sub> to NO<sub>2</sub> calculator to convert the measured NO<sub>2</sub> annual mean to NO<sub>x</sub>, taking into account estimated regional background concentrations, derives a background total annual mean NO<sub>x</sub> concentration of 44.2 µg.m<sup>-3</sup> for the study area.

## 4 Monitoring data 2012

Tamworth Borough Council currently undertakes monitoring of NO<sub>2</sub> within the immediate study area at four roadside diffusion tube sites, and at nearby urban background diffusion tube sites. A map showing the location of the diffusion tube sites is presented in Figure 2.

Details of the NO<sub>2</sub> diffusion tube monitoring site and the annual mean NO<sub>2</sub> concentrations measured during 2012 are presented in Table 3.

Annual mean NO<sub>2</sub> concentrations very close to, or in excess of, the 40 µg.m<sup>-3</sup> objective were measured during 2012 at all of the diffusion tubes located on the main roads in the study area. It should be noted that as the diffusion tubes are positioned at a greater height than ground level exposure (typically 1.5 m), and NO<sub>2</sub> concentrations tend to reduce with height as they disperse; it's likely that the concentrations at head height are greater than measured at 3m and above.

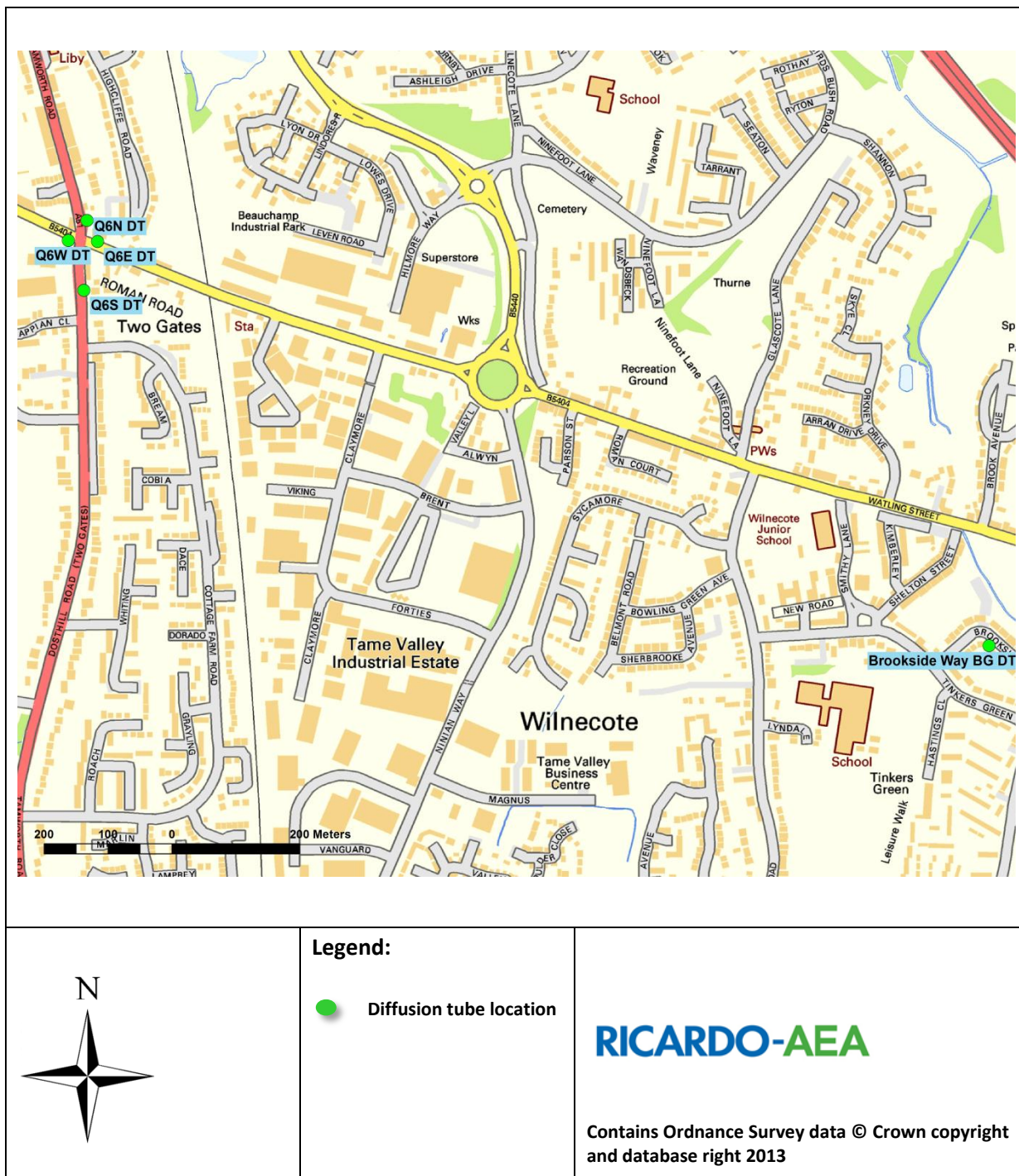
Full details of bias adjustment factors applied to the diffusion tube results and QA/QC procedures are presented in Appendix 4.

**Table 3: NO<sub>2</sub> Diffusion tube measurements 2012**

Site	Type	OS Grid Ref.		Approx. tube height (m)	Relevant exposure Y/N with distance (m)	Data Capture 2012 (%)	Bias corrected annual mean 2010 (µg.m <sup>-3</sup> )
		Easting	Northing				
Q6S Dosthill Rd Two Gates	R	421588	301526	3	Yes – 12m	100 %	<b>42.6</b>
Q6W Watling St. Two Gates Club	R	421558	301605	3.2	No – 10m	100 %	39.8
Q6N Tamworth Rd. Two Gates	R	421580	301630	3.2	Yes – 15m	100 %	<b>40.6</b>
Q6E 440 Watling St.	R	421600	301600	3.3	Yes – 9m	100 %	<b>45.7</b>
12 Brookside Way	UB	423000	300970	3	Yes – 9m	100 %	24
Exceedances of the annual mean objective are highlighted in <b>bold</b>							
R – Roadside monitoring location, 1-5m from the kerb of a busy road UB – Urban Background, more than 50m from a busy road – residential							



Figure 2: Two Gates, Tamworth Diffusion Tube Locations





## 5 Modelling

### 5.1 Modelling methodology

Annual mean concentrations of NO<sub>2</sub> during 2012 have been modelled within the study area using the atmospheric dispersion model ADMS Roads (version 3.1).

The model was verified by comparing the modelled predictions of road NO<sub>x</sub> with local monitoring results. The available roadside diffusion tube measurement within the study area (described in Section 4 above) were used to verify the annual mean road NO<sub>x</sub> model predictions.

Following initial comparison of the modelled concentrations with the available monitoring data, refinements were made to the model input to achieve the best possible agreement with the diffusion tube measurements. Further information on model verification is provided in Section 5.1.3 and Appendix 3.

A surface roughness of 1.5 m was used in the modelling to represent a large urban area in the model domain. A limit for the Monin-Obukhov length of 10 m was applied.

The source-oriented grid option was used in ADMS-Roads; this option provides finer resolution of predicted pollutant concentrations along the roadside, with a wider grid spaced at approximately 3.5 metres being used to represent concentrations further away from the road across the wider study area. The predicted concentrations were interpolated to derive values between the grid points using the Spatial Analyst tool in the GIS software ArcMap 10. This allows contours showing the predicted spatial variation of pollutant concentrations to be produced and added to the digital base mapping.

Queuing traffic was treated in the model using the methodology described in Section 3.2.2 above. A time varying emissions file was used in the model to account for daily variations in traffic flow.

It should be noted that any dispersion modelling study has a degree of uncertainty associated with it; all reasonable steps have been taken to reduce this where possible.

### 5.1.1 Treatment of modelled NO<sub>x</sub> road contribution

It is necessary to convert the modelled NO<sub>x</sub> concentrations to NO<sub>2</sub> for comparison with the relevant objectives.

The Defra NO<sub>x</sub>/NO<sub>2</sub> model<sup>5</sup> was used to calculate NO<sub>2</sub> concentrations from the NO<sub>x</sub> concentrations predicted by ADMS-Roads. The model requires input of the background NO<sub>x</sub>, the modelled road contribution and accounts for the proportion of NO<sub>x</sub> released as primary NO<sub>2</sub>. For the Tamworth area in 2012 with the “All other UK urban Traffic” option in the model, the NO<sub>x</sub>/NO<sub>2</sub> model estimates that 22% of NO<sub>x</sub> is released as primary NO<sub>2</sub>.

### 5.1.2 Validation of ADMS-Roads

Validation of the model is the process by which the model outputs are tested against monitoring results at a range of locations and the model is judged to be suitable for use in specific applications; this is usually conducted by the model developer.

CERC have carried out extensive validation of ADMS applications by comparing modelled results with standard field, laboratory and numerical data sets, participating in EU workshops on short range dispersion models, comparing data between UK M4 and M25 motorway field monitoring data, carrying out inter-comparison studies alongside other modelling solutions such as DMRB and CALINE4, and carrying out comparison studies with monitoring data collected in cities throughout the UK using the extensive number of studies carried out on behalf of local authorities and Defra.

### 5.1.3 Verification of the model

Verification of the model involves comparison of the modelled results with any local monitoring data at relevant locations. This helps to identify how the model is performing at the various monitoring locations. The verification process involves checking and refining the model input data to try and reduce uncertainties and produce model outputs that are in better agreement with the monitoring results. LAQM.TG(09) recommends making the adjustment to the road contribution of the pollutant only and not the background concentration these are combined with.

The approach outlined in Example 2 of LAQM.TG(09) has been used in this case

The modelled NO<sub>x</sub> concentrations in this study were verified using the available kerbside and roadside diffusion tube site.

Following various refinements to the model input; the modelled Road NO<sub>x</sub> contribution required adjustment by an average factor of 1.022 to bring the predicted NO<sub>2</sub> concentrations within closer agreement of those results obtained from the monitoring data. This factor was applied to all Road NO<sub>x</sub> concentrations predicted by the model; the adjusted total NO<sub>2</sub> concentrations were then calculated using the Defra NO<sub>x</sub>/NO<sub>2</sub> calculator.

After the NO<sub>x</sub>/NO<sub>2</sub> model was run no further adjustments were made to the data. Model agreement for the NO<sub>2</sub> monitoring data after adjustment is presented in Table 4 and Figure 3. Full model verification data is provided in Appendix 3.

Model uncertainty can be estimated by calculating the root mean square error (RMSE). In this case the calculated RMSE was 0.7 µg.m<sup>-3</sup> after adjustment, which is within the suggested value (10% of the objective being assessed) in LAQM.TG(09). The model has therefore been assessed to perform sufficiently well for use within this assessment.

