

# Representations and Officer Responses

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## Issues and Options Consultation

September 2023

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# Introduction

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## What is the purpose of this document?

From Friday 30th September 2022 to Monday 14th November 2022, Tamworth Borough Council held an Issues and Options consultation to inform the new Local Plan.

The consultation sought views on the key planning issues facing the borough over the proposed plan period (to 2043) and the potential options to address them. This document sets out all the comments that we received, alongside officer responses and accompanying action points.

## How many comments have been received?

We received 47 representations in total, which are broken down into the following respondent groups:

Residents and General Public	10
Local Businesses	1
Councillors and MPs	1
Government and Public Bodies	18
Developers, Agents and Landowners	11
Charities and Community Groups	3
Other Stakeholders and Businesses	3
<b>Total</b>	<b>47</b>

## How is the document organised?

The document runs through each feedback point posed in the consultation, and lists all the corresponding comments received.

Any responses that offer comments beyond the focus of the feedback points have been included in the **Additional Representations** section on page 134.

## How do I find my comments?

All respondents have been assigned a Unique Reference Number (URN), which will be valid throughout all stages of the local plan process.

Each respondent is identifiable via their URN, as listed in Table 1, and any personal details have been anonymised. The relevant URN is included alongside each representation.

## How have we responded to your comments?

Officers from the Planning Policy Team have provided initial responses to each of the comments submitted. Where necessary, action points have also been identified. If you require any further information, or would like to discuss any part of this document with the team, then please get in touch with us at [developmentplan@tamworth.gov.uk](mailto:developmentplan@tamworth.gov.uk).

# Record of Respondents

**Table 1: List of Respondents and Corresponding Unique Reference Numbers (URNs)**

URN	Respondent Type	Company/Organisation/ Individual	Agent (if applicable)
001	Resident/General Public		
002	Resident/General Public		
003	Resident/General Public		
004	Local Business		
005	Resident/General Public		
006	Resident/General Public		
007	Government/Public Body	Staffordshire County Council Transport Planning	
008	Government/Public Body	Natural England	
009	Resident/General Public		
010	Councillor/MP		
011	Resident/General Public		
012	Resident/General Public		
013	Other Stakeholder/Business	Lands Department, British Pipeline Agency	
014	Government/Public Body	Historic England	
015	Charity/Community Group	Inland Waterways Association	
016	Government/Public Body	Severn Trent	
017	Government/Public Body	Birmingham City Council	
018	Developer/Agent/Landowner	Churchill Retirement Living	Planning Issues Ltd
019	Government/Public Body	Sport England	
020	Developer/Agent/Landowner	Home Builders Federation	
021	Government/Public Body	Staffordshire County Council Environment and Countryside	
022	Government/Public Body	South Staffordshire Council Strategic Planning Team	
023	Government/Public Body	National Highways	
024	Charity/Community Group	Canal and River Trust	
025	Developer/Agent/Landowner	McCarthy Stone	The Planning Bureau Limited

026	Government/Public Body	Staffordshire County Council School Organisation Team	
027	Resident/General Public		
028	Resident/General Public		
029	Government/Public Body	Dudley Council Planning Team	
030	Government/Public Body	Coal Authority	
031	Government/Public Body	The Environment Agency	
032	Other Stakeholder/Business	National Grid	Avison Young
033	Developer/Agent/Landowner	Gladman	
034	Developer/Agent/Landowner	Local Landowner	JVH Town Planning Consultants
035	Other Stakeholder/Business	West Midlands Housing Association Planning Consortium	Tetlow King
036	Developer/Agent/Landowner	Vistry	Turley
037	Developer/Agent/Landowner	Bellway Homes	Marrons Planning
038	Developer/Agent/Landowner	Hodgetts Estates	WSP
039	Charity/Community Group	Staffordshire Wildlife Trust	
040	Developer/Agent/Landowner	B&S Aucott	WSP
041	Developer/Agent/Landowner	Peer Real Estate Ltd	
042	Government/Public Body	Theatres Trust	
043	Government/Public Body	Sandwell Metropolitan Borough Council	
044	Government/Public Body	Staffordshire and Stoke-on- Trent Integrated Care Board	
045	Developer/Agent/Landowner	Bloor Homes	Define Planning and Design Ltd
046	Government/Public Body	Staffordshire County Council Flood Risk Management	
047	Government/Public Body	Midlands NHS Foundation Trust	Tyler Parkes

Section 4

## Proposed Timeframe

*The following section contains representations relating to Feedback Point 1*

# Feedback Point 1: Our proposed timeframe

Question ID	URN	Respondent Type	Representation	Officer Response	Further Action
<b>FP1.1: Do you agree that 2043 is an appropriate end date for the new local plan? If you do not agree, then please detail what alternative date you would suggest and why.</b>					
FP1.1	001	Resident/General Public	No. Too far in advance. More relevant to look at a 10 year plan.	The National Planning Policy Framework is clear that strategic policies should be prepared over a minimum 15 year period and a local planning authority should be planning for the full plan period. Considering this, and an additional time allowance to produce and adopt the plan, we consider 2043 to be in line with national guidance. Once adopted, the plan and its policies will be reviewed every five years. This will ensure that both the plan and its policies remain effective for Tamworth's circumstances.	No further action required.
FP1.1	002	Resident/General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP1.1	003	Resident/General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP1.1	004	Local Business	No. It's too long, by that time town centre will be totally ruined like Sutton Coldfield. This will result in less people coming to town and more businesses closing.	The National Planning Policy Framework is clear that strategic policies should be prepared over a minimum 15 year period and a local planning authority should be planning for the full plan period. Considering this, and an additional time allowance to produce and adopt the plan, we consider 2043 to be in line with national guidance. Once adopted, the plan and its policies will be reviewed every five years. This will ensure that both the plan and its policies remain effective for Tamworth's circumstances. Such circumstances include any changes to the economic environment and town centre.	No further action required.
FP1.1	005	Resident/General Public	No. With the way the country is changing it should be earlier. 2033.	The National Planning Policy Framework is clear that strategic policies should be prepared over a minimum 15 year period and a local planning authority should be planning for the full plan period. Considering this, and an additional time allowance to produce and adopt the plan, we consider 2043 to be in line with national guidance. Once adopted, the plan and its policies will be	No further action required.

				reviewed every five years. This will ensure that both the plan and its policies remain effective for Tamworth's circumstances.	
FP1.1	006	Resident/General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP1.1	009	Resident/General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP1.1	011	Resident/General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP1.1	012	Resident/General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP1.1	014	Government/ Public Body	Historic England considers 2043 is an appropriate end point for the plan in relation to its business, the historic environment.	Comment noted.	Comments will be considered as part of the local plan process.
FP1.1	015	Charity/ Community Group	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP1.1	020	Developer/Agent/ Landowner	It is proposed that the end date of the new Plan should be 2043. It is noted that the NPPF states strategic policies should look ahead over a minimum 15-year period from adoption and that where larger scale developments form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take in account the likely timescale for delivery. The HBF considers that the Plan period to 2043 may be appropriate as long the Plan is prepared efficiently and that this still provides a 15-year period at the point at which the Plan is adopted, however, if larger scale developments are proposed in the Plan, then a longer period will be required.	Comments are noted in respect of the relevant National Planning Policy Framework guidance. This guidance relates to larger scale developments such as new settlements or significant extensions to existing villages and towns.  Tamworth is one of the smallest local authority districts in England, extending across 12 square miles within tight administrative boundaries. The borough is significantly constrained for future growth, with much already developed. In consideration of these factors, it is highly unlikely that such large scale developments as described by the NPPF will be feasible within Tamworth.	Comments will be considered as part of the local plan process.
FP1.1	027	Resident/General Public	No. We've got enough housing estates being built to suit Lichfield already.	Comment noted.	Comments will be considered as part of the local plan process.
FP1.1	028	Resident/General Public	No. I think for most of the plan that the end point of 2043 is acceptable but for any part of the plan which focuses on the reduction of carbon emissions an earlier end point is desirable if TBC want's to demonstrate a serious and focused commitment to stabilising global warming.	Comments are noted in respect of 2043 being considered an acceptable end date, excluding in relation to carbon emission targets.  Tamworth Borough Council are committed to working towards reducing carbon emissions. However, as the	Comments will be considered as part of the local plan process.

				<p>current reduction requirements are set by other regulations outside of the planning system, such requirements do not need to be reproduced in the local plan. We will therefore continue to work towards those targets in line with government-suggested timeframes, and such deadlines will not be restated in the new plan.</p> <p>Once adopted, the new plan and its policies will also be reviewed every five years. The purpose of this is to ensure that both the plan and its policies remain effective for Tamworth's circumstances. In respect of this representation, we note that this will include a consideration of Tamworth's wider environmental concerns and current position in respect of climate change.</p>	
FP1.1	029	Government/ Public Body	References to the national planning policy requirement for a plan to cover a least a 15 year timeframe from the point of adoption are supported.	Comment noted.	Comments will be considered as part of the local plan process.
FP1.1	035	Other Stakeholder/ Business	We are encouraged by the proposed plan period set out in Section 4. An end of plan date of 2043 should ensure that Tamworth will continue to benefit from a plan-led approach for development to meet current and future needs. Assuming the new plan's timeline for adoption is met, the proposed end date of 2043 would satisfy paragraph 22 of the National Planning Policy Framework (NPPF), which requires that "strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure".	Comment noted.	Comments will be considered as part of the local plan process.
FP1.1	037	Developer/Agent/ Landowner	<p>Bellway consider that the Plan period should be extended until 2045.</p> <p>The Council's latest Local Development Scheme 2022-2025 was approved by Cabinet in September 2022, and it sets out a proposed timetable for the progression of the Local Plan. The Local Development Scheme anticipates that the Local Plan will be submitted to the Secretary of State in late 2025. Assuming a timely and successful Examination took place in 2026/27, it is likely adoption of the Local Plan on this timetable would be in 2027/28.</p> <p>On that basis of the Council's current anticipated timetable, a Plan period which runs to 2043 would be acceptable in principle in line with the National Planning Policy Framework (the Framework). However, it is considered that the timetable set out in the Local</p>	<p>The representation acknowledges that the proposed 2043 end date is in line with National Planning Policy Framework guidance, however, suggests that this may be too ambitious, and in the likely event of delays, should be extended to 2045.</p> <p>The timeline detailed in the Local Development Scheme (published September 2022) has been comprised to include a time contingency for delays in the production and/or adoption process. At this stage, we feel that such contingency is sufficient.</p> <p>However, should we experience any significant delays beyond our anticipated contingency, we endeavour to be flexible and responsive. Should such delay(s) be</p>	No further action required.



			<p>Development Scheme is ambitious and will likely be subject to delays, as has been common with a significant number of Local Plans in recent months. This is considered particularly likely in Tamworth given the likelihood of the need for neighbouring authorities to contribute towards unmet needs arising from the Tamworth Local Plan, and wider cross boundary issues relating to Birmingham as explored in further detail in these representations.</p> <p>Given the Framework supports a minimum 15 year Plan period from adoption, it is considered that the Local Plan should set an end date of 2045. This is to allow for sufficient flexibility and to limit the potential of the need for the Council to carry out additional work at a later stage of the Local Plan process in order to ensure compliance with the Framework.</p>	deemed significant enough to affect the overall plan timeline, the Local Development Scheme will be amended to reflect a more accurate timeframe.	
FP1.1	039	Charity/ Community Group	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP1.1	041	Developer/Agent/ Landowner	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP1.1	042	Government/ Public Body	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP1.1	043	Government/ Public Body	No. We would query the end date of the new plan of 2043, the LDS includes a 3 year period to Regulation 19 with submission anticipated 2025; allowing one year for the Examination adoption could be in 2026. A 15 year plan date from adoption would be 2041. There would appear to be sufficient contingency with the timetable so it is unclear why an end plan date of 2043 is needed. A reduction of two years would equate to a total need of 2679.	Comments noted. We acknowledge that the timeline set out in our Local Development Scheme is ambitious, but believe that the additional two years of contingency beyond 2041 will offer us the most appropriate level of flexibility to respond to delays in the local plan timeline.	No further action required.
FP1.1	044	Government/ Public Body	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP1.1	045	Developer/Agent/ Landowner	<p>Bloor Homes Ltd (BHL) welcome the preparation of the Tamworth Borough Council (TBC) Local Plan Review (LPR) and the opportunity to respond to the Issues and Options Consultation. BHL support the intention to positively plan for sustainable development and growth in the Borough over the upcoming plan period.</p> <p>Whilst the proposed end date of 2043 currently appears reasonable, TBC should be sufficiently flexible to respond to any slippage in the plan preparation schedule. It should be noted that other Local Authorities within the Greater Birmingham Housing</p>	The current end period of 2043 is in line with National Planning Policy Framework guidance. The process timeline detailed in the Local Development Scheme (published September 2022) has been comprised to include a time contingency for delays in the production and/or adoption process. However, should we experience any significant delays beyond our anticipated contingency, we endeavour to be flexible and responsive. Should such delay(s) be deemed significant	Comments will be considered as part of the local plan process.

			<p>Market Area (GBHMA) have experienced delays as a result of protracted plan preparation and examination periods, largely due to complexities in planning for the region such as addressing unmet housing need, green belt release and HS2. For example, Solihull Metropolitan Council are yet to adopt their Local Plan, seven years on from their Issues and Options consultation. If TBC were to experience similar delays, the plan period would need to be adjusted to meet the requirement as per NPPF (para. 22) for plans to “look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities”.</p> <p>Therefore, BHL support the proposed plan period but suggest that TBC keep the plan period under review.</p>	<p>enough to affect the overall plan timeline, the Local Development Scheme will be updated in reflection.</p>	
FP1.1	047	Government/ Public Body	<p>We would support a 20-year time frame for the review.</p>	<p>The National Planning Policy Framework is clear that strategic policies should be prepared over a minimum 15 year period and a local planning authority should be planning for the full plan period. Considering this, and an additional time allowance to produce and adopt the plan, we consider 2043 to be in line with national guidance. Once adopted, the plan and its policies will be reviewed every five years. This will ensure that both the plan and its policies remain effective for Tamworth’s circumstances.</p>	<p>No further action required.</p>

## Section 5

# Vision and Objectives

*The following section contains representations relating to Feedback Point 2*

## Feedback Point 2: Our vision and objectives

Question ID	URN	Respondent Type	Representation	Officer Response	Further Action
<b>FP2.1: Do you agree that these are the right vision and objectives for the new local plan? If you do not agree, then please detail the changes you would like to see and why.</b>					
FP2.1	001	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP2.1	002	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP2.1	003	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP2.1	004	Local Business	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP2.1	005	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP2.1	006	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP2.1	007	Government/ Public Body	Objective 9. Promote sustainable transport modes for all journeys through improving walking, cycling, public transport and electric vehicle facilities Electric vehicles may not fully fit into the definition of 'sustainable transport modes'. Whilst EVs have some environmental benefits (such as better air quality) they will still contribute to traffic congestion and the disbenefits that brings socially and to the economy. Maybe this objective should make reference to the government's decarbonisation plan which covers this more holistically? Is 'Promote' strongly worded enough to ensure that developers deliver on this objective?	Comments noted in respect of Objective 9.	We will be in contact with the Transport Planning team at Staffordshire County Council to undertake further discussions.
FP2.1	009	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.

FP2.1	011	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP2.1	012	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP2.1	014	Government/ Public Body	<p>We welcome the proposed vision statement which has the potential to offer various opportunities to celebrate and enhance heritage, in its' widest sense, in a sustainable manner.</p> <p>We also welcome the proposed objectives for the emerging Plan. In terms of Objective 6 we note that 'setting' is not included and we would recommend that heritage assets and setting are referred to in the main Plan text as it progresses. We also note that there is no reference to designated and non-designated heritage assets in this strategic context and, again, would recommend that these are referred to in the main Plan text as it progresses.</p>	Comments noted and amendments acknowledged.	Changes required to ensure that there is reference to 'setting' in the supporting text of Objective 6. Similarly, we will introduce reference to both designated and non-designated heritage assets, where appropriate.
FP2.1	015	Charity/ Community Group	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP2.1	016	Government/ Public Body	<p>We support the plans visions and objectives, particularly themes of sustainability, climate change resilience, blue/green infrastructure, and biodiversity.</p> <p>Regarding the plans aim to make best use of council owned land (objective 2) and regenerate and diversify the town centre (option 5) we would welcome and conversations around site specific ambitions. We would like to explore partnership opportunities in collaborating with you to retrofit green infrastructure across the Borough.</p>	Comments noted.	Severn Trent will be informed of future Local Plan updates, and their advice sought on specific matters where necessary.
FP2.1	018	Developer/ Agent/ Landowner	It is the view of the respondent that one of the Council's objectives should be an appropriate level of specialist older persons' housing to meet the needs of the Borough's ageing population (see appended letter for more details).	<p>Our housing must cater for a diverse community, all of whom require different types and tenures of dwelling to meet a range of needs. Objective 3 sufficiently summarises all of these needs, including providing for our ageing population.</p> <p>Further work is yet to be carried out to establish exactly where our specific needs exist. In the new plan, there may be potential opportunities to discuss specific needs in plain text or, where justified by evidence, specific policies for particular housing needs.</p>	Further work and evidence required to establish specific housing needs, to be completed prior to Preferred Options.

