

PLANNING COMMITTEE

17th January 2023

APPLICATION FOR CONSIDERATION

0179/2022

REPORT OF ASSISTANT DIRECTOR - GROWTH & REGENERATION



Application Number: 0179/2022

Development: Full planning application for residential development (Class C3) for 59 dwellings with vehicular access point onto Coton Lane, public open space, drainage and associated infrastructure.

Location: Land at Coton Lane, TAMWORTH

1. Introduction

1.1. This application is for full planning permission on land north off Coton Lane for a total of 59 dwellings in a mix of 2, 3 and 4 bedrooms. The application has been supported by a number of reports including:

- 26807_08_020_02.2 Refuse Vehicle Tracking
- 26807_08_020_02.3 Refuse Vehicle Tracking
- 26807_08_020_02.4 Internal Visibility Splays
- 26807_08_020_02.5 Proposed Traffic Management Scheme
- 26807_08_020_02.1 Rev F Refuse Vehicle Tracking
- 26807-01-FRA-01-D Flood Risk Assessment
- 26807-CALC-0102 Design Calculations Sheet
- BG21.313 Coton Lane, Tamworth Geophysical Report
- 26807-08-Transport Assessment REV C
- TAMW-SS-001rev.E - Street Scenes
- TAMW-PL-001 Planning Layout-REV W – COLOUR
- BG21.313.3 Coton Lane, Tamworth Masterplan REV 8
- TAMW-MP-001 Materials Plan Revision E
- BG21.313.3-BRGR-ZZ-ZZ-DR-L-00001 Landscape Masterplan
- BG21.313 Landscape Strategy REV2
- AV22/ASK/0-002 Rev B Planning Sheet – Elevations
- Darley-Det-Sheet 0-001 C+- Planning Floor Plans
- Design and Access Statement with Adendums
- BG21.313.2 Ecological Impact Assessment June 2022
- Avant Group England 2022 – SAP Calculations Specification under Part L1A 2013 – Rev A
- 26807-04-LR-02 Statistical Assessment
- 26807-04-GI-01 REV A Phase II Ground Investigation Report
- BG21.313.2 Archaeological Desk Based Assessment
- 008318 Energy Statement
- 26807-04-AQA-02 REV A Air Quality Assessment
- A001256 Noise Survey
- OIA-22416-22-84 Rev A IDOM Preliminary Odour Impact Assessment March 2022
- SOIA-22416A-22-213 Supplementary Odour Impact Assessment June 2022
- L-22416-22-835-KRJ Response to EHO comments on Odour Assessment
- 26807-04-AQA-01 REV A Waste Audit and Management Strategy
- Planning Statement, March 2022

1.2 The site itself comprises approximately 2.5ha of countryside with a railway line running along the western edge and caravan storage facility to the north and sewage treatment works beyond this. To the eastern side is 'Outfall Works Cottage', a single detached residential property. The site is bisected from the south west corner to the north west corner by an electricity line and pylon which itself is located centrally in the site.

1.3 The site is visible from Coton Lane being below ground level with a semi-mature hedgeline giving some visual obscurity from the roadside.

1.4 The site falls away slightly from west to east when viewed from the existing access onto Coton Lane.

- 1.5 This existing access point is located to the right hand southern corner with a double entry metalled gate.
- 1.6 Some of the site is located in flood zone 2 and benefits from existing flood defences.
- 1.7 There are no listed buildings or other heritage assets within the vicinity of the site. There is however a possibility of archaeological remains present. The closest heritage asset is Comberford Hall, located approximately 775m north of the site off Hallfields Drive.
- 1.8 The site is not allocated for development of any kind within the adopted Tamworth Local Plan 2006-31
- 1.9 The application has been amended on numerous occasions in attempt to improve the design of the scheme through layout and arrangement changes. Attempts have also been made to reduce amenity issues for potential occupiers due to the proximity of the site to the railway, pylon and water treatment works.

2. Policies

2.1 Local Plan Policies

SS1 - The Spatial Strategy for Tamworth
 SS2 – Presumption in Favour of Sustainable Development
 HG1 – Housing
 HG4 – Affordable Housing
 HG5 – Housing Mix
 HG6 – Housing Density
 EN3 – Open Space and Green and Blue Links
 EN4 – Protecting and Enhancing Biodiversity
 EN5 – Design of New Development
 SU2 – Delivering Sustainable Transport
 SU4 – Flood Risk and Water Management
 IM1 – Infrastructure and Developer Contributions
 Appendix C Car parking Standards

Supplementary Planning Documents

Tamworth Design: Supplementary Planning Document Adopted July 2019
 Planning Obligations: Supplementary Planning Document Adopted August 2018

2.2 National Policies

National Planning Policy Framework 2021
 Planning Practice Guidance 2014
 National Design Guide 2021

3. Relevant Site History

3.1 No site history

4. Consultation Responses

- 4.1. The following is a summary of the received consultation responses. The full responses are available [online](#), if conditions are suggested within a response these will be considered, and if appropriate included within the conditions at the end of this report.

Staffordshire County Council Highways

Please note that this response encapsulates some of the history of the discussions and subsequent proposal amendments between the highways authority and agent to allow for a final formal response to be given.

Proposed Highway related works

All plots are provided with off-road car parking and a garden shed. Plots 1, 2, 20, 52 and 53 also shown to have a separate garage, the internal dimensions of which are approximately 3m x 6m. House Types Darley, Oakwood and Wentbridge are shown to have an integrated garage with approximate internal dimensions as follows: Darley – 3m x 6m; Oakwood – 2.4m x 4.7m; and Wentbridge 2.5m x 4.6m. The proposed site layout is shown on Drawings TAWM-PL-001 W Planning Layout and TAWM-PL-001C W Planning Layout COLOUR.

A new vehicular access to the application site is proposed in the form of a bell-mouth junction from Coton Lane, comprising a 5.5m wide carriageway with 8m kerb radii. The site access is proposed to be located opposite Fontenaye Road, forming a crossroads arrangement with Fontenaye Road and Coton Lane. The existing dropped crossing vehicular access to the application site from Coton Lane, located in the south-eastern corner of the application site, would be made redundant with full height kerbs and verge reinstated. The proposed site access arrangements are demonstrated on Drawing 26807_08_020_02.1 H Access Design.

A 2m wide footway is proposed on the north-eastern side of the access which continues through the application site to the last turning head, with a section also provided along the site frontage to the northeast of the site access. A 3m wide shared foot/ cycleway is proposed on the south-western side of the access which continues into the application site, through the proposed POS; a section of 3m wide foot/ cycleway is also proposed along the site frontage to the south-west of the site access. A 2m wide footway is proposed to connect to either end of the 3m wide foot/ cycleway within the application site.

Dropped kerb crossings with tactile paving are proposed at the site access to aid crossing of the site access, and either side of the site access to aid crossing Coton Lane. Dropped kerb crossings with tactile paving are proposed within the application site to aid crossing the internal estate road along pedestrian desire lines connecting the residential dwellings with the POS.

An extension to the traffic calming scheme along Coton Lane, consented as part of the Coton House Farm, Coton Lane development (Ref. 0020/2019), is proposed. This would extend the extent of speed cushions provided along Coton Lane from its junction with Mariner up to the relatively new residential development built-out under planning permission Ref. 0027/2017 Land off Coton Lane, Tamworth (170 dwellings). The extent of the traffic calming scheme is demonstrated on drawing 26807_08_020_02.5 C Proposed Traffic Management Scheme.

Real Time Passenger Information is proposed to be provided at the bus stop on Fontenaye Road which would be secured via a S106 contribution to be agreed at a late date.

Review of Planning Application Documents

The planning application has been supported by a suite of documents including site layout plans, a Transport Assessment and Design and Access Statement. An initial review of the planning application documents raised several queries and further details were requested to address the concerns raised. Subsequently, several revisions of the application plans and documents have been submitted by the applicant to address these concerns which have been discussed in turn below.

Site access and traffic management scheme

Insufficient information had been provided regarding the gradients proposed along the site access road where it would connect with the adopted highway. This was a concern due to the level differences between Coton Lane and the internal area within the application site which could have an impact on forward visibility and internal speeds. The applicant has provided a street scenes plan (Drawing TAMW-SS-001 E Proposed Street Scenes) which has addressed this concern and shows that the gradient at the site access would be in line with adoptable standards (5% or 1:20). Any further checks required regarding levels would be subject to the technical approvals process.

The site access design drawing did not show the highway extents or was reflected incorrectly on some drawings. This information was required to check visibility splays of 2.4m x 120m from the proposed site access were achievable within the adopted highway and land under the control of the applicant. The extent of the adopted highway was also queried as some drawings showed land under the control of Network Rail penetrating the site access whereas others did not. The latest version of the site access design drawing (Drawing 26807_08_020_02.1 H Access Design) provides the highway extents and shows that the requisite visibility splays are achievable within the adopted highway. The extent of the Network Rail land queried is now understood to be highway maintainable

at public expense.

The extent of the proposed traffic calming scheme along Coton Lane was not clear. It was difficult to see how the proposed scheme tied in with the consented scheme as part of the Coton House Farm, Coton Lane development (Ref. 0020/2019). Following further amendments, a revised plan (Drawing 26807_08_020_02.5 C Proposed Traffic Management Scheme) demonstrating the extent of the proposed traffic calming scheme was considered acceptable.

A Stage 1 Road Safety Audit of the proposed site access arrangements was undertaken which was supported by a Designer's Response. The responses provided by the applicant to the Stage 1 Road Safety Audit were considered acceptable.