Verifying modelling data with diffusion tube monitoring data will always be subject to uncertainty due to the inherent limitations in such monitoring data (even data from continuous analysers has

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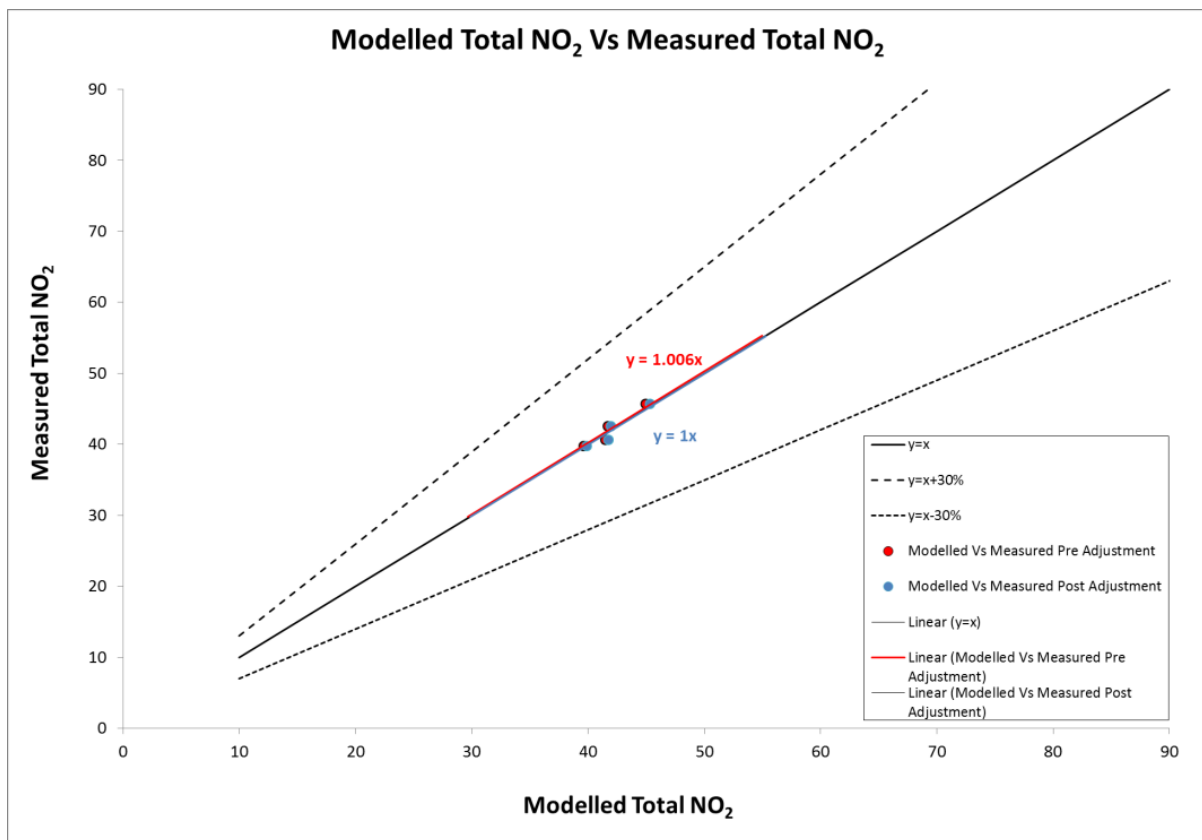
<sup>5</sup> Defra (2012) NO<sub>x</sub> NO<sub>2</sub> Calculator v3.2 released September 2012; Available at <http://laqm.defra.gov.uk/tools-monitoring-data/no-calculator.html>

notable uncertainty). The model results should be considered in this context. Further information on the verification process including the linear regression analysis is provided in Appendix 3.

**Table 4: Modelled vs. measured annual mean NO<sub>2</sub> concentrations**

Site	NO <sub>2</sub> annual mean concentration (µg.m <sup>-3</sup> )	
	Measured	Modelled
Q6E 440 Watling St.	45.7	45.3
Q6N Tamworth Rd. Two Gates	40.6	41.8
Q6W Watling St. Two Gates Club	39.8	39.9
Q6S Dosthill Rd Two Gates	42.6	42.0
<b>RMSE =</b>		<b>0.69</b>

**Figure 3: Linear regression analysis of modelled vs. monitored NO<sub>2</sub> annual mean**



## 5.2 Modelling results

### 5.2.1 Model results at specified receptor locations

Annual mean NO<sub>2</sub> concentrations have been predicted at a selection of receptor locations within the study area. The receptors are located at the facade of residential buildings in the model domain where relevant exposure exists. The receptor locations selected are at the residential properties closest to the roads sources being modelled.

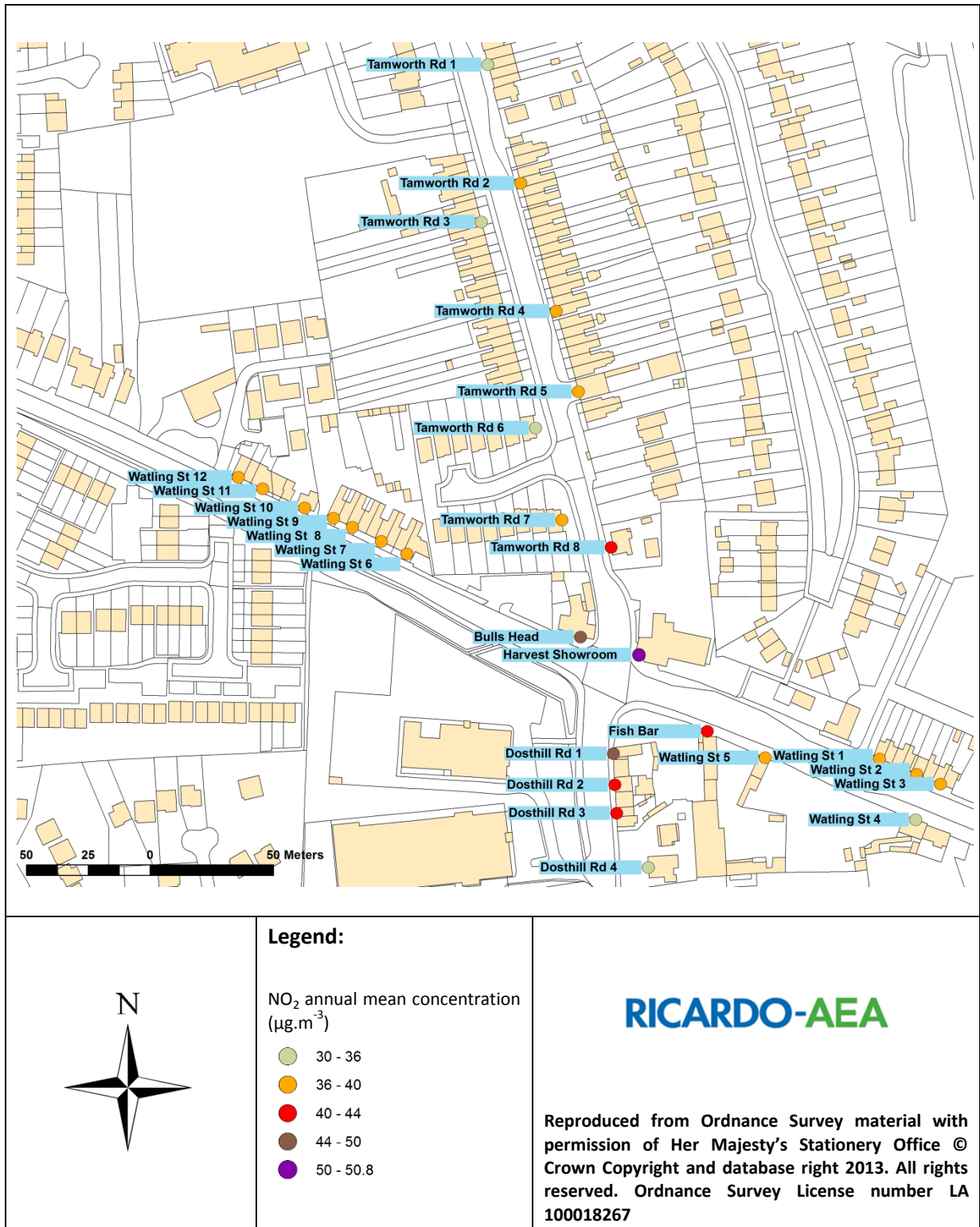
The receptors have been modelled at 1.5m height to represent ground level exposure. The predicted annual mean NO<sub>2</sub> concentrations at each of the specified receptors during 2012 are presented in Table 5. Maps representing the predicted annual mean NO<sub>2</sub> concentrations at the specified receptors using graduated colours are presented in Figure 4.

Annual mean NO<sub>2</sub> concentration in excess of the 40 µg.m<sup>-3</sup> objective were predicted at seven of the specified receptors all of which are located close to the crossroads junction on Dosthill Road, Tamworth Road and Watling Street. Three of the locations were however commercial properties where the annual mean objective does not apply.

**Table 5: Predicted 2012 annual mean NO<sub>2</sub> concentrations at specified receptors**

Receptor location	Receptor type	Height (m)	OS Grid reference		Annual mean NO <sub>2</sub> concentration (µg.m <sup>-3</sup> )
			X	Y	
Tamworth Rd 1	Residential	1.5 m	421530	301851	35.8
Tamworth Rd 2	Residential	1.5 m	421543	301803	36.1
Tamworth Rd 3	Residential	1.5 m	421527	301787	33.4
Tamworth Rd 4	Residential	1.5 m	421558	301751	36.6
Tamworth Rd 5	Residential	1.5 m	421567	301718	37.1
Tamworth Rd 6	Residential	1.5 m	421549	301704	34.9
Tamworth Rd 7	Residential	1.5 m	421560	301666	37.0
Tamworth Rd 8	Residential	1.5 m	421580	301655	41.6
Bulls Head	Commercial	1.5 m	421567	301619	48.9
Harvest Showroom	Commercial	1.5 m	421591	301612	50.8
Dosthill Rd 1	Residential	1.5 m	421581	301572	44.0
Dosthill Rd 2	Residential	1.5 m	421581	301559	42.5
Dosthill Rd 3	Residential	1.5 m	421582	301548	42.0
Dosthill Rd 4	Residential	1.5 m	421595	301526	35.9
Fish Bar	Commercial	1.5 m	421619	301581	40.4
Watling St 1	Residential	1.5 m	421689	301570	39.6
Watling St 2	Residential	1.5 m	421704	301563	39.1
Watling St 3	Residential	1.5 m	421713	301559	38.8
Watling St 4	Residential	1.5 m	421703	301545	35.0
Watling St 5	Residential	1.5 m	421642	301570	37.9
Watling St 6	Residential	1.5 m	421497	301653	38.9
Watling St 7	Residential	1.5 m	421487	301658	38.5
Watling St 8	Residential	1.5 m	421475	301663	38.0
Watling St 9	Residential	1.5 m	421467	301667	37.5
Watling St 10	Residential	1.5 m	421456	301671	37.5
Watling St 11	Residential	1.5 m	421439	301679	37.0
Watling St 12	Residential	1.5 m	421429	301684	36.6
Watling St not in use	Residential	1.5 m	421670	301579	39.4

Figure 4: Predicted NO<sub>2</sub> annual mean concentrations at specified receptor Locations



### 5.2.2 Model results – contour plot

Contour plots showing the spatial variation of predicted annual mean NO<sub>2</sub> concentrations at ground level exposure height (1.5m) across the study area for each scenario modelled are presented in Figure 5 and Figure 6. The contour plots are created by interpolating predicted concentrations across a grid of discrete receptor points using the spatial analyst tool in ArcGIS. Figure 6 has been created using concentrations modelled across a finer resolution grid to provide a better indication of the spatial extent of predicted concentrations in excess of the objective at locations close to the crossroads.

The plots indicate that the main hotspots where high NO<sub>2</sub> annual mean concentrations are predicted are at roadside locations close to the junction; this includes the facades of residential properties on Dosthill Road and Tamworth Road. All other locations where the contour indicates that the objective is being exceeded are either at roadside locations where there are no buildings or at commercial properties where the annual mean objective does not apply as it not considered representative of relevant exposure. The contour indicates that annual mean NO<sub>2</sub> concentrations in excess of the objective occurred at seven residential properties within the study area during 2012; this equates to a population exposure of approximately 16 people based on an average household occupancy<sup>6</sup> of 2.3.

The results should be considered in context with the various uncertainties associated with the modelling process and the error (RMSE) of 0.7 µg.m<sup>-3</sup> calculated in the model verification process.