FP2.1	020	Developer/ Agent/ Landowner	The HBF notes objective 3 which states that the Plan should 'Provide a supply of high quality and affordable homes to meet the needs of all sections of our community'. Whilst the HBF agrees this is important, it is also important to ensure that sufficient market and affordable homes are provided to meet the current and future identified local housing need.	Comments noted.	Further clarification is required to ensure that both market and affordable housing are effectively represented in Objective 3.
FP2.1	021	Government/ Public Body	The inclusion of specific objective focusing on protecting and enhancing the borough's heritage is welcomed and supported.	Comments noted.	Comments will be considered as part of the local plan process.
FP2.1	026	Government/ Public Body	Objectives 7, 8, 9 and 11 have direct link with education and there may be others with indirect links. We welcome objective 11 as it is fundamental to the success of the local plan that the appropriate infrastructure including the delivery of school places is secured over the plan period. We note that the 11 objectives are not ranked in priority order.	Comments noted.	Comments will be considered as part of the local plan process.
FP2.1	027	Resident/General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP2.1	028	Resident/General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP2.1	029	Government/ Public Body	It is appropriate for Tamworth Borough Council to identify its own locally specific vision and priorities, in line with the National Planning Policy Framework (NPPF, paragraph 15). Dudley MBC particularly welcomes reference to Objective 2 (Make the most efficient and sustainable use of the borough's limited supply of land).	Comments noted.	Comments will be considered as part of the local plan process.
FP2.1	035	Other Stakeholder/ Business	Section 5 of the consultation document sets out 11 objectives covering a range of issues and topics which will form the basis for the policies in Tamworth's new Local Plan. The WMHAPC is pleased that the delivery of affordable housing in Tamworth is recognised as a key objective:  "Objective 3: Provide a supply of high quality and affordable homes to meet the needs of all sections of our community."  This objective is discussed further in Section 6.2 of the consultation document.	Comments noted.	Comments will be considered as part of the local plan process.
FP2.1	036	Developer/Agent/ Landowner	We have no objection to such a brief vision, but it should perhaps include reference to some of the challenges that the plan will seek to resolve by 2043, including ensuring there is housing for all. This then follows through to the plan's objectives, including providing a supply of high quality and affordable housing and making the most	Comments noted. In the new plan, our vision will be supported by a set of coordinated objectives and policies. All will be further contextualised with supporting text, which will include a discussion of the challenges and opportunities facing Tamworth.	No further action required in respect of the current vision. Supporting subtext will be explored later in the local plan process.

			efficient use of the borough's limited supply of land. Given the borough's tightly drawn administrative boundary, a further necessary objective is to acknowledge that the Council will have to work with its neighbours if Tamworth's housing needs are to be met in full. Reflecting this, objective 11 should also recognise that some infrastructure delivered in Tamworth may support new development across the borough and immediately beyond given Tamworth cannot meet its own needs.		
FP2.1	039	Charity/ Community Group	<p>Generally the objectives are good. It would be useful to have Environmental Net Gain as an objective, as this would cover many aspects such as flood management, water/air quality etc. Some amendments would be beneficial, see below.</p> <p>Objective 10: Protect, enhance, link and expand ecological and geological assets. To achieve a robust ecological network in line with Tamworth Borough Council's Nature Recovery Network mapping and the county's forthcoming Local Nature Recovery Strategy.</p> <p>Objective 11: Ensure that appropriate infrastructure is in place to support existing and new development across the borough, including digital infrastructure. Some infrastructure needs may be current and need to be improved before new development takes place to solve existing issues or gaps, e.g. flooding or lack of accessible natural greenspace.</p>	Comments noted. It appears that the points raised are already covered within the existing proposed objectives. The objectives themselves are intended to be concise whilst covering a range of topic areas. They are intended to form the basis for the policies of the plan which is where more detail will be provided.	Consider whether any amendments to the wording of the objectives is required.
FP2.1	041	Developer/Agent/ Landowner	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP2.1	042	Government/ Public Body	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP2.1	043	Government/ Public Body	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP2.1	044	Government/ Public Body	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP2.1	045	Developer/Agent/ Landowner	BHL welcome the proposed vision and objectives and wish to emphasise the role that suitably located residential development can play in realising them.	In respect of Objective 2, we wish to note that any release of the Green Belt would be a last resort in delivering our housing need, and, in line with the NPPF, would only be considered once all other options have been reasonably explored. Only once further evidence	In respect of Objective 2, further work will be undertaken to determine the overall housing figure required over the plan

		<p>Objective 2 to make efficient use of the limited land supply is supported which, for the purpose of addressing Local Housing Need (LHN), will require an element of green belt release. Indeed, Policy EN2 of the adopted Local Plan recognises that a review of the Green Belt boundaries may be required to meet TBC’s housing needs over the longer term.</p> <p>Objective 3 recognises that a supply of high quality and affordable homes must be provided to meet the needs of the community, the importance of which should be reflected throughout the plan. BHL recommend the objective is expanded further to read “Provide a supply of high quality and affordable homes to fully meet the needs of all sections of our community.” It is particularly important that TBC seeks to fully meet its identified housing needs within its own jurisdiction, given the substantial unmet need that has been identified in the Greater Birmingham Housing Market Area.</p> <p>Objectives 4 and 5 seek to support the existing local economy and the regeneration of the town centre, in line with the requirement under the NPPF (para. 86) for planning policies to “support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation.” The NPPF (para. 86) acknowledges the role residential developments play in delivering these objectives, through supporting the vitality and ongoing viability of key services and generating additional footfall into town centres.</p> <p>Objectives 7, 9 and 11 focus on sustainable transport and infrastructure provision, which, as outlined in the NPPF (para. 92), can be supported through residential development. Indeed, the sustainable location of new developments, provision of active travel/green infrastructure corridors and funding of infrastructure improvements through levies will positively contribute to the delivery of these objectives. Additionally, the delivery of on-site green and blue infrastructure and public open spaces will contribute to achieving Objectives 8 and 10.</p> <p>For further discussion on how sustainably located residential development can contribute towards achieving these objectives, please refer to Feedback Point 10.</p>	<p>has been gathered to establish housing need will the appropriate delivery approach(es) be decided.</p> <p>This is echoed in respect of Objective 3. The mechanisms through which we could deliver our housing need are identified in Option 6.2(b). The most appropriate option, or combination of options, still needs to be determined, with further evidence required to support this decision. Despite this, any final approach will be assembled to fully meet our identified housing need, and this will be reflected in supporting text. On this basis, no alteration to the wording of Objective 3 is considered necessary.</p> <p>Further comments in relation to Objectives 4, 5, 7, 9 and 11 are noted.</p>	<p>period, and the most appropriate option(s) to deliver this. This will be carried out prior to the Preferred Options Stage.</p> <p>No change required in respect of suggested amendments to Objective 3.</p>
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FP2.1	047	Government/ Public Body	We would like to see health infrastructure mentioned in the same way as transport and digital infrastructure. This might be achieved through a minor addition to Objective 11: " Ensure that appropriate infrastructure is in place to support new development AND GROWTH across the borough, including HEALTH AND digital infrastructure".	Comments noted and the suggested amendment to Objective 11 is acknowledged. On reflection, we do not feel it is necessary to amend Objective 11 to include any further reference to specific types of infrastructure.	No further action required.
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Section 6.1

## **Climate Change and Biodiversity**

*The following section contains representations relating to Feedback Points 3, 4, 5, 6, 7 and 8*

## Feedback Point 3: Achieving carbon reduction from new development

Question ID	URN	Respondent Type	Representation	Officer Response	Further Action
<b>FP3.1: Which of the proposed options do you feel is the most appropriate way forward?</b>					
FP3.1	001	Resident/ General Public	ii. Look to set our own reduction standards that are stricter than the national requirements (acknowledging that the introduction of any Future Homes and Buildings Standards will set a new minimum standard).	Comment noted.	Comments will be considered as part of the local plan process.
FP3.1	002	Resident/ General Public	ii. Look to set our own reduction standards that are stricter than the national requirements (acknowledging that the introduction of any Future Homes and Buildings Standards will set a new minimum standard).	Comment noted.	Comments will be considered as part of the local plan process.
FP3.1	003	Resident/ General Public	ii. Look to set our own reduction standards that are stricter than the national requirements (acknowledging that the introduction of any Future Homes and Buildings Standards will set a new minimum standard).	Comment noted.	Comments will be considered as part of the local plan process.
FP3.1	004	Local Business	i. Rely on national standards and building regulations to set the carbon reduction levels for new buildings.	Comment noted.	Comments will be considered as part of the local plan process.
FP3.1	005	Resident/ General Public	(i) is my preferred option.	Comment noted.	Comments will be considered as part of the local plan process.
	006	Resident/ General Public	i. Rely on national standards and building regulations to set the carbon reduction levels for new buildings.	Comment noted.	Comments will be considered as part of the local plan process.
FP3.1	007	Government/ Public Body	ii) set own more challenging targets – given TBC’s Climate Change emergency and their desire to hit targets by 2030 (rather than 2050), and the Government’s likely future guidance to make stricter targets by 2025.	Comment noted.	Comments will be considered as part of the local plan process.
FP3.1	009	Resident/ General Public	i. Rely on national standards and building regulations to set the carbon reduction levels for new buildings.	Comment noted.	Comments will be considered as part of the local plan process.
FP3.1	011	Resident/ General Public	ii. Look to set our own reduction standards that are stricter than the national requirements (acknowledging that the introduction of any Future Homes and Buildings Standards will set a new minimum standard).	Comment noted.	Comments will be considered as part of the local plan process.
FP3.1	012	Resident/ General Public	i. Rely on national standards and building regulations to set the carbon reduction levels for new buildings.	Comment noted.	Comments will be considered as part of the local plan process.

FP3.1	014	Government/ Public Body	It will be for the Local Authority to establish which option in 6.1a would be reasonable but we welcome the specific reference to new development. Historic England has produced various information in relation to carbon efficiency and reduction which may be of use as the Plan progresses: <a href="https://historicengland.org.uk/whats-new/features/climate-change/">https://historicengland.org.uk/whats-new/features/climate-change/</a>	Comments noted.	Supporting information will be considered as part of the local plan process.
FP3.1	020	Developer/ Agent/ Landowner	<p>The HBF considers that it would be most appropriate to rely on national standards and building regulations to set the carbon reduction levels for new buildings. The HBF generally supports sustainable development and considers that the homebuilding industry can help to address some of the climate change emergency challenges identified by the Council. However, the HBF recognises the need to move towards greater energy efficiency via a nationally consistent set of standards and timetable, which is universally understood and technically implementable.</p> <p>Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations were updated in 2021 and took effect from 15<sup>th</sup> June 2022, with transitional arrangements in place for dwellings started before 15<sup>th</sup> June 2023. To ensure as many homes as possible are built in line with new energy efficiency standards, these transitional arrangements will apply to individual homes rather than an entire development.</p> <p>The Government Response to The Future Homes Standard: 2019 Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings dated January 2021 provided an implementation roadmap. The 2021 Building Regulations interim uplift will deliver homes that are expected to produce 31% less CO2 emissions compared to current standards. The implementation of the Future Homes Standard 2025 will ensure that new homes will produce at least 75% lower CO2 emissions than one built to previous energy efficiency requirements. By delivering carbon reductions through the fabric and building services in a home rather than relying on wider carbon offsetting, the Future Homes Standard will ensure new homes have a smaller carbon footprint than any previous Government policy. In addition, this footprint will continue to reduce over time as the electricity grid decarbonises.</p>	Comments noted.	Comments will be considered as part of the local plan process.
FP3.1	021	Government/ Public Body	ii) setting your own stricter than national standards should help achieve carbon reduction from new development sooner.	Comment noted.	Comments will be considered as part of the local plan process.

FP3.1	026	Government/ Public Body	<p>From an education perspective it would be appropriate to use Option 1 - to rely on national standards and building regulations to set the carbon reduction levels for new buildings, for the reasons set out below.</p> <p>The provision of infrastructure such as new schools or school expansions rely on the receipt of developer contributions. Adherence to higher local standards would have cost implications that would need to be met by increases in developer contributions.</p> <p>Cost multipliers in the Staffordshire Education Infrastructure Contributions Policy do not currently include increased costs for enhanced initiatives such as the recent major changes in Building Regulations to reflect changes in how buildings are constructed and the environment. New housing developments, including affordable homes, should be expected to meet the full education requirement either through new schools, school expansions or the use of existing capacity. Increased costs for both new schools and expansion projects to account for requirements over and above the national standards may make developments less viable.</p> <p>Should it not be possible to secure education contributions to mitigate a housing development locally by delivering additional school places, it may be necessary to transport pupils outside of the local area to areas where there is capacity. Provision of additional transport to access school places outside of the local area impacts on the ability of pupils to use sustainable modes of travel to and from school. This could impact negatively on proposals to reduce carbon emissions. This furthermore would be a significant strain on the public purse for transport costs and would be contrary to objective 11.</p>	Comments noted.	Comments will be considered as part of the local plan process.
FP3.1	027	Resident/ General Public	i. Rely on national standards and building regulations to set the carbon reduction levels for new buildings.	Comment noted.	Comments will be considered as part of the local plan process.
FP3.1	028	Resident/ General Public	i. Rely on national standards and building regulations to set the carbon reduction levels for new buildings.	Comment noted.	Comments will be considered as part of the local plan process.
FP3.1	036	Developer/ Agent/ Landowner	The options presented here fail to recognise that the location of new development can also contribute to carbon reduction. For instance, working with the borough's neighbours to ensure any unmet need from the town is located adjacent to its administrative boundaries so it can benefit from Tamworth's incredible range of services and facilities.	Comments noted. Tamworth Borough Council works closely with its neighbours to ensure development meets local requirements. This will continue in the future to ensure that the needs of the local area are met in the most appropriate way possible.	Comments will be considered as part of the local plan process.

FP3.1	037	Developer/ Agent/ Landowner	Bellway consider that, given that Future Homes and Buildings Standards are due to be implemented by 2025, additional carbon reduction standards in a Local Plan to be approved post 2025 would not be justifiable.	Comment noted.	Comments will be considered as part of the local plan process.
FP3.1	041	Developer/ Agent/ Landowner	i. Rely on national standards and building regulations to set the carbon reduction levels for new buildings.	Comment noted.	Comments will be considered as part of the local plan process.
FP3.1	044	Government/ Public Body	i. Rely on national standards and building regulations to set the carbon reduction levels for new buildings.	Comment noted.	Comments will be considered as part of the local plan process.
FP3.1	045	Developer/ Agent/ Landowner	<p>The Government has an ambitious target of achieving net zero carbon emissions by 2050, and the introduction/updating of the Building Regulations and the development of the Future Homes Standards (FHS) are a key element of that.</p> <p>BHL is supportive of the Government's intentions to move towards greater energy efficiency and considers that planning and the homebuilding industry can help to address some of the identified climate change emergency challenges. However, policies should ensure that they follow nationally consistent set of construction standards/timetables that are technically implementable.</p> <p>Only through this process will the economies of scale be developed to allow developers to viably implement the technologies required to meet such ambitious targets. The policy should require residential developments to meet the latest standards set by the Government (whether that is the Building Regulations or the FHS).</p>	Comments noted.	Comments will be considered as part of the local plan process.
FP3.1	047	Government/ Public Body	At a local level, the NHS is fully committed to reducing its carbon footprint in line with national targets. While local targets may be desirable it is necessary to recognise that acceleration of reductions, if unfunded, would impact on the level of services. Could such improvements be funded through a charge on development?	Comments noted. Any future policies within the plan will be tested to ensure they meet viability criteria. Tamworth Borough Council will look to work with the NHS to deliver the required infrastructure and investigate possible use of funds from developers for this purpose.	Work with the NHS to examine projects and to include an infrastructure plan.
<b>FP3.2: If you believe that we should set our own reduction standards, then what levels do you think these standards should be?</b>					
FP3.2	001	Resident/ General Public	This is vital to everyone so as high a target as possible should be set.	Comment noted. Any level that is set will be tested against viability.	Comments will be considered as part of the local plan process.
FP3.2	002	Resident/ General Public	Based on the amount of infrastructure that would be required or is lacking before granting permission.	Comment noted. Any level that is set will be tested against viability.	Comments will be considered as part of the local plan process.

FP3.2	003	Resident/ General Public	Require developers to add solar panels to all new build properties in the area, this should include both housing and industrial/retail developments. Require housing developers to include a network of cycle paths in their housing developments, where these need to run alongside new roads they should be fully physically separated from road traffic.	Comment noted. Any level that is set will be tested against viability.	Comments will be considered as part of the local plan process.
FP3.2	011	Resident/ General Public	Passivhaus level.	Comments noted. The Passive House Standards are voluntary at this time, although changes to building control regulations will improve the energy efficiency of all buildings going forward. The Council would be happy to receive applications from developers wishing to build within these standards and will consider what other actions can be achieved locally through policy.	Comments will be considered as part of the local plan process.

**FP3.3: If you believe that there is a particular set of evidence that we should be using, then please detail this below.**

FP3.3	001	Resident/ General Public	Views of community Changes in legislation Economic impact	Comments noted. Tamworth Borough Council will look into the evidence in these areas before implementing suggestions.	Comments will be considered as part of the local plan process.
FP3.3	002	Resident/ General Public	Local areas and local people's views, amount of residents, what sites are available, keeping environmental impact to a minimum.	Comments noted.	Comments will be considered as part of the local plan process.
FP3.3	003	Resident/ General Public	Current climate change evidence should be more than enough to back up the case for better environmental standards.	Comments noted.	Comments will be considered as part of the local plan process.
FP3.3	011	Resident/ General Public	It costs more money to retrofit a house than to build one with good insulation standards.	Comments noted. All new dwellings must conform to building regulations which include minimum standards for insulation and energy efficiency.	Comments will be considered as part of the local plan process.