Adoptable areas and internal layout

A series of comments were provided on the internal site layout as sections proposed were not in line with adoptable standards. The extents of the internal layout to be put forward for adoption had not been clearly shown/ demarcated with driveways and private pedestrian paths shown within areas likely to be put forward adoption. Adequate forward visibility and visibility splays of 2.4m x 25m from the proposed private drives were not sufficiently demonstrated.

A private drive was proposed to spur off the site access road to the west. This had a substandard carriageway width with no footways and was proposed to serve 13 dwellings. A pedestrian path was also proposed at the end of the private drive, routeing through the POS. Refuse vehicle tracking provided demonstrated that the refuse vehicle could not safely negotiate the proposed layout of this private drive. The applicant suggested that the proposed layout was reflective of a Mews Court arrangement; however, this was not considered acceptable due to the proposed pedestrian link which would direct pedestrians into the carriageway. Subsequently, a section of this private drive was proposed to be put forward as adoptable highway with the carriageway width increased to 5m and turning head facility lengthened and widened to better accommodate a large refuse vehicle. A 2m wide footway is proposed on the southern side of the carriageway with a section provided on the northern side providing connectivity with the proposed play area and POS. Pedestrian crossing facilities comprising dropped kerbs with tactile paving will be provided to aid safer crossing of this section of the internal road layout.

The proposed site layout plan (Drawing TAWM-PL-001 W Planning Layout) now demonstrates the internal road layout, apart from private drives, is in line with adoptable standards with a 5m/ 5.5m wide carriageway and footways at least 2m wide where required. Where residential dwellings are not provided on both sides of the carriageway a 2m wide footway is provided adjacent to the dwellings with a 1m wide service strip on the opposite side of the carriageway. Demarcation of the end of the proposed adoptable highway has now been shown on the site layout plan. A plan indicating the extent of the areas proposed for adoption has also been provided (Drawing 26807_08_020_03 Adoptable Areas Plan).

Drawing 26807_08_020_02.4 F Internal Visibility Splays now demonstrates that adequate forward visibility within the internal site layout and visibility splays from private drives can be achieved. Where the visibility requirements pass through areas such as POS, these sections would be put forward for adoption by the Highway Authority.

Speed reducing measures are required on the internal road layout to encourage lower vehicle speeds. The approximate locations of where such measures are proposed to be provided are indicated on Drawing 26807_08_020_03 Adoptable Areas Plan. The form and final locations of the internal speed reducing measures would be subject to the technical approvals process.

A Traffic Regulation Order (TRO) to restrict on-street car parking at the site access junction and around the bend in proximity to Plot 58. The proposed TRO is supported by the Highway Authority as it is not uncommon for households to own more than two cars, and where tandem parking is provided, residents sometimes park one car on the drive and one on the highway for ease of access. The TRO would help alleviate on-street parking at least in proximity to the site access and where forward visibility is required.

Gated maintenance access

The proposed access to the Severn Trent Water foul pumping station located in proximity to Plot 50 required gates to be set back at least 5m from the back of the carriageway to allow vehicles to pull off the highway before the gates are opened, to avoid blocking the turning head. This has been

addressed on the latest version of the proposed site layout plan (Drawing TAWM-PL-001 W Planning Layout).

Refuse vehicle swept path analysis

Swept path analysis using a large refuse vehicle had only been provided for the site access; however, this was also required for the internal road layout to demonstrate that a large refuse vehicle could safely access the site in forward gear, turn around within the site and egress in forward gear.

The subsequent swept path analysis showed that a refuse vehicle would not be able to safely negotiate the internal layout, especially the proposed private drive with spurred off to the west of the site access road. There were areas where the wheels would overrun kerbs and impact the back edge of kerbing in the turning heads which would lead to damage in the adoptable highway from repeat impacts.

The internal road layout has been amended to accommodate a large refuse vehicle. Refuse vehicle swept paths demonstrated on Drawings 26807_08_020_02.2 H Refuse Vehicle Tracking and 26807_08_020_02.3 E Refuse Vehicle Tracking are considered acceptable.

Pedestrian and cycle routes

The locations of pedestrian crossings proposed at the site access did not appear to be on desire lines with no pedestrian crossings proposed within the internal layout. Pedestrian crossings were required within the application site to aid crossing of the internal estate road, namely by those that required the use of mobility aids and people pushing buggies, and to provide pedestrian connectivity between the residential dwellings and the POS. The proposed path through the POS was requested to be at least 3m wide so that it could be used as a shared foot/ cycleway, with the proposed section of 3m wide shared foot/ cycleway at the site access extending into the site and connecting to the path through the POS.

The site access drawing has been updated (Drawing 26807_08_020_02.1 H Access Design) to show acceptable pedestrian crossing locations at the site access, with proposed pedestrian crossing locations within the application site shown on Drawing 26807_08_020_03 Adoptable Areas Plan. The final locations of the pedestrian crossings would be subject to the technical approvals process. The proposed site layout plan (Drawing TAWM-PL-001 W Planning Layout) also now shows the path through the POS as a 3m wide shared foot/ cycleway. Ideally this path would be put forward for adoption however, this has not been indicated on Drawing 26807_08_020_03 Adoptable Areas Plan. Despite this however, the CHA are accepting of this information.

Private drives and aisle widths

The widths of some private drives were found to be substandard (less than 4.2m wide) with the aisle spacing behind car parking areas also found to be substandard (less than 6m wide). The proposed alignment of some private drives appeared to direct vehicles towards footways which was not acceptable.

The proposed site layout plan (Drawing TAWM-PL-001 W Planning Layout) now demonstrates all private drives are at least 4.2m wide, and the aisle spacing behind car parking areas are 6m wide which is considered acceptable.

Parking and boundary treatments

The length of tandem car parking spaces was considered inadequate with insufficient space allowed for two vehicles to park without over-hanging the adjacent footway/ carriageway. Some driveways were also considered to be sub-standard, especially where one or both sides were hard bound, for example, where they were located between two dwellings. It was suggested a minimum length of 10m should be provided for driveways where the car parking was proposed to be in tandem, or 11m where the tandem parking is located in front of a garage to enable the garage door to open without the need to first move parked vehicles. Where driveways were between hard boundaries, they were required to be at least 3.2m wide if serving a single dwelling or at least 5m wide if serving two dwellings. These dimensions would help provide sufficient space to open car doors. Where a driveway is provided in front of a garage for parking a single vehicle, the depth should be a minimum of 6m to allow garage doors to be opened without the need to first move parked vehicles. Following a series of revisions, the driveways were considered to be in accordance with the recommended dimensions.

Integrated garages were found to have sub-standard internal dimensions making it difficult to utilise the garage as a car parking space. The integrated garage associated with House Type Oakwood is approximately 2.4m x 4.7m and the integrated garage associated with House Type Wentbridge is approximately 2.5m x 4.6m. These dimensions are smaller than a standard car parking space which is 2.4m x 4.8m. As the garages have hard boundaries it is extremely unlikely that these could be used as a car parking space for a typical sized family car. The location of the garage door on House Type Oakwood is also poorly located and would likely require the driveway in front of the garage to be clear of any parked cars if it were to be used for parking a car. For both of these House Types, car parking within the curtilage of the plot was in line with local car parking standards and therefore was considered acceptable.

The integrated garage associated with House Type Darley was also found to be sub-standard with the internal dimensions measuring approximately 2.7m x 5m. As this sufficient car parking was not available within the curtilage of the plots, a revised floor plan for this House Type was submitted demonstrating internal garage dimensions of 3m x 6m which was considered acceptable.

Transport Assessment

The applicant's transport consultant engaged in pre-application highways discussions with the highway authority and through that process the key data requirements for the Transport Assessment had been agreed including vehicular trip rates, distribution and assignment. Initially the proposed development was for up to 71 dwellings, this was then revised down to 67 dwellings as part of the initial planning application submission and then further to 59 dwellings as part of the most recent submission. For the current level of development proposed, a Transport Assessment would not be required, instead a Transport Statement would be sufficient. Notwithstanding this, the applicant's transport consultants have provided an updated Transport Assessment (dated December 2022) which addressed queries relating to the suitability of the baseline surveys; calculations to determine the network peak hours; traffic growth factors; and junction geometry used to inform the traffic modelling.

The proposed development is anticipated to generate 37 two-way vehicle trips in the morning peak hour and 33 two-way vehicle trips in the evening peak hour. Junction capacity assessments of the proposed site access in a crossroad arrangement with Coton Lane and Fontenaye Road were undertaken using Junctions 9 transport modelling software for a forecast year of 2029. The forecast year of 2029 was requested to align with the assessments of committed developments within the surrounding area. The outputs of the modelling showed that the proposed crossroad junction is anticipated to operate well within capacity with no significant impacts on queuing or delay.

An audit of safe walking routes to Coton Green Primary School and The Rawlett School was also requested to form part of the Transport Assessment. This audit did not need to be a formal audit but should include a review of the existing conditions of the footways and crossing facilities between the site and the schools and identify any constraints or where improvements may be required. The Transport Assessment was updated to include the audit of walking routes to the schools and the existing pedestrian infrastructure, in addition to the infrastructure improvements proposed as part of the proposed development were considered acceptable.

RECOMMENDATION

Following the reviewing of the initially submitted application documents, amended plans and additional information, it is **not considered** that the development proposals would have an adverse impact on the surrounding highway network or on highway safety and therefore there is **no objection** to the proposed application subject to conditions.

Staffordshire Ecology

Final response dated 11th July concluded that following a request for further information on great crested newts (GCN), foraging bats and reptiles, and on net gain to biodiversity. This information has now been provided satisfactorily.