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<sup>6</sup> Office for National Statistics (2013) Population and Household Estimates for the United Kingdom March 2011



Figure 5: Predicted spatial variation in annual mean NO<sub>2</sub> concentrations at 1.5m height

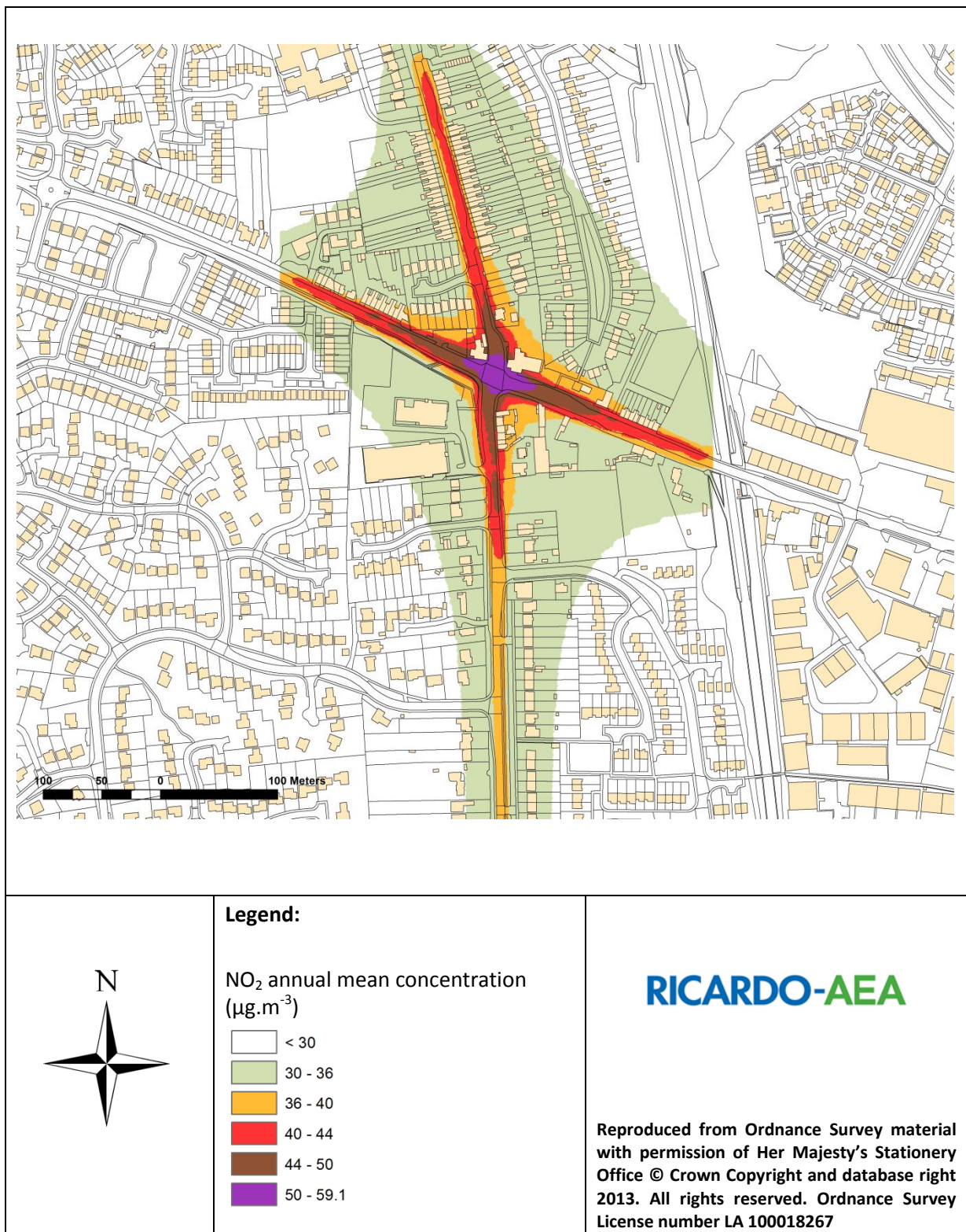
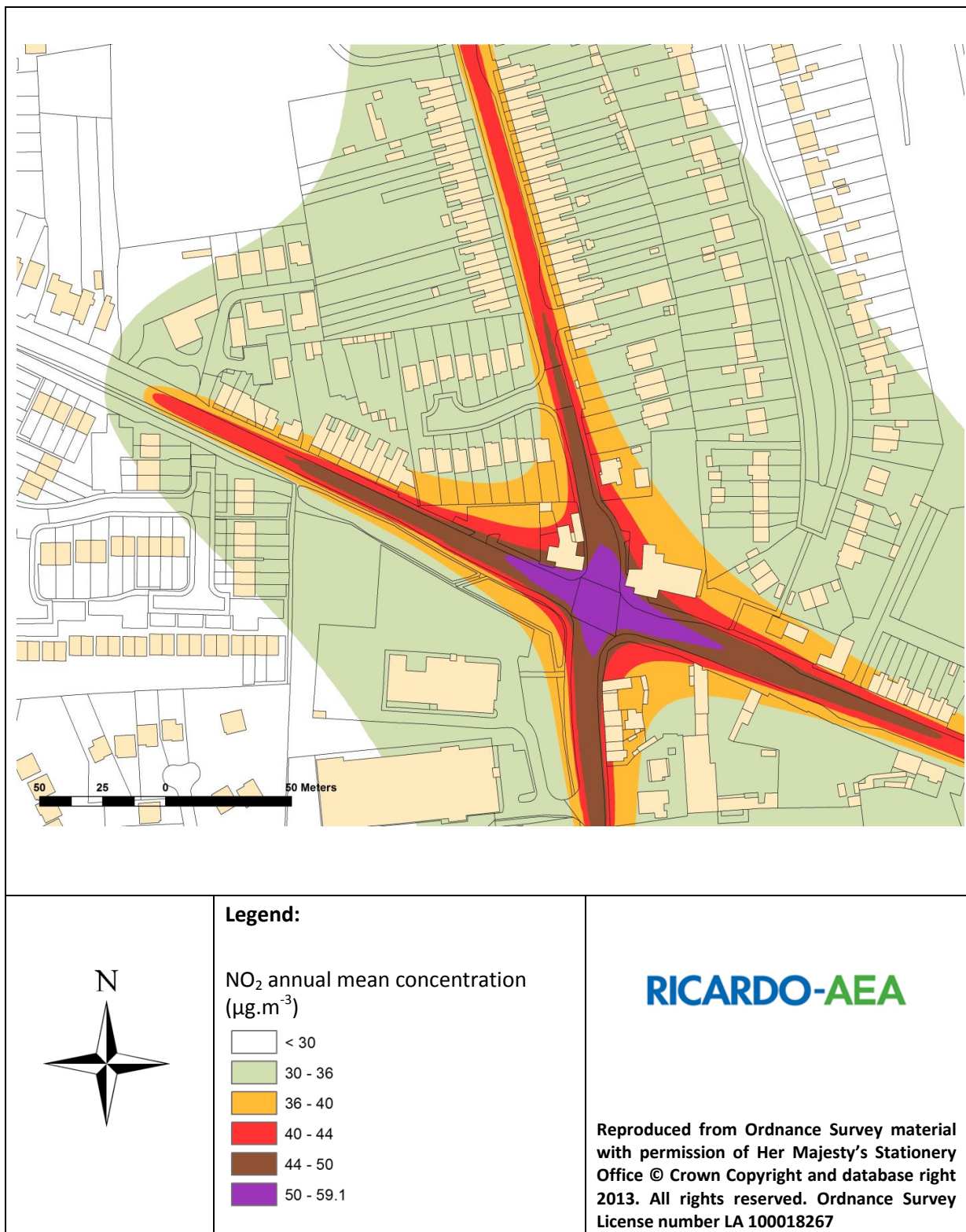


Figure 6: Predicted annual mean NO<sub>2</sub> concentrations at 1.5m height - finer resolution at crossroad





## 6 Conclusion

A dispersion modelling study of road traffic emission in the area around the Two Gates Crossroads in Tamworth has been conducted to allow a detailed assessment of nitrogen dioxide concentrations at this location.

The modelling study, which used traffic, monitoring and meteorological data for a calendar year of 2012 has indicated that annual mean NO<sub>2</sub> concentrations in excess of the objective are occurring at seven residential properties on Dosthill Road and Tamworth Road close to the Two Gates junction.

**In light of this Detailed Assessment of Air quality which is based on the available monitoring data from 2012, Tamworth Borough Council should consider declaring an Air Quality Management Area at this time to include all areas of exceedance of the annual mean NO<sub>2</sub> objective predicted in this study.**

# Appendices

Appendix 1: Traffic Data

Appendix 2: Meteorological dataset

Appendix 3: Model Verification

## Appendix 1 – Traffic data

Table A1.1 summarises the Annual Average Daily Flows (AADF) of traffic and fleet compositions used within the model for each road link. 2011 Annual counts with 24-hr resolution were provided by Staffordshire County Council. A local TEMPRO growth factor was applied to the count data to account for projected increase in traffic flows between 2011 and 2012. Fleet composition split data from 2011 was available from a DFT traffic count location approximately 1km south of Dosthill Road only; this fleet split has been applied across all road links modelled.

**Table A1.1: Two Gates, Tamworth - Annual Average Daily Flows**

Street	%Cars	%LGV	%HGV	%Bus	%2WM	AADF 2012
Dosthill Road	80.0	12.8	5.5	0.8	0.8	9308
Watling Street	80.0	12.8	5.5	0.8	0.8	15492
Atherstone Street	80.0	12.8	5.5	0.8	0.8	15492
Tamworth Road	80.0	12.8	5.5	0.8	0.8	12650

LGV – Light Goods Vehicles

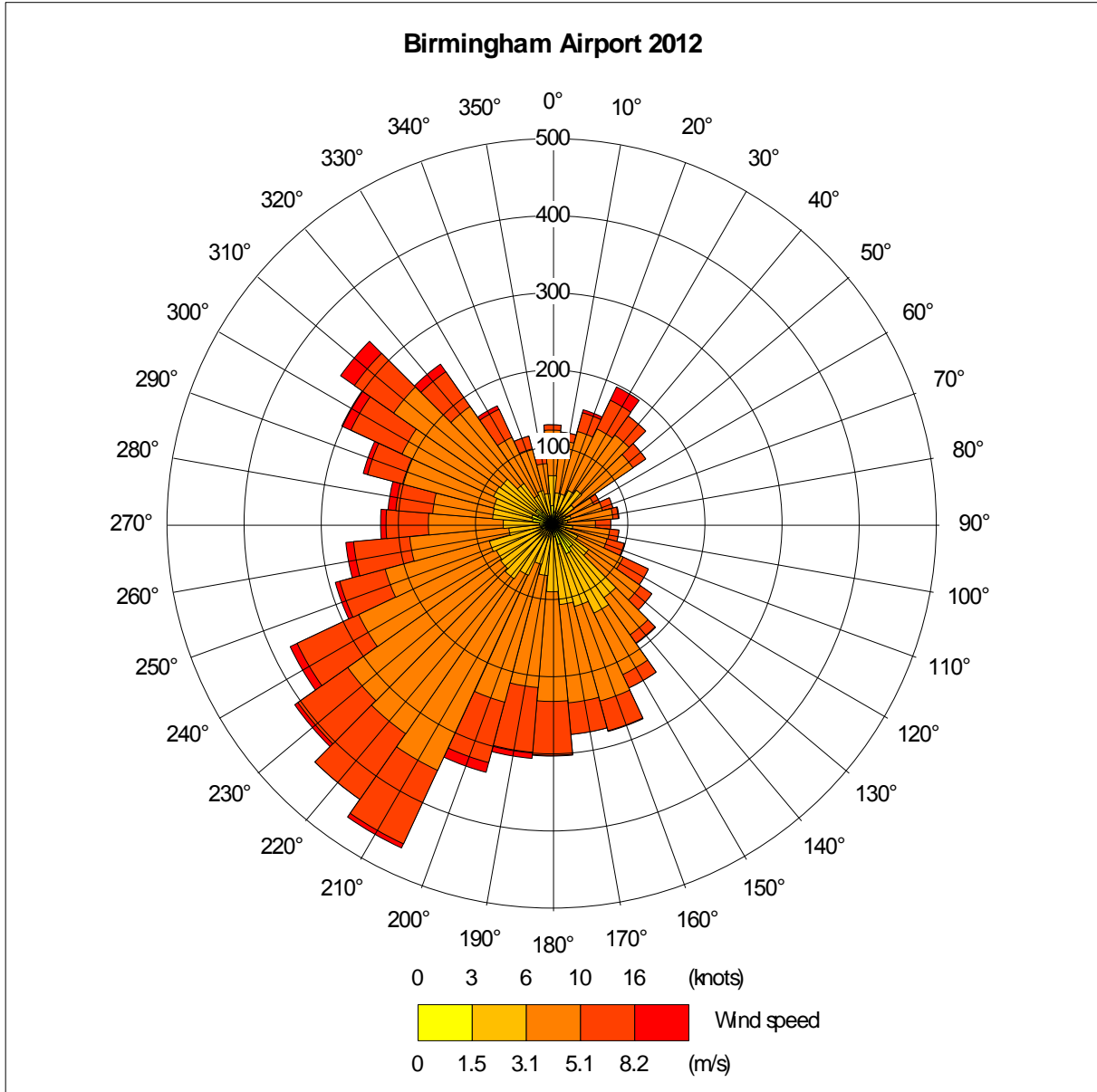
HGV – Heavy Goods Vehicles (Articulate and Rigid)

2WM - Motorcycles

## Appendix 2 – Meteorological dataset

The Wind Rose for the 2012 Birmingham Airport meteorological dataset is presented in Figure A2.1

**Figure A2.1 Meteorological dataset windrose**



## Appendix 3 – Model verification

Verification of the baseline model involves comparison of the modelled results with the available local monitoring data at relevant locations. This helps to identify how the model is performing at the various monitoring sites. The verification process involves checking and refining the model input data to try and reduce uncertainties and produce model outputs that are in better agreement with the monitoring results. This can be followed by adjustment of the modelled results if required. LAQM.TG(09) recommends making the adjustment to the road contribution only and not the background concentration these are combined with.