## Feedback Point 4: Mitigating the impacts of flooding

Question ID	URN	Respondent Type	Representation	Officer Response	Further Action
<b>FP4.1: Are there any specific measures that you would like to see that could help to mitigate the impact of flooding?</b>					
FP4.1	001	Resident/ General Public	More effective flood plains.	Comments noted.	Comments will be considered as part of the local plan process.
FP4.1	002	Resident/ General Public	Don't build on floodplains or areas known to be prone to flooding, put in defences first in areas which could be liable to flood.	Comments noted.	Comments will be considered as part of the local plan process.
FP4.1	003	Resident/ General Public	I would like to see improvements to the height of the flood defences along the Lichfield Road especially near Park Street and further along past Meadow Park. I have seen the water very near to the top of the small wall in this area in previous years.	Comments noted.	Comments will be considered as part of the local plan process.
FP4.1	005	Resident/ General Public	Reduce housing development on flood plain or areas that will contribute to increased river flow in wet weather. Keep as open space when possible.	Comments noted.	Comments will be considered as part of the local plan process.
FP4.1	006	Resident/ General Public	Significantly increase tree planting in all areas subject to flooding with water tolerant trees such as willows and alders. The water take-up will mitigate the effect of flooding providing the tree density is adequate.	Comments noted.	Comments will be considered as part of the local plan process.
FP4.1	009	Resident/ General Public	Stop allowing building new houses to be built on floodplains!	Comments noted.	Comments will be considered as part of the local plan process.
FP4.1	011	Resident/ General Public	Tree planting, stop pouring concrete everywhere and educate people about the positive impacts that plants and porous ground types have to mitigate flooding.	Comments noted.	Comments will be considered as part of the local plan process.
FP4.1	012	Resident/ General Public	None.	Comments noted.	No further action required.



<p>FP4.1</p>	<p>014</p>	<p>Government/ Public Body</p>	<p>We note that the SFRA will be updated as part of the Plan process and this is welcomed. Should there be specific areas of concern we would be happy to discuss with you and other stakeholders, e.g. The Environment Agency, in due course.</p> <p>Where natural and historic environment issues arise in relation to flooding situations, there can be benefits through collaborative approaches e.g. Derby's Our City Our River project which has helped managed flooding whilst linking in with natural habitat and historic environment community projects within a World Heritage Site <a href="https://www.derby.gov.uk/environment-and-planning/regeneration/our-city-our-river/our-city-our-river-project-overview/">https://www.derby.gov.uk/environment-and-planning/regeneration/our-city-our-river/our-city-our-river-project-overview/</a> . Synergy between the relevant objectives (1, 6, 8, and 10 for example) could explored further in the Sustainability Appraisal for the Plan to highlight potential threats (such as watering or de-watering of heritage assets) as well as opportunities.</p> <p>With regard to technical input, Historic England has produced advice which may be of interest at this time <a href="https://historicengland.org.uk/advice/technical-advice/flooding-and-historic-buildings/">https://historicengland.org.uk/advice/technical-advice/flooding-and-historic-buildings/</a></p>	<p>Comments noted.</p>	<p>Comments to be considered as part of the local plan process. Tamworth Borough Council will be in touch if further help is required.</p>
<p>FP4.1</p>	<p>016</p>	<p>Government/ Public Body</p>	<p>We would highlight that river flooding is not the only source of flood risk which can adversely impact the borough. Surface water can be equally as disruptive, if not more so on smaller more frequent rainfall events.</p> <p>Continuing our comments on Feedback Point 2 we would welcome the opportunity to work with the Borough council and other partner organisations to retrofit green infrastructure and help provide both flooding and climate change resilience.</p> <p>Sewer flooding is another source of flood risk which the plan can positively contribute to, specifically through how it allocates housing. Site selection for housing allocations should be considerate to surface water management. If a development is allocated with limited surface water drainage options, then the sites sustainability is flawed from day one. We offer our support to you through the site selection process via a high-level sewerage and surface water drainage assessment which may help you recognise constraints.</p>	<p>Comments noted.</p>	<p>Comments will be considered as part of the local plan process.</p>

FP4.1	021	Government/ Public Body	Much of Tamworth has flood defences to protect existing properties from river flooding, but any new developments need to consider what would happen if the defences failed. SCC's Flood Team and the EA review applications for major developments with this in mind. More tree and woodland planting help to reduce surface water flooding and slows the flow into rivers. There should be no building in the flood plain.	Comments noted.	Comments will be considered as part of the local plan process.
FP4.1	027	Resident/ General Public	Stop building on flood plains.	Comments noted.	Comments will be considered as part of the local plan process.
FP4.1	037	Developer/ Agent/ Landowner	Bellway support the principle of locating growth in areas at lowest risk of flooding, i.e. within Flood Zone 1, to limit the potential impacts of flooding. This is supported by the Framework which seeks to apply a sequential test to steer new development to areas with the lowest risk of flooding (Paragraphs 161 and 162 of the Framework).	Comments noted.	Comments will be considered as part of the local plan process.
FP4.1	039	Charity/ Community Group	Through the proposed updated Strategic Flood Risk Assessment, identify nature-based solutions that would reduce flood risk, for example retro-fitting sustainable drainage features, and working with landowners further up in the catchment to slow flows and spread water storage. Co-operate across borders and with partners including the Catchment Based Approach (CaBA) Partnerships to deliver new blue infrastructure that reduces flood risk, which development may contribute to alongside other funding streams.	Comments noted.	Comments will be considered as part of the local plan process.
FP4.1	044	Government/ Public Body	Considering the potential of green roofs within Major employment developments where there is an absence of above ground SuDS features. Consider the removal of PD rights re: the installation of hard surfaces for housing/employment locations in proximity of vulnerable flood locations where there is demonstrable harm from overland flows	Comments noted. These issues will be considered but fall outside of the remit of the local plan.	Comments will be considered as part of the local plan process.
FP4.1	046	Government/ Public Body	Staffordshire County Council Flood Risk Management Team, as Lead Local Flood Authority (LLFA), are Statutory Consultees with regard to all Major Development in Staffordshire, the LLFA requests to be consulted on Major strategic development site allocations, with a view to ensuring development is appropriately sited and flood risk within Tamworth Borough and the county of Staffordshire as a whole is fully considered and mitigated. All Major development, on which the LLFA are consulted, should proceed in fully concordance with the Non Statutory Technical Standards for Sustainable Drainage Systems and the SCC LLFA SuDs Handbook. A catchment wide approach is much preferred, rather than looking at development sites in discrete isolation.	Comments noted. Tamworth Borough Council will be in contact as part of the forthcoming development of the local plan.	Comments will be considered as part of the local plan process.

FP4.1	047	Government/ Public Body	The NHS supports the measures to reduce flood risk. This can have a bearing on service delivery but also, if unchecked, could potentially undermine our ability to deliver services.	Comments noted.	Comments will be considered as part of the local plan process.
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## Feedback Point 5: Protection and enhancement of existing biodiversity

Question ID	URN	Respondent Type	Representation	Officer Response	Further Action
<b>FP5.1: Do you agree with our approach towards biodiversity protection and enhancement? If you do not agree with our existing approach, then please detail what alternative approach(es) you would suggest and why.</b>					
FP5.1	001	Resident/ General Public	Yes.	Comments noted. Under new Biodiversity Net Gain requirements, from November 2023 developers are required to demonstrate how they will deliver a 30 year net gain in biodiversity prior to plans being approved. These plans will legally be required to be monitored regularly, with this overseen by a government body.	Comments will be considered as part of the local plan process.
FP5.1	002	Resident/ General Public	No. I think even more needs to be done to protect biodiversity, it's usually minimal rather than maximum effort put into this.	Comments noted. Under new Biodiversity Net Gain requirements, developers are required to demonstrate how they will deliver a net gain in biodiversity prior to plans being approved.	Comments will be considered as part of the local plan process.
FP5.1	003	Resident/ General Public	Yes.	Comments noted. Under new Biodiversity Net Gain requirements, developers are required to demonstrate how they will deliver a net gain in biodiversity prior to plans being approved.	Comments will be considered as part of the local plan process.
FP5.1	004	Local Business	Yes.	Comments noted. Under new Biodiversity Net Gain requirements, developers are required to demonstrate how they will deliver a net gain in biodiversity prior to plans being approved.	Comments will be considered as part of the local plan process.
FP5.1	005	Resident/ General Public	I cannot see that this approach has been used to date and would hope you would consider the experts opinions when allowing planning applications. SSI and other areas within the borough have been lost due to not applying this and also inspections to see that the area are being respected. Not really qualified <i>[to suggest an alternative approach]</i> .	Comments noted. Under new Biodiversity Net Gain requirements, developers are required to demonstrate how they will deliver a net gain in biodiversity prior to plans being approved. Any sites affected by prior development are outside the remit of the Local Plan process.	Comments will be considered as part of the local plan process.
FP5.1	006	Resident/ General Public	Yes.	Comments noted. Under new Biodiversity Net Gain requirements, developers are required to demonstrate how they will deliver a net gain in biodiversity prior to plans being approved.	Comments will be considered as part of the local plan process.
FP5.1	009	Resident/ General Public	Yes.	Comments noted. Under new Biodiversity Net Gain requirements, developers are required to demonstrate how they will deliver a net gain in biodiversity prior to plans being approved.	Comments will be considered as part of the local plan process.

FP5.1	011	Resident/ General Public	Yes.	Comments noted. Under new Biodiversity Net Gain requirements, developers are required to demonstrate how they will deliver a net gain in biodiversity prior to plans being approved.	Comments will be considered as part of the local plan process.
FP5.1	012	Resident/ General Public	Yes.	Comment noted. Under new Biodiversity Net Gain requirements, developers are required to demonstrate how they will deliver a net gain in biodiversity prior to plans being approved.	Comments will be considered as part of the local plan process.
FP5.1	014	Government/ Public Body	Historic England has no concerns with the approach to biodiversity, but would wish to highlight the need for potential open space or preferred development site allocations to consider landscaping proposals in relation to the historic environment where that situation arises. This would relate particularly to buried heritage assets whether designated or non-designated, where root damage from planting schemes could be problematic.	Comments noted.	Comments will be considered as part of the local plan process.
FP5.1	016	Government/ Public Body	Yes we support the plans ask to be sympathetic to existing biodiversity, ecological and natural assets. We believe the plan could be more ambitious and aim for larger “net gain” rather than “no net loss”. This could be delivered at plan level, allowing flexibility for specific sites, but ensuring that the borough as a whole maximises long term biodiversity improvements.	Comments noted. From 23 <sup>rd</sup> November 2023, The Environment Act 2021 requires developments to demonstrate a minimum of 10% biodiversity net gain. This target, along with its associated environmental initiatives, is something that we will have to factor into our policies within the new plan.	Comments will be considered as part of the local plan process.
FP5.1	020	Developer/ Agent/ Landowner	The HBF notes the biodiversity approach proposed and would remind the Council of the impact that the need to provide biodiversity net gain can have on the efficient use of land and the density of development, and would suggest that this is taken in to consideration when allocating land, preparing policies related to the efficient use of land and the viability assessment of development. The HBF would also note that the creation of net biodiversity gain is a significant benefit of increased housing development and should be considered as such as part of any assessment of the housing requirement and housing allocations.	Comment noted.	Comments will be considered as part of the local plan process.
FP5.1	021	Government/ Public Body	Yes, but it is also important to develop a clear strategy; this is made clear in the Environment Act 2021 – Local Nature Recovery Strategies.	Comment noted.	Comments will be considered as part of the local plan process.
FP5.1	025	Developer/ Agent/ Landowner	Para 6.1.3 states that ‘We propose to include policies to require existing vegetation to be retained unless there are very good reasons why they should be removed’.  NPPF para 16. identifies that ‘Plans should.....b) be prepared positively, in a way that is aspirational but deliverable’. We do not believe that requiring existing vegetation to be retained is deliverable and is therefore contrary to NPPF. This is because even	Comments noted. The approach does already indicate a level of flexibility, with a reference to potential circumstances for removal. However, we understand that further work is required to establish the parameters under which removal would be justified. Notwithstanding, the majority of developments will be required to demonstrate a 10% net gain in biodiversity regardless. This is	Comments will be considered as part of the local plan process.

			<p>on brownfield sites there is likely to be some vegetation that needs to be removed to facilitate the development. The council should therefore reconsider this element and ensure any such policy approach introduces flexibility and is based on the value of the vegetation and / or biodiversity that the vegetation may contain.</p> <p>The council should therefore reconsider this element and ensure any such policy approach introduces flexibility and is based on the value of the vegetation and / or biodiversity that the vegetation may contain.</p>	expected to be introduced from 23rd November 2023, under The Environment Act 2021.	
FP5.1	026	Government/ Public Body	This may make obtaining necessary approvals for school expansions and/or new schools more difficult. We would always try to minimise unnecessary removal of trees or vegetation as a matter of course and assume that where this is necessary and sufficient justification is provided to this would be supported.	Comment noted.	Comments will be considered as part of the local plan process.
FP5.1	027	Resident/ General Public	No. No provision to preserve hedgerows adjacent to proposed building areas.	Comment noted. Within new Biodiversity Net Gain proposals, there are separate assessment measures for hedgerows and any loss of hedgerow habitat is discouraged via the national biodiversity assessment metric, and would need to be replaced, with a 10% gain, if its loss was unavoidable.	Comments will be considered as part of the local plan process.
FP5.1	028	Resident/ General Public	No. I would like to see a bolder statement: 'We propose to include policies to require existing vegetation to be retained unless there are very good reasons why they should be removed.' Considering where we are in history what would constitute a 'very good reason'? Are you referring to the sale of land for redevelopment? If so then I don't think your approach goes far enough.	Comment noted. Under new Biodiversity Net Gain requirements, developers are required to demonstrate how they will deliver a net gain in biodiversity prior to plans being approved.	Comments will be considered as part of the local plan process.
FP5.1	036	Developer/ Agent/ Landowner	Reflecting the Environment Act it is agreed that development should achieve a minimum 10% biodiversity net gain. It is also welcomed that the Council is being realistic in acknowledging that it may be necessary to make off-site contributions to meet this requirement.	Comment noted. Under the Biodiversity Net Gain guidance, there is facility for offsite contributions which may be secured via purchase of biodiversity units on habitat banks, but a tenth of the 10% net gain must be provided onsite.	Comments will be considered as part of the local plan process.
FP5.1	037	Developer/ Agent/ Landowner	Whilst Bellway recognise the importance of retaining vegetation, where possible, there may be cases where removal of vegetation is necessary to facilitate development, and this should be recognised particularly in cases where the quality and biodiversity value of vegetation is relatively poor. The Council will be aware of Biodiversity Net Gain and the legal obligation on developers to achieve a net gain in biodiversity value which will come into force in late 2023. Given this, it is considered that additional restrictions around dealing with biodiversity in the Local Plan would not be justifiable.	Policies will be in line with national policies. If the levels set are above the national minimum standards they will be justified with appropriate evidence and with viability considered.	Comments will be considered as part of the local plan process.

FP5.1	039	Charity/ Community Group	In the main the approach is positive, however needs to align with national objectives. Species recovery should also be an aim, in line with targets to be published under the Environment Act (2021). Linking and expanding designated wildlife sites should be an aim as well as protecting and enhancing them - the most strategically valuable areas for linking and expanding sites to support nature recovery can be identified using the council's Nature Recovery Network maps. The council could highlight its intention to contribute to the Local Nature Recovery Strategy that will be developed for Staffordshire, and commit to incorporating proposals and recommendations of the LNRS into the Local Plan.	Comments noted. The Council will look to work with neighbouring authorities to support the objectives as laid out in the LNRS.	Comments will be considered as part of the local plan process.
FP5.1	045	Developer/ Agent/ Landowner	Policies that seek to protect and enhance biodiversity should be developed to ensure that they are consistent with the provisions of the NPPF. The NPPF (para.175) is clear that the protection that is afforded to biodiversity designations should be commensurate to their statutory status or identified quality.	Tamworth Borough Council will work with developers to ensure that the most appropriate methods for achieving the required BNG are utilised. The Environment act 2021 sets out a clear hierarchy with onsite improvements expected to be the first consideration in all cases, with a minimum 10% of the 10% gain to be provided onsite as a mandatory requirement. Where gain cannot be wholly achieved onsite, the BNG can be achieved offsite via local partners in the commercial and voluntary sectors, or the local authority.	Comments will be considered as part of the local plan process.
<b>FP5.2: Are there any specific local biodiversity issues that you would like to see addressed through the local plan?</b>					
FP5.2	002	Resident/ General Public	All areas to be reassessed, things change frequently so it needs to be assessed on a regular basis.	To be considered during the development of the plan to put appropriate protection in place. We are committed to the LNRS and using local Nature Recovery Network mapping to guide policy in this respect.	To be considered during the development of the plan to put appropriate protection in place.
FP5.2	003	Resident/ General Public	More wild flowers planted to encourage birds and insects. How about filling the gardens by the bandstand with wild flowers every year or so instead of cultivated varieties.	Comment noted. This is outside of the remit of the Local plan but would encouraged where appropriate.	Comments will be considered as part of the local plan process.
FP5.2	005	Resident/ General Public	Greater use and respect for Staffordshire Wildlife Trust and other agencies.	Comment noted. Staffordshire Wildlife Trust are a key partner for the Nature Recovery Network and Local Nature Recovery Strategy for Staffordshire, and their guidance is sought in development of policy around this.	Comments will be considered as part of the local plan process.
FP5.2	006	Resident/ General Public	I would like to see Burgess Nature Park Glascote Heath to be granted Local Nature Reserve status because of its rich diversity of trees, plants, animals and birds and two traditional orchards. Given	Comment noted.	Comments will be considered as part of the local plan process.

			all of this it could be designated a 'Carbon Sink' to achieve carbon reduction.		
FP5.2	011	Resident/ General Public	Inform people that fake grass is a massive problem for biodiversity and soils.	Comment noted. One of the objectives of Nature Recovery is to increase awareness of the nature crisis, and 'citizen science' approaches to supporting local nature recovery.	Comments will be considered as part of the local plan process.
FP5.2	012	Resident/ General Public	None.	Comment noted.	No further action required.
FP5.2	021	Government/ Public Body	Connectivity of habitat, particularly along water corridors.	Comment noted. Local 'transport corridor habitats', including along waterways, have been identified as important in the local nature recovery opportunity mapping developed in partnership with Staffordshire Wildlife Trust, which is feeding into policy development in this area.	Comments will be considered as part of the local plan process.
FP5.2	027	Resident/ General Public	Insist on a commitment to preserve hedgerows and not to net them prior to work starting.	The approach we intend to take will prevent the removal of existing vegetation without very good reason. There is a hedgerow specific value calculation within the Natural England Biodiversity Metric which will be used to calculate the value of any loss of habitat.	Comments will be considered as part of the local plan process.
FP5.2	028	Resident/ General Public	I would argue that that there is a lack of biodiversity in the town centre and I would like to see an increase in biodiversity outside of the Castle Grounds.	Comment noted.	Comments will be considered as part of the local plan process.
FP5.2	039	Charity/ Community Group	An accurate biodiversity evidence base should be maintained with regular monitoring of local biodiversity, such as Local Wildlife Sites and their condition, as well as supporting species recording and data management via Staffordshire Ecological Record. Policies should include identification, mapping and protection of priority habitats as well as designated sites as part of an updated borough Nature Recovery Network.	Comment noted. As part of the Nature Recovery Network for Staffordshire, Tamworth Borough Council has already commissioned biodiversity opportunity mapping from Staffordshire Wildlife Trust and subscribes to the Staffordshire Ecological Record. This evidence base will inform policy development in this area.	Comments will be considered as part of the local plan process.