Regarding net gain to biodiversity, the submitted report and biodiversity metric conclude that, with the proposed retained and created habitats, there will be a net gain to biodiversity. The ecological Impact Assessment concluded that protection of breeding birds, hedgehog, badger, reptiles and amphibians could be covered by Reasonable Avoidance Measures and pre-commencement site checks. These should all be included in a Construction Environmental Management Plan, for which I have suggested a condition.

All final developed landscaped site and internal boundary structures (fences, walls etc.) should be designed and constructed so that they do not seal to the ground continuously and stop the movement and dispersal of wildlife, notably hedgehogs. Boundaries should have 130mm by 130mm holes at ground level at least every 10m running length or should not seal to the ground at all between posts with a 120mm gap from fence base to ground. External lighting should be installed on buildings and / or access routes and /or exterior spaces (patios etc) so that residents can safely access houses and gardens and so as to prevent poor-quality floodlighting etc., being retrofitted on occupancy which then disturbs bat flight routes. I have suggested a condition for this; the applicant should ensure a contour diagram is included that demonstrates minimal levels of lighting on receptor habitats. As a result of this, conditional approval was recommended.

Initial Response dated 25/04/2022 stated that the site comprises approximately 2.5 ha, of which most is poor semi-improved grassland and the remainder is scrub / mixed habitats. The PEA concludes that:

'These habitats are not listed as local or national habitat of principle importance, as such their loss is not considered to result in a significant negative effect... the mature scattered trees and native species poor hedgerow are of higher value with native species poor hedgerow listed as a LBAP. These habitats should be retained where possible and post construction enhancement of these habitats and the additional green space proposed to the west of the site is recommended to achieve a biodiversity net gain'.

However, the grassland and scrub habitats still have an ecological function, and the current proposals would shift the balance on site to predominantly built development and hardstanding. This clearly represents a net loss to biodiversity, contrary to NPPF 174 and 180, which does not seem to be mitigated onsite. A solution to this would be for the applicant should indicate how off-site compensation will be achieved, preferably through habitat improvements elsewhere in the north of Tamworth.

The application site is in an amber Impact Risk Zone (IRZ) for Great Crested Newt, and as such further surveys and / or a certificate of participation in the District Level Licence Scheme will be needed.

All final developed landscaped site and internal boundary structures (fences, walls etc.) should be designed and constructed so that they do not seal to the ground continuously and stop the movement and dispersal of wildlife, notably hedgehogs. Boundaries should have 130mm by 130mm holes at ground level at least every 10m running length or should not seal to the ground at all between posts with a 120mm gap from fence base to ground.

External lighting should be installed on buildings and / or access routes and /or exterior spaces (patios etc) so that residents can safely access houses and gardens and so as to prevent poor-quality floodlighting etc., being retrofitted on occupancy which then disturbs bat flight routes. I have suggested a condition for this; the applicant should ensure a contour diagram is included that demonstrates minimal levels of lighting on receptor habitats.

Further information is required:

1. Applicant to provide information on how no net loss (and preferably net gain) to biodiversity will be achieved. The Defra biodiversity metric (v3) should be used to determine whether mitigation or compensation is adequate.
2. Further surveys for foraging bats, great crested newts, reptiles as specified in the Preliminary Ecological Appraisal

Environment Agency

Final comments received 25/10/2022 stated that since the previous advice of 5th September 2022 the Flood Risk Assessment (FRA) has been updated. This has sought to address surface drainage concerns presumably raised by the LLFA, and to reflect an updated layout.

The above changes do not change our position with regards to required finished floor levels and as such an updated version of the original condition.

Initial comments 05/09/2022

In the absence of an acceptable flood risk assessment (FRA) we object to this application and recommend that planning permission is refused.

Overcoming the objection

Flood Risk Assessment dated March 2022 undertaken by Mewies Engineering Consultants dated March 2022 has been reviewed. The FRA has not established the flood extent across the site satisfactorily. Although, there is the drawing in Appendix B with a yellow line indicating the flood envelope and showing that the development is located outside of this envelope, we require that a more definitive drawing is submitted. We require that the 1 in 100 year plus climate change flood extent is more accurately defined and a layout drawing should be overlain on to the topographical survey to demonstrate that the development is located outside of the flood plain. We are unable to view the appendices in the FRA as these are scanned in and consequently the finer detail is blurred.

Staffordshire County Lead Local Flood Authority

Final comments received 02/11/2022 concluded that the proposed development will only be acceptable if the following measures as detailed in the Flood Risk Assessment and Drainage Strategy and other associated planning documents, submitted with this application are implemented and secured by way of a planning condition on any planning permission

Initial Comments received 28/04/2022

We recommend that planning permission is not granted on the following grounds. If you are minded to approve the application contrary to this advice, we request that you contact us again to allow further discussion.

The applicant has discounted infiltration / soak-away-to-ground as a primary means of surface water discharge for the proposed development. However according to the data presented, the LLFA has no evidence of satisfactory infiltration testing to validate this strategy.

In the presented Flood Risk Assessment (FRA) document, and drainage plan a CCTV survey is proposed as a next-step action. However, in order to identify and confirm the condition of any existing drainage assets or watercourse, that are to be incorporated into, or utilised by the development including those downstream that may be discharged into, a full and complete CCTV survey of these assets and watercourses should be presented to the LLFA for our review at this current Full Planning Application stage

Can the applicant explore other methods of surface water discharge than a pumped system. Gravity connections should be considered, and the above mentioned CCTV survey may provide evidence in support of these.

The detailed drainage plan submitted by the applicant in the presented Flood Risk Assessment is not adequately annotated. All pipes, nodes / manholes and attenuation structures should be satisfactorily labelled. All pipe diameters, gradients/slopes, lengths, falls/drops should be fully noted. Cover and invert levels of manholes should also be referenced. This is so they can be cross-referenced with the hydraulic modelling calculations (MicroDrainage).

Amongst other technical details still required to sufficiently assess the surface water issues on site.

Staffordshire County Council (School Organisation)

Amended received 16th November 2022 (based on unit reductions)

This amended application reduces the planned number of dwellings and our response reflects this as well as changes to our building cost multipliers since our previous response dated 19 April 2022.

Planning application would result in an education contribution of £547,784 (index linked from the date of this response) to be sought from the developer to mitigate the impact on education from the development and would be acceptable from an education perspective subject to a S106 agreement which meets this requirement.

The response is based on the information contained within the planning application which details a dwelling mix of: 24 two bedroom, 28 three bedroom and 7 four bedroom dwellings.

The project to provide the additional places required has not yet been fully determined and therefore the contribution has been calculated utilising the latest cost multipliers.

Primary school education contribution

(£17,450) Cost multiplier x (19) number of places required for development = £331,550

Secondary school education contribution

(24,026) Cost multiplier x (9) number of places required for development = £216,234

Based on an agreed set of standard triggers the size of this development will necessitate payment of the education contribution at the following points:

50% on commencement of the development

50% on commencement of 50% of the development

Staffordshire and Stoke Clinical Commissioning Group (CCG)

Amended comments received 23rd November 2022 revised this contribution to **£38,350** owing to the reduction in numbers proposed.

Comments received 27th May 2022

Having reviewed the submission details and after considering key facets associated with practices that fall within influencing distance of this site (those practices with a catchment that covers the application site) the CCG is requesting a contribution which would support the development of primary care services in the Mercian PCN. With this contribution paid, the development is supported by the Staffordshire And Stoke Clinical Commissioning Group.

The outputs are derived from the Department for Health guidance 'Health Building Note 11-01:Facilities for Primary and Community Care Services', which provides best practice guidance on the delivery of new healthcare buildings and adaptation and extension of existing facilities. It is applicable to a range of building types including GP premises, Health centres, Primary care centres and Urgent care centres.

The development site falls within the contract catchments Aldergate Medical Practice (approximately 13,660 patients), Hollies Medical Centre (approximately 15,775 patients), Laurel House Surgery (approximately 12,763 patients) and Riverside Surgery (approximately 1,992 patients). It is confirmed that all practices have a shortfall of both GIA and clinical rooms to serve the existing patient population and that infrastructure changes are required at a PCN level to address these shortfalls in order to provide integrated and high-quality primary care services for a growing patient population.

Whilst the request made herein is related in scale to the proposed development, it is evident that there is an existing deficiency in terms of both physical GIA and clinical rooms to serve this area and therefore the trigger for payment requested in this case is reflective of the need to address such pressure at the earliest opportunity.

The sum (**£43,459**) requested has been tailored to the level of development sought and it is requested that payment is to be released upon commencement of development in this case and that such payment should be index linked to the Construction Tender Price Indices (TPIs).

Staffordshire County Council (Archaeology)

Comments received 30th March 2022

This application has been reviewed against the information held by the Staffordshire Historic Environment Record (HER) and an Archaeological Deskbased Assessment (ADBA) submitted in support of the application. The ADBA, which has been supported by a full HER search and a review of readily available background information, such as historic mapping, has been produced in line with the relevant Chartered Institute for Archaeologists' Standard and Guidance and provides a very

useful understanding of the developmental history of the application site and its archaeological potential based on our current knowledge of the archaeological resource in the wider area. This info will not be repeated in detail here, but, whilst there are no known archaeological features within the application site, there is clear archaeological potential, particularly relating to the prehistoric and Romano British periods in the area.

