



North Warwickshire
Borough Council

Local Plan
(November 2016)
Representation Form

Ref:

(for official use)

Please return to North Warwickshire Borough Council by **31st March 2017**
(email to planningpolicy@northwarks.gov.uk or post to Forward Planning Team, North Warwickshire Borough Council, The Council House, South Street, Atherstone, CV9 1DE

All representations will become public

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Do you support the Local Plan? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
If yes, we would like to know why you support the document. If no, please explain why and what changes you would like to see to the document	
Paragraph No	COMMENTS
7.36	The commitment to deliver 500 dwellings for Tamworth remains as set out in the Memorandum of Understanding. It should follow that a site is identified (as with the employment site below to help meet Tamworth's employment requirement). A further commitment to meeting the balance of Tamworth's housing requirement is intimated in paragraph 15.44 and this too should be incorporated within the plan and sites identified to meet the requirement.
7.46	It is suggested that a site allocation at land to the west of Junction 10 M42 will help meet a proportion of the 14 hectares that Tamworth require to meet its employment needs. The allocation is welcomed; however the 14 hectares should be seen as a minimum figure. HS2 will impact on this site and it may not be available in future in which case a reserve site should be identified. The draft plan states that additional housing and employment needs will be considered within the Greater Birmingham HMA requirement which suggests that individual sites will not be identified that would directly contribute to Tamworth's requirement. We would prefer to see a clear commitment to how much of Tamworth's unmet needs are being met (presumably you will have agreed with Lichfield on the balance) and how these will be met.
15.43	"The site south-west of Junction 10 of the M42 is seen as part of the neighbouring local authority due to its physical location and access through Page 70 Relay Park means it is read as

being part of Tamworth. For this reason the Borough Council will accept that this contributes to the proportion of 14 hectares being sought by Tamworth Borough Council.”

Similar criteria should be applied to sites that can be read to be aligned with Tamworth. The 25.4 hectare site to the south-east of the M42 Junction 10 that was granted outline consent at appeal (decision date 28th November 2016) for B1, B2 and B8 uses falls into a similar category due to its proximity to Tamworth. As with the site above, a proportion should be allocated to Tamworth which would go towards meeting employment needs. The residential proposal site at Robey’s Lane also displays very similar attributes and access is being stipulated to be provided through a development site within Tamworth that will be delineated from the rest of North Warwickshire by the Meaningful Gap. It will clearly relate more to Tamworth than North Warwickshire.

15.44

The approach being taken to meeting the remaining 825 required to meet Tamworth’s housing need is confused. There is an aspiration to provide an additional number of units to meet the needs arising from the Greater Birmingham Housing Market Area of which Tamworth is part. The 3790 units being provided for the GBHMA will also meet a proportion of Tamworth’s need. This infers that only a proportion of the 825 units will be delivered as only part of the GBHMA need will be met.

Migration and commuting patterns have been suggested as a reasonable basis to test the delivery of additional housing units that amount to 10% of the GBHMA requirement (3790 out of 37,900 total requirement). On this basis it can be assumed that 10% of the Tamworth requirement would be met through this approach and an additional 82 units would be delivered. The remainder would therefore fall to Lichfield (743 units). It is felt that this is not a sustainable approach and does not conform to the Duty to Co-operate.

It is requested that the Tamworth requirement is separated from the GBHMA requirement and specific sites are identified that would also avoid any issue of double counting. Without this level of clarity, the distribution of housing numbers is confused and not properly justified.

Tamworth has not been able to implement the requirement for a single pitch identified through the Gypsy, Traveller and Travelling Showpeople Accommodation Assessment.

Tamworth would request that the requirement for a single pitch to meet Tamworth’s need be considered as an allocation cannot be progressed in the Borough at present.

The role that North Warwickshire is providing to assist in addressing the housing shortfall within the GBHMA is acknowledged and supported. Similarly, the aspiration to assist Tamworth in meeting its employment and housing needs is also welcomed and it is recommended that this is captured within a revised Memorandum of Understanding at the appropriate time.

Do you support the Policies LP1 – LP40?

YES

NO

Poicy Number(s) 39

Please give your reason below

LP39 Housing Allocations

Tamworth strongly objects to the housing allocation at Robey's Lane. The unacceptable reduction in the area within the meaningful gap has been used to provide a site to deliver development at the boundary of Tamworth but maintain a buffer between this development and the rest of North Warwickshire. In effect North Warwickshire is facilitating development that will be seen to extend Tamworth into North Warwickshire where previously a clear separation existed.

The scale of development proposed will impact significantly on services and infrastructure within Tamworth and there is no mention of any corresponding contributions to Tamworth to mitigate the impact of development at this location. The lack of supporting evidence and justification for the proposed allocation should necessitate its removal from the plan.

Tamworth Borough Council is extremely concerned that this allocation, along with allocations around Polesworth will increase traffic numbers on the local network leading to a more than significant impact, particularly along the B5000, Pennine Way, A5 and M42 junction. There is no evidence on transportation available that demonstrates the impact and the mitigation required.