The approach outlined in Example 2 of LAQM.TG(09) has been used in this case.

It is appropriate to verify the ADMS Roads model in terms of primary pollutant emissions of nitrogen oxides ( $\text{NO}_x = \text{NO} + \text{NO}_2$ ). The model has been run to predict annual mean Road  $\text{NO}_x$  concentrations during 2012 at the diffusion tube sites in the study area.

The model output of Road  $\text{NO}_x$  (the total  $\text{NO}_x$  originating from road traffic) has been compared with the measured Road  $\text{NO}_x$ , where the measured Road  $\text{NO}_x$  contribution is calculated as the difference between the total  $\text{NO}_x$  and the background  $\text{NO}_x$  value. Total measured  $\text{NO}_x$  for each diffusion tube was calculated from the measured  $\text{NO}_2$  concentration using the 2012 version of the Defra  $\text{NO}_x/\text{NO}_2$  calculator.

The initial comparison of the modelled vs measured Road  $\text{NO}_x$  identified that the model was under-predicting the Road  $\text{NO}_x$  contribution. Subsequently, various refinements were made to the model input to improve the overall model performance.

The gradient of the best fit line for the modelled Road  $\text{NO}_x$  contribution vs. measured Road  $\text{NO}_x$  contribution was then determined using linear regression and used as the adjustment factor. This factor was then applied to the modelled Road  $\text{NO}_x$  concentration for each modelled point to provide adjusted modelled Road  $\text{NO}_x$  concentrations. A linear regression plot comparing modelled and monitored Road  $\text{NO}_x$  concentrations before and after adjustment is presented in Figure A3.1.

The background  $\text{NO}_x$  concentration was then added to determine the adjusted total modelled  $\text{NO}_x$  concentrations. The total annual mean  $\text{NO}_2$  concentrations were then determined using the  $\text{NO}_x/\text{NO}_2$  calculator.

A primary adjustment factor (PAdj) of **1.022** was applied to all modelled Road  $\text{NO}_x$  data prior to calculating an  $\text{NO}_2$  annual mean. A plot comparing modelled and monitored  $\text{NO}_2$  concentrations before and after adjustment during 2012 is presented in Figure A3.2.

Figure A3.1: Comparison of unadjusted modelled Road NO<sub>x</sub> Vs Measured Road NO<sub>x</sub>

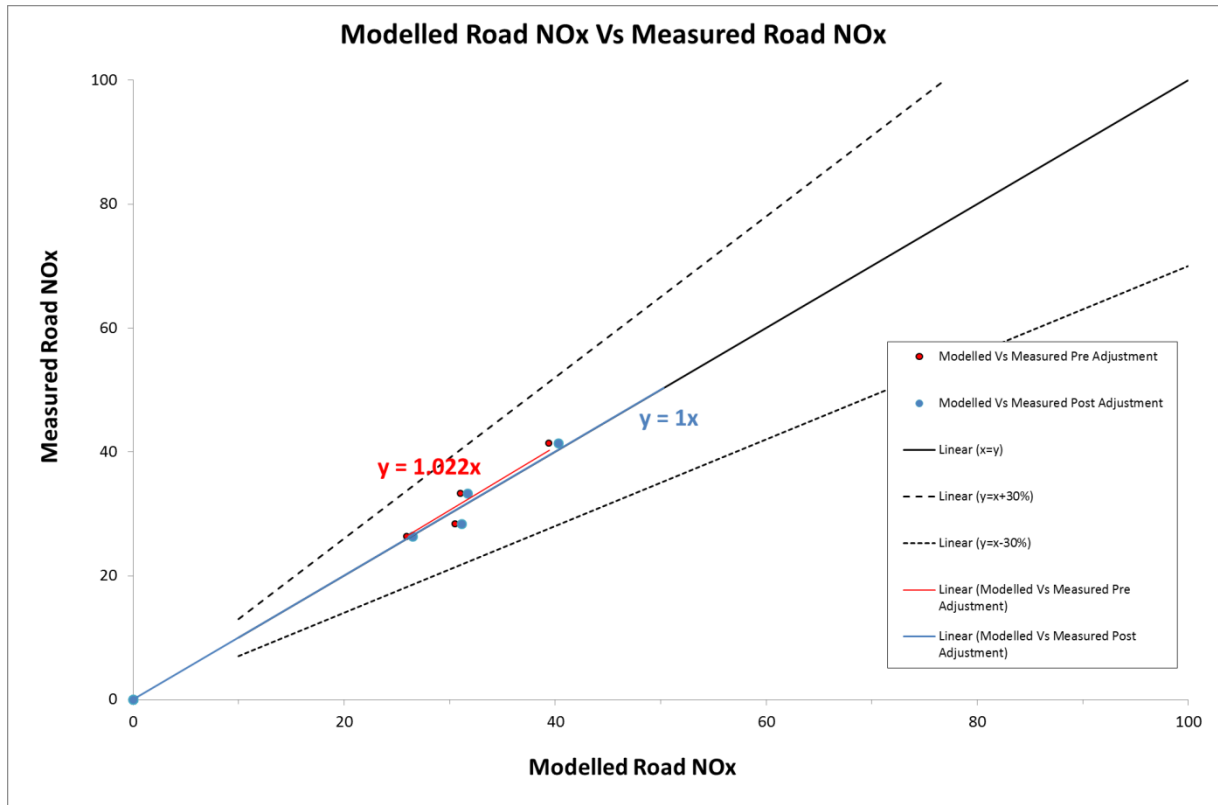
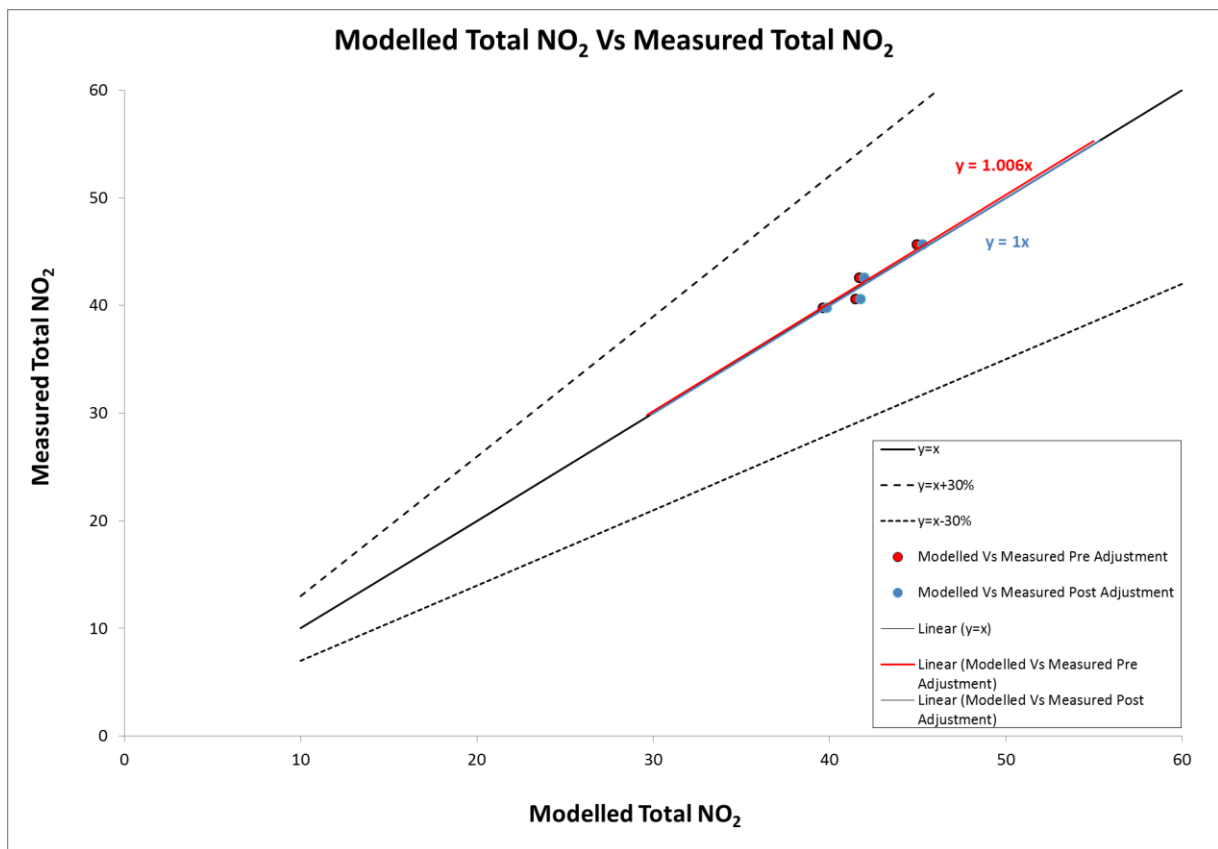


Figure A3.2: Linear regression analysis of modelled vs. monitored NO<sub>2</sub> annual mean



To evaluate the model performance and uncertainty, the Root Mean Square Error (RMSE) for the observed vs. predicted NO<sub>2</sub> annual mean concentrations was calculated, as detailed in Technical Guidance LAQM.TG(09), Box A3.7, Appendix 3. The calculated RMSE is presented in Table A3.1.

It is recommended that the RMSE is below 25% of the objective that the model is being compared against, but ideally under 10% of the objective i.e. 4 µg.m<sup>-3</sup> (NO<sub>2</sub> annual mean objective of 40 µg.m<sup>-3</sup>). In this case the RMSE is calculated at 0.7 µg.m<sup>-3</sup>, the model uncertainty is therefore considered acceptable and the model has performed sufficiently well for use within this assessment.

**Table A3.1: Station Hill, Farnham model - Root mean square error**

Site	NO <sub>2</sub> annual mean concentration (µg.m <sup>-3</sup> )	
	Measured	Modelled
Q6E 440 Watling St.	45.7	45.3
Q6N Tamworth Rd. Two Gates	40.6	41.8
Q6W Watling St. Two Gates Club	39.8	39.9
Q6S Dosthill Rd Two Gates	42.6	42.0
<b>RMSE =</b>		<b>0.69</b>

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## Appendix 2

### **DECLARATION OF AIR QUALITY MANAGEMENT AREA, TWO GATES – Consultation Letters/FAQ**

Under Schedule 11 of the Environment Act 1995 requires a local authority to consult with a range of statutory consultees and other stakeholders in matters relating to Air Quality including Detailed Assessments and the subsequent need to designate an Air Quality Management Area.