The conclusions in the ADBA that further investigation would be required to better understand and characterise potential remains is supported. As such, it is advised that an archaeological evaluation be undertaken which will aim to establish the survival, nature, extent, character and significance of archaeological remains within the application site. The evaluation, which should comprise a geophysical survey followed by a programme of archaeological trial trenching (the scope of which to be determined based on the results of the geophysical survey), should be undertaken sufficiently in advance of works commencing in order to allow the results of this work to inform the need for and extent of any further archaeological mitigation.

This approach is in line with NPPF paragraph 194, which requires applicants to describe the significance of any heritage assets and the potential impact of any proposed development upon them. It is also supported by NPPF paragraph 205 which states that ‘...they [Local Planning Authorities] should also require developers to record and advance understanding of significance of any heritage asset to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible’. The evaluation should be undertaken by a suitably experienced archaeologist(s) working to the Chartered Institute for Archaeologists ‘Code of Conduct’ and the relevant standards and guidance (2014). The geophysical survey should be carried out in line with the Written Scheme of Investigation (WSI) submitted in support of the application, whilst the subsequent trial trenching will require a separate WSI to be approved by this office in advance of intrusive archaeological works commencing.

Provided that this is followed, the Staffordshire County Council Archaeology team have no objections to the proposal subject to conditions.

TBC Environmental Protection

Comments were received 2nd December 2022 finding the submitted **odour** assessment underestimates the odour residents would experience for the following reasons:

- a) The close proximity of odour sources to receptors;
- b) The wind distribution . The proposed development is south of the wastewater treatment facility, the assessment only managed to capture wind blowing from the north to the proposed site of development for only part of one of the assessment days.
- c) The proposed area of development appears to be located at the south of the waste water works and running east to west as a result airflow along the valley maybe more frequent and as such increase the risk of impact within the development area;
- d) The configuration of the wastewater treatment works i.e. it consists of open treatment processes with the potential to release odour at low level (height) .

The distance between the existing works and nearest receptors, and the lack of historical complaints (there are very few dwellings nearby) is not sufficient justification to support the findings of the Odour Assessment and would have concerns about this.

Revised comments on 11th July 2022 have reviewed the updated **noise reports** and confirmed they are acceptable and have no objections subject to conditions.

The proposed noise attenuation barrier must be kept in good condition for the lifetime of the houses which could be conditioned if the application is approved.

With regards to contamination, if during the works contamination is encountered which has not previously been identified, then the additional contamination shall be fully assessed, and an appropriate remediation scheme submitted to and approved in writing by the local planning authority.

Additional conditions on hours of construction and dust control measures have been requested.

Original comments received on 27th April 2022 showed concern over the conclusions of the noise report with the acoustic fencing not providing the required level of noise attenuation required due to the exceptional high background level day and night.

External Design Consultant

Final comments of 30th October 2022

Relationship with the open space

The revised layout to the north of the pylon, encompassing plots 51-53 now facing towards the open space, feels much more successful in offering some positive relationship and direct natural surveillance. The length of side boundary (to plot 54) is now much reduced, which provides a stronger edge to the space in general.

Layout and Highways

I note the introduction of a 25m forward visibility onto the corner in front of plot 57. Figure 7.16 in Manual for Streets highlights the correlation between visibility and vehicle speed; increased forward visibility naturally leads to greater speed of traffic. Given how few houses are served beyond this corner it feels difficult to justify the need for this feature. The rear of plot 51 will form part of the streetscene and this needs to be considered. The plots at the entrance have been removed and I do believe this is positive, helping to organise some of the play to this corner along with some strong landscaping.

The boundary treatment for side boundaries facing into the public realm should be a 1.8m wall with appropriate detailing (tile crease etc) and this should apply to plots 54 (for example) and both the side and rear of plot 51

Parking

There remains an extensive amount of forecourt parking, dictated by the plan form that positions the plots very close together. As before, a more varied approach would help but this solution would require a loss of units to enable parking to the side. Achieving this in one area of the plan would be of great benefit as the challenge of extensive forecourt parking (hard surfacing/view of cars and a loss of boundary treatment) is that it is magnified across the proposal.

Landscape might also offer a solution to reducing the impact of forecourt parking. The proposals show a series of trees within the parking, though further detail is still needed to ensure that these will be protected and maintained. The landscape approach could go further, however, to introduce more hedges between parking bays should space be found.

Consider how the impact of forecourt parking might be mitigated. This could involve reorganisation to introduce side parking in some part of the plan. Alternatively, further consideration of the landscape to explore how hedges might break up the areas of parking to soften the impact within the streetscene.

Architecture and form

The proposals involve the introduction of standard housetypes. They are arranged in some groups, however, which is positive in terms of offering some legibility. Plot 42 has been amended to match its neighbour, which helps the natural flow as the development responds to and follows the topography.

Revision T of the layout, along with accompanying streetscene drawings, includes the addition of chimneys at various locations across the development. This is welcome and will help to provide some articulation to the roofscape and visual interest.

Summary conclusion

The proposals respond much better to the central green space and there is an improved level of surveillance.

The density of development still results in the majority of plots being organised tightly together, which necessitates forecourt parking that still dominates.

Revised comments of 17th October 2022

Relationship with the open space

The revised layout to the north of the pylon, encompassing plots 51-53 now facing towards the open space, feels much more successful in offering some positive relationship and direct natural surveillance. The length of side boundary (to plot 54) is now much reduced, which provides a stronger edge to the space in general.

Layout and highways

I note the introduction of a 25m forward visibility onto the corner in front of plot 57.

Figure 7.16 in Manual for Streets highlights the correlation between visibility and vehicle speed; increased forward visibility naturally leads to greater speed of traffic. Given how few houses are served beyond this corner it feels difficult to justify the need for this feature.

The rear of plot 51 will form part of the streetscene and this needs to be considered. The plots at the entrance have been removed and I do believe this is positive, helping to organise some of the play to this corner along with some strong landscaping.

Parking

There remains an extensive amount of forecourt parking, dictated by the plan form that positions the plots very close together.

As before, a more varied approach would help but this solution would require a loss of units to enable parking to the side. Achieving this in one area of the plan would be of great benefit as the challenge of extensive forecourt parking (hard surfacing/view of cars and a loss of boundary treatment) is that it is magnified across the proposal.

Landscape might also offer a solution to reducing the impact of forecourt parking. The proposals show a series of trees within the parking, though further detail is still needed to ensure that these will be protected and maintained. The landscape approach could go further, however, to introduce more hedges between parking bays should space be found.

Consider how the impact of forecourt parking might be mitigated.

This could involve reorganisation to introduce side parking in some part of the plan. Alternatively, further consideration of the landscape to explore how hedges might break up the areas of parking to soften the impact within the streetscene.

Summary conclusion

The proposals respond much better to the central green space and there is an improved level of surveillance.

The density of development still results in the majority of plots being organised tightly together, which necessitates forecourt parking that still dominates.

Revised comments of 25th September 2022

Layout, pylon and easement

The pylon and associated easement creates a real challenge for the development. While there is some merit in the suggestion that there is an opportunity to create some meaningful landscape within this area, for it to feel and operate as a Village Green there needs to be a greater relationship between the surrounding buildings to achieve this.

The Briefing Note cites Overwoods Road as an example of a recent approval locally. Although only discernible on plan the key difference here is the direct relationship created between the buildings and the space with the plots framing and overlooking the space between them.

The interrelationship between the buildings and the space is critical to the success of the scheme and it is disappointing that the layout has not altered to any great degree since the previous comments. The northern side in particular fails to create a meaningful relationship with the open spaces by virtue of being gable on, resulting in limited plots being able to offer surveillance and an extent of side/rear boundary directly facing the space.

While I acknowledge that plot 56 faces directly to a portion of the open space, in itself this feels insufficient and I am conscious that in any case the active windows at ground floor for both this plot and plot 67 are set behind the hedge illustrated. Plot 56 in addition also presents an awkward blank gable to the remainder of the street, sitting forward of plot 57.

I still feel that positioning the LEAP within this zone is not the best approach and am not wholly convinced by the argument for not positioning it at the entrance. Plots 11-14 remain a concern for the reasons previously outlined. This is a prominent location on arrival into the development – arguably the most important as it helps define the sense of arrival – and one half of the elevation will be an exposed rear elevation. It remains unclear how this area will be dealt with.

The additional challenge for these maisonette properties is that they do not appear to have any private garden space

As previously stated, the success of the public open space rests upon a strong relationship between the buildings and the space to ensure there is good natural surveillance and overlooking of it. The example from Overwoods Road demonstrates such an approach, with development clearly addressing and facing onto the open space.

Further consideration needs to be given to how to address this, particularly on the northern side of the space where the boundary is uneven and there is only limited surveillance.

Plots 11-14 do not work as they fail to address the entrance well by virtue of needing to orientate in every direction. I still maintain this could be a more preferable location for the LEAP, perhaps tightening up the space in other areas

Elevational approach

On streetscene A-A it feels awkward that plot 47 suddenly steps up and it would feel more in keeping with the topography if it mirrored the adjoining housetype.

The streetscenes do highlight the need for some chimneys to help articulate the roofscape and break down the extent of ridge.

There is some repetition of housetype in certain areas, together with consistency of materials, which is positive. The exception is the run between plots 32-47 where there is a significant amount of variation.

Grouping of materials could still be improved and utilised to enhance legibility. Plot 31, for example, feels like quite an important building and more could be made of it given its location at the end of the main vista.

A series of identifiers – such as a string course and approach to roof form as two examples – could still be used to tie the different housetypes together and reinforce some identity.

Parking

Taking 'frontage parking' and 'frontage parking with integral garage' together there is an extensive amount of forecourt parking throughout.

