

Lichfield District Local Plan Review Preferred Options

Please return to Lichfield District Council by 5pm on 24th January 2020, by:

- Email: developmentplans@lichfielddc.gov.uk
- Post: **Spatial Policy and Delivery, Lichfield District Council, District Council House, Frog Lane, Lichfield, WS13 6YZ.**

This form can also be completed on line using our consultation portal: <http://lichfielddc-consult.limehouse.co.uk/portal>

PLEASE NOTE: This form has two parts:

- Part A: Personal details.
- Part B: Your representation(s).

Part A: Personal details

	1. Personal details ^{1 2}	2. Agent's details (if applicable)
Title	Mrs	
First name	Anna	
Last Name	Miller	
Job Title (where relevant)	Assistant Director – Growth and Regeneration	
Organisation (where relevant)	Tamworth Borough Council	
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Town	Tamworth	
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¹ If an agent is being used only the title, name and organisation boxes are necessary but please don't forget to complete all the Agent's details.

² Please note that copies of all comments received will be made available for the public to view, including your address and therefore cannot be treated as confidential. Lichfield District Council will process your personal data in accordance with the Data Protection Act 1998. Our Privacy Notice is at the end of this form.

Part B: Your representation

Where in the document does your comment relate:

Part of document	Various – please see below
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General comments:

The Council notes that the proposed new local plan is intended to replace the current local plan strategy (2015) and local plan allocations document (2019). However it is not clear how sites allocated in the 2019 local plan allocations document will be treated as part of the new local plan. The Council would appreciate some clarification on whether sites marked as 'existing housing allocations' on the policies maps are intended to be brought forward into the new plan.

The adopted Tamworth Borough Local Plan 2006-2031 identifies a need for 6,250 additional dwellings by 2031 and available land to provide only 4,425. This leaves a shortfall of 1,825 dwellings. Tamworth Borough Council signed a statement of common ground with Lichfield District Council (LDC) and North Warwickshire Borough Council (NWBC) in September 2018 in which LDC committed to provide 912 dwellings towards Tamworth's unmet need. There is no specific reference within the preferred options document to providing for Tamworth's unmet need; it simply states that 4,500 dwellings will be provided towards meeting the Greater Birmingham and Black Country housing market area shortfall. It is assumed that any unmet need arising from Tamworth would be met within this overall unmet need.

As you will be aware, recent evidence, in the form of the joint Lichfield and Tamworth Housing and Economic Development Need Assessment (HEDNA), demonstrates that Tamworth's housing need should now be considered to be significantly lower than previous evidence suggested, and so there is unlikely to be any unmet need arising in Tamworth over your proposed plan period. In light of this most recent evidence, the Council does not consider it necessary for LDC to specify an amount of housing to be delivered to meet Tamworth's needs at this time. However, the Council wish to make it clear that, on the basis of this evidence, it will not accept meeting Tamworth's housing need as an argument to support development on or in close proximity to the Tamworth border.

Strategic Policy SHA2: Strategic housing allocation land west of Fazeley

The Council notes the proposed allocation of the site to the west of Fazeley which is not directly adjacent to the borough boundary, but is in close proximity to it. It is also noted that the document states that your intention is for the Fazeley strategic allocation (consisting of Fazeley, Mile Oak and Bonehill) to provide facilities and services to meet day to day needs for the settlement and the surrounding rural areas. However at this stage there is very limited information available about the proposal as the key design principles and infrastructure requirements will be addressed through a masterplan at a later date. The Council is concerned that there is currently not enough detail on the allocation to be content that the infrastructure requirements for an allocation of this size will be fully met within the development and that any development has the potential to have a significant impact on infrastructure within Tamworth borough. The Council therefore considers it appropriate to object to the allocation of the site until sufficient information is available to be able to adequately assess the potential impacts of development at the site on Tamworth.

Should a full assessment of the allocation result in an impact to infrastructure and facilities in Tamworth Borough, the Council would expect to be engaged in the development of an Infrastructure Delivery Plan to ensure that any impacts are fully mitigated through the provision of s106 and/or CIL contributions to be made towards affected infrastructure within Tamworth borough.

Strategic Policy ONR1: Green Belt

The Council notes that it is proposed to make a number of changes to the Green Belt in order to accommodate the growth requirements and that two of these proposed changes are within the Fazeley area. The allocated site for 800 dwellings at Fazeley is one of those proposed. When looking at the contribution this parcel of land makes to the Green Belt in the 2019 Green Belt review, less than half of the land was actually assessed (parcel FZ1) and it was concluded that it makes a moderate contribution to the purposes of the Green Belt. The Council is concerned that a full assessment of the housing allocation at Fazeley has not been made and considers this should be done before the plan moves forward. Parcel FZ9 has been identified in policy ONR1 and inset 11 as an area of development restraint to be removed from the Green Belt. This appears to be for the purposes of reserving the site for future development, the need for which is questionable at this point in time. It is considered that a decision on the removal of this area of land from the Green Belt should be deferred until a later plan review when it can be established whether it is required to meet an identified need.