## Feedback Point 6: Achieve 10% net biodiversity gain on all new developments

Question ID	URN	Respondent Type	Representation	Officer Response	Further Action
<b>FP6.1: Are there any specific measures that you would like to see new developments deliver to improve biodiversity locally?</b>					
FP6.1	002	Resident/ General Public	All areas should make disruption to wildlife minimal, things like hedgehog highways, house martin boxes etc should be a mandatory feature on all new builds, also green spaces, ponds, wildlife areas also should be part of any building plan, hedges not walls, any existing hedges should be kept and no netting of hedges.	Comment noted. Measures are to be considered as part of the new Local Plan process.	Comments will be considered as part of the local plan process.
FP6.1	003	Resident/ General Public	New housing developments should include more space for wildlife to flourish, instead of just concrete and tarmac and cramming in as many properties as possible. Developers should consider adding a percentage of housing on new developments that have no provision for off street parking/garaging. Not everyone wants to drive, such housing would be more affordable. Any land saved by doing this should be bundled together and used for nature/flowers/trees etc.	Under the Environment Act 2021, almost all developments will have to show that they have increased the Biodiversity of a site after the development is completed. This is termed Biodiversity Net Gain (BNG). Where this is not possible on site it will be delivered in the local area. Regulations around provision of parking will be met in line with national guidance.	Comments will be considered as part of the local plan process.
FP6.1	005	Resident/ General Public	While the council may feel they address the issues in planning. In practise the building companies do not seem to be held to account for transgressions. Without oversight of progress this cannot be addressed and should be written into approval. We also have a problem with other authorities building up to our borders. What can be done to ensure they have the same values?	Comments noted. Under the Environment Act 2021, the 10% net gain regulation is to be set nationally. This is expected to come into force from 23rd November 2023. As part of their application, developers will have to demonstrate that they have a suitable management scheme in place. This will be subject to monitoring with outcomes reported to a national register.  In respect of our neighbours, they will also be governed by the same national regulations and legislation.	No further action required.
FP6.1	006	Resident/ General Public	Ensure that the 'Leaf Area Index' of trees and bushes are adequate to absorb every new house and every shopping facility. Substantial is already required.	Comment noted.	Comments will be considered as part of the local plan process.
FP6.1	009	Resident/ General Public	No.	Comment noted.	Comments will be considered as part of the local plan process.
FP6.1	011	Resident/ General Public	More wild spaces, use bricks or roof tiles that can be used as a shelter for birds.	Comment noted. Biodiversity opportunity mapping by Staffordshire Wildlife Trust has been commissioned and guides policy in this area in line with National Guidance and the Local Nature Recovery Strategy for Staffordshire.	Comments will be considered as part of the local plan process.

FP6.1	014	Government/ Public Body	Historic England has no specific measures to propose.	Comment noted.	No further action required.
FP6.1	021	Government/ Public Body	Orientation of new development to optimize the impact of green and blue infrastructure as connectivity corridors.	Comment noted.	Comments will be considered as part of the local plan process.
FP6.1	021	Government/ Public Body	Suggest promoting more trees, shrubs, groundcover, real grass etc, and hedges in back gardens instead of fences – use of native species.	Comment noted.	Comments will be considered as part of the local plan process.
FP6.1	027	Resident/ General Public	Only as stated previously.	Previous comments noted in this respect.	Comments will be considered as part of the local plan process.
FP6.1	028	Resident/ General Public	Not specific but I would like developers to consult with local people on the types of projects that will deliver 10 net gain so they are creating spaces that will be used and cherished for years to come.	Comment noted.	Comments will be considered as part of the local plan process.
FP6.1	037	Developer/ Agent/ Landowner	Whilst the principle of Biodiversity Net Gain is supported by Bellway, it should be recognised that each site is different in terms of its existing biodiversity value and its potential to implement certain biodiversity measures. As such, whilst a list of desired biodiversity measures to be incorporated in new development could be set out, it should be recognised in any policy that biodiversity net gain will be site driven.	The Environment act 2021 lays out the hierarchy for BNG delivery. The site being developed is always the preferred option but where this is not possible developers will be able to deliver the required BNG offsite.	Comments will be considered as part of the local plan process.
FP6.1	039	Charity/ Community Group	The local plan could consider requiring a greater gain than 10% in particular areas e.g. green belt. The local plan could adopt Building With Nature standards and require all new developments to meet this standard. <a href="https://www.buildingwithnature.org.uk/">https://www.buildingwithnature.org.uk/</a> The council should consider developing a register of sites, aligned to the area's Nature Recovery Network maps, that would be suitable for receiving offsite biodiversity net gain funds so that these funds are allocated in the areas that would have the most impact on supporting biodiversity.	Tamworth Borough Council will be investigating appropriate approaches within the Borough and as part of the wider Local Nature Recovery Strategy. We will consider the development of habitat banking within the borough as part of local plan development. Gain plans that do not support biodiversity appropriately are likely to be challenged during the planning application process by consulted bodies.	Comments will be considered as part of the local plan process.
FP6.1	045	Developer/ Agent/ Landowner	The recognition that BNG can be secured on-site or off-site through financial contributions is welcomed. TBC's intention to identify opportunity areas means contributions can be made towards larger, and often more meaningful, biodiversity schemes.	Comment noted. Our approach to BNG is guided by both national policy and the local nature recovery strategy, and this will also be reflected in the local plan.	Comments will be considered as part of the local plan process.

## Feedback Point 7: Delivering low carbon and renewable energy infrastructure

Question ID	URN	Respondent Type	Representation	Officer Response	Further Action
<b>FP7.1: Do you agree that we should focus on small scale energy generation, rather than looking for opportunities for larger developments like solar farms?</b>					
FP7.1	001	Resident/ General Public	No.	Comment noted.	Comments will be considered as part of the local plan process.
FP7.1	002	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP7.1	003	Resident/ General Public	No.	Comment noted.	Comments will be considered as part of the local plan process.
FP7.1	004	Local Business	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP7.1	005	Resident/ General Public	We should do both. That may be a means of offsetting within another authority.	Comments noted.	Comments will be considered as part of the local plan process.
FP7.1	006	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP7.1	009	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP7.1	011	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP7.1	012	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP7.1	014	Government/ Public Body	Historic England would wish to highlight how the historic environment can help reduce carbon emissions and tackle climate change. We are researching and promoting how the historic environment can positively contribute to overall global sustainability through adapting and mitigating and further information is available via our website: <a href="https://historicengland.org.uk/whats-new/features/climate-change/">https://historicengland.org.uk/whats-new/features/climate-change/</a> .	Comments and attached weblink are both noted.	Comments will be considered as part of the local plan process.

FP7.1	015	Charity/ Community Group	The right place for commercial scale solar power generation panels is on the roofs of warehouses and factories, not on food-producing farmland.	Tamworth Borough Council will consider any applications for solar power generation on a case by case basis. Any development granted permission after November 2023 will be subject to regulations regarding biodiversity net gain.	Comments will be considered as part of the local plan process.
FP7.1	027	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP7.1	028	Resident/ General Public	No.	Comment noted.	Comments will be considered as part of the local plan process.
FP7.1	039	Charity/ Community Group	This would depend on the other land-use priorities. Solar parks for example can still be farmed and have biodiversity benefits, and small-scale wind generation can be located in the right place. However a range of energy generation is needed that suits the borough- this could be the subject of further work to formulate a green energy strategy.	Comment noted. Tamworth Borough Council will consider any applications for green energy generation sites on a case by case basis, and any development granted permission after November 2023 will be subject to regulations regarding biodiversity net gain.	Comments will be considered as part of the local plan process.
FP7.1	041	Developer/ Agent/ Landowner	No.	Comment noted.	Comments will be considered as part of the local plan process.
FP7.1	047	Government/ Public Body	The NHS are keen to work collaboratively to reduce their energy footprint. Greater efficiency would help reduce costs so that their focus can be on service delivery.	Comments noted.	Comments will be considered as part of the local plan process.
<b>FP7.2: Do you agree that we should look to encourage alternative ways of heating buildings to reduce carbon emissions?</b>					
FP7.2	001	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP7.2	002	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP7.2	003	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP7.2	004	Local Business	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP7.2	005	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP7.2	006	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.

FP7.2	009	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP7.2	011	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP7.2	012	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP7.2	014	Government/ Public Body	Historic England would wish to highlight how the historic environment can help reduce carbon emissions and tackle climate change. We are researching and promoting how the historic environment can positively contribute to overall global sustainability through adapting and mitigating and further information is available via our website: <a href="https://historicengland.org.uk/whats-new/features/climate-change/">https://historicengland.org.uk/whats-new/features/climate-change/</a> .	Comments noted.	Comments will be considered as part of the local plan process.
FP7.2	027	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP7.2	028	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP7.2	039	Charity/ Community Group	Yes, however there should be equal focus on reducing energy demand by improving building insulation and efficiency. There should be targets for the number of existing homes meeting a minimum energy rating, and requirements for improvements within any works to buildings requiring planning permission.	Comments noted. The Government has introduced changes to Building Regulations that are intended to achieve these objectives. Consideration will be given to whether there is anything further that can be achieved through planning policy.	Comments will be considered as part of the local plan process.
FP7.2	041	Developer/ Agent/ Landowner	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP7.2	044	Government/ Public Body	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP7.2	047	Government/ Public Body	The NHS are keen to work collaboratively to reduce their energy footprint. Greater efficiency would help reduce costs so that their focus can be on service delivery.	Comment noted.	Comments will be considered as part of the local plan process.
<b>FP7.3: Are there any other ways that we could look to reduce carbon emissions and tackle climate change?</b>					
FP7.3	001	Resident/ General Public	Greater involvement of public.	Comment noted.	Comments will be considered as part of the local plan process.

FP7.3	002	Resident/ General Public	Encourage walking buses to schools, grants for solar panels and energy efficiency, more so than ever before, more tree planting in parks and green spaces.	Comment noted.	Comments will be considered as part of the local plan process.
FP7.3	003	Resident/ General Public	I agree with both approaches in question 19. Build more physically protected cycling infrastructure throughout the town that actually forms a cohesive network. There are many studies that show more people of all ages would cycle if they felt safe doing so. "Magic paint" is not enough to make people feel safe on the roads in traffic, there needs to be physical separation for cyclists to feel safe.	Comment noted.	Comments will be considered as part of the local plan process.
FP7.3	004	Local Business	Insulate buildings and houses. Don't leave them derelict.	This is outside of the remit of the Local Plan but we will consider policies to bring properties back into circulation.	Comments will be considered as part of the local plan process.
FP7.3	005	Resident/ General Public	Unsure again not my area of experience.	Comment noted.	Comments will be considered as part of the local plan process.
FP7.3	006	Resident/ General Public	Substantial tree planting both sides of the Tamworth Ring Road where carbon emission from vehicle exhausts are excessive. Also, extra trees to be planted either side of all highways in and out of Tamworth. Extra trees are also needed along the M42.	Comment noted.	Comments will be considered as part of the local plan process.
FP7.3	009	Resident/ General Public	No.	Comment noted.	Comments will be considered as part of the local plan process.
FP7.3	011	Resident/ General Public	Insulate homes.	Comment noted.	Comments will be considered as part of the local plan process.
FP7.3	014	Government/ Public Body	Historic England would wish to highlight how the historic environment can help reduce carbon emissions and tackle climate change. We are researching and promoting how the historic environment can positively contribute to overall global sustainability through adapting and mitigating and further information is available via our website: <a href="https://historicengland.org.uk/whats-new/features/climate-change/">https://historicengland.org.uk/whats-new/features/climate-change/</a> .	Comment noted.	Comments will be considered as part of the local plan process.
FP7.3	028	Resident/ General Public	I strongly believe that to reduce carbon emissions TBC must look at traffic management to avoid congestion particularly in the mornings and evenings - there must be a better way to route vehicles than sending them through the town centre and along Upper Gungate where they have to sit at multiple sets of traffic lights, this is becoming increasingly urgent with the development of more new home sites on the outskirts of our town.  The roads in the town are not designed to take as many vehicles as are using them every day and it is becoming an unpleasant place to	Tamworth Borough Council will work with the highways authorities to seek the best solutions, especially for any new developments.	Comments will be considered as part of the local plan process.

			walk around - if you are truly serious about raising the popularity of residents choosing walking and cycling over getting in their cars then you must reduce traffic levels for safety and also to improve air quality.		
FP7.3	039	Charity/ Community Group	Increase carbon sequestration in soils and vegetation by restoring/ creating new habitats, particularly tree cover, wetlands and peatlands. Gaining a carbon baseline for all publicly owned land to enable this to be enhanced, for example by managing land to increase carbon capture and storage, thus contributing to the council's net zero targets. Consider requiring carbon standards and offsetting for new developments	Tamworth Borough Council will look into a range of measures that fall within the remit of the Local Plan.	Comments will be considered as part of the local plan process.
FP7.3	041	Developer/ Agent/ Landowner	Improve the energy efficiency of the building stock but considering buildings in a holistic way to avoid unforeseen effects from improved performance of buildings e.g. condensation. Have consideration to the limitations of such actions on historic and Listed buildings which should be given special dispensation with their overall contribution to the quality of life and the community considered.	Comment noted.	Comments will be considered as part of the local plan process.
FP7.3	047	Government/ Public Body	The NHS are keen to work collaboratively to reduce their energy footprint. Greater efficiency would help reduce costs so that their focus can be on service delivery.	Comment noted.	Comments will be considered as part of the local plan process.

## Feedback Point 8: Any further comments on climate change and biodiversity

Question ID	URN	Respondent Type	Representation	Officer Response	Further Action
<b>FP8: Any further comments on climate change and biodiversity</b>					
FP8	001	Resident/ General Public	Vital area for future generations.	Comment noted.	Comments will be considered as part of the local plan process.
FP8	003	Resident/ General Public	Don't pander to the constant demands of motorists, always seek to implement active travel schemes/infrastructure to encourage walking/cycling wherever possible. consider implementing "School Streets" to help reduce congestion and pollution around schools at drop off/pick up times. Plenty of info about school streets can easily be found on the internet.	Tamworth Borough Council will work with all appropriate agencies to improve access to sustainable transport.	Comments will be considered as part of the local plan process.
FP8	005	Resident/ General Public	Like the objectives but how are these to be applied?	All applications will be considered and assessed against the new policies to be implemented in the local plan and national frameworks.	Comments will be considered as part of the local plan process.
FP8	006	Resident/ General Public	Some woodland areas to be established on the edges of Tamworth Pleasure Grounds and also on the flood plains on the road towards Fazeley and also along the River Anker by Bolehall and Amington.	Comment noted.	Comments will be considered as part of the local plan process.
FP8	012	Resident/ General Public	Critical emphasis should be on commencing and advancing necessary activity as quickly as possible. Need for immediate action.	Comment noted.	Comments will be considered as part of the local plan process.
FP8	014	Government/ Public Body	Historic England has no further comments to make on these matters.	Comment noted.	Comments will be considered as part of the local plan process.
FP8	021	Government/ Public Body	Much of Tamworth is built environment, which will be more affected by climate change. Additional tree planting will help in cooling the environment and reduce flood risk. Management of existing and future tree stock is vital to how successful this will be. While native species are preferred, we need to future proof by including more resilient species. With climate change there are additional threats such as new pests and diseases which will affect our natural environment. In the most urban environments, we can look to some tree and shrub species which are not native that will cope better with climate change extremes. All new developments should make accommodation on their site for green/blue elements. Above ground Sustainable Drainage (SUDS) systems for example are small interventions that include green element - these will help towards mitigating climate change.	Comment noted.	Comments will be considered as part of the local plan process.



FP8	028	Resident/ General Public	I think you just have to see how all of these factors are intertwined and I sincerely hope that you take your responsibility for tackling climate change seriously and encouraging your residents to do the same but also providing us with appealing options so when we want to make a choice which is good for the environment it is safe for us to do so.	Comments noted. Tamworth Borough Council are committed to Climate and Nature Recovery.	Comments will be considered as part of the local plan process.
FP8	039	Charity/ Community Group	Figures for designated wildlife sites in the consultation document should be reviewed- there are 6 Local Nature Reserves in the borough, and 22 Local Wildlife Sites.	Comments noted.	We will seek clarification with regards to number of wildlife sites located in the borough.