As before a more varied approach would help support the reinforcement of a street hierarchy as this one approach tends to dominate. It also, in passing, illustrates that there is quite a lot of development as the plots are tightly arranged and a solution with parking to the side (and therefore more generous spacing) has not been employed.

The introduction of trees into the forecourt areas does offer some respite, but the approach is limited and itself fraught with maintenance challenges unless these areas are brought within a management company agreement. Extensive use of forecourt parking also severely limits (or more probably negates) the ability to introduce any front boundary treatment.

As before, parking to the side would also allow some tightening of streets, which would also assist the hierarchy.

Consideration of a greater range of parking options that would help reduce the prominence of vehicles within the streetscene. Further deliberation on how to make the endpoint of the spine road

(the view between plots 42/48) more attractive and less car dominated.

Summary conclusion

This remains a really challenging site.

As before, responding to the central green space is essential and further consideration should be given to how the buildings frame it.

Further consideration should also be given to creating a better relationship between streets, hierarchy and parking arrangements.

Original comments of 9th August 2022

This is an extremely challenging, constrained, and compromised site, set alongside the railway line, adjacent to a caravan park and sewage treatment farm and with a large HV pylon line running diagonally across it.

In some ways the design team has done quite a job in fitting a residential scheme onto this parcel, but several challenges remain that would need to be addressed for this to be a successful proposal in design terms.

In passing I would highlight that the planning layout and the landscape proposals indicate a different approach in a few areas on the plan. I have assumed the planning layout is the most up to date for the purposes of these comments.

The pylon and easement

Addressing what feels like the 'elephant in the room' from the outset, this is a dominating feature across the landscape and within the proposals that in all probability will have a divisive nature on how the place works and operates.

I understand the rationale for placing the LEAP within this zone beneath the pylons, but it may not completely be an environment that parents may be content to let their children play in.

A further significant challenge – and something that reinforces the somewhat sterilised nature of the centre of this site – is the inability to get any trees within this zone. There are strict regulations preventing planting and a real danger, consequently, that this may truly feel like a 'no man's land' as a result

The planning layout and landscape proposals seem to suggest a slightly different approach for the central space; the landscape plans indicate a straight path across the space, whereas the other layout suggests the LEAP across the point.

Species rich grassland is a good choice (of limited options) and it will be quite a challenge to make this feel like an interesting and successful space.

Layout

Associated with the point above, the associated challenge concerns how to respond to the surrounding neighbours and just as importantly how to shape the central space.

To the north the properties back on to the boundary with the caravan park, as is the case with the railway line, and these feel reasonable approaches.

Plots 1-2 face the entrance to the site, while 3-10 are orientated towards the open space and in so doing turn away from Coton Lane, but this is equally valid due to the change of levels that exists. By contrast, plots 14-18 'face' Coton Lane, with parking to the side and a rear parking courtyard. I will refer to parking later, but as a general comment there is a strong likelihood with these properties that the rear will become and function as the front as this will become the more likely arrival point for residents. This is more likely as there is no footpath on Coton Lane on this side of the road.

There are further challenges in seeking to face in multiple directions.

Plots 11-14 occupy an important position at the entrance to the site, but this very position demands

that they are almost an island within the scheme as they almost don't have a rear, needing to face every which way. The team has sought to address this, commendably, but the result is a 'push me – pull you' type arrangement where one half of the maisonette block faces towards the open space and the other half in the opposite direction. Completing the circle, the doors are on the east and west sides.

The added complication is in understanding what the boundary treatment is; the layout resulting in plot 14 at ground floor having its bedroom facing the entrance road and alongside the car parking.

To the north there are some long extents of side boundary that for the edge to the open space, most notably the side to plots 56 and 67 to the north. While efforts have been made to soften these with hedgerows, the fact remains that these will be blank elevations and boundaries that will have limited or no natural surveillance across the open space.

Some detail of what is taking place between Coton Lane and the rear of plots along this road would be useful. While it is outside the RLB it would be good to understand what the intention is, both for the boundary itself and any potential landscaping that may be introduced to form a buffer.

The pylon easement does make it next to impossible to offer the sort of intimate surveillance that feels necessary across such a large swathe of open space. The uneven building line along both 'dead' boundaries also compounds the challenge by offering more secluded spots than one would wish to see.

While clearly the pylon is not the view that anyone wants, the public open space is and its success depends upon a strong relationship between the buildings and the space to ensure there is good natural surveillance and overlooking of it. More needs to be done to achieve this.

I understand why plots 11-14 are there as they are 'developable', but I do think it raises additional questions.

This might be a more preferable location for the LEAP, so that it is not sat underneath the pylon, while also still giving the opportunity for some substantial trees. The DAS refers to the first junction within the site being a 'nodal space' and this would assist in reinforcing that.

Elevational approach

Nevertheless, I think it is important to understand how these will work together to make a place and a series of streets.

The pack I have includes the Birkdale/Airedale and Darley. Of these it is questionable what they have in common as they do appear very different; one is quite traditional in form with a front projecting gable and the other has a hipped roof.

Grouping of housetypes together within the street could be considered slightly further, to avoid the disposition seeming too random. Variation (in housetype or with a change of material) should be used to accentuate difference – the end of a street for example.

While there is, as articulated in the DAS, quite a variety of different characters present in the surrounding locality this is an opportunity to offer some coherence for this development.

A series of identifiers – such as a string course and approach to roof form as two examples – could be used to tie the different housetypes together and offer some identity.

Parking

There is quite a large amount of forecourt parking throughout and this needs careful handling to ensure that it doesn't dominate. This has implications in limiting or removing the ability to have front gardens, and in the capacity to tighten streets up as the houses must sit further back to accommodate vehicles.

A more varied approach may also help to reinforce a street hierarchy. There are obvious space implications to having parking to the side, but it may allow plots to move forward, creating more generous back gardens as well as front garden spaces.

The sharp junction within the spine road (which may be an issue for highways) highlights that there will be a long view of the car parking to plot 42-48, which forms an end vista for this section of road.

Consideration of a greater range of parking options that would help reduce the prominence of vehicles within the streetscene. Further deliberation on how to make the endpoint of the spine road (the view between plots 42/48) more attractive and less car dominated.

Summary conclusion

This is a really challenging site with a whole series of physical, visual, and possibly sensory constraints in it.

Responding to these is a real challenge and making sense of the central green space and making it work successfully is critical. Due to the constraints, it will be an empty space, so how buildings shape it is paramount.

Further work could be undertaken to address this, and to consider how to create a better relationship between streets, hierarchy and parking arrangements.

Tamworth Borough Council (Planning Policy and Delivery) 21st April 2022 (Based on original scheme)

Principle of Residential Development

The subject land appears to be currently used for agricultural purposes and is not allocated for any specific purpose in the Policies Map. On this basis, we have no strategic objection to the overarching principle of residential development on the site, subject to compliance with the wider policies of the Local Plan.

Notwithstanding, it should be noted that at present we have a healthy 5-year supply of housing land. On such grounds, there is not a pressing need for housing that could be used as a justification for accepting a lower standard of design or other material considerations

Affordable Housing (Policy HG4)

The submitted documents detail plans to deliver 14 affordable dwellings on site, equating to approximately 20.9% of the overall housing provision. Under Policy HG4 (Affordable Housing), developments that involve the construction of 10 or more dwellings are required to deliver 20% as affordable tenures. The 14 affordable dwellings proposed are therefore acceptable in policy terms.

The submitted Planning Statement notes that the tenure of the proposed affordable housing will be confirmed as part of the consideration of the application. In view of this, it should be noted at this stage that the applicant will be required to deliver First Homes as part of the subject scheme. Any provision of First Homes should be implemented in line with published Council guidance, which can be found at <https://www.tamworth.gov.uk/local-plan>.

In line with the above guidance, we would expect to see the 14 affordable dwellings apportioned as follows:

- The delivery of 4 First Homes
- The delivery of 3 Affordable Home Ownership tenures
- The remaining 7 affordable dwellings delivered as Affordable Rented tenures, split between social and affordable rent.

Housing Mix (Policy HG5)

The following breakdown of units are required to evidence compliance with Policy HG5 (Housing Mix). A subject site comparison has been provided below for reference.

Unit Size	Policy HG5 Requirement (% of Total dwellings on Site)	Proposal	% of dwellings on site	Difference
2 Bedroom	42%	27 units	40.3%	-1.7%
3 Bedroom	39%	31 units	46.3%	+7.3%
4 Bedroom	15%	9 units	13.4%	-1.6%

The proposed delivery of dwellings on site fall short in reflecting the housing mix preferred by Policy HG5, as demonstrated above. Notably, the mix demonstrates an over provision of three-bed properties and an absolute absence of one-bed dwellings. Notwithstanding, such policy preferences should be considered the starting point from which the most suitable dwelling mix can be determined. On this basis, deviation from the requirements of Policy HG5 may be considered acceptable, subject to the presence of an appropriate justification. In this case, given the identified

variation, we would expect to see reasoning as to why the requirements of Policy HG5 cannot be achieved, and why the proposed alternative is more appropriate for this particular site.

In relation to the above, it should also be noted that the proposed dwelling mix also fails to reflect the more recent housing evidence outlined in the Housing and Economic Needs Development Assessment (2019)

Housing Density (Policy HG6)

The site area submitted in the application form is 2.48ha, which gives a 60% net developable area of 1.488ha under the guidelines of Policy HG6. The proposed construction of 67 dwellings on site would provide a density of approximately 45 dwellings per hectare, which is in line with the minimum density requirements of Policy HG6.