#### Statutory Consultees

- Environment Agency
- Highways Authority
- All neighbouring Councils
- Staffordshire County Council

#### Other Stakeholders (non-statutory)

- Local Members of the Council for the relevant area
- Tamworth Chamber of Trade
- Member of Parliament
- Businesses in the affected areas
- Residents in the affected areas

Recommended consultation letters are included in this appendix

## **DRAFT LETTER to Residents and Businesses in the affected area**

**Your property may be affected by this proposal.**

Dear Sir or Madam

### **CONSULTATION ON THE DECLARATION OF AN AIR QUALITY MANAGEMENT AREA FOR NITROGEN DIOXIDE AROUND TWO GATES CROSSROADS, DOSTHILL**

Tamworth Borough Council has a statutory duty to undertake frequent reviews of air quality in the area. These reviews consider the likelihood of an exceedence of standards (called Air Quality Objectives), which have been set by the Government for seven key pollutants. Where an Air Quality Objective is being breached the Council must take action, initially by declaring an Air Quality Management Area (AQMA) and subsequently by developing an Air Quality Action Plan that will aim to improve and prevent further degradation of air quality within the AQMA.

I write to advise you that Tamworth Borough Council is proposing to make an Order designating an area around Two Gates Crossroads as an Air Quality Management Area (AQMA). This course of action is necessary because a Detailed Assessment of air quality completed in October 2013 has shown that an exceedence of the nitrogen dioxide annual mean air quality objective (AQO) is likely to be affecting some residential properties. The need for an Air Quality Management Area designation arises primarily because of vehicle pollution from the traffic light controlled crossroads.

The 2013 Detailed Assessment Report may be downloaded from the Tamworth Borough Council website at [www.tamworth.gov.uk](http://www.tamworth.gov.uk). Alternatively, on request I will send you a copy via e-mail or you may visit the Council Offices at Marmion House, Lichfield Street, Tamworth to view the Report during normal office opening hours.

Further information on Air Quality can be found at the following website [UK-AIR, air quality information resource - Defra, UK](#)

**We are seeking your views on the conclusion of the Detailed Assessment and the proposal to declare an Air Quality Management Area.**

Enclosed with this letter is plan of the area showing the nitrogen dioxide concentrations at the facades of properties in the study area. Those properties which have a red, brown or purple spot on them have an annual mean nitrogen dioxide exposure of above the Air Quality Objective and are likely to be included in the AQMA (business properties would not be included). Properties that have an amber spot have a nitrogen dioxide

concentration marginally below the Air Quality Objective and are unlikely to be included in the AQMA unless the consultation process strongly indicates otherwise.

Once the Order has been made, a further air quality assessment will have to be produced within 12 months. In addition, an Action Plan must be produced within 18 months of the Order being made. The Further Assessment is intended to supplement the information provided in the Detailed Assessment. The purpose of the Action Plan is to identify appropriate measures to prevent further degradation of air quality and to reduce the levels of nitrogen dioxide in the AQMA so that air quality meets the required standard.

The Council is inviting members of the public and other interested organisations to make comments on the Detailed Assessment, proposed AQMA declaration and the area proposed to be so designated prior to any designation being formalised.

Please send to me any comments that you wish to make by no later than **[insert]** 2014. In the meantime, if you have any queries about this matter or wish to discuss it, you may contact me by telephone or e-mail.

Yours faithfully,

**Steve Lewis**  
**Head of Environmental Health**  
**[stephen-lewis@tamworth.gov.uk](mailto:stephen-lewis@tamworth.gov.uk)**  
**01827 709437 direct**  
**01827 709445 general**

## **DRAFT LETTER to Statutory consultees and other organisations**

Dear Sirs

### **CONSULTATION ON THE DECLARATION OF AN AIR QUALITY MANAGEMENT AREA FOR NITROGEN DIOXIDE AROUND TWO GATES CROSSROADS, DOSTHILL**

Tamworth Borough Council has a statutory duty has a statutory requirement under the Environment Act 1995, Part IV (the Act) to undertake three-yearly Updating and Screening Assessments, produce Annual Air Quality Progress Reports, and to produce Detailed Assessments where potential exceedences of any of the Air Quality Objectives set out in the Air Quality (England) Regulations 2000 are identified.

Section 83 of the Act requires local authorities to designate an Air Quality Management Area where Air Quality Objectives are not being achieved. Once an area has been designated, Section 84 requires the local authority to carry out a Further Assessment to develop an Air Quality Action Plan for improving and preventing further degradation of air quality in the Air Quality Management Area. Action Plans are specific to a pollutant and the area of concern and in the case of traffic derived pollution may involve reviewing traffic management, low vehicle emissions and travel plan initiatives and the use of transport policy and development control strategies under planning legislation. There is a need for widespread consultation and the involvement of all interested stakeholders when Action Plans are being developed.

The Act also requires local authorities to consult on their air quality review and assessment (including Detailed Assessments), on the declaration of Air Quality Management Areas and further air quality assessments in declared AQMAs, which is the main focus of this report.

I write to advise you that Tamworth Borough Council is proposing to make an Order designating an area around Two Gates Crossroads as an Air Quality Management Area (AQMA). This course of action is necessary because a Detailed Assessment of air quality completed in October 2013 has shown that an exceedence of the nitrogen dioxide annual mean air quality objective (AQO) is likely to be affecting some residential properties. The need for an Air Quality Management Area designation arises primarily because of vehicle pollution from the traffic light controlled crossroads.

The 2013 Detailed Assessment Report may be downloaded from the Tamworth Borough Council Website at [www.tamworth.gov.uk/](http://www.tamworth.gov.uk/) [\[insert link\]](#) . Alternatively, on request I will send you a copy via e-mail or you may visit the

Council Offices at Marmion House, Lichfield Street, Tamworth to view the Report during normal office opening hours.

Further information on Local Air Quality Management can be found at the following website [UK-AIR, air quality information resource - Defra, UK](#)

Enclosed with this letter is plan of the area showing the nitrogen dioxide concentrations at the facades of properties in the study area. Those properties which have a red, brown or purple spot on them have an annual mean nitrogen dioxide exposure of above the Air Quality Objective and are likely to be included in the AQMA (business properties would not be included). Properties that have an amber spot have a nitrogen dioxide concentration marginally below the Air Quality Objective and are unlikely to be included in the AQMA unless the consultation process strongly indicates otherwise.

Once the Order has been made, a further air quality assessment will have to be produced within 12 months. In addition, an Action Plan must be produced within 18 months of the Order being made. The Further Assessment is intended to supplement the information provided in the Detailed Assessment. The purpose of the Action Plan is to identify appropriate measures to prevent further degradation of air quality and to reduce the level of nitrogen dioxide in the AQMA so that air quality meets the required standard.

The Council is inviting statutory consultees and other interested organisations to make comments on the Detailed Assessment, proposed AQMA declaration and the area proposed to be so designated prior to any designation being formalised.

Please send to me any comments that you wish to make by no later than **[insert]** 2014. In the meantime, if you have any queries about this matter or wish to discuss it, you may contact me by telephone or e-mail.

Yours faithfully,

**Steve Lewis**  
**Head of Environmental Health**  
**stephen-lewis@tamworth.gov.uk**  
**01827 709437 direct**  
**01827 709445 general**

## **Air Quality - Frequently Asked Questions**

Tamworth Borough Council have put together some further information that we hope will answer any questions or concerns regarding the Air Quality in Tamworth.

### **1. Is this a regular problem around the country?**

Since the introduction of the legislation requiring local authorities to monitor and report air quality (Air Quality (England) Regulations 2000) and declare an Air Quality Management Area where appropriate, approximately 220 local authorities have declared at least one Air Quality Management Area. Some, such as the London Boroughs have declared their whole boroughs as Air Quality Management Areas.

### **2. What are the implications of an Air Quality Management Area?**

An AQMA means that within that area, the levels of a certain pollutant are above those required by legislation for health reasons. Any declaration in summary, means that further monitoring of that pollutant has to be undertaken and a plan has to be put in place to improve the air quality within it. Therefore the implications of an AQMA are all to encourage positive steps.

### **3. What is being done to improve Air Quality?**

Tamworth Borough Council have in fact already undertaken measures to improve air quality within the Borough. We are at present monitoring air quality levels to ascertain if this improvement is enough to reduce levels to below the required objective. We are furthermore undertaking all the correct procedures required of us by DEFRA (Department of Environment Food and Rural Affairs).

### **4. What do we do to monitor the problem?**

Tamworth Borough Council monitor air quality within the area using high-tech real time monitoring equipment. We will liaise with Staffordshire County Council Highways and using data and information supplied by transportation services in relation to queue length and number of vehicles develop solutions.

### **5. I suffer from asthma, how will this affect me?**

Certain sensitive individuals who are more susceptible to respiratory pollution may feel the effects more acutely, or at lower levels. These individuals include those who suffer from heart disease, asthma and bronchitis, especially in young children and the elderly. The Health Protection Agency have advised that if you are in this risk category it is advisable to avoid prolonged exposure during periods of peak traffic.

### **6. Will this increase my chance of suffering from Asthma?**

For most people, pollution levels in the UK are unlikely to cause any serious health effects. During particularly severe pollution episodes, short term effects such as coughing and eye irritation may be triggered. The levels measured within Two Gates, Tamworth however are not considered as 'severe', and the levels are likely to go unnoticed by most people.

#### **7. I work in the area, how will this affect my health?**

The criteria used to assess the levels of nitrogen dioxide are based on a long term exposure limit of where members of the public might be regularly exposed for long periods, e.g. residential properties, schools, hospitals. It is thought that the workplace is not considered as long term exposure. Research undertaken by DEFRA identified that exceedences of the shorter term objectives were considered unlikely where the annual mean is below 60µg/m<sup>3</sup> (Two Gates, Tamworth levels are below 60µg/m<sup>3</sup>).

#### **8. Is it safe to allow my children to play in the garden?**

Yes of course, these levels are only very close to the main road where traffic is sometimes queued. Furthermore, they are based on exposure to nitrogen dioxide for far longer periods of time than it is considered for children playing in their gardens.

#### **9. What are the implications for property values?**

The designation of an AQMA is a legislative requirement and is not an optional process. AQMA's are not subject to land searches and many other councils have declared AQMA's and to the best of our knowledge there have been no reported effects on property values.

For more information, there is guidance available on the Department for Environment Food and Rural Affairs (DEFRA)

<http://uk-air.defra.gov.uk/air-pollution/faq?view=general>

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THURSDAY, 13 MARCH 2014

**REPORT OF THE PORTFOLIO HOLDER FOR PUBLIC HOUSING AND VULNERABLE PEOPLE****HOUSING REVENUE ACCOUNT (HRA) BUSINESS PLAN UPDATE****EXEMPT INFORMATION****PURPOSE**

- To approve the update to the HRA Business Plan Update Summary 2014 attached as Appendix One

**RECOMMENDATIONS**

- **That members approve the HRA Business Plan Update Summary 2014**
- **That a further report is received by July 2014 to agree plans for the delivery of new affordable homes**

**EXECUTIVE SUMMARY**

The Council's HRA Business Plan was approved in March 2012 in readiness for the implementation of Council Housing Finance Reform. The plan provided the basis for the Council's use of HRA resources to meet the following objectives:

- Deliver customer focused and efficient housing management and repairs services to tenants
- Ensure that the existing stock is maintained effectively, including meeting the decent homes standard and needs for other improvements over time.
- Ensure that the housing debt can be financed over time
- Explore the options and opportunities to develop a programme for new build and regeneration in the borough.

A light touch review has been undertaken to update the HRA Business Plan to update the financial model and test the resilience of the plan to deliver the Council's objectives. A full review of the plan will be undertaken during 2014/2015.