## Section 6.2

# **New and Affordable Homes**

*The following section contains representations relating to Feedback Points 9, 10, 11, 12, 13, 14 and 15*

## Feedback Point 9: Setting the right level of housing need

Question ID	URN	Respondent Type	Representation	Officer Response	Further Action
<b>FP9.1: Do you agree that the Standard Method figure of 2,961 homes should be used as the starting point for setting our housing need? If you do not agree, then please detail what alternative figure you feel should be used, and why?</b>					
FP9.1	001	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP9.1	002	Resident/ General Public	No. Empty properties need to be utilized far more, not just houses, commercial units too, there are far too many lying neglected which could be used, also less industrial building while there are hundreds of units on industrial estates lying empty and getting vandalized, look at Tolsons Mill a huge building which will house hundreds of people, conversion of existing empty properties before allowing developers to gobble up swathes of green spaces, or green belt land, make them use them first. and make sure they ensure enough parking areas are put in the plans, far too many areas where parking on pavements is the norm because that was not put in place. also stop allowing huge developments without also extending the amount of doctors, dentists etc to cope with it, same with the traffic, allowing thousands of houses and no infrastructure is a recipe for disaster.	Comments noted. Under the NPPF, strategic policies should set out a clear strategy for accommodating our assessed needs, in a way that makes as much use as possible of previously developed land. Our future policies in the new plan will have to align with this, ensuring that we are promoting the most effective use of land to meet the borough's various needs. This typically involves the use of brownfield land first.  Although your suggestions regarding vacant property use is something we would like to do, if the property is not in our ownership then it is unfortunately not something that we could directly influence through planning policy.	Comments will be considered as part of the local plan process.
FP9.1	003	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP9.1	004	Local Business	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP9.1	005	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP9.1	006	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP9.1	009	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.

FP9.1	011	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP9.1	012	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP9.1	014	Government/ Public Body	Historic England has no comments to make on the proposed options.	Comment noted.	Comments will be considered as part of the local plan process.
FP9.1	015	Charity/ Community Group	No. A figure lower than the standard method which recognises that the boundaries of Tamworth are very constrained and that maintaining the quality of the environment is more important than growth in the quantity of housing.	Under both the NPPF and the PPG, the Standard Method should be used to calculate the minimum number of homes needed in Tamworth over the plan period. This should be used as a starting point when preparing the housing requirement in the new plan, unless exceptional circumstances justify an alternative approach. In the absence of exceptional circumstances, to plan for fewer homes would risk non-compliance with the NPPF.  Whilst we are required to use the Standard Method, the protection and enhancement of our environment is highly valued, as reflected across both Objective 8 and 10 of the new plan. Our environmental objectives will be delivered in conjunction with those relating to housing, with the purpose of the plan to strike the right balance between the two.	Comments will be considered as part of the local plan process. Further work will be commissioned to establish the housing need across the plan period.
FP9.1	020	Developer/ Agent/ Landowner	The HBF considers that the Council should use the Standard Method as the starting point for determining the housing requirement, as set out in the NPPF and the PPG. However, the HBF also recommends that the Council consider the potential circumstances when it might be appropriate to plan for a higher housing need figure than the standard method indicates as set in the PPG. This includes growth strategies for the area, strategic infrastructure improvements, taking unmet need from neighbouring authorities, previous levels of delivery or previous assessments of need.  When considering the level of housing land supply to meet the housing requirement the HBF recommends that the Council ensure that they give consideration to an appropriate level of flexibility within the supply to ensure that the Plan is robust and resilient to change.	As noted, the Standard Method should be used to calculate the minimum housing requirement. As we progress through the plan making process, should any evidence, as listed in your representation, suggest that it is necessary to increase this figure, then the overall housing figure will be set to reflect this.	Comments will be considered as part of the local plan process. Further work will be commissioned to establish the housing need across the plan period.

FP9.1	026	Government/ Public Body	It is noted that Tamworth Borough Council have a housing target of 2,961 for the proposed local plan period to 2043. This equates to approximately 4.5FE of additional Primary places (933 pupils) and 444 additional secondary pupils. The number, location and rate of build of developments will determine the necessary education provision required to mitigate development and whether this could be achieved through expanding existing local schools and/or the provision of new schools.	Comments regarding the Standard Method are noted, and we welcome the further information regarding both primary and secondary school places.	No further action required at present. Should any further information be required in the future, consultation with the School Organisation Team will be sought.
FP9.1	027	Resident/ General Public	No. We have too many new housing estates already!	Comment noted.	Comments will be considered as part of the local plan process.
FP9.1	028	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP9.1	029	Government/ Public Body	Yes, this should be the starting point for a Local Housing Need assessment and setting the housing need figure for Tamworth Borough, as per national planning policy and guidance (NPPF, paragraph 61).	Comment noted.	Comments will be considered as part of the local plan process.
FP9.1	035	Other Stakeholder/ Business	<p>Yes, the WMHAPC agrees that an annual need of 141 new homes per year or 2,961 new homes over the plan period should be seen as the minimum number of homes that should be planned for. Planning Practice Guidance (PPG) is clear that the standard method for assessing local housing need “uses a formula to identify the minimum number of homes expected to be planned for” (ID: 2a-002-20190220).</p> <p>Despite this, there is a need to reiterate that the standard method does not account for changing economic/demographic circumstances that may require the Council to set a higher housing target than the standard method indicates, PPG goes on to state:</p> <p>“This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:</p> <ul style="list-style-type: none"> <li>• Growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);</li> </ul>	As noted, the Standard Method should be used to calculate only the minimum housing requirement. It should be considered a starting point from which the most appropriate requirement is subsequently decided. As we progress through the plan making process, should any evidence, as listed in your representation, suggest that it is necessary to increase this figure, then the overall housing figure will be set to reflect this. The final housing figure will not be set until further evidence has been gathered and evaluated.	Comments will be considered as part of the local plan process. Further work will be commissioned to establish the housing need across the plan period.

			<ul style="list-style-type: none"> <li>• Strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or</li> <li>• An authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground” (Emphasis added)</li> </ul> <p>At this time, it would be inappropriate to set an overall housing figure without taking into consideration the findings of the further work that is suggested: economic growth strategies, the need to support strategic infrastructure improvements and existing delivery rates.</p>		
FP9.1	036	Developer/ Agent/ Landowner	<p>It is right the standard method need for Tamworth is used as the minimum starting point for determining the plan’s housing requirements, as per national planning guidance (paragraph: 002 ref ID:2a-002-20190220).</p> <p>But it should only be treated as a starting point. Although not updated for some time, the Council’s most recent five year housing land supply report (for the base date 1 April 2019) indicated a five year supply of 8.6 years. In the last six years since the Local Plan was adopted the Council has delivered a total of 2,110 homes (taken from the government’s live housing completion data), equating to circa 351 homes per year. That is well in excess of the adopted Local Plan requirement (177 homes per annum) and the standard method need (141 homes per annum).</p> <p>It is welcomed the Council is open to considering a higher figure based on economic growth strategies, the need to support strategic infrastructure improvements, and existing delivery rates. This is especially prudent given the borough’s housing challenges, as acknowledged in the consultation document.</p> <p>To deliver this scale of development will require all of the ‘taps of supply’ to be turned on, so all of the options listed at option 6.2(b). In particular, it will be necessary to look for support from neighbouring councils to deliver the need. In working with Councils, it will be essential that infrastructure delivery is agreed.</p>	<p>As noted, the Standard Method should be used to calculate only the minimum housing requirement. It should be considered a starting point from which the most appropriate requirement is subsequently decided. As we progress through the plan making process, should any evidence, as listed in your representation, suggest that it is necessary to increase this figure, then the overall housing figure will be set to reflect this. The final housing figure will not be set until further evidence has been gathered and evaluated.</p> <p>Preferences regarding the approaches set out in Option 6.2(b) are also noted.</p>	<p>Further work will be undertaken to determine the overall housing figure, including whether an increased housing target is required. This will be carried out prior to the Preferred Options Stage.</p>
FP9.1	037	Developer/ Agent/ Landowner	<p>Bellway agree that, in line with the requirement set out in the Framework, the basis for local housing need calculation should be derived from the Standard Method. However, given the Framework is clear that the local housing need calculation derived from the Standard Method provides a minimum number of homes to be</p>	<p>As noted, the Standard Method should be used to calculate only the minimum housing requirement. It should be considered a starting point from which the most appropriate requirement is subsequently decided. As we progress through the plan making process, should any evidence suggest that it is</p>	<p>Comments will be considered as part of the local plan process. Further work will be commissioned to establish the housing need across the plan period.</p>

planned for, Bellway consider that consideration should be given to the provision of an increased housing requirement.

The need for an increase in the housing requirement will likely be borne out of the emerging evidence base, i.e. an identified economic growth strategy or the need to support significant infrastructure improvements, as set out in the Issues and Options document. Factors which could influence the need for an increase in the housing requirement over and above that derived from the Standard Method calculation are explored in more detailed in the preceding paragraphs of these representations.

Recent Levels of Delivery  
 The Standard Method calculation for Tamworth is currently 141 dwellings per annum, however this is significantly lower than the level of delivery in the Borough in recent years. Data from the latest Housing Delivery Test measurement (2014) indicates that there were 317, 546 and 461 completions in the monitoring years 2018/19, 2019/20 and 2020/21 respectively, at an average of 441 per annum. This is more than three times the annual requirement derived from the Standard Method calculation (141), and suggests that the level of need in Tamworth is significantly higher than would be delivered through the implementation of the Standard Method as the basis for the housing requirement without adjustment.

As set out in the National Planning Practice Guidance (NPPG), where previous levels of housing delivery are significantly greater than the outcome of the Standard Method calculation the Council will need to take this into account when considering whether it is appropriate to plan for a higher level of growth (Reference ID: 2a-010-20201216 of the NPPG.)

Economic Growth  
 Tamworth town centre has been subject to recent regeneration, notably the £6.2m refurbishment of Tamworth Assembly Rooms to create Tamworth Enterprise Centre, and is due to be subject to significant regeneration in the coming years. This includes regeneration of the Gungate quarter which is expected to deliver a mixed-use scheme comprising housing, retirement living, a leisure centre, workspace, medical services, evening leisure and multi-storey car parking. Even more significantly, the Council have been successful in securing £21.65m from the Future High Streets Fund, the fourth highest level of funding awarded across the country, with

necessary to increase this figure, then the overall housing figure will be set to reflect this. The final housing figure will not be set until further evidence has been gathered and evaluated.

In respect of our recent levels of delivery, we note that they are particularly high as our three allocated sustainable urban extensions have come forward within close succession. Collectively, the three represent a significant proportion of the Council's identified housing sites in the current Local Plan.

Under our Duty to Cooperate, we work with the wider Birmingham and Black Country Housing Market Area to deliver needs across the whole area. We do not contribute towards Birmingham's unmet need, on account of our own current unmet need.

major projects across the Borough planned including provision for small scale, start-up and niche businesses.

Data from the 2021 Census published by the Office for National Statistics shows that the Borough’s population only grew by 2.3% in the 10 year period since the 2011 Census, much lower than national (6.3%) and regional (6.2%) averages, and in fact the fourth lowest of all West Midlands local authorities. Notably Tamworth’s ageing population has grown significantly, with the Borough’s 65 and over population increasing by some 32.8%, much higher than the national average of 20.1%. In addition, Tamworth’s working age (15-64) population actually saw a decline of 2.7%, which is of note particularly in the context of a national increase in the same population of 3.6%.

Given the above factors and the reality of a declining working population in the Borough, a more ambitious housing growth agenda is required if the Council’s regeneration and investment projects are to be a success. If jobs are not matched with new housing, the likelihood will be increased in-commuting from other urban areas and less sustainable patterns of travel.

Affordable Housing Need  
A key evidence base document supporting the production of the Tamworth Local Plan will be a Strategic Housing Market Assessment (SHMA). This will include consideration of the level of affordable housing need in the Borough, and is highly likely to indicate that the Borough has a significant need for affordable housing, which will not be delivered by policies in the Local Plan should the Standard Method calculation be utilised as the basis for the housing requirement without adjustment.

Affordability  
Tamworth has a sustained and increasing issue relating to affordability of housing. The affordability ratio for Tamworth in 2021 was 8.59, meaning the average house price in the Borough was more than 8 and a half times the gross annual workplace-based earnings. Whilst the 2021 affordability ratio was slightly lower than the all-time high of 8.63 in 2020, there is a clear trend of an increasing disparity between increase in wages and the cost of housing from a ratio of 5.83 just nine years ago.



			<p>Availability of housing plays a major role in affordability, and as such an increased housing requirement over and above that calculated by the Standard Method will support local residents by helping to reduce the inequality between wages and house prices in the Borough and its hinterland.</p> <p><u>Unmet need from Birmingham</u>  Tamworth Borough has a close relationship with Birmingham, where there is a significant and increasing level of housing needs which are not being met.</p> <p>Birmingham City Council published their Local Plan for Issues and Options consultation in October 2022<sup>10</sup>. It identifies a housing need in the City of 149,286 new dwellings in the period 2020 to 2042, and a supply of just 70,871 new dwellings over the same period, thus equating to a shortfall of some 78,415 new dwellings.</p> <p>Whilst the Birmingham Local Plan is in the early stages of production, it is clear that there will be a significant proportion of unmet need which will require contributions towards from neighbouring authorities.</p>		
FP9.1	039	Charity/ Community Group	<p>The number of homes should be determined by the environmental capacity of the area, regarding land-use, water supply etc. as well as population needs.</p>	<p>Under both the NPPF and the PPG, the Standard Method should be used to calculate the minimum number of homes needed in Tamworth over the plan period. This should be used as a starting point when preparing the housing requirement in the new plan, unless exceptional circumstances justify an alternative approach. In the absence of exceptional circumstances, to plan for fewer homes would risk non-compliance with the NPPF.</p> <p>Whilst we are required to use the Standard Method, the protection and enhancement of our environment is highly valued, as reflected across both Objective 8 and 10 of the new plan. Our environmental objectives will be delivered in conjunction with those relating to housing, with the purpose of the plan to strike the right balance between the two.</p>	<p>Comments will be considered as part of the local plan process. Further work will be commissioned to establish the housing need across the plan period.</p>
FP9.1	043	Government/ Public Body	<p>Yes.</p>	<p>Comment noted.</p>	<p>Comments will be considered as part of the local plan process.</p>

<p>FP9.1</p>	<p>045</p>	<p>Developer/ Agent/ Landowner</p>	<p>The presumption in favour of sustainable development is central to the NPPF (para.11), with the requirement for Local Plans to proactively plan for and meet the development needs of their area, along with the needs that cannot be met within neighbouring areas. A critical policy for the Government is to ensure the continual supply of both market and affordable housing in response to the national housing-crisis, which has resulted from the historic undersupply of housing and led to far reaching with social and economic consequences including escalating house prices, soaring rents, declining home ownership and reduced labour mobility. This crisis needs to be redressed as a matter of urgency, hence, the NPPF (para. 60) putting emphasis on “significantly boosting the supply of homes”. It is, therefore, imperative that the need for market and affordable homes for the Borough is established and fully planned for in the Plan period up to 2043.</p> <p>NPPF (para. 61) states that “to determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method in national planning guidance.” The standard method-derived local housing need (LHN) for TBC is 141 dwellings per annum, equivalent to nearly 3000 homes over the plan period.</p> <p>However, the Government’s Planning Practice Guidance (PPG) stresses that the standard method provides “a minimum starting point in determining the number of homes needed in an area” and that this figure may be exceed “where increases in housing need are likely to exceed past trends” (PPG Ref. ID: 2a-010-20201216). TBC’s assertion under issue 6.2(a)ii. that they are permitted to set an alternative target if they wish to do so is somewhat inaccurate.</p> <p>The PPG states that there is a range of factors that would drive an increase in an authority’s housing need, including but not limited to the implementation of growth strategies, strategic infrastructure improvements, and agreeing to take on a neighbouring authority’s unmet need. BHL recommend a Housing and Economic Needs Assessment (HENA) to be instructed to consider whether TBC’s actual housing need is actually higher than its standard method LHN. The HENA should consider the following factors, which a likely to result in a higher figure:</p>	<p>As noted, the Standard Method should be used to calculate only the minimum housing requirement. It should be considered a starting point from which the most appropriate requirement is subsequently decided. As we progress through the plan making process, should any evidence, as listed in your representation, suggest that it is necessary to increase this figure, then the overall housing figure will be set to reflect this. The final housing figure will not be set until further evidence has been gathered and evaluated.</p> <p>Comments in relation to the HEDNA are noted, which will be commissioned soon.</p> <p>We acknowledge that we should always be looking to meet our own need before exporting our needs to other authorities. We are also part of the Birmingham and Black Country Housing Market Area, and work collectively to deliver an appropriate housing growth.</p>	<p>Comments will be considered as part of the local plan process. Further work will be commissioned to establish the housing need across the plan period.</p>
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The delivery of HS2 to the West Midlands, which will drive economic activity in the region. That will particularly be the case if HS2 Phase 2b (West Midlands to Leeds) comes forward, with a node proposed within Tamworth.

The I&O consultation document states that *“housing affordability remains an issue in the Borough”* and that *“house price inflation has led to a housing market that first time buyers find difficult to access.”* The median house price is currently 8.59 times higher than the median wage in the Borough (2021). Thus, in addition to requiring affordable housing as a percentage of the overall housing offer, it would be sensible to increase the overall supply of housing to deliver an increased quantity of affordable dwellings.

Therefore, the housing requirement for Tamworth should be its LHN, plus an appropriate uplift (as defined by the HENA), applied across the extents of the final plan period. Moreover, TBC should provide a 20% buffer in its supply of housing land above that requirement to allow for flexibility (as per the Local Plan Experts Group).

Whilst TBC exported an element of its housing need in its extant plan, the housing need and supply context has altered across the HMA. Birmingham Council has an unmet housing need of 78,415 dwellings and the Black Country 28,524 dwellings (as published in the now collapsed Black Country Plan and likely to worsen following removal of Green Belt sites). It is, therefore, critical that TBC seeks to fully meet its own housing needs in its own jurisdiction.


Furthermore, the NPPF (para. 61) states that the overall housing need figure should *“take account of any needs that cannot be met within neighbouring areas”*. Therefore, if TBC were to have more suitable sites than required to meet its own housing need, they should seek to support the wider HMA in delivering unmet need.