Notwithstanding, a density of 45dph does suggest quite an intensive development for the peripheral location of the site. Whilst we would not refuse an application on the basis of too many dwellings, higher density developments must typically be well-designed in order to compensate for greater density. This should be judged against the criteria outlined in the adopted Design SPD and the wider policies of the Local Plan.

Summary

The proposal relates to the construction of 67 residential dwellings on unallocated agricultural land. As noted above, we have no strategic objection to the overarching principle of residential development on the site. However, the proposed dwelling mix does not reflect either the requirements of Policy HG5 or more recent evidence contained within the Housing Economic Development Needs Assessment (2019). We would require justification as to why the mix outlined in Policy HG5 cannot be met, and why the alternative mix proposed by the applicants would be more appropriate for the specific site.

Supplementary to the requirements outlined above, the proposal must also be able to demonstrate compliance with the wider policies of the Local Plan in order to be deemed acceptable.

Joint Waste Services

Unadopted roads/drives cannot be accessed by a collection vehicle if they are not constructed to an adoptable standard. Therefore a suitable bin collection point (BCP) may be required. The BCP can be a simple paved area but it must be sufficient to accommodate 3 x 240l bins and 1 x recycling bag for every property served by the private drive and be adjacent to the adopted highway to ensure an efficient refuse/recycling operation takes place. The inclusion of these in the plans is noted.

Severn Trent Water

Received 4th April 2022

No objections to the proposals subject to the inclusion of the following condition:

The development hereby permitted should not commence until drainage plans for the disposal of foul and surface water flows have been submitted to and approved by the Local Planning Authority, and

The scheme shall be implemented in accordance with the approved details before the development is first brought into use. This is to ensure that the development is provided with a satisfactory means of drainage as well as to prevent or to avoid exacerbating any flooding issues and to minimise the risk of pollution

4.2 Additional Representations (Public)

As part of the consultation process 37 adjacent residents have been notified as well as a press notice in the Tamworth Herald (dated 7th April 2022) and a site notice displayed at the entrance with Coton Lane.

Objections/Concerns:

Those points raised that are material to the process are considered below. Other comments such as impact on property value, setting house prices etc are not material planning considerations and cannot be considered as part of this application process.

Transport/Road Issues

By far the largest issue identified was how the development would create further congestion to an already worsening situation.

Next to this was the problems posed by how the site access proposed safety issues being so close to the junction with Fontenaye Road.

Health Issues

Close proximity to sewage works

Drainage and Flooding Issues

Hill above railway on undefended flood land

Possible flooding problems on the lower level of the development.

Wildlife

Countryside incursion will destroy wildlife with no mitigation proposed to address this.

Infrastructure Pressures

Many had concerns relating to the how the development would cause further strain on hospital/surgery places, school places and overall infrastructure in the local area.

Amenity

Health implications of proposed residents living close to the pylon, railway, sewage and general noise from the road.

Along with the individual responses, a petition was received by the council using the online platform www.change.org. On this, 760 signatures were received with comments attached making comments as above.

5. Equality and Human Rights Implications

- 5.1 Due regard, where relevant, has been taken to the Tamworth Borough Council's equality duty as contained within the Equalities Act 2010. The authority has had due regard to the public sector equality duty (PSED). Under section 149 of the Equality Act 2010, a public authority must in the exercise of its functions, have due regard to the interests and needs of those sharing the protected characteristics under the Act, such as age, gender, disability and race. This proposal has no impact on such protected characteristics.
- 5.2 There may be implications under Article 8 and Article 1 of the First Protocol of the Human Rights Act, regarding the right of respect for a person's private and family life and home, and to the peaceful enjoyment of possessions. However, these issues have been taken into account in the determination of this application.

6. Planning Considerations

- 6.1 The key issues to be considered at this stage are:
- Principle
 - Character and Design
 - Amenity for current and potential occupiers
 - Affordable Housing
 - Housing Mix
 - Housing Density
 - Open Space
 - Biodiversity
 - Trees
 - Noise and Pollution
 - Highways

- Drainage
- Other Matters

6.2 Principle

- 6.2.1 The site is not allocated for residential development in the adopted Tamworth Local Plan. This however does mean that residential development cannot be considered acceptable but does however require a detailed assessment of relevant policy to be considered.
- 6.2.2 As per the comments made by the Tamworth Borough Council Planning Policy and Delivery and department, there is no strategic objection to the overarching principle of residential development on the site, subject to compliance with the wider policies of the Local Plan
- 6.2.3 They have however further commented that there is a well in excess of five-year supply of housing land currently in the borough where there is no pressing need for housing that could be used as a justification for accepting a lower standard of design or other material considerations.
- 6.2.4 Considering the location is a sustainable one, close to key amenities the principle of residential development in this location is acceptable.
- 6.2.5 The applicant has provided justification for further acceptance making the following points:
- Recent evidence has confirmed that Tamworth should be supplying approximately 105 new affordable homes per annum (gross) to 2036. This is higher than the current requirement within the Local Plan. The most recent publicly available evidence sets out that the Council have not managed to achieve this between 2016 – 2019 (44, 101 and 77 delivered)
 - The site has no strategic designation which prevents development coming forward. We note that Policy HG1, which sets out where housing is acceptable in principle, states that at least 4,425 dwellings will be delivered over the Plan Period (our emphasis). This figure should not be taken as a minimum, clearly evidence by the wording of the policy, and the fact the Government is seeking to 'significantly boost the supply of homes' (NPPF Para 60)
 - The fact the Council can achieve a five year housing land supply does not change that the supply of housing should be boosted, and it is clear the Council were expecting windfall sites to be delivered given Policy HG1 seeks for c. 50% of the housing to be delivered this way (i.e. outside of the SUEs)
 - It is also worth noting that the Council has exported an element of its needs to neighbouring authorities. This demonstrates that there is a need in Tamworth, and it stands to reason that this should be provided as close to the need as possible, to ensure sustainable development.
 - Beyond this, the current five year housing land supply is predicated largely on the delivery of the large SUEs, and the Council have acknowledged that the level of supply will drop as these are built out.
 - The existing Statements of Common Ground with LDC and NWBC also require update given there has been an amendment housing requirement figures. The unmet need of Birmingham will also need to be taken into account going forward
 - The Site will also deliver much needed affordable housing, which the latest evidence shows the Council is failing to provide for against evidenced need. This benefit should not be ignored.
 - The Local Plan is more than five years old, and the Council have confirmed that a complete review should be undertaken, with many policies either being requiring wholesale change, or modification in line with NPPF Para 11 where relevant policies are out of date, the proposed should be assessed against the NPPF, which seeks to support housing in sustainable locations
 - Further, the most up to date evidence sets out that the Council is failing to provide for the evidenced amount of affordable housing.
 - The above approach was taken by the Council in approving an application for housing on an unallocated Site at Land North of Overwoods Road, Hockley (Ref No. 0324/2021)
- 6.2.6 The council will respond to these points in the concluding sections towards the end of the report but feel in the main we do not disagree with a lot of these points.

6.3 Character and Design

- 6.3.1 Throughout the adopted Tamworth Local Plan 2006-31 there is frequent reference to securing high quality in development decisions. This includes policy SS1 The Spatial Strategy for Tamworth; HG1 Housing and in all specific areas of targeted housing need e.g. HG2 Sustainable Urban Extensions.
- 6.3.2 Perhaps most relevant is the specific reference to high quality design at Policy EN5 which applies to all new developments. This states that high quality buildings and places will be achieved across Tamworth. Furthermore, it states poor design or design that fails to take the opportunities available to improve the character and quality of an area and the way it functions will be refused. New developments will be expected to (relevant to this development):
- a) Respect and where appropriate reflect existing local architectural and historic characteristics but without ruling out innovative or contemporary design which is still sympathetic to the valued characteristics of an area.
 - b) Be of a scale, layout, form and massing which conserves or enhances the setting of the development.
 - c) Utilise materials and overall detailed design which conserves or enhances the context of the development.
 - d) Be outward facing with active frontages which incorporate landscaping and boundary treatments appropriate to the local context.
 - e) Be legible and allow users to navigate the area with ease by providing landmark buildings at key locations and a choice of routes to walk, cycle or drive along.
 - f) Minimise or mitigate environmental impacts for the benefit of existing and prospective occupants of neighbouring land. Such impacts may include loss of light, privacy or security or unacceptable noise, pollution, flooding or sense of enclosure.
 - g) Pay particular regard to highway safety and servicing requirements, the capacity of the local road network and the adopted parking standards set out in Appendix C.
 - h) Incorporate landscaping appropriate to the site, using native species wherever possible.
 - i) Maximise health benefits through the incorporation of usable open space and footpaths and links to the wider green infrastructure network, in accordance with Policy EN3.
- 6.3.3 The constant reference to high quality design is one which is considered consistent with the requirements of the National Planning Policy Framework at paragraphs 126, 128 and throughout paragraph 12. At paragraph 134 of the NPPF and in Tamworth Local Plan Policy EN5 it recognises that development that is not well designed should be refused.
- 6.3.4 In October 2019 the then Ministry of Housing, Communities and Local Government produced the National Design Guide which seeks to help inform development proposals and their assessment by local planning authorities.
- 6.3.5 As a result of all this aforementioned policy and guidance, it is therefore crucial for the council to carefully consider all development proposals and whether they demonstrate this high quality of design. The commentary below therefore seeks to provide an analysis of the proposal and how it is adjudged to perform in terms of delivering in these aims.