The Council has progressed the plan significantly since its approval including:

- Progressing regeneration of Tinkers Green and Kerria
- Undertaking an updated stock condition survey and investment plan
- Reviewing opportunities for delivery of further regeneration and new build including exploration of alternative delivery models
- Delivery of a comprehensive tenant involvement programme and co-regulatory framework

- Successful delivery of the investment programme including the delivery of environmental improvements

Since the plan was approved a number of factors have changed with potential impact on the delivery of the plan. These include:

- An increase in the level of Right to Buy sales from the housing stock
- The implementation of Welfare Benefit Reform with potential implications for rental income
- Changes to rent convergence arrangements

These issues have been reviewed as part of the update work.

Principal outcomes of the current review are that:

1. There will be sufficient resources over the long term to meet the council's obligations towards its existing stock, the housing debt and towards tenants in terms of service delivery
2. There will be additional resources arising in the short to medium term within the business plan which can be reinvested in meeting more of the council's priorities
3. There will be resources available to commence a new build and regeneration programme and to complete the redevelopment of Tinkers Green and Kerria in the HRA within 5 years
4. The availability of resources to meet the council's obligations should be resilient to changes in financial conditions as far as these can be reasonably predicted.

The updated business plan model provides an opportunity for the Council to develop plans for the development of new affordable housing utilising HRA resources in addition to current plans regarding regeneration of Tinkers Green and Kerria.

The attached Business Plan update provides an outline of these potential opportunities including:

The acquisition of properties on the open market to increase the Council's housing stock  
The re-development of Council owned land assets, including HRA garage sites to provide new homes and if developed with the HRA increase the Council housing Stock

The loss of properties through the Right to Buy is an ongoing risk for the Council and the updated business plan provides an opportunity to replenish the Council owned stock ensuring that the asset base retains a necessary critical mass and contributing to the delivery of central Government objectives of a 'one for one' replacement at a National level.

A further report will be submitted to Cabinet by July 2014 to agree the specific programme and delivery of this aim.

## **RESOURCE IMPLICATIONS**

The updated Business Plan has informed the development of the Council's MTFs and Capital Programme.

The HRA Business Plan update confirms that, based on current financial assumptions, the Council's expenditure plans can be met. This includes:

The management and maintenance of the stock  
Payment of debt  
Investment in the stock

Delivery of regeneration and new affordable housing

The Council therefore has assurance that its HRA is on sound financial footing.

#### **LEGAL/RISK IMPLICATIONS BACKGROUND**

The major financial risks have been assessed as part of the update as discussed in the attached report. The delivery of individual schemes and projects within the plan are subject to detailed risk assessment.

#### **SUSTAINABILITY IMPLICATIONS**

The Maintenance of the Council's housing stock is of significant benefit in delivering the Corporate Objectives and Sustainability Strategy.

The Business Plan provides an opportunity to increase the supply of affordable housing to meet housing need, regeneration of neighbourhoods and ensuring the best use is made of the Council's assets.

#### **BACKGROUND INFORMATION**

Please see the attached HRA Business Plan Summary Documents for further detail.

#### **REPORT AUTHOR**

Rob Barnes: Director of Housing and Health

#### **LIST OF BACKGROUND PAPERS**

#### **APPENDICES**

Appendix One: Housing Revenue Account Update Summary 2014

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Tamworth Borough Council

Housing Revenue Account Business Plan  
Update Summary

**March 2014**

## **Introduction**

This summary paper presents an update to Tamworth's Council Housing Business Plan. The plan was approved by the council in March 2012 in the run-up to the implementation of self-financing for the Housing Revenue Account (HRA). Since then, we have been delivering against the priorities set within the plan which have been to:

- Deliver customer focused and efficient housing management and repairs services to tenants
- Ensure that the existing stock is maintained effectively, including meeting the decent homes standard and needs for other improvements over time.
- Ensure that the housing debt can be financed over time
- Explore the options and opportunities to develop a programme for new build and regeneration in the borough.

A key priority within the plan has been to identify opportunities for the regeneration and new development of council housing in Tamworth. In particular, two challenging areas that require short-term action in order to reverse decline are Tinkers Green and Kerria. A review supported by external advisers and specialist development consultants has identified the potential for redevelopment of the sites and the likely building costs. Having explored alternative options for financing the regeneration of the sites, it has become clear that the council favours direct replacement with new council housing.

The new opportunities within self-financing, together with the history of prudent financial and resource management within the HRA have now put the council in a position where we are able to carry out the regeneration of Tinkers Green and Kerria ourselves, whilst at the same time ensuring a viable and sustainable future for the remainder of the existing council housing stock.

Detailed work has therefore been undertaken to update all of the financial modelling and assumptions supporting the business plan.

It is intended to carry out a full update of the business plan in the next year, including:

- Assessment of relative priorities compared to changing housing needs and demographics in the Tamworth
- Consultation with tenants, residents and other stakeholders on future priorities.

A detailed update of financial assumptions and further work to refine and update stock condition and asset management data will also be carried out to support the new plan.

As with previous versions, the business plan will be a public document and therefore an important statement of the council's commitment to a sustainable future for its council housing – the aim is to publish in the spring of 2015.

**Business Plan: links to budget and capital programme**

Detailed financial modelling has been developed to support this business plan update. This generates a detailed and fully-funded 5-year revenue and capital programme for the HRA from 2014-2019.

The plan has been based on the 5 year Medium Term Financial Strategy (MTFS) presented to members in November 2013. The process of updating the business plan has allowed a review of some of the assumptions made within the MTFS – the outcome of this has been to refine a small number of assumptions within the budget, the MTFS and the business plan – these are set out below.

At the same time, an update to the Stock Condition Survey database was commissioned from Ridge. The pattern of future major repairs and improvements are in line with previous survey updates. This has led to some refinement being applied to the 5 year renewals capital programme previously reported. A completely new survey will be commissioned during the course of the 5 year plan.

Further work has also been undertaken to develop outline phasing and a programme for regeneration and new build schemes, developed in conjunction with external advisers. The process adopted for the business plan has therefore enabled us to identify in detail the funding streams supporting the proposed new build schemes.

### **Business plan forecast: A Sustainable and Viable plan**

The business plan baseline forecast model utilises the MTFS for 2014.15 to 2018.19 as the basis for forecasting revenue and capital expenditure and income forward over 30 years.

The fundamentals of the forecast for the HRA business plan are unchanged from last year. The plan is sustainable and financially viable, enabled through the implementation of self-financing in April 2012. The four key conclusions from the forecast are:

1. There will be sufficient resources over the long term to meet the council's obligations towards its existing stock, the housing debt and towards tenants in terms of service delivery
2. There will be additional resources arising in the short to medium term within the business plan which can be reinvested in meeting more of the council's priorities
3. There will be resources available to commence a new build and regeneration programme and to complete the redevelopment of Tinkers Green and Kerria in the HRA within 5 years
4. The availability of resources to meet the council's obligations should be relatively resilient to changes in financial conditions.

Whilst the forecast shows how future costs can be covered across the life of the plan (30 years), in practical terms the focus of this update is on setting the plan for 5 years.

The council is therefore able to embark on the 5-year plan with the comfort of knowing that the programme can be sustained in the long term.

### **Assumptions of future behaviour**

In projecting forward over 30 years, we have made assumptions around the future changes in income, expenditure, stock investment and new build needs. A short commentary on each of the assumptions within the forecast is set out below.

#### Economic and policy assumptions

Core inflation within the plan is based on the government's move to CPI as the basis for rent increases from 2015 onwards - 2.5% for income and both revenue and capital expenditure in the second year and 2.0% for all years thereafter; this is in line with the long term economic prospects published in the government's most recent forecast in the Autumn Statement 2013. Rent increases are based on an underlying CPI+1% - 3.5% for 2015.16 and 3.0% for all years from 2016.

#### Property numbers

HRA stock numbers are forecast to be 4,457 on 1<sup>st</sup> April 2014.

Right to Buy sales completions have increased in 2013.14 and are therefore projected to reach 50 pa for the first 5 years of the plan. We then expect a slowdown in sales to 24 pa from 2019 reducing to 20 pa over the longer term.

Pending the redevelopment of the sites, the current Tinkers Green and Kerria units are removed from debit for demolition during the period 2015-2017 – 135 units in total, with voids and arrears totals adjusted accordingly.

#### Rent income

Rent increase are subject to a change in policy towards rent convergence from the Government – the effect is that there will be no allowance for further convergence to target rents from 2015 onwards for existing tenants. Re-let at target rents when properties have become void will still be allowed.

Progress on convergence at Tamworth has been delivered annually in line with government expectations. We are therefore very close to average target rent across the stock. This means that a core assumption of CPI+1% rent increases annually is supportable and that no specific action towards convergence is recommended for the rent increase in April 2014.



Forecast average rents in 2014.15 are £79.94 on a 52-week basis, £86.60 charged to tenants on a 48-week basis

Voids rates are assumed to be 1% pa for all years – same as for previous years.

The provision set aside for bad debts needs to reflect changes in welfare reform and housing benefit. In the original business plan and MTFs, we assumed prudently that bad debts would rise to require £470k set aside annually from the HRA – this was primarily based on the then thinking around roll-out of Universal Credit. Two factors have now allowed us to reduce the contribution for 2014-2016:

- The delay in implementation of Universal Credit
- The impact of the Bedroom Tax Subsidy has started to work through into actual arrears levels so we have a clearer idea of what has actually happened.

We have therefore reduced the contribution to £220k in 2014.15 and 2015.16 retaining the increase to £470k in 2016.17. Within the Business Plan this has released £500k of revenue resources from the MTFs to support the capital programme.

#### Revenue income and expenditure

Core CPI inflation has been applied to management costs, maintenance costs and non-rent sources of income (garage rents, service charges). These have been modelled in line with the MTFs and take account of planned service enhancements and changes over the 5 year period.

#### Debt management and interest

The council took a prudent approach to the funding for the self-financing settlement debt, opting to take out several stable long-term loans for between 40 and 50 years.

Prior to self-financing, there were a small amount of loans already in place relating to HRA debt – some of these fall for repayment in the first 5 years of the plan. These will be refinanced on a like-for-like basis with the aim of securing a lower average interest rate across the HRA debt portfolio of 4.05% by 2019, reducing from 4.37% in 2014.15, including internal borrowing.

The overall approach remains one of debt-maintenance within the HRA, with the addition of new loans as required to support new build and regeneration.

#### Capital investment and renewals

The update to the stock condition survey was undertaken during October and November 2013. The process resulted in an updated estimate of stock

investment needs over the next 30 years when applied to individual stock elements and life cycles.

The outputs from the update are in line with previous exercises, taking into account that the council has undertaken works to achieve the decent homes standard and other investment priorities. A detailed review process has been undertaken to assess the needs identified within the survey profile against known conditions 'on the ground'. For example, some of the works identified as 'catch up' within the survey profile would not be put into the capital programme, but dealt with as day to day repairs when need arises.

The outcome of the exercise has been to establish a 5-year capital renewal programme totalling £23.0m which ensures that the stock continues to meet the decent homes standard and other structural/environmental needs; the programme addresses the following major elements:

- £9.8m kitchen and bathroom renewal programme
- £2.9m gas central heating£1.5m for windows and doors
- £1.5m general environmental and fencing improvements
- £1.4m lift renewals in high rise blocks
- £1.1m disabled facilities adaptations in the council stock
- £0.8m structural and balcony works.

The detailed capital renewals programme is set out in appendix 2.

The total 30 year capital investment need for the current stock contained within the plan is £157.4m, the equivalent of £33,841/unit or £1,128 per unit per year. This represents a sustainable basis for the stock to continue in its current use and is able to be financed through the resources generated by the plan over the longer term.

#### Financing the capital programme

As a result of changes to international accounting standards, the council must move to a 'component-based' approach to financing the capital programme through depreciation within 5 years of the implementation of self-financing (ie by 2017). Until that date, the government has allowed councils to continue to utilise the Major Repairs Allowance calculated as part of the self-financing settlement as the basis for depreciation. We have therefore included an amount of £4.482m annually per the MTFs for depreciation, adjusted within the Business Plan for changes in property numbers as a result of regeneration and new build.