## Feedback Point 10: Delivering the housing need

Question ID	URN	Respondent Type	Representation	Officer Response	Further Action
<b>FP10.1: Which approach, or combination of approaches, do you think would be most appropriate to deliver the housing need?</b>					
FP10.1	001	Resident/ General Public	i) Look to make the best use of previously developed land before allocating any greenfield land for housing.	Comment noted.	Comments will be considered as part of the local plan process.
FP10.1	002	Resident/ General Public	i) Look to make the best use of previously developed land before allocating any greenfield land for housing.	Comment noted.	Comments will be considered as part of the local plan process.
FP10.1	003	Resident/ General Public	i) Look to make the best use of previously developed land before allocating any greenfield land for housing. ii) Increase housing density for new developments, especially in more sustainable locations such as the town centre and close to existing local and neighbourhood centres. iii) Look for support from neighbouring councils to deliver any need that is unable to be met within the borough.	Comments noted.	Comments will be considered as part of the local plan process.
FP10.1	004	Local Business	i) look to make the best of properties.	Comment noted.	Comments will be considered as part of the local plan process.
FP10.1	005	Resident/ General Public	i) and ii) are my preferred but I think item (iii) has been abused by neighbouring authorities. iv) This should be absolutely the last resort and resisted as much as possible because it affects the proposals in the need for 'green' to combat mental health and biodiversity issues.	Comments noted.	Comments will be considered as part of the local plan process.
FP10.1	006	Resident/ General Public	i), ii), iii) definitely not iv).	Comment noted.	Comments will be considered as part of the local plan process.
FP10.1	007	Government/ Public Body	Either Option i) or ii). These are likely to be located near to existing facilities and infrastructure and therefore be less car reliant. This is more sustainable in terms of transport, causing less traffic congestion effects and reducing carbon impact.	Comments noted.	Comments will be considered as part of the local plan process.
FP10.1	009	Resident/ General Public	Definitely i) and identifying houses that are not being lived in currently. iv) should be the very last resort!	Comment noted.	Comments will be considered as part of the local plan process.
FP10.1	011	Resident/ General Public	Consider brown sites rather than green field for housing development.	Comment noted.	Comments will be considered as part of the local plan process.

FP10.1	012	Resident/ General Public	A combination of brownfield site redevelopment and increased housing density for new development is vital to best meet the aims of the Local Plan. There should be no need to seek any significant release of Green Belt land but if it is then seeking support from neighbouring Councils would be necessary. Tamworth is too constrained by its existing boundaries.	Comments noted.	Comments will be considered as part of the local plan process.
FP10.1	014	Government/ Public Body	<p>We note the various approaches which could help achieve the delivery of housing need and would wish to highlight that any of the approaches would need to link in with an overall site selection methodology that included consideration of the historic environment, heritage assets and their setting. These considerations would need to include those set out in NPPF Footnote 68 relating to unknown archaeology.</p> <p>Our Historic Environment Advice Note 3 sets out a five step process for considering site allocations in Local Plans and we recommend that the assessment work adopts this approach to ensure the Plan can demonstrate a positive approach to the historic environment, in respect of site allocations, in line with NPPF requirements.  <a href="https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/">https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</a></p>	<p>Comments noted. In line with our vision, objectives and wider NPPF guidance, the historic environment will be a key consideration in our housing delivery.</p> <p>We welcome the additional guidance provided in respect of site allocation. Should any further guidance be required in the later stages of the plan-making process, we will seek additional consultation with Historic England.</p>	Further discussions with Historic England may be necessary in the future, regarding site allocation.
FP10.1	015	Charity/ Community Group	Options i), ii), and iii) but not iv).	Comments noted.	Comments will be considered as part of the local plan process.
FP10.1	016	Government/ Public Body	<p>We would recommend that previously developed brownfield land be used to deliver the plans housing need where possible. This land type often has some form of existing infrastructure provision from its previous use which means redeveloping it often has a lower impact than using greenfield.</p> <p>Releasing greenfield from the green belt should be a last resort, new infrastructure provision can be costly and challenging to provide and the environmental impact goes against the several of the plans objectives and aims set out in section 5.</p>	Comments noted.	Comments will be considered as part of the local plan process.
FP10.1	021	Government/ Public Body	Option i), ii) and iii), but not iv). Tamworth has very little green belt land, so what it has should be protected and retained.	Comments noted.	Comments will be considered as part of the local plan process.
FP10.1	021	Government/ Public Body	<p>Once the SHLAA process is complete is TBC intending to commission a Heritage Impact Assessment of these sites like they did for the current Local Plan  <a href="https://www.tamworth.gov.uk/sites/default/files/planning_docs/LPautumn2014/K9%20Heritage%20IA%20pre-sub.pdf">https://www.tamworth.gov.uk/sites/default/files/planning_docs/LPautumn2014/K9%20Heritage%20IA%20pre-sub.pdf</a></p>	A Heritage Impact Assessment will inform the site allocation process of the new plan, with the SHLAA identifying which potential sites will require a full impact assessment.	No immediate action required. Once the relevant stage has been reached, we will seek further collaboration.

			We would certainly advocate this approach and suggest that the County Council's Historic Environment Team and Historic England are consulted on the scope.		
FP10.1	026	Government/ Public Body	Any approach taken should ensure there is appropriate education infrastructure either through existing or new provision.	Comments noted.	Comments will be considered as part of the local plan process.
FP10.1	027	Resident/ General Public	i through iii.	Comments noted.	Comments will be considered as part of the local plan process.
FP10.1	028	Resident/ General Public	i, iii	Comments noted.	Comments will be considered as part of the local plan process.
FP10.1	029	Government/ Public Body	<p>The Issues and Options document states that the options for accommodating an additional 2,961 homes within the Borough (up to 2043 as part of this Local Plan review) are likely to be limited.</p> <p>There should be focus on option i) (making best use of previously developed land before allocating greenfield land) and option ii) (increase housing density for new developments) in the first instance. The Plan should seek to maximise housing land supply within Tamworth Borough to meet its own housing needs as far as possible (as per Chapter 11 'Making effective use of land' of the NPPF, in particular paragraph 125). This should be demonstrated through the supporting evidence base to the Local Plan. It is noted that the Council is in the process of carrying out a Strategic Housing Land Availability Assessment (SHLAA). As part of the SHLAA, or other Local Plan supporting evidence base documents, the Council should fully explore all options to make effective use of land for housing supply including consideration of under-utilised land, appropriate densities and alternative uses of land (as per Chapter 11 of the NPPF). As part of option i) the Council should consider the potential of greenfield sites (non-Green Belt land in the first instance) which may be suitable for housing development within the Borough, alongside making as much use as possible of previously developed land.</p> <p>Option iii) considers the potential for support from neighbouring councils to deliver any housing needs that cannot be met within Tamworth Borough. The Issues and Options document outlines that Lichfield and North Warwickshire Councils have previously assisted in delivering the unmet needs of Tamworth Borough as part of current adopted Local Plans. Dudley MBC and Tamworth BC are not neighbouring authorities, however both Councils are party to the</p>	Comments noted.	Comments will be considered as part of the local plan process.

			<p>Greater Birmingham and Black Country Housing Market Area where wider housing supply shortfalls have been identified to date. Given these strategic housing supply shortfall issues, it is particularly important that Tamworth Borough maximises its capacity to deliver its own housing needs.</p> <p>In relation to option iv) which considers the potential release of Green Belt land, regard should be had to national planning policy (NPPF, in particular paragraphs 140-143).</p>		
FP10.1	034	Developer/ Agent/ Landowner	<p>i), ii), iv)</p> <p>Review the green belt boundary and remove land from the green belt for housing and or safeguarded land for the future.</p> <p>Do not rely on the small housing sites to deliver and allocate a further SUE at Dosthill as below</p> <p>Amend the proposals map to alter the green belt boundary</p> <p>Remove site below from the Green Belt</p> 	Comments noted.	Further work on the quantum and distribution of housing to be carried out prior to the Preferred Options stage.
FP10.1	035	Other Stakeholder/ Business	<p>The WMHAPC supports the option which will allow the greatest provision of affordable homes, in the most sustainable locations. Whilst it is understood that the re-use of previously developed land is preferable as set out in options i and ii, there is a need to be cautious that these approaches do not undermine the delivery of affordable homes given that the use of previously developed land often has viability implications, therefore the WMHAPC cannot support this as a sole option.</p>	Comments noted and preferences acknowledged. As a highly urbanised and constrained authority, we have no rural settlements. On this basis, the new plan will not include any policy for Rural Exception Sites.	Comments will be considered as part of the local plan process.

			<p>Taking the above into consideration, whilst it may be preferable to develop brownfield and non-Green Belt sites, the Issues and Options consultation document acknowledges that “many of the larger more easily developable sites [have] come forward for development. This means our options for accommodating an extra 2,961 homes are likely to be limited.” As a result, it is likely that a number of Green Belt and greenfield sites will need to be considered in order to meet the needs of the Borough (option iv) along with the added support from neighbouring councils to deliver any unmet need.</p> <p>Given the housing land supply constraints that the Borough encounters we would like to remind the Council of the benefits of Rural Exception Sites as explained in paragraph 78 of the NPPF (2021) “Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this.” Such sites are an exception to inappropriate development within the green belt as set out by paragraph 149 of the NPPF (2021).</p>		
FP10.1	036	Developer/ Agent/ Landowner	<p>It is right the standard method need for Tamworth is used as the minimum starting point for determining the plan’s housing requirements, as per national planning guidance (paragraph: 002 ref ID:2a-002-20190220).</p> <p>But it should only be treated as a starting point. Although not updated for some time, the Council’s most recent five year housing land supply report (for the base date 1 April 2019) indicated a five year supply of 8.6 years. In the last six years since the Local Plan was adopted the Council has delivered a total of 2,110 homes (taken from the government’s live housing completion data), equating to circa 351 homes per year. That is well in excess of the adopted Local Plan requirement (177 homes per annum) and the standard method need (141 homes per annum).</p> <p>It is welcomed the Council is open to considering a higher figure based on economic growth strategies, the need to support strategic infrastructure improvements, and existing delivery rates. This is especially prudent given the borough’s housing challenges, as acknowledged in the consultation document.</p>	<p>As noted, the Standard Method should be used to calculate only the minimum housing requirement. It should be considered a starting point from which the most appropriate requirement is subsequently decided. As we progress through the plan making process, should any evidence, as listed in your representation, suggest that it is necessary to increase this figure, then the overall housing figure will be set to reflect this. The final housing figure will not be set until further evidence has been gathered and evaluated.</p> <p>Preferences regarding the approaches set out in Option 6.2(b) are also noted.</p>	<p>Comments will be considered as part of the local plan process. Further work will be commissioned to establish the housing need across the plan period.</p>



			<p>To deliver this scale of development will require all of the ‘taps of supply’ to be turned on, so all of the options listed at option 6.2(b). In particular, it will be necessary to look for support from neighbouring councils to deliver the need. In working with Councils, it will be essential that infrastructure delivery is agreed.</p>		
FP10.1	037	Developer/ Agent/ Landowner	<p>Whilst the Council should fully investigate making best use of brownfield land and increasing the density of new developments in more sustainable locations, any assumptions made about capacity must be realistic and deliverable.</p> <p>It is inevitable the Council will need to also consider greenfield and Green Belt sites in order to deliver the required amount of new homes. Non Green Belt greenfield sites should of course be fully considered first in accordance with paragraph 141 of the Framework, although it is recognised these are limited.</p> <p>Whilst the Council should also undertake a review of its Green Belt, it should consider undertaking a joint exercise with Lichfield Council who share Green Belt adjacent to the administrative boundary. This is particularly relevant given the likelihood of unmet needs and Lichfield being asked to contribute towards meeting those unmet needs. This would provide a more effective approach to plan making, and in particular ensure that first consideration is given to locations well served by public transport in accordance with paragraph 142 of the Framework.</p> <p>In respect of Bellway’s land interests, the land north of Coton Lane is one of the limited opportunities within the Borough’s boundary to support non-Green Belt growth where there are no constraints to development coming forward. The site is in a suitable location, being surrounded by residential development to the east, south and west, and adjacent to The Rawlett School. The site can make an important contribution towards meeting Tamworth’s housing requirement. A call for sites submission has been made for this site with evidence as to its suitability.</p> <p>Whilst the balance of the site falls within Lichfield District, given its relationship to Tamworth, it is considered that the Tamworth Local Plan should allocate the land within the Borough boundary and identify the remainder which falls within Lichfield District as necessary to be delivered to help meet Tamworth’s housing requirement. There is precedent for this approach, with a very similar situation at land at Mitton, near Tewkesbury which falls</p>	<p>Comments noted. As part of our evidence base, we commissioned a review of the Tamworth’s Green Belt last year, which took into account neighbouring Green Belt land.</p> <p>Sites will be assessed for their relevant suitability to deliver Tamworth’s housing need.</p>	<p>Comments will be considered as part of the local plan process.</p>

			<p>entirely within Wychavon District but is identified in the adopted Cheltenham, Gloucester and Tewkesbury Joint Core Strategy as a location for growth to help meet Tewkesbury's needs.</p> <p>Further additional unmet needs to be met by neighbouring authorities should also be closely related to Tamworth in terms of accessibility to services and connectivity with the town centre.</p> <p>One such site for consideration is Land off Bonehill Road which falls entirely within Lichfield District but is adjacent to Tamworth's western boundary and well connected to services, jobs and facilities within Tamworth.</p> <p>As shown on the attached Concept Masterplan, the site could make a significant contribution to Tamworth's housing and employment needs of circa 700 dwellings, including affordable housing provision, circa 10ha employment land, whilst also safeguarding land for a potential secondary school as well as retail uses. This would be supported by improvement to local junctions and a new access on to the A5, and a sizeable area of land to the north given over for wildlife and recreation.</p>		
FP10.1	039	Charity/ Community Group	Previously developed land of high environmental value should be avoided, and this needs to be identified within any brownfield register.	Comments noted. In respect of our Brownfield Register, our current version is due to be updated once our upcoming Strategic Housing Land Availability Assessment has been completed.	An update of the Brownfield Register will be carried out once the upcoming Strategic Housing Land Availability Assessment has been completed.
FP10.1	043	Government/ Public Body	We would support an approach to delivering housing need that included a combination of all 4 of the options in Option 6.2(b).	Comments noted.	Comments will be considered as part of the local plan process.
FP10.1	044	Government/ Public Body	Combining options i) and ii) and then treating the remaining options on a sequential basis.	Comments noted.	Comments will be considered as part of the local plan process.
FP10.1	045	Developer/ Agent/ Landowner	<p>In accordance with the NPPF, TBC should focus on releasing brownfield and non-Green Belt land. However, even if TBC were to maximise delivery from those sites and optimise built densities, it would still be insufficient for TBC to meet their own housing need (sites on the latest TBC Brownfield Register only contain enough capacity to deliver 504 dwellings, assuming all are deliverable).</p> <p>Indeed, TBC is correct to recognise that land within its jurisdiction is constrained, with land to the north is constrained by the flood zone,</p>	<p>Comments noted and preferences towards delivering the housing need acknowledged.</p> <p>Sites will be assessed for their relevant suitability to deliver Tamworth's housing need.</p>	Further work on the quantum and distribution of housing to be carried out prior to the Preferred Options stage.

land to the east and west is demarked by the authority boundary, and land to the south is constrained by the designated Green Belt. Therefore, sustainably located development sites are limited.

In light of the housing context in the wider HMA, it should be TBC's priority to fully meet its identified housing need within its own jurisdiction, as discussed under Feedback Point 9. Exceptional circumstances exist to justify strategic alterations to the Green Belt boundaries, to remove sites from the Green Belt and allow their allocation for development.

Moreover, as discussed in Feedback Point 9, if TBC have more suitable sites than required to meet the identified housing need, they should seek to support neighbouring councils within the wider HMA, rather than the reverse described in option 6.2(b)iii. Therefore, TBC should welcome sustainable sites that come forward for residential development.

Overwoods Road  
Given the above, the BHL site of Land South of Overwoods Road provides both a suitable and sustainable opportunity for residential development.

The land is currently designated as Green Belt, part of the larger West Midlands designation, and is located between the southern urban edge of Tamworth and the TBC boundary with North Warwickshire. The BHL Vision Document (included herein) assesses the site against the five purposes of Green Belt. Although the development of this site will inevitably result in some incremental growth of Tamworth to the south, the landscape is generally considered to be of low quality due to the influence of the settlement edge and prevalence of urbanised features including pylons, overhead powerlines and the possible future location of the HS2 line. Furthermore, a sensitive development of this site provides an opportunity to strengthen the landscape structure around the edges of the settlement and provide accessible green infrastructure to local residents. Therefore, the site could be released from the Green Belt without undue harm to the wider Green Belt.

The site is not subject to any known insurmountable spatial planning constraints as it is not in a flood risk zone, does not contain any heritage assets and its ecological/arboriculture features will be maintained through sensitive Masterplanning.

The site is well connected to public and sustainable transport nodes, with regular services from the nearest bus stop 200m from the site and Wilnecote Railway Station is 3km away. It is suitable location for family housing, with both an infant school and a secondary school within 1.2km, along with the essential community services of a pharmacy and doctors within 2km. For employment, there are a number of options available locally. The Tame Valley Industrial estate (1.2km) contains a number of commercial and retail business, and commuting to Birmingham New Street is just 20 minutes by rail. Additionally, there are plenty of opportunities for residents to be active, with footpaths to the south, Kingsbury Water park (6km) and a variety of local sports clubs. For other leisure opportunities, Tamworth town centre (accessible via rail or bus) provides a large variety of retailers and restaurants, with residents able to further support local businesses.

The sustainable location of this proposed development site and the strong connection to local services mean that a high-quality development on this site would positively contribute to TBC's visions and objectives, as discussed in feedback point 2.