Preferred Policy NS1: New Settlement

The Council notes that preferred policy NS1 sets out your support for the concept of a new settlement to deliver around 10,000 dwellings starting after the end of the proposed plan period (2040). The Council has significant concerns about the lack of detailed information relating to the proposed settlement at such a late stage in the plan making process. It is unclear at this stage what housing need the proposed new settlement would be seeking to meet, and the lack of information on potential locations for the settlement leads the Council to have concerns that a development of this magnitude has the potential to adversely affect infrastructure in Tamworth. It seems premature to jump to a spatial strategy post 2040 to deliver an unquantified housing need without first a) determining such a need exists and b) testing other spatial options at an appropriate time. It is the Council's view that it is doubtful such a policy would be found sound at examination. Notwithstanding this, the Council object to the proposed inclusion of the policy at this stage due to a lack of evidence to support it and available information to be able to determine the potential impacts. The Council would like to make it clear however that were such a policy to be included, it would seek to work with LDC through Duty to Cooperate on the development of the potential new settlement.

Policy Maps Inset 21

The Council objects to the inclusion of Inset 21 North of Tamworth as it is currently drawn and requests that the map be updated to clearly show the boundary between Tamworth and Lichfield in order to illustrate that the existing housing commitments are adjacent to the Tamworth Borough boundary.

Please use this space to provide comments³

³ Continue on a separate sheet/expand box if necessary. Mark any additional pages with your contact details

Signature⁴:	
Date:	

If you require this form in an alternative format please contact Spatial Policy and delivery on 01543 308192 or developmentplans@lichfielddc.gov.uk

More representation forms are available from the District Council House reception, can be downloaded from the Council's website www.lichfielddc.gov.uk/Allocations or a paper copy can be provided by phoning 01543 308192 or emailing developmentplans@lichfielddc.gov.uk

All responses received by 5pm on 6th February, 2019 will be considered, late responses will not be accepted under any circumstances. Individual acknowledgement of receipts will not be possible.

Please note that copies of all comments received will be made available for the public to view, including your address and therefore cannot be treated as confidential. Lichfield District Council will process your personal data in accordance with the Data Protection Act 1998. Our Privacy Notice can be viewed at www.lichfielddc.gov.uk/Council/Privacy-notice.aspx or contact us and for a copy to be sent to you.

Representations may be accompanied by a request to be notified at a specified email address or postal address of the following:

- The submission of the Plan for independent examination under Section 20 of the Planning and Compulsory Purchase Act 2004.
- The publication of the recommendation of the person appointed to carry out the independent examination
- The adoption of the Plan.

Lichfield District Council ('the Council') will process your personal data in accordance with the Data Protection Act 1998 and (when in force) the General Data Protection Regulation ('GDPR').

We are required to provide certain information to you:

Data Controller

The Council is the Data Controller. Our address is Frog Lane, Lichfield, Staffs, WS13 6YY, telephone 01543 308 000, email developmentplans@lichfielddc.gov.uk

We are represented by a Data Protection officer who can be contacted via the above details.

Why do we process your information?

To fulfil our statutory duty.

What entitles us to process your personal information?

Processing is necessary for the performance of a task (general development management) carried out in the public interest or in the exercise of official authority vested in the Council.

Who might see your personal data (recipients)?

We may share your information with officers of the Council employed to work in other service areas.

⁴ Please sign the box if you are filling in a paper copy. The box can be left blank if you are filling in an electronic copy

How long do we store your data for?

It is impossible to state a definite retention period. The Council will have received and recorded your personal data for a particular purpose(s). When the Council no longer needs your data for these purposes it will either be destroyed or deleted.

Your rights

- Access - you have a right to know if we are processing your data. We will tell you either way. If we are processing your data you have further rights such as to be provided with a copy of it.
- Rectification – if we are holding inaccurate information you can ask us to correct it.
- Erasure- in certain circumstances you can ask us to destroy or delete your information
- Restriction – in certain circumstances you can ask us to put a hold on the processing of your information
- Objection – again you can ask us to stop processing your personal data.

Complaints

If you are unhappy with the way we process your personal data then please speak to us in the first instance. Notwithstanding this you have the right to complain to the Information Commissioner. Their contact details can be accessed by clicking here: <https://ico.org.uk/>

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