Do you support the housing allocations (LP39)? YES

NO

Site Address Land west of Robey's Lane, adjacent Tamworth

Please give your reasons below

The reduction in the area within the meaningful gap has been used to provide an opportunity to deliver development at the boundary of Tamworth but maintain a buffer between this development and the rest of North Warwickshire. In effect North Warwickshire is facilitating development that will be seen to extend Tamworth into North Warwickshire where previously a clear separation existed.

There are serious concerns that the highway infrastructure will not be able to support the scale of development proposed at Robey's Lane and Polesworth. The M42, A5, Penine Way and B5000 corridors suffer from congestion particularly during peak hours and there is no demonstration that there is capacity to accommodate increased traffic numbers or measures that would be required to release capacity. A detailed assessment should be carried out to determine the feasibility and quantity of development that can be delivered as well as an indication of mitigation required. The proposal cannot be deemed to be sustainable development in the context of these concerns and the proposal should therefore be removed from the plan.

The scale of development proposed will impact significantly on services and infrastructure within Tamworth and there is no mention of any corresponding contributions to Tamworth to mitigate the impact of development at this location. Should this site be brought forward against the view of Tamworth, there should be a clear requirement for development at this location to contribute towards provision that may be required in Tamworth including education, open space and green infrastructure, leisure and sports facilities, transport and walking and cycling provision as well as affordable housing.

The release of 66 hectares east of the former Tamworth Golf Course is subject to primary access to be provided via the adjoining Golf Course redevelopment site (only

service/emergency and pedestrian access to be accommodated onto Robey's Lane). It is not clear what the impact would be on the scheme should the access from the golf course not be secured as presumably the development should not come forward. The reference to the primary access to be provided through the former golf course development should be removed as it is outside the scope of a local plan to insist that the developer of a site in a neighbouring authority facilitate a large scheme outside their development site when no such requirement has been placed on them at any time.

Development at the former Tamworth Golf Course has commenced. The Robey's Lane allocation will result in over 2,000 dwellings being built in the short to medium term, there is a concern that two separate sites of this nature in close proximity will distort the market and potentially the rate of delivery. Tamworth is reliant upon this development meeting a large proportion of its housing need and the allocation at Robey's Lane may have an adverse impact. Should housing delivery slow down, Tamworth may have to look at further allocations to boost supply. It is unlikely that the shortfall can be addressed given the constrained nature of the Borough and there may well be a further requirement on North Warwickshire as well as Lichfield to assist in addressing this shortfall. These issues are highlighted within the recent Housing White Paper and evidenced in the preparation of the Birmingham Local Plan.

The 160.8 hectares to the east of Polesworth and Dordon is a significant allocation intended to realise 2000 new dwellings. Again, the proximity to Tamworth will have an impact on its infrastructure. An assessment should be carried out of the feasibility of the proposal and identify any issues requiring mitigation within North Warwickshire and Tamworth that the scheme should address.

Do you support the Employment Allocations (LP40) YES **NO**

Site Address: Land west of Junction 10 M42

Please give your reasons below

This site adjoins Centurion Park within Tamworth and therefore would be seen to serve the needs of Tamworth.

The approach taken to allocate this site to meeting Tamworth's requirement should be extended to other sites for employment and housing needs allowing for easy identification.

The site to the south-east of the M42 Junction 10 granted at appeal allocates 25.4ha for B1, B2 and B8 uses. This site should also be seen as contributing to the needs of Tamworth and the plan should make the proportion available to meet Tamworth's need clear and incorporated into the plan.

These sites should be reflected in a new Memorandum of Understanding.

Do you have any comments to make on the associated consultation documents?

Infrastructure Delivery Plan

Sustainability Appraisal

Please set out your comments below

In view of the comments relating to the proposal at Robey's Lane, the infrastructure requirements generated by the scheme will have the greatest impact on Tamworth and

mitigation in the form of new or improved facilities should be directed to Tamworth.

The IDP makes reference to education, sports, leisure, transport, housing, green infrastructure, social infrastructure, public services, utility services and digital technology. The only area where costs are quantified is education and further studies and reports are required in order to quantify the contributions required in each of the others areas. It would appear that the requirements within the IDP are mainly aspirational and further work is required for it to serve the purpose of an IDP document. The missing elements within the IDP particularly those related to highway infrastructure are a glaring omission as the major proposals revolve around them.

The lack of evidence in the form of highway modelling does not allow for a realistic appraisal of the impact of developments that are being proposed. In particular, the cumulative impacts of development is unknown and in that regard the Sustainability Appraisal cannot be seen to be complete,

The potential contributions to infrastructure within Tamworth can be found within the Local Plan evidence base in a number of detailed studies relating to areas such as sport and leisure, green and blue infrastructure, affordable housing, education and transport.

Do you wish to have your details added to our mailing list? We will then consult you on any further consultations undertaken by the Forward Planning Team YES NO

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