Given the need for TBC to meet its significant housing need and limited land supply in which to do so, this site provides an opportunity for a high quality and sustainably located residential development. A high-level Masterplan of the site (as set out in the accompanying Vision Document) shows that it is able to provide c.170 dwellings towards meeting the housing need in TBC, providing market and affordable homes across a range of sizes and tenures. The development will incorporate green infrastructure corridors, public open space and a sensitive design to ensure the development is in keeping within its context.

Ashby Road

BHL Land South of Ashby Road site presents a timely opportunity to deliver residential development in a sustainable location, at a time where housing need is significant and land supply is scarce.

The site is to the north of Tamworth, just north of the River Anker, and is set within a growth area of new developments: Anker Valley, Chestnut Walk and Arkall Farm. Focusing residential development in this area presents the opportunity to meet the housing needs of

the community whilst creating connected and sustainably located neighbourhoods. The site is not a Green Belt site.

The BHL Vision Document (included herein) demonstrates how the proposed site is well connected to transport and local amenities. It has good connections to public transport, with the nearest bus stop within 800m and Tamworth Railway 2.5km away. Additionally, the site will benefit from the two new primary schools built on the surrounding developments, just 400m away, along with both Landau Forte Academy and South Staffordshire College for secondary/higher education within 1.7km of the site. Convenience retail is available at the new Co-op store on Brooklime Way.

Close proximity to Tamworth town centre (2.5km or 10-minute cycle) affords good access to community facilities, such as a doctor's surgery, pharmacy, banks and grocery stores. Moreover, the site benefits from a new convenience store just 400m away. With regards to employment, Lichfield Industrial Estate is 2.5km away and provides employment in automotive, manufacturing and commercial sectors, with further opportunities in the hospitality sector in Tamworth town centre. Additionally, with Birmingham New Street just 20-minute train journey, commuting via public transport is accessible and convenient.

The site is not subject to insurmountable planning constraints, being outside of the flood risk zone that affects much of the land to the south of the site. The Amington Hall Conservation Area is located approximately 1km to the east of the site, including the grade 2 listed Amington Hall and Amington Old Hall, however, the site does not directly border it and sufficient vegetation screening will be retained and, where necessary, enhanced to mitigate impact on the area. There are perceived highways constraints along Ashby Road that have been identified as part of the surrounding permitted developments. An initial highways assessment has shown that the proposed junction would operate with spare capacity during peak times, although it may be the case that further development will be subject to the pending results of the Monitor and Mitigate Strategy for the adjacent development.

Given the need for TBC to meet its substantial housing need and the limited land supply in which to do so, this site provides an opportunity for a high quality and sustainably located residential

			<p>development. A high-level Masterplan of the site (as set out in the accompanying Vision Document) shows that it is able to provide c.235 dwellings towards meeting the housing need in TBC, providing both market and affordable homes across a range of sizes and tenures. The development will incorporate green infrastructure corridors, public open space and sensitive design to ensure the development is in keeping with its context.</p> <p><u>Concluding Remarks</u>          BHL largely support the intentions of the Issues and Options document, and have outlined in feedback responses above how it can be strengthened to deliver a sustainable and prosperous future for the Tamworth. The principal recommendation is that a HENA is conducted, to understand and enable planning for the true housing need for the Borough.</p> <p>BHL present two sustainably located sites, which would contribute c.405 dwellings towards local housing need. Given the need to deliver nearly 3,000 dwellings over the plan period, the limited land supply in which to do so and the vast unmet housing need in the wider HMA, it is strongly recommended that TBC approve these sites for residential development. Enclosed are the Vision Documents for each site, which demonstrate how careful Masterplanning and design will allow the schemes to integrate within their surroundings and deliver much needed homes, public open space and green infrastructure for the local community.</p>		
FP10.1	047	Government/ Public Body	It is important that infrastructure implications are taken into account as part of cross boundary discussions over the location of new growth.	Comments noted.	Comments will be considered as part of the local plan process.

## Feedback Point 11: Providing sufficient affordable homes

Question ID	URN	Respondent Type	Representation	Officer Response	Further Action
<b>FP11.1: Should we look to maximise affordable housing over other forms of infrastructure, or take a more balanced approach?</b>					
FP11.1	001	Resident/ General Public	Take a more balanced approach, prioritising affordable housing and other infrastructure more equally.	Comment noted.	Comments will be considered as part of the local plan process.
FP11.1	002	Resident/ General Public	Maximise affordable housing over other forms of infrastructure.	Comment noted.	Comments will be considered as part of the local plan process.
FP11.1	003	Resident/ General Public	Take a more balanced approach, prioritising affordable housing and other infrastructure more equally.	Comment noted.	Comments will be considered as part of the local plan process.
FP11.1	004	Local Business	Maximise affordable housing over other forms of infrastructure.	Comment noted.	Comments will be considered as part of the local plan process.
FP11.1	005	Resident/ General Public	ii) the balanced approach should be used.	Comment noted.	Comments will be considered as part of the local plan process.
FP11.1	009	Resident/ General Public	Take a more balanced approach, prioritising affordable housing and other infrastructure more equally.	Comment noted.	Comments will be considered as part of the local plan process.
FP11.1	011	Resident/ General Public	Take a more balanced approach, prioritising affordable housing and other infrastructure more equally.	Comment noted.	Comments will be considered as part of the local plan process.
FP11.1	012	Resident/ General Public	Maximise affordable housing over other forms of infrastructure.	Comment noted.	Comments will be considered as part of the local plan process.
FP11.1	014	Government/ Public Body	Historic England has no specific comments to make on the proposed options for affordable housing delivery. A general comment is that any options would need to consider the historic environment, heritage assets and their setting as part of the Plan process.	Comment noted.	Comments will be considered as part of the local plan process.
FP11.1	026	Government/ Public Body	From an education perspective, any prioritising of affordable housing over other forms of infrastructure may adversely affect those living in the affordable housing. If education infrastructure is not prioritised, families may not be able to access education provision locally. Any proposed development where education provision is insufficient to accommodate additional pupils, and additional infrastructure is not secured, may increase the cost to	Comments noted. In consideration of our infrastructure, new developments will continue to be tested against viability.	Comments will be considered as part of the local plan process.

			<p>the public purse for school transport. Consideration must be given to the ongoing costs both to the developer and the public purse as well as the sustainability and environmental impacts of the site(s). In such circumstances it would normally be expected that the developer meets these additional transport costs.</p> <p>Provision of additional transport to access school places outside of the local area of need impacts on the ability of pupils to use sustainable modes of travel to and from school. This may have implications for local highway infrastructure in relation to the increase in volume of traffic and impacts negatively on proposals to reduce carbon emissions.</p>		
FP11.1	027	Resident/ General Public	Take a more balanced approach, prioritising affordable housing and other infrastructure more equally.	Comment noted.	Comments will be considered as part of the local plan process.
FP11.1	028	Resident/ General Public	Take a more balanced approach, prioritising affordable housing and other infrastructure more equally.	Comment noted.	Comments will be considered as part of the local plan process.
FP11.1	035	Other Stakeholder/ Business	<p>The WMHAPC naturally supports the option that enables the delivery of much needed affordable housing. Having said that, it is important that a balance in infrastructure and affordable housing delivery is established, so not to frustrate overall housing delivery. This balance needs to be established by appropriate assessments of affordable housing needs and viability, as set out in PPG:</p> <p>“Plans should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards including the cost implications of the Community Infrastructure Levy (CIL) and planning obligations. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and the total cumulative cost of all relevant policies will not undermine deliverability of the plan.”</p> <p>Option iii seeks to “Allocate appropriately sized sites specifically for the development of affordable housing”. This option will enable the targeted delivery of affordable housing in order to address locally identified needs. However, the sustainability and appropriateness of such sites will not be able to be delivered without the suitable supporting infrastructure that planning obligations seek to secure. Taking this into account, a combination of options ii “Continue to try and strike a balance between providing affordable housing and</p>	Comments noted.	Comments will be considered as part of the local plan process.



			contributions towards other infrastructure' and iii 'Allocate appropriately sized sites specifically for the development of affordable housing" would appear to be a sensible path to pursue.		
FP11.1	036	Developer/ Agent/ Landowner	Affordable housing delivery is a critical aspect of why this review is necessary. In reality a balanced approach will be required to securing the maximum affordable housing delivery.  An important part of that will be ensuring that viable sites capable of delivering policy compliant affordable housing and contributions are allocated in the plan, or infrastructure is provided to unlock sites of this nature if they are located in neighbouring authority areas with the intention to meet Tamworth's unmet needs.	Comments noted.	Comments will be considered as part of the local plan process.
FP11.1	037	Developer/ Agent/ Landowner	Bellway consider that the Council should continue to try and strike a balance between providing affordable housing and contributions towards other infrastructure. Whilst provision of an appropriate level of affordable housing on new development is important, this should not be at the expense of other infrastructure which is necessary to deliver the scheme.	Comments noted.	Comments will be considered as part of the local plan process.
FP11.1	044	Government/ Public Body	Take a more balanced approach, prioritising affordable housing and other infrastructure more equally.	Comment noted.	Comments will be considered as part of the local plan process.
FP11.1	045	Developer/ Agent/ Landowner	The requirement for Affordable Housing (AH) should be informed by the HENA (to establish the overall AH need), and a balanced consideration of the interplay between AH provision and other infrastructure delivery. The AH requirement should also be considered in a comprehensive viability assessment that takes account of all development requirements (as they come forward).	Comment noted. As part of the local plan process, we are due to commission an updated Housing and Economic Needs Assessment, which will include an assessment of the borough's affordable housing needs.	Comments will be considered as part of the local plan process. Further work will be completed to commission an updated HEDNA.
FP11.1	047	Government/ Public Body	Provision of good quality housing is central to healthy lifestyles so it is necessary for a balance to be struck. However, in the terms of the order of support for infrastructure we believe that health facilities should be set alongside others including education and transport. It is also the case that the quality of provision for the existing population should not be undermined through growth pressures.	Comments noted.	Comments will be considered as part of the local plan process.
<b>FP11.2: Do you think we should look to allocate certain sites specifically to provide affordable housing?</b>					
FP11.2	001	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP11.2	002	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.

FP11.2	003	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP11.2	004	Local Business	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP11.2	005	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP11.2	006	Resident/ General Public	No.	Comment noted.	Comments will be considered as part of the local plan process.
FP11.2	009	Resident/ General Public	No.	Comment noted.	Comments will be considered as part of the local plan process.
FP11.2	011	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP11.2	012	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP11.2	014	Government/ Public Body	Historic England has no specific comments to make on the proposed options for affordable housing delivery. A general comment is that any options would need to consider the historic environment, heritage assets and their setting as part of the Plan process.	Comment noted.	Comments will be considered as part of the local plan process.
FP11.2	026	Government/ Public Body	The allocation of sites should prioritise the infrastructure to support it. If considering allocating sites specifically to provide affordable housing, ideally this should be where there is existing infrastructure with the capacity to effectively serve the development. We welcome early discussions with the local planning authority on potential sites.	Comments noted.	Where necessary, we shall seek further liaison throughout the plan process.
FP11.2	027	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP11.2	028	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP11.2	035	Other Stakeholder/ Business	The WMHAPC naturally supports the option that enables the delivery of much needed affordable housing. Having said that, it is important that a balance in infrastructure and affordable housing delivery is established, so not to frustrate overall housing delivery.	Comments noted.	Comments will be considered as part of the local plan process.

			<p>This balance needs to be established by appropriate assessments of affordable housing needs and viability, as set out in PPG:</p> <p>“Plans should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards including the cost implications of the Community Infrastructure Levy (CIL) and planning obligations. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and the total cumulative cost of all relevant policies will not undermine deliverability of the plan.”</p> <p>Option iii seeks to “Allocate appropriately sized sites specifically for the development of affordable housing”. This option will enable the targeted delivery of affordable housing in order to address locally identified needs. However, the sustainability and appropriateness of such sites will not be able to be delivered without the suitable supporting infrastructure that planning obligations seek to secure. Taking this into account, a combination of options ii “Continue to try and strike a balance between providing affordable housing and contributions towards other infrastructure’ and iii ‘Allocate appropriately sized sites specifically for the development of affordable housing” would appear to be a sensible path to pursue.</p>		
FP11.2	039	Charity/ Community Group	It could be valuable for the council to take a role in building and providing affordable housing that also meets sustainable standards with quality green infrastructure.	Comments noted and suggestions welcomed. Unfortunately, the choice of housing developer cannot be influenced by the planning process. Should the Council ever be involved in the construction of affordable housing then this would be a separate issue. However, national policy requires sustainability at the heart of all development, and this is an overarching objective that the new local plan will reflect.	Comments will be considered as part of the local plan process.
FP11.2	044	Government/ Public Body	No.	Comment noted.	Comments will be considered as part of the local plan process.

## Feedback Point 12: Providing the right type of homes

Question ID	URN	Forename	Representation	Officer Response	Further Action
<b>FP12.1: Are there any particular housing needs that you think can be or should be addressed through the plan?</b>					
FP12.1	001	Resident/ General Public	First time buyers or renters.	Comments noted.	Comments will be considered as part of the local plan process.
FP12.1	002	Resident/ General Public	1/2 bed houses / flats are needed, all we see are large 34 bed luxury houses being built, the need is not for them, especially as rates rise, it is for first time buyers, with a cap on the prices or more shared equity.	<p>Comments noted. On major developments, current policy helps to ensure that housing mix meets the needs of the borough. It also directs both the amount and tenure of affordable housing that should be delivered. As part of the plan process, we will be commissioning an updated Housing and Economic Development Needs Assessment, which will include an assessment of both our housing mix and affordable housing requirements. In the new plan, our current policy will be updated to reflect this evidence. This will ensure that we are meeting the needs of our borough.</p> <p>Although planning policy cannot influence house prices, there are affordable housing products which do introduce price caps, such as First Homes. This tenure will also be included in the new affordable housing policy.</p>	Comments will be considered as part of the local plan process. We will be carrying out further work to determine the specifics of our housing need. This will include commission of an updated Housing and Economic Needs Assessment.
FP12.1	003	Resident/ General Public	As mentioned in a previous answer consider building more housing for people that do not drive or need cars. Maybe cluster such properties together in smaller safer streets. Potential purchasers would be made aware of the "No Car" policy when purchasing/renting housing in these areas.	<p>Comments noted and suggestions welcomed. The concept described is something that we could potentially seek to encourage through design guides, and this is something that we could look at during the plan process.</p> <p>Beyond this, sustainability is a significant component of both national policy and priorities. This is something that will be reflected in the new local plan.</p>	Comments will be considered as part of the local plan process.
FP12.1	004	Local Business	More adapted disabled homes.	Comments noted.	Comments will be considered as part of the local plan process. We will be carrying out further work to determine the specifics of

					our housing need as the plan progresses.
FP12.1	005	Resident/ General Public	Support towards or provision for housing with new generation heating provision.  Not all apartment living is suitable for the elderly who do need access to an outside space both for exercise and also small plots to sit outside in preferable their own space.	Comments noted. We will be carrying out further work to establish the specifics of our housing need, including housing for the elderly.  Furthermore, recent changes to building regulations have included certain improvements to the efficiency of housing. However, we already intend to include elements associated to this in the new plan, in relation to our commitment to climate change.	Comments will be considered as part of the local plan process. We will be carrying out further work to determine the specifics of our housing need as the plan progresses.
FP12.1	006	Resident/ General Public	Because of the scarcity of land in Tamworth affordable housing should be 4 or 5 storeys flats sold exclusively to 'OCCUPYING LESSEES'. BUY-TO-LET landlords should not be allowed to buy up your affordable housing stock. First time buyers should not be deprived of the opportunity to get on the housing ladder. There has to be a first-time buyer.	Although planning policy cannot influence property purchase or buyers, your comments are noted. Over the years, the government has introduced national affordable housing schemes, which include a buyer eligibility criteria. For example, the newly introduced First Homes scheme is for first time buyers only, with the purchase price discounted at a minimum of 30%. We are already requiring the delivery of this product on major developments, and the new affordable housing policy will reflect the national schemes which are active at the time.	Comments will be considered as part of the local plan process. We will be carrying out further work to determine the specifics of our housing need as the plan progresses. This will include commission of an updated Housing and Economic Needs Assessment.
FP12.1	009	Resident/ General Public	As the population of Tamworth is getting a lot older, is there a way of supporting those more vulnerable with those who are seeking accommodation.	Comments noted. We will be carrying out further work to decipher the specifics of our housing need, including housing for the elderly.	Comments will be considered as part of the local plan process. We will be carrying out further work to determine the specifics of our housing need as the plan progresses.
FP12.1	011	Resident/ General Public	The possibility for people to live in tiny houses, or create an eco-community.	Comments noted and suggestions welcomed. From a design perspective, this is a concept that we can consider planning for.  We should note that we cannot necessarily make sure that this specific type of development occurs. However, we can try to encourage more eco-friendly developments to come forward through our future design and environmental policies.	Comments will be considered as part of the local plan process.
FP12.1	012	Resident/ General Public	Not sure.	Comment noted.	No further action required.
FP12.1	014	Government/ Public Body	Historic England has no specific comments to make on this issue. A general comment is that any options would need to consider the	Comments noted.	Comments will be considered as part of the local plan process.

			historic environment, heritage assets and their setting as part of the Plan process.		
FP12.1	020	Developer/ Agent/ Landowner	<p>The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. However, if the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG. The PPG identifies the type of evidence required to introduce a policy requiring the M4 standards, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability.</p> <p>The Council should also note that the Government response to the Raising accessibility standards for new homes states that the Government proposes to mandate the current M4(2) requirement in Building Regulations as a minimum for all new homes, with M4(1) applying in exceptional circumstances. This will be subject to a further consultation on the technical details and will be implemented in due course through the Building Regulations. M4(3) would continue to apply as now where there is a local planning policy in place and where a need has been identified and evidenced.</p>	Comments noted. We will be carrying out further work to decipher the specifics of our housing need. This includes evidence relating to both the elderly and disabled. This will be distinguished between accessible and adaptable market housing, and more specialised provision like care homes and assisted living facilities.	Comments will be considered as part of the local plan process. We will be carrying out further work to determine the specifics of our housing need as the plan progresses.
FP12.1	025	Developer/ Agent/ Landowner	<p>Thank you for the opportunity to comment on the Tamworth Local Plan Issues and Options Consultation. McCarthy Stone is the leading provider of specialist housing for older people.</p> <p>It is welcomed that on page 6 of the consultation document under the heading 'Our population' that the council recognise the growth in ageing population of Tamworth and recognise that already <i>'there is a higher proportion of over 65s compared to the regional and national average'</i>. This is reconfirmed in paragraph 6.2.4 of the consultation document entitled 'Providing the right type of homes' that again recognises that <i>'The population of Tamworth is ageing, and older people have different needs when it comes to housing. Not only that, but the Covid-19 pandemic has changed the way that people use their homes with many people now working from home significantly more than in the past. We will be collecting some evidence to help us identify the types of housing that we need to be delivering in the borough to reflect these changing needs. We'll also be exploring ways in which people's homes can be more flexible, to suit their changing needs over time'</i>. Whilst we welcome the recognition that the issues and options has with regard to the</p>	Comments noted. We will be carrying out further work to decipher the specifics of our housing need, which will include gathering evidence related to elderly provision. This will be distinguished between accessible and adaptable market housing, and more specialised provision like care homes and assisted living facilities.	Comments will be considered as part of the local plan process. We will be carrying out further work to determine the specifics of our housing need as the plan progresses.

growth in the ageing population, we provide additional information below on need and benefits of older people's housing and make recommendation as to the best policy approach that the council should take forward.