In addition, we have assumed significant amounts of revenue will be committed to finance capital expenditure, both in the current year and for future regeneration and new build schemes.

In total, £18.8m of revenue resources have been assumed to be committed in this way, a combination of Revenue Contributions to Capital and contributions made to the Regeneration Reserve. This allows us significant flexibility in applying resources to financing investment, especially when combined with

capital reserves and other receipts arising from increased Right to Buy sales (see below).

### **Baseline Business Plan: sustaining the current stock**

The business plan model has been developed to exemplify how the council is able to sustain the existing stock on a viable basis for 30 years, subject then to identifying priorities for additional investment.

The core business plan forecast results in the following key headlines:

- All service management costs are able to be covered in all years
- The expected increase to arrears from Universal Credit can be sustained in the short to medium term
- The capital renewals programme is able to be financed from revenue set aside from a combination of depreciation and direct contributions to capital

The carry forward reserves position at March 2019 would be a total of £23.2m comprising resources in capital reserves, the Regeneration Reserve, the Major Repairs Reserve and the HRA Reserve. The core HRA reserve would be £1.4m<sup>1</sup> (£1.5m within the MTFs after the inclusion of further savings from agile working and pension costs).

Providing the landlord service is managed to the assumptions made within this summary, the HRA 5-year financial position is very strong and enables the council to be able to begin to achieve its new build ambitions.

### **Realising the council's new build ambitions**

#### *Background*

Since the implementation of self-financing, there has been a series of discussions within the council, utilising the advice of external advisers, on the opportunities and options for the council to directly deliver new affordable housing in the borough.

As well as building within the HRA, options around separate delivery vehicles or partnerships with housing associations or the private sector have been considered.

Much of this work has been undertaken on the basis of the options for the redevelopment of Tinkers Green and the Kerria, two sites where there is consensus that regeneration is long overdue. This approach has allowed us to investigate options with more of a practical view rather than simply looking at the theory.

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<sup>1</sup> This compares to £889k reported in the draft MTFs November 2013 – the difference arises mainly due to the reduction in bad debt provision contribution that has been made within the first 2 years of the plan

A key benefit of the approach that has been taken is that we have collected a lot of information about the sites, local housing needs and the potential costs of redevelopment. This has enabled us to model in some detail a phased programme for the two schemes against the resources available within the HRA.

At the same time, we have identified a series of potential sites where infill and other small-scale additions to the housing stock could be made, beginning with Bloomfield Way, but also potentially extending to the development and/or acquisition of new homes at a rate up to 15 per year.

The business plan position within the HRA now makes it sustainable to deliver the regeneration of the two sites as new HRA council housing, without the need to seek an alternative financing option for either, as well as deliver further plans to increase the supply of affordable housing and regenerate neighbourhoods. This may include an initial garage and small-site renewal programme, with options around the acquisition of stock (for example former Right to Buy homes that might come onto the market).

#### Regeneration and new build plans

The plan has been modelled on the delivery of 4 schemes to deliver new homes within the first 5 years of the plan. All homes built in the HRA would be subject to the usual legislative requirements around tenancies.

We have also assumed rents at a higher level than traditional 'target' social rents, to reflect the fact that these will be brand-new properties built to a modern standard of design and energy efficiency.

#### *Bloomfield Way*

This garage site has been identified as an area that has potential to be developed in the short term to deliver 2x1-bed flats and 1x2-bed house at a cost of £335,600 financed entirely from the Regeneration Reserve.

#### *Kerria*

The plan is to demolish the existing site (which would take 41 units out of debit) and replace with 55 newly built rented units built in the two years from 2015 to 2017. Although the build would take place during those 2 years there would be a need for some capital costs to be incurred earlier to reflect development agent set-up costs.

The new scheme will have a mix of 1- & 2-bed flats, 2-, 3-, and 4-bed houses and cost a total of £7.275m to develop, including all design, add-ons and overheads. This is line with the report received from advisers Ark Consultancy on the current market rates for design, development and construction.

The scheme will be financed through a combination of Regeneration Reserve, revenue contributions, capital reserves brought forward in 2014, Right to Buy receipts and additional top-up borrowing.

An additional allocation of £600k development agent costs has also been brought forward from 2013.14 and allocated against this scheme in 2014.15 financed through brought forward capital reserves.

On a prudence basis, no assumption of rent income has been included until the site is completed (April 2017). However, in practice, it is likely that some properties will be completed and able to be occupied on a phased basis. This would enhance net revenue income during the development period.

### *Tinkers Green*

The plan is to demolish the existing site (taking 94 units out of debit) and replace with a scheme of 127 units, 20 of which would be for sale realising a profit for reinvestment in the affordable rented homes in the new scheme.

Of the 107 rented homes, 43 would be flats and 64 houses and these would be built over a period of 3 years from 2015-2018.

The total costs provided for within the plan are £15.468m including all design, add-ons and overheads. Again, this is in line with the report received from advisers Ark Consultancy on the current market rates for design, development and construction.

The scheme will be financed through a combination of profits from sales (£1.3m), resources from the Regeneration Reserve, revenue contributions, capital reserves brought forward in 2014, Right to Buy receipts and additional top-up borrowing.

As with Kerria, on a prudence basis, no assumption of rent income has been included until the site is completed (April 2018).

### *General new build and acquisitions*

In order to allow the council to continue to deliver its ambitions of adding to the housing stock beyond the completion of Tinkers Green and Kerria, we have included a general programme of 15 units per year from 2015.16, with a generic combination of flats and houses (half and half).

£1.605m annually has been provided for in the plan, continuing with inflation beyond the 5 year period and included in all years through the lifetime of the plan.

Longer term plans to make a contribution towards additional stock will come from revenue resources via the Regeneration Reserve.

### *Building capacity*

Over 5 years, this plan contains ambitions to deliver over £30m of schemes comprising 225 new homes. This is rightly ambitious and will require the commitment of officers and members to ensure effective delivery.

Although the Council has considerable experience in the development and financing of new affordable housing development. It will be necessary however for the Council to review its capacity and the Council will review its options for delivery. In particular the Council will consider the appointment of a development agent or other external support to advise on scheme design, planning and procurement of developers/builders. It will also be necessary for the Council to review internal capacity for the delivery of any future development programme and the financing for any new resources required will be identified within the overall capital programme.

### Financing new build

The capital resources available to finance our new build and regeneration programme will come from a range of sources, and will be committed in the following order:

- Regeneration Reserve: ultimately these funds have been generated from HRA revenue and allocated for reinvestment in new or redeveloped homes. We have set out our plans to invest £12.4m of revenue in this way and carry forward a balance of £1.8m at the end of the 5-year period. We will need to consider the level of resources we plan to place into this reserve beyond 2019 as we update the business plan on an ongoing basis.
- Direct revenue contributions: in addition to those being allocated via the reserve, we have also provided for £6.4m of resources direct from the HRA to support the capital programme.
- Capital Reserves: we have a cumulative £2.55m of capital resources able to be committed to support new build.
- Sales proceeds: for the Tinkers Green development, the profits on the sale of 20 units are forecast to amount to £1.3m.
- Additional Right to Buy receipts: the council entered into the 'one for one replacement' agreement with the government in 2012. This allows us to reinvest additional receipts into replacement housing following the reinvigoration of the Right to Buy introduced in April 2012. The rules around reinvestment mean that all receipts beyond a minimum set in the self-financing settlement are able to be reinvested into new homes providing that they do not exceed 30% of scheme costs. We are also able to take into account an element of the receipts that relate to assumed debt on sold properties. Failure to reinvest these receipts in new homes could mean that they are surrendered to government (with interest). Current projections of available receipts suggest a minimum of £3m available over

5 years with a *requirement* to commit some of these in the first 3 years. We have therefore assumed that this amount is available to support Tinkers Green and Kerria. This is a prudent assumption and there is a high probability that additional receipts may exceed this amount – we will need to keep options under review for deploying these receipts and be ready to switch funding sources within the first 5 years of the plan.

- **Borrowing:** we have headroom beneath the debt cap of £11.3m and this has been left undrawn as the end of 2013.14. Where necessary we will draw down on new borrowing to complete new build schemes, particularly focused into Kerria and Tinkers Green. The plan forecast shows that £5.8m of borrowing will be needed to top-up the resources in order to complete the two schemes. There are treasury management options as to the format of this borrowing (could be internal or external, long or short term etc) and we will keep these under review. This differs from the approved MTFS by £1.4m represented by the additional revenue underspends from the bad debts provision and a greater use of HRA revenue balances over the 5 year period.

In addition to the above resources, the capital renewals programme will be financed by depreciation and the Major Repairs Reserve. There will need to be minor financing adjustments on an annual basis to ensure that both the renewals programme and new build programme are able to finance by the appropriate sources of finance.

### **Summarising the HRA Business Plan**

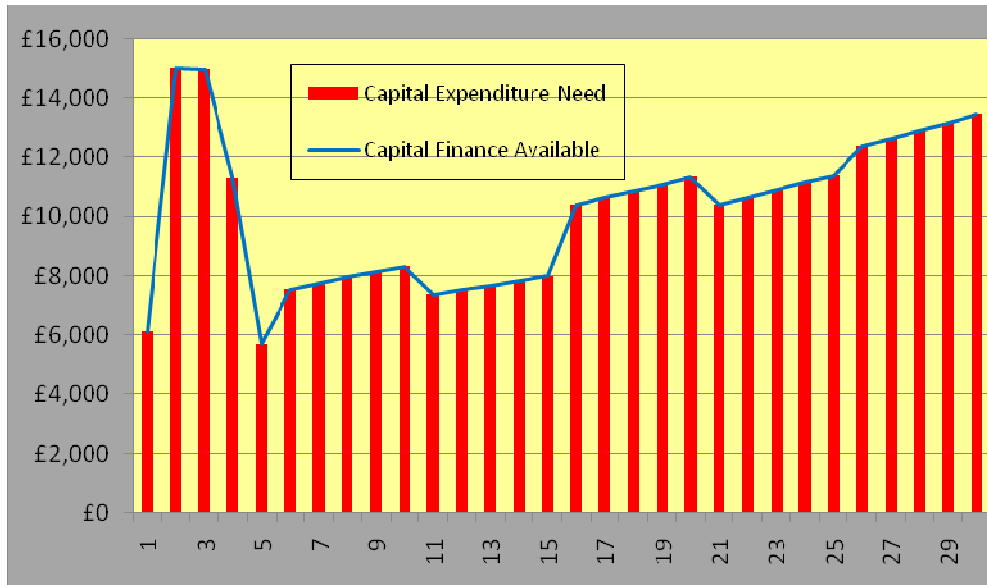
The business plan represents a balanced investment into the priorities of the council, ensuring the resources that are available are used in the most effective way.

#### *A sustainable business plan*

The detailed revenue and capital forecasts are shown at appendix 2.

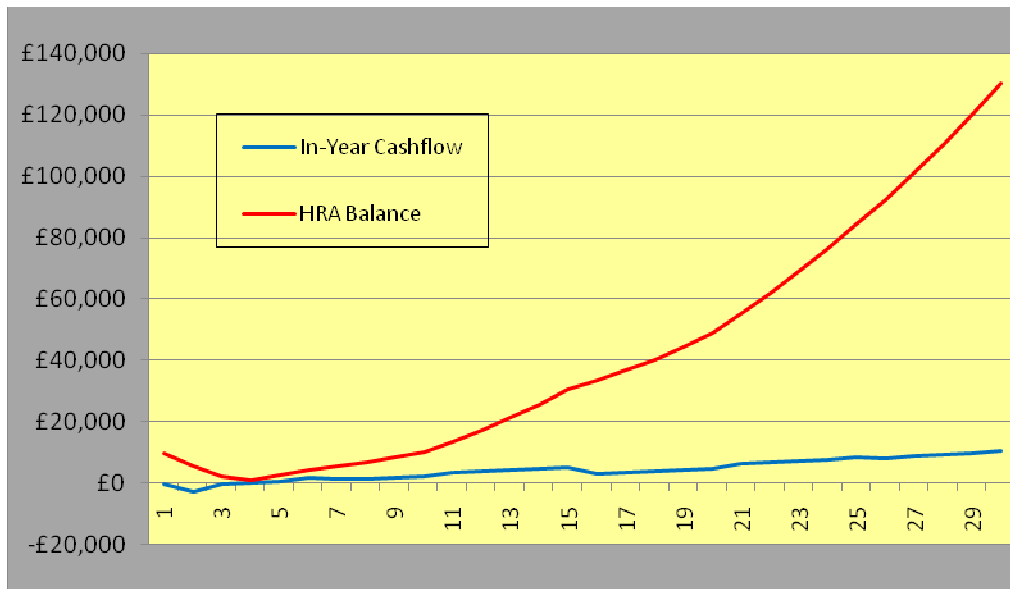
The charts below summarise the capital and revenue business plans shown in a 30 year dimension to highlight that the detailed 5 year plan is affordable over the long term.