Context

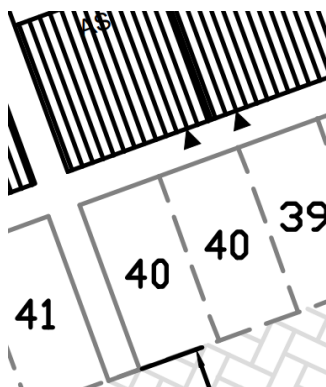
- 6.3.2 The site, whilst being adjacent to a sole residential property would be viewed as an individual housing estate off Coton Lane. Over the years, Tamworth's housing in close proximity to this site, especially around Coton Green Primary School in particular, has developed a distinct settlement pattern. As a result, the proposed development of relatively smaller housing numbers bound strongly with existing uses and infrastructure would be visually very different to what is currently present in the immediate area.
- 6.3.3 As a result, it is essential therefore that the design of this new housing development is of high quality to those who see it, how it presents in the landscape and for those who eventually live here. The emphasis on improving design is well documented in central Government policy, appeal

decisions and wider commentary which the Council fully endorses and therefore a very meticulous approach to this has been given for this proposal. This is especially more prudent as owing to the council's very healthy housing supply at present giving us comfort that we are sufficiently providing enough housing for Tamworth and its neighbouring authorities.

- 6.3.4 Despite requesting a number of amendments, the proposal in its final iteration lacks a number of aspects to be considered good enough to override our more than acceptable housing provision. The environmental context also presents a number of challenges to the living environment which do not tally with being one in which creates 'a high standard of amenity for... future users'.¹

Layout

- 6.3.5 The layout of the site is naturally split into two halves to cater for the stand-off distances from the electricity pylon which runs through the site. This immediately causes severance which whilst features such as paths and the main road can produce transient connection, the built form reads as two very separate area which does not create a well designed proposal.
- 6.3.6 Local plan policy EN5 e) states that development should be outward facing and therefore having the houses facing inwards along Coton Lane does not fully represent a policy complaint development. The agent has argued that this has been done to both provide natural surveillance and prevent housing fronting onto an embankment with revisions in the design and access statement to further justify this. Whilst this might be the case, it is considered that improvements could be made to avoid this and still achieve an outward facing proposal similar to housing developments along Coton Lane which create a more welcome environment.
- 6.3.7 Better attempts from the original submission have been made to provide linkages from one side to the other but again it is difficult to look past how the pylon makes this scheme a very disjointed form of development which is not required.
- 6.3.8 Plots 12-15 continue to propose parking at the rear of properties, plots 21, 51, 57 parking is located in an awkward/unsecure location compared to the house itself and there are some parking spaces which straddle into neighbouring properties.



Other issues:

- 6.3.9 Other issues include:
- Rear/side parking areas which do not create surveillance
 - Lack of trees along the road to create a pleasing environment along a large stretch of hard surface.
 - The SUDs are unimaginative; simply a balancing pond which when one considers some of the measures that are pointed to in guidance such as the National Design Guide ² there are others that could be used that create a better design response.
 - The two smaller roads to the north east of the site just create closed roads which have no connection to the rest of the site
 - The site entrance is not particularly overly welcoming, greeted with built form right on the boundary

¹ NPPF, paragraph 130 f).

² Page 29 of the National Design Guide

- Questionable amount of parking for visitors/residents to prevent pavement parking which is unsightly
- House types and designs not particularly inspiring – lack decorative features

6.3.10 This list is not exhaustive and it is the view that should it be taken to a design review panel (which has been suggested but not taken up by the applicant) there would be other issues that would need to be addressed.

6.3.11 The applicant has stated that some of the issues could be addressed by condition such as imaginative play space however to really provide an appreciation for high quality design this information should be given up front so a full consideration can be made.

6.3.12 Attempts to resolve a lot of the concerns including numerous layout changes and propose a number of 'zones' to create interesting landscape features including a sport zone; wildflower area and wetland zone around the drainage pond.

6.3.13 In summary, this site will be read as very much independent of what is located around the area so there is opportunity for a 'showcase' proposal to fully demonstrate how development can become better designed for all those who eventually will live in this community and see it as they enter from Lichfield or from the train. As proposed however, it reads very much as a standard housing estate with a lack of high quality that is so important in current planning decision making. Therefore the proposal conflicts with EN5 of the Tamworth Local Plan and chapter 12 of the NPPF.

6.4 Amenity for current and potential occupiers

6.4.1 Tamworth local plan policy EN5 g) states that new developments will be expected to g) Minimise or mitigate environmental impacts for the benefit of existing and prospective occupants of neighbouring land. Paragraph 130 of the NPPF further reinforces this, stating that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users. The Design SPD provides guidance on how these amenity considerations are to be made using adopted measurements.

6.4.2 *Current Neighbouring Occupiers*

The only residential property close to the site is Outfall Works Cottage to the east of the site. This property is however located sufficiently always from the side of proposed plot 16 to the left and therefore considered to not be significantly impacted by this property in terms of being overbearing or causing a loss of privacy (see image below showing this relationship).



6.4.3 *Potential Occupiers*

The site is recognised to be located adjacent to uses that could cause noise and disturbance for those would occupy the site on completion. Such uses include the sewage works to the north, the major railway line to the west and the busy Coton Lane to the south. The pylon too also creates noise, especially in winter/wet months when they can crackle caused when there's a change from

the normal conditions of a power line's insulators enabling the electric current to partially conduct along it or through the surrounding air to earth.

- 6.4.4 The local authority has consulted with the council's environmental health department and attempted to consult National Grid on any particular issues however this has not been fruitful. As a result, their guidance has been observed¹ which states that 15m clearance should be given has been adhered to be the latest layout proposed.
- 6.4.5 As a result of satisfactory reporting and contamination reports, the proposal should be satisfactory in terms of noise from neighbouring uses subject to conditions.
- 6.4.6 In terms of odour, the agent has stated the Preliminary OIA sets out a comprehensive qualitative risk assessment which considers a number of factors including the proximity of the proposed receptors to the source, the processes undertaken at the works and the effectiveness of the odour pathway (including consideration of wind conditions at the site).
- 6.4.7 The reason that the surveys do not capture wind blowing from sewage works towards the subject site is that such conditions (where wind is blowing from the north towards the south) are very uncommon as demonstrated on the wind rose enclosed as Figure 1 in the Preliminary OIA report. Monitoring the forecast on a daily basis for a number of weeks (with a view to undertaking the surveys) confirmed that such conditions were rare. The only opportunity when wind was forecast from the north for a short period was on 28th May. This which was actually a Saturday but the site was visited on this day due to the difficulties experienced capturing such conditions. Despite best efforts to align with the forecast, conditions encountered on site do not always accord with what is predicted. Wind also does not blow consistently from the same direction and the direction often varies over the 5 minute survey period. The directions quoted on the survey sheet were 'typical' for the sampling period but wind would have been experienced from other wind directions as well.
- 6.4.8 During the three odour surveys it was more typical for wind to be blowing from the northwest (towards the adjacent housing development). An off-site observation point was therefore located at the closest point to the sewage works within the adjacent development. The odour at the off-site observation point was noted to be stronger than at the subject site on all occasions indicating that odours are stronger at locations directly downwind of the sewage works. Whilst the uncommon occurrence of wind blowing from the north poses difficulties in capturing worst-case conditions for the purpose of site surveys, the fact that the subject site is upwind of the sewage works for the vast majority of the year is a key factor in the assessment of pathway effectiveness which concludes (in the OIA) that there is a low risk of adverse odour effects at the subject site arising from operation of the sewage works.
- 6.4.9 Both the Preliminary and Supplementary OIAs present the findings of a number of assessment tools as recommended in the IAQM guidance. The overall conclusion of 'no likely significant effects' draws together the findings of all assessment tools and is not reliant on individual factors.
- 6.4.10 National Planning Practice Guidance ³ states that assessments should 'be proportionate to the nature and scale of development proposed and the level of concern'. The IAQM odour guidance reinforces this stating that the selection of the number and type of assessment tools should be based on the potential of the proposed development to experience adverse odour effects. The potential for adverse odour effects itself requires some initial assessment or professional judgement.
- 6.4.11 As the comprehensive qualitative risk assessment, on-site odour surveys and review of complaints history (as presented within the preliminary and supplementary OIAs) all indicate a low risk of odour effects, it is not considered necessary or proportionate to undertake detailed dispersion modelling. Dispersion modelling itself is an inherently uncertain process in its attempt to simulate the complex atmospheric parameters that influence the behaviour of gaseous substances emitted into the atmosphere by means of a series of simplified mathematical equations and formulae. The IAQM

³ <https://www.gov.uk/guidance/air-quality--3>

guidance states that 'where the assessment is of an existing activity or process, empirical observations will usually be possible of what is happening on the ground: considerable weight should normally be given to the observational findings of community-based tools (complaints analysis, community surveys and odour diaries) and sensory assessments (such as sniff tests)'. It goes on to state that 'despite the understandable perception that the subjective nature of the sniff test is somehow inaccurate or imprecise, such extended surveys can arguably provide some of the best evidence on odour impact out of all the tools at our disposal'. The use of qualitative and observational techniques rather than dispersion modelling in this case should not therefore be assumed to be an inferior standard of assessment.

6.4.12 As a result of this despite the concerned levelled by the TBC environmental protection team, it is considered that the proposal would be acceptable in terms of amenity of the potential occupiers and would comply with policy EN5 of the Tamworth Local Plan 2006-31.

6.5 Affordable Housing

6.5.1 Policy HG4 requires that any new residential developments involving 10 or more dwellings are to provide at least 20% on site affordable units. The application proposes 59 dwellings following amendments to the layout, 12 of which are suggested as affordable units totalling 21% affordable units with at tenure split to be agreed which is compliant with policy HG4. of the Tamworth Local Plan 2006-2031.