Government's policy, as set out in para 60 of the revised NPPF, is to boost significantly, the supply of housing. Paragraph 62 identifies within this context, the size, and type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies including older people.

In June 2019, the PPG was updated to include a section on Housing for Older and Disabled People, recognising the need to provide housing for older people. Paragraph 001 Reference ID: 63-001-20190626 states:

*"The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million. Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking" (emphasis added).*

*Paragraph 003 Reference ID: 63-003-20190626 recognises that "the health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support."*

Thus, a range of provision needs to be planned for and recognising that housing for older people has its own requirements and cannot be successfully considered against criteria for general family housing or adaptable housing is important. Paragraph 006 Reference ID: 63-006-20190626 sets out *"plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider*

*proposals for the different types of housing that these groups are likely to require.”*

Need for Older Persons’ Housing  
It is well documented that the UK faces an ageing population. Life expectancy is greater than it used to be and as set out above by 2032 the number of people in the UK aged over 80 is set to increase from 3.2 million to 5 million (ONS mid 2018 population estimates).

It is generally recognised (for example The Homes for Later Living Report September 2019). That there is a need to deliver 30,000 retirement and extra care houses a year in the UK to keep pace with demand.

The age profile of Tamworth can be drawn from the 2018 population projections from the Office for National Statistics. This advises that there were 14,336 persons aged 65 and over in 2018, accounting for 18.7% of the total population of the District. This age range is projected to increase by 4,583 individuals, or 32%, to 18,919 between 2018 and 2043. The population aged 65 and over is expected to increase to account for 24.7% of the total population of the District by 2043.

In 2018 there were 3,218 persons aged 80 and over, individuals who are more likely to be frail and in need of long-term assistance. The number of people in this age range is forecasted to increase by 3,182 individuals, or 98.9%, to 6,400 between 2018 and 2043. The population aged 80 and over is anticipated to represent a higher proportion of Tamworth’s residents, accounting for 4.2% of the total population in 2018 and increasing to 8.4% by 2043.

It is therefore clear there will be a significant increase in older persons’ over the Plan Period in Tamworth and the provision of suitable housing and care to meet the needs of this demographic should be a priority of the emerging Local Plan. The Plan should be ensure that a policy is incorporated to address the need.

Benefits of Older Persons’ Housing  
Older peoples housing produces a large number of significant benefits which can help to reduce the demands exerted on Health and Social Services and other care facilities – not only in terms of the fact that many of the residents remain in better health, both physically and mentally, but also doctors, physiotherapists,



community nurses, hairdressers and other essential practitioners can all attend to visit several occupiers at once. This leads to a far more efficient and effective use of public resources.

Economic  
 A report *'Healthier and Happier' An analysis of the fiscal and wellbeing benefits of building more homes for later living* by WPI Strategy for Homes for Later Living explored the significant savings that Government and individuals could expect to make if more older people in the UK could access this type of housing. The analysis showed that:

'Each person living in a home for later living enjoys a reduced risk of health challenges, contributing to fiscal savings to the NHS and social care services of approximately £3,500 per year. Building 30,000 more retirement housing dwellings every year for the next 10 years would generate fiscal savings across the NHS and social services of £2.1bn per year.

On a selection of national well-being criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing to housing specially designed for later living.'

A further report entitled *Silver Saviours for the High Street : How new retirement properties create more local economic value and more local jobs than any other type of residential housing* (February 2021) found that retirement properties create more local economic value and more local jobs than any other type of residential development. For an average 45 unit retirement scheme built in a sustainable location, the residents generate £550,000 of spending a year, £347,000 of which is spent on the high street, directly contributing to keeping local shops open and high streets vibrant.

As recognised by the PPG, Retirement housing releases under-occupied family housing and plays a very important role in recycling of housing stock in general. There is a 'knock-on' effect in terms of the whole housing chain enabling more effective use of existing housing. In the absence of choice, older people will stay put in properties that are often unsuitable for them until such a time as they need expensive residential care. A further Report *"Chain Reaction" The positive impact of specialist retirement housing on the generational divide and first-time buyers (Aug 2020)* reveals

that about two in every three retirement properties built, releases a home suitable for a first-time buyer. A typical Homes for Later Living development which consists of 40 apartments therefore results in at least 27 first time buyer properties being released onto the market.

Social

Retirement housing gives rise to many social benefits: Specifically designed housing for older people offers significant opportunities to enable residents to be as independent as possible in a safe and warm environment. Older homes are typically in a poorer state of repair, are often colder, damper, have more risk of fire and fall hazards. They lack in adaptations such as handrails, wider internal doors, stair lifts and walk in showers. Without these simple features everyday tasks can become harder and harder. Retirement housing helps to reduce anxieties and worries experienced by many older people living in housing which does not best suit their needs by providing safety, security and reducing management and maintenance concerns. The Housing for Later Living Report (2019) shows that on a selection of wellbeing criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing into housing specifically designed for later living.

Environmental

The proposal provides a number of key environmental benefits by: Making more efficient use of land thereby reducing the need to use limited land resources for housing. Providing housing in close proximity to services and shops which can be easily accessed on foot thereby reducing the need for travel by means which consume energy and create emissions. Providing shared facilities for a large number of residents in a single building which makes more efficient use of material and energy resources.

Recommendations

Given all these factors, evidence and the guidance of the PPG, the council should initially ensure that the Housing Needs study, still to be undertaken, includes the identification of needs for older persons housing. We then consider that the best approach is for the plan to identify the level of housing needed to meet the requirement of older people and to allocate specific sites to meet

the that are in the most sustainable locations close to key services. The plan should also continue to include a standalone policy actively supporting the delivery of specialist older people’s housing in the main urban areas, smaller settlements and other locations with good access to services and facilities for older people.

Developers should not be required to demonstrate need for older persons housing, given the many benefits that such developments bring and if a quantum is specified this should be regarded as a target and not a ceiling. Given also that such developments “*help reduce costs to the social care and health systems*” (PPG refers), requirements to assess impact on healthcare services and/or make contributions should be avoided.

While we appreciate that no one planning approach will be appropriate for all areas, an example policy is provided that, we hope, will provide a useful reference for the Council:

*“The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations. The Council aims to ensure that older people are able to secure and sustain independence in a home appropriate to their circumstances by providing appropriate housing choice, particularly retirement housing and Extra Care Housing/Housing with Care. The Council will, through the identification of sites, allowing for windfall developments, and / or granting of planning consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities.”*

We would also remind the council of the following:  
That adaptable houses that enable older people to stay in their homes for longer is not, in itself, an appropriate manner of meeting the housing needs of older people. Such homes do not provide the on-site support, care and companionship of specialist older persons’ housing developments. They also do not provide the wider community benefits such as releasing under occupied family housing as well as savings to the public purse by reducing the stress of health and social care budgets. A supportive local planning policy framework that does not just rely on adaptable housing, will be crucial in increasing the delivery of specialist older persons’ housing.

			<p>The increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that <i>“The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan”</i> (Paragraph: 002 Reference ID: 10-002-20190509). The evidence underpinning the Council’s planning obligations and building requirements should therefore be robust.</p> <p>The viability of specialist older persons’ housing is more finely balanced than ‘general needs’ housing and we are strongly of the view that these housing typologies should be robustly assessed in the forthcoming Local Plan Viability Assessment. This would accord with the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG which states that. <i>“A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period.</i> If this is not done, the delivery of much needed specialised housing for older people may be significantly delayed with protracted discussion about other policy areas such as affordable housing policy requirements which are wholly inappropriate when considering such housing need.</p>		
FP12.1	026	Government/ Public Body	Education mitigation would need to be considered irrespective of type or tenure.	Comment noted.	Comments will be considered as part of the local plan process.
FP12.1	027	Resident/ General Public	Tell Lichfield to build in their own back yard!	Comment noted.	Comments will be considered as part of the local plan process.
FP12.1	035	Other Stakeholder/ Business	Paragraph 6.2.4 of the consultation document reveals that the Council is looking to collect new evidence to help identify what types of housing are needed in the Borough. This is positive given that the new Local Plan will require an up to date assessment of housing need to justify its housing policies. The Lichfield and Tamworth Housing and Economic Development Needs Assessment (HEDNA) was published in November 2020 and suggests a net social/affordable housing need for 170 homes per annum in Tamworth to be provided over the period from 2016 to 2036. Although the HEDNA is fairly recent, the Covid-19 pandemic and the cost of living crisis have had significant effects on housing need. The consultation document recognises at paragraph 6.4.2 this:	Comments noted. As discussed, we will be commissioning an updated Housing and Economic Development Needs Assessment as part of the local plan process.	Comments will be considered as part of the local plan process. We will be carrying out further work to determine the specifics of our housing need. As noted, this will include commission of an updated Housing and Economic Needs Assessment.

			<p>“The population of Tamworth is ageing, and older people have different needs when it comes to housing. Not only that, but the Covid-19 pandemic has changed the way that people use their homes with many people now working from home significantly more than in the past.”</p> <p>The WMHAPC therefore welcomes the production of a new housing assessment as part of the evidence base to the new Local Plan in order to plan to meet affordable and overall housing needs in Tamworth.</p>		
FP12.1	037	Developer/ Agent/ Landowner	<p>Whilst Bellway generally support the provision of homes to meet a variety of needs, the Council should be mindful of the Framework which is clear that the Government’s optional technical standards for accessible and adaptable housing should only be implemented through planning policy where this would address an identified need. NPPG identifies the type of evidence required to introduce M4(2) and M4(3) standards, namely the likely future need for housing for older and disabled people; size, location, type and quality of dwellings needed to meet specifically evidenced needs; the accessibility and adaptability of existing housing stock; how needs vary across different housing tenures; and the overall impact on viability.</p>	<p>Comments noted. We will be carrying out further work to decipher the specifics of our housing need, including accessible and adaptable housing.</p>	<p>Comments will be considered as part of the local plan process. We will be carrying out further work to determine the specifics of our housing need.</p>
FP12.1	045	Developer/ Agent/ Landowner	<p>BHL reiterate that specialist housing need requirement must be demonstrated by the evidence set out in an updated HENA and other available datasets outlined under PPG (Ref. ID: 56-007-20150327). The point should be made, however, that in relation to elderly housing, the HENA should distinguish between the need arising for care homes and assisted living communities, and the separate need arising for accessible/adaptable housing in market schemes. The final policy, which should be subject to a comprehensive viability assessment, should reflect the HENA’s findings in that regard.</p>	<p>Comments noted. Under the PPG, we will be carrying out further work to decipher the specifics of our housing need. This includes evidence relating to the elderly. This will be distinguished between accessible and adaptable market housing, and more specialised provision like care homes and assisted living facilities.</p>	<p>Comments will be considered as part of the local plan process. We will be carrying out further work to determine the specifics of our housing need. This will include commission of an updated Housing and Economic Needs Assessment.</p>
FP12.1	047	Government/ Public Body	<p>It is important that sufficient accessible accommodation is provided to meet the needs of household of all types and for those at particular stages in the life cycle. Provision of suitable accommodation for the elderly is important not only to meet the needs of this growing cohort but practically to enable the NHS to function efficiently and avoiding bed-blocking.</p>	<p>Comments noted. We will be carrying out further work to decipher the specifics of our housing need, for all stages of life. In respect of elderly provision, this will be distinguished between accessible and adaptable market housing, and more specialised provision like care homes and assisted living facilities.</p>	<p>Comments will be considered as part of the local plan process. We will be carrying out further work to determine the specifics of our housing need.</p>

FP12.2: Do you agree that we should explore ways in which housing can be more flexible to meet people's needs?					
FP12.2	001	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP12.2	002	Resident/ General Public	Yes.. to people's needs and the area proposed to see if it can cope ..not the developers needs	Comment noted.	Comments will be considered as part of the local plan process.
FP12.2	003	Resident/ General Public	Yes I do see answer 27 (FP12.1).	Comment noted and attention paid to Feedback Point 12.1.	Comments will be considered as part of the local plan process.
FP12.2	004	Local Business	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP12.2	005	Resident/ General Public	Surely housing needs are down to the individual. Having lived in a council house, apartment and private housing. My basic needs were very adequately covered by social/council housing at the time. It was down to me to move to somewhere else as my needs changed. Some older people do need more than a one bedroomed house to accommodate family or a carer as required.	Comments noted.	Comments will be considered as part of the local plan process.
FP12.2	006	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP12.2	007	Government/ Public Body	Agreed. Working from home is more common since Covid-19, which helps reduce car traffic on the road network at peak times.	Comment noted.	Comments will be considered as part of the local plan process.
FP12.2	009	Resident/ General Public	Yes, see above [referring to FP12.1].	Comment noted and attention paid to Feedback Point 12.1.	Comments will be considered as part of the local plan process.
FP12.2	012	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP12.2	014	Government/ Public Body	Historic England has no specific comments to make on this issue. A general comment is that any options would need to consider the historic environment, heritage assets and their setting as part of the Plan process.	Comment noted.	No further action required.
FP12.2	027	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP12.2	028	Resident/ General Public	I agree.	Comment noted.	Comments will be considered as part of the local plan process.

FP12.2	044	Government/ Public Body	The issues and options paper sets the context for Tamworth showing that there is a higher proportion of over 65s compared to regional and national averages. Falls are a common cause of injury with around 1 in 3 adults over 65 having at least one fall a year. Placing accessibility at the heart of the design process and requiring a proportion of all new build homes to be constructed to requirement M4(2) of the Approved Document M Requirements e.g. ensuring the provision of more accessible and adaptable dwellings will provide further suitable housing choice for an ageing population and prevent avoidable falls from occurring thus reducing pressures upon the healthcare system.	Comments noted.	Comments will be considered as part of the local plan process.
FP12.2	047	Government/ Public Body	It is important that sufficient accessible accommodation is provided to meet the needs of household of all types and for those at particular stages in the life cycle. Provision of suitable accommodation for the elderly is important not only to meet the needs of this growing cohort but practically to enable the NHS to function efficiently and avoiding bed-blocking.	Comments noted.	Comments will be considered as part of the local plan process.

## Feedback Point 13: Providing custom and self-build opportunities

Question ID	URN	Respondent Type	Representation	Officer Response	Further Action
<b>FP13.1: Do you agree that we should allocate sites exclusively for self-build housing opportunities? Should we look to allocate sites and/or make sure a percentage of housing developments are for self-build plots for people wanting to build their own homes?</b>					
FP13.1	001	Resident/ General Public	Yes (allocate sites for self-building) Yes (ensure a percentage of plots on housing developments are for self-build)	Comments noted.	Comments will be considered as part of the local plan process.
FP13.1	002	Resident/ General Public	No (allocate sites for self-building) Yes (ensure a percentage of plots on housing developments are for self-build)	Comments noted.	Comments will be considered as part of the local plan process.
FP13.1	003	Resident/ General Public	No (allocate sites for self-building) Yes (ensure a percentage of plots on housing developments are for self-build)	Comments noted.	Comments will be considered as part of the local plan process.
FP13.1	004	Local Business	Yes (allocate sites for self-building) Yes (ensure a percentage of plots on housing developments are for self-build)	Comments noted.	Comments will be considered as part of the local plan process.
FP13.1	005	Resident/ General Public	I live on a self-build plot but did not build myself. They did open up an opportunity for those in the trades to build their own homes, most of whom have moved on. My greatest concern would be with those building a second home. I do not believe second homes should be allowed unless it is for a work related second property. It really depends on the site – what it offers that other developments do not and the uniqueness of their design. So I would go with i).	Comments noted.	Comments will be considered as part of the local plan process.
FP13.1	006	Resident/ General Public	No (allocate sites for self-building) No (ensure a percentage of plots on housing developments are for self-build)	Comments noted.	Comments will be considered as part of the local plan process.
FP13.1	009	Resident/ General Public	No (allocate sites for self-building) No (ensure a percentage of plots on housing developments are for self-build)	Comments noted.	Comments will be considered as part of the local plan process.
FP13.1	011	Resident/ General Public	No (allocate sites for self-building) Yes (ensure a percentage of plots on housing developments are for self-build)	Comments noted.