*Chart 1: capital programme and financing over 30 years*



The chart highlights the extent of increased investment driven by the new build programme commencing in year 2 (2015.16).

*Chart 2: HRA revenue and reserves forecast*



The chart highlights that the plan's resources are committed fully to the delivery of priorities in the first 5 years with longer term surpluses generated within the plan, particularly after 10 years.

We therefore have multiple options open to us in considering future business planning opportunities beyond this initial 5 year timeframe. The business plan update next year will give us the opportunity to assess priorities and think through these options with tenants and residents.

The long term forecast allows the council the comfort of knowing that there is the capability to cover its debts (ie repay debt in the unlikely event that such a policy became a future requirement).

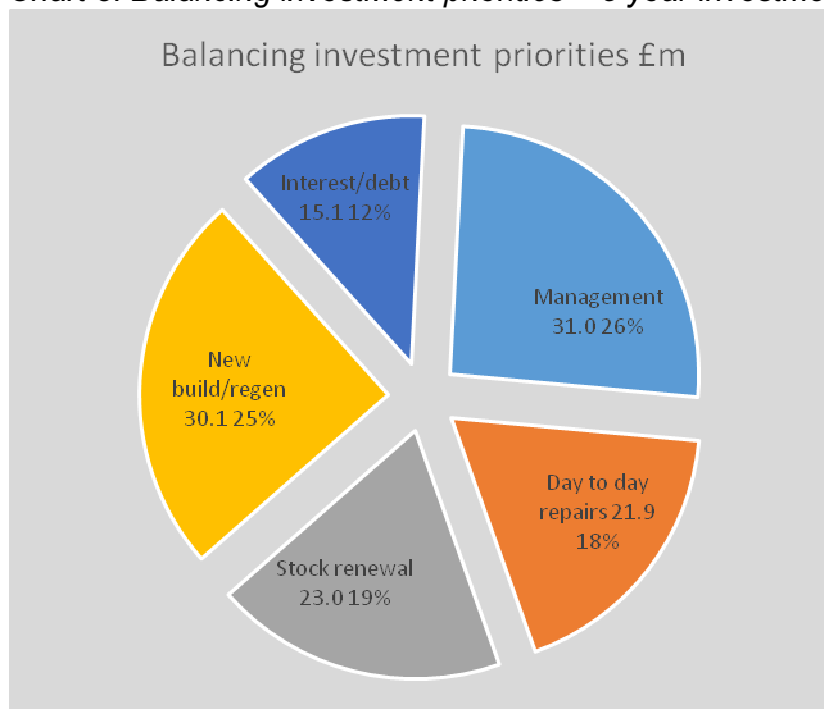


Allocating resources to priorities

In order to illustrate that the business plan represents investment into a range of priorities, the chart below shows the way in which resources are committed between the key priorities of service delivery, stock renewal and new build, all compared to the amount set aside to cover housing debt.

This highlights the substantial commitment the council is making towards realising our ambitions towards new build and regeneration (how this is featuring as a priority – backed by money) and the importance of putting in place measures to ensure the money is spent.

*Chart 3: Balancing investment priorities – 5 year investment £m / %*



Sensitivities

As will be seen, the business plan forecast provides for substantial surpluses resources to build up over the long term with a 5 year programme that is fully funded and committed.

We have analysed the sensitivity of the plan to changes in assumptions and/or economic conditions. The outcome is shown in the table below highlighting the impact on the reserves position at year 5, year 10 and year 30.

*Table 1: Sensitivity of business plan to changes in assumptions*

Sensitivity table	Reserves at
-------------------	-------------

£'000's	5 year	10 year	30 year
<b>Business plan</b>	<b>791</b>	<b>8,455</b>	<b>128,566</b>
<b>Economic assumptions *</b>			
Inflation plus 1%	1,907	13,089	185,427
Inflation minus 1%	-308	4,634	82,662
Cost inflation plus 1% higher	791	6,670	71,876
<b>Policy changes / decisions</b>			
Rent increases CPI only - from year 11	791	6,474	47,690
Rent increases CPI only - from year 2	-982	1,922	16,571
No new build programme	1,465	17,001	143,188

\* Note - the plan is not sensitive to interest rate variations given the way the council approach the financing of the self-financing buy-out. Increased interest rates could impact on the cost of borrowing for new build but this would of marginal overall impact on the plan in the long term.

The table shows that the plan is resilient to most changes in policy and assumptions but highlights two things:

- That inflation is a driver of value in the plan – the higher inflation, the better it is for the business plan, providing inflation applies evenly to income and expenditure.
- The critical importance of achieving planned rent increases over the long term, but particularly in the early years of the plan.

In the unlikely event that inflation is below 2% over 5 years or that the council determines in the next 5 years to implement lower rent increases than are included in this plan, the main mitigations the council can apply are to:

- Reduce revenue expenditure to ensure reserves and contributions to capita can be maintained
- Slip the regeneration and new build programme so that it is phased over more year.

## Conclusions

- There will be sufficient resources over the long term to meet the council's obligations towards its existing stock, the housing debt and towards tenants in terms of service delivery
- There will be additional resources arising in the short to medium term within the business plan which can be reinvested in meeting more of the council's priorities
- There will be resources available to commence a new build and regeneration programme and to complete the redevelopment of Tinkers Green and Kerria in the HRA within 5 years – these now form part of the business plan
- The availability of resources to meet the council's obligations should be relatively resilient to changes in financial conditions.

The plan therefore represents an ambitious and proportionate programme for investment in services, the existing stock and regeneration and can be implemented with confidence.

## Appendix 1

### SUMMARY 5 YEAR REVENUE AND CAPITAL FORECASTS

#### 5 year HRA revenue forecast

HRA 5 year forecast	1	2	3	4	5
	2014.15	2015.16	2016.17	2017.18	2018.19
Rent income	18,239	18,304	18,870	19,691	20,379
Other income	2,280	2,292	2,305	2,317	2,330
<b>Total income</b>	<b>20,519</b>	<b>20,596</b>	<b>21,175</b>	<b>22,009</b>	<b>22,709</b>
Management	-5,942	-6,049	-6,247	-6,349	-6,450
Repairs and Maintenance	-4,123	-4,242	-4,371	-4,494	-4,621
Bad debt provision	-220	-220	-470	-470	-470
<b>Operating expenditure</b>	<b>-10,285</b>	<b>-10,511</b>	<b>-11,087</b>	<b>-11,313</b>	<b>-11,540</b>
<b>Operating surplus</b>	<b>10,234</b>	<b>10,085</b>	<b>10,088</b>	<b>10,695</b>	<b>11,168</b>
interest on debt	-3,000	-3,001	-3,054	-3,005	-3,021
Interest in balances	67	55	27	10	15
Depreciation	-4,484	-4,423	-4,503	-4,555	-4,570
<b>Net operating income</b>	<b>2,817</b>	<b>2,715</b>	<b>2,557</b>	<b>3,145</b>	<b>3,592</b>
Contribution to Regen Reserve	-3,540	-3,446	-1,725	-1,825	-1,825
Revenue direct to Capital	0	-2,328	-1,379	-1,379	-1,379
<b>In year balance</b>	<b>-724</b>	<b>-3,059</b>	<b>-547</b>	<b>-59</b>	<b>388</b>
HRA reserve b/f	<b>4,792</b>	4,068	1,009	462	403
HRA reserve c/f	4,068	1,009	462	403	<b>791</b>
MTFS approved Feb 2014	4,314	1,394	1,264	1,285	<b>1,492</b>

#### 5 year Capital Programme with sources of finance

Showing separate financing streams for Capital Renewals and New Build/Regeneration.

	1	2	3	4	5	5 yr Capital
£'000's	2014.15	2015.16	2016.17	2017.18	2018.19	Total
<b>Capital maintenance</b>	<b>5,167</b>	<b>5,079</b>	<b>4,271</b>	<b>4,359</b>	<b>4,090</b>	<b>22,966</b>
<b>Major Repairs Reserve (MRR)</b>	<b>5,167</b>	<b>4,850</b>	<b>4,503</b>	<b>4,555</b>	<b>3,839</b>	<b>22,914</b>
<b>Balance on MRR</b>	<b>0</b>	<b>-229</b>	<b>232</b>	<b>196</b>	<b>-251</b>	<b>-52</b>

Bloomfield	336	0	0	0	0	<b>336</b>
Kerria *	500	2,930	3,845	0	0	<b>7,275</b>
Tinkers Green	0	4,890	5,239	5,339	0	<b>15,468</b>
General new build	0	1,605	1,605	1,605	1,605	<b>6,420</b>
<b>Total Regeneration</b>	<b>836</b>	<b>9,425</b>	<b>10,689</b>	<b>6,944</b>	<b>1,605</b>	<b>29,499</b>
<i>Financed by...</i>						
Regeneration Reserve	336	4,100	4,100	2,500	0	<b>11,036</b>
Release of capital reserve	500	489	489	489	489	<b>2,456</b>
Sales proceeds	0	0	649	649	0	<b>1,298</b>
Additional RTB receipts	0	1,000	1,000	1,000	0	<b>3,000</b>
Borrowing	0	2,242	2,846	739	0	<b>5,827</b>
Revenue direct	0	1,823	1,373	1,371	1,367	<b>5,934</b>
MRR balance transferred	0	-229	232	196	-251	<b>-52</b>
<b>Total regen financing</b>	<b>836</b>	<b>9,425</b>	<b>10,689</b>	<b>6,944</b>	<b>1,605</b>	<b>29,499</b>

\* Development agent start-up costs allocated against Kerria for convenience, in practice will apply across all new build schemes

## Appendix 2

### 5-YEAR CAPITAL RENEWALS PROGRAMME

£'000's	2014.15	2015.16	2016.17	2017.18	2018.19	5 years
Bathroom Renewals	851	871	890	909	929	<b>4,450</b>
Disabled Facilities Adaptations	205	209	214	219	224	<b>1,071</b>
Gas Central Heating Upgrades and Renewals	545	558	570	582	595	<b>2,850</b>
Kitchen Renewals	1,019	1,042	1,065	1,089	1,113	<b>5,328</b>

Roofing - High Rise	43	44	0	0	0	87
High Rise Lift Renewal	328	335	342	350	0	1,355
Major Roofing Overhaul and Renewals	147	150	153	157	160	767
Fire Upgrades to Flats	553	565	0	0	0	1,118
General Estate Works	256	262	268	273	279	1,338
Window and Door Renewals	286	292	299	305	312	1,494
Contingency	100	100	100	100	100	500
Gas Heating at Belgrave	278	285	0	0	0	563
Electric Heating removal at Belgrave	41	0	0	0	0	41
Carbon Monoxide Detectors	102	0	0	0	0	102
Agile Working	51	0	0	0	0	51
Fencing and structural	190	190	190	190	190	950
Capital Salaries	162	166	169	173	177	847
CDM Fees	9	11	11	11	11	53
<b>Total</b>	<b>5,167</b>	<b>5,079</b>	<b>4,271</b>	<b>4,359</b>	<b>4,090</b>	<b>22,966</b>

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