6.5.2 A section 106 legal agreement will be required to ensure the affordable units are delivered in accordance with Policy IM1 (infrastructure and developer contributions), and if the committee approve the application this will be subject to a section 106 agreement securing the affordable housing units.

6.6 Housing Mix

6.6.1 Tamworth Local Plan Policy HG5 states that the following housing mix for the **total** dwellings should be required for housing development such as that proposed with this application:

- 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

6.6.2 There has been concern raised by the policy team that the proposed mix of housing is not fully in accordance with what the council require. However, whilst there may be a discrepancy against these requirements it is the overarching planning view that the mix still provides for smaller units of accommodation which are most in demand and therefore could not substantiate a refusal on these grounds.

6.7 Housing Density

6.7.1 Policy HG6 considers housing density and states that new residential developments will make efficient and effective use of land, whilst enhancing the character and quality of the area it is located in. 30 units per hectare is required to be policy compliant.

6.7.2 Density of housing was originally an issue for the Council's Planning Policy team and does need addressing as part of wider design related concerns.

6.8 Open Space

6.8.1 Local Plan Policy EN3 and the Design Guide SPD require that new housing developments should provide on site open space at a standard of 2.43Ha per 1000 people. Utilising this guidance, the proposed development would be required to include approximately 0.37ha of open space on site.

- 6.8.2 The proposals here provide two play spaces with elements of landscaping:
- Tree buffer along the western edge with the railway
 - Undeveloped land underneath the pylon and its wires
 - Areas to the front of some dwellings with trees
 - Small parcel of green space forward of plots 15's parking spaces.
 - Small parcel of green space to the side of plot 28
- 6.8.3 The application has also been supported by a landscaping which there are some slight discrepancies between this and the final proposed layout.
- 6.8.4 Policy EN3 Open Space and Green and Blue Links state that open space should be multi-functional and contribute to a range of objectives including increasing biodiversity, connecting habitats, healthy living, leisure and tourism, enhancing landscape character and helping to mitigate climate change.
- 6.8.5 The proposals show that that the housing development would be within 400m of accessible high quality open space. In addition, this policy also states that any new on-site open space should incorporate existing landscape features of value and provide links for biodiversity, cycling and walking to the wider green and blue infrastructure network within, and where appropriate, outside of Tamworth. There is some areas of concern that the proposals do not do this to their full potential however on balance there is considered to be a reasonable approach to this and further conditions could be applied to ensure true open space enhancements could be made.
- 6.8.6 If approved the areas of landscaping would be secured by condition and management of this would be left for a management company agreed within any section 106. This would include the balancing pond located in the southwest corner and acoustic fence alongside the railway line.
- 6.9 **Biodiversity**
- 6.9.1 Policy EN4 states that development should incorporate planting of native tree species where appropriate to the site. Development that would involve the removal of any tree, woodland or hedgerow, which contributes significantly to its setting, local landscape character or its surroundings, will be resisted unless the wider benefits of the development are sufficient to offset the loss and cannot be avoided by appropriate siting or design. Where removal is justified and unavoidable, suitable and appropriate mitigation planting will be required to offset the loss of these features.
- 6.9.2 The application has been supported by a Preliminary Ecological Appraisal (PEA) and Ecological Mitigation and Enhancement Strategy from reputable consultants. The PEA identifies several existing ecological constraints to development, including the presence of Dunnock and House Sparrow and a potential for hedgehogs. A number of suitable mitigation and compensatory measures have been included such as bird and bat boxes, new landscape planting and careful consideration of a timetable of works. An updated metric to reflect the changed numbers of dwellings illustrates that there will be a net loss for biodiversity. In order to offset this loss, a financial contribution has been committed by the applicants of an amount to be agreed to improve the biodiversity on a suitable receptor to ensure that the proposal fully complies with Local Plan Policy EN4 (Protecting and Enhancing Biodiversity) and the NPPF. Therefore, the proposals comply with policy EN4 of the Tamworth Local Plan 2006-2031
- 6.8 **Noise and Pollution**
- 6.8.1 Policy SU5 - Pollution, Ground Conditions and Minerals and Soils states that development should manage the risk of air, light, noise, or water pollution and land instability. Relevant reports proportionate to the scale of the development will be required to assess pollution levels and mitigation measures where a risk is identified.

- 6.8.2 There are a number of environmental constraints that could cause noise that would have amenity impacts to those who would live in this location. To this extent, reports have been produced by the applicant and reviewed by the Council's Environmental protection team.
- 6.8.3 Initial comments returned did not consider that the proposed acoustic barrier adjacent to the railway line would provide sufficient protection from noise and therefore further justification and technical data was requested which was produced in a timely manner. As a result, the environmental protection officer has since removed their objection on this. They have also observed the other noise and odour reports submitted with the application and deemed these acceptable subject to conditions.
- 6.8.3 The scheme is therefore considered to comply with the requirements of policy SU5 of Tamworth Local Plan 2006-2031.

6.9 Highways

- 6.9.1 The applicants have continued work directly with the County Highways Authority following the original submission to provide additional information to completely satisfy their requirements. To this end, the Highway Authority is now in a position to produce final comments based on the information submitted by the applicant.

The revised Transport Assessment, associated tracking, layout and other plans and drawings have demonstrated that the proposed scheme will provide the required parking for residents and visitors, a safe access from the entrance off Coton Lane.

It is noted that there is a number of objections on highway grounds including the volume of transport that would be created to serve the housing and the proposed access off Fontenaye Road. This has been carefully inspected by the County Highways Authority as a result of the submitted technical data with a close consideration of the national and local policy approach to considering this information. As a result of the data supplied however, it is considered that there would not be a severe impact upon highway safety in accordance with NPPF paragraph 111 and the proposal would also comply with policy SU2 of the Tamworth Local Plan 2006-2031.

6.10 Drainage and Surface Water Flooding

- 6.10.1 Following amendments to drainage proposals, Severn Trent Water and the Lead Local Flood Authority have requested 'prior to commencement' conditions to demonstrate suitable drainage for foul and surface water in accordance with Policy SU4, which requires any major development to demonstrate that there is adequate wastewater infrastructure in place to serve the development.

Therefore, the proposals comply with policy SU4 of the Tamworth Local Plan 2006-2031

6.11 Other Matters

- 6.11.1 As a result of consultation, Staffordshire County Council Highways, the Education Authority and Highways Authority have requested financial contributions.
- 6.11.2 These contributions have been reviewed in compliance with the relevant CIL regulations it is considered they are CIL compliant, and they are also agreed as acceptable by the applicants to mitigate against the impacts of the development.
- 6.11.3 Given that the application is proposed for more than three new dwellings the development will trigger a Community Infrastructure Levy (CIL) payment if the development is commenced. CIL is a tariff upon development, which local authorities can charge in order to raise funds to contribute to the delivery of new infrastructure, which arises as a result of development in an area. A CIL charge will apply to all relevant applications determined on or after **1st August 2018** (including those successful on appeal and those where a resolution to grant has been made but a S106 agreement has yet to be finalised). The CIL Charging Schedule confirms a payment of £35 per square metre for

residential developments of 11 units or more. A relief could apply to the 12 affordable/social units on the site; this is subject to a formal application process outside of the planning application consideration.

7 Conclusion

- 7.1 The site is one that is not allocated for development. It does however lie close to existing built form and is reasonably close to public transport connections and two miles to the town centre and ten-minute walk to a local store making it a reasonably sustainable location for housing and therefore acceptable in principle.
- 7.2 We welcome the fact the proposal will provide policy compliant affordable housing and contributions for schools, healthcare provision and highways. The proposal however must also deliver on being well designed if we are to create the very sustainable development so required in planning decisions and stated in both local and national policy and guidance.
- 7.3 The applicant has notably worked hard to make various changes in response to a number of specific design related issues. They have produced design and access statement addendums to give justification for various responses all with a high level of detail.
- 7.4 Nonetheless, the pylon represents a real challenge in creating a truly highly designed scheme. It means that the site is in effect cut into two sides which does not make for a cohesive place. Living so close to this large piece of infrastructure too will be very oppressive and not create a high quality living environment.
- 7.5 We have also identified a number of issues at 6.3.9 that also do not fully provide a well designed scheme that meets design policy that does not outweigh the above benefits.
- 7.3 National Planning Policy Framework paragraph 134 states that 'development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design'. Whilst the applicant feels that have achieved this, it is the opinion that the high bar has not been achieved. As a result the proposal fails to comply with EN5 of the Tamworth Local Plan 2006-31 and the NPPF.

8 Recommendation

Refusal

Reason

National Planning Policy Framework paragraph 134 states that 'development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design'. The proposed development, by virtue of its poor design is not considered to reflect these high ambitions required by local and national policy. Such elements of the proposed development includes:

- Having a poor split layout and general arrangement in relation to the electricity pylon which bisects the site.
- The proposed contrived and awkward parking arrangements for the potential users of some of the dwellings.
- Providing an unwelcoming site entrance for what is a large housing estate.
- A lack of attractive roads and connections through the site.
- Proposing a unimaginative response to the main sustainable drainage feature.

As a result therefore, the development is considered to not comply with relevant local and national policy. Furthermore, the council is also able to demonstrate more than five-year supply of housing land and therefore no overly pressing requirement for further homes in excess of the requirements set out in policy HG1. The proposal therefore is in conflict with policy EN5 Design of New Development of the Tamworth Local Plan 2006-2031 and National Planning Policy Framework paragraph 134.

ⁱ <https://www.nationalgrid.com/electricity-transmission/document/130626/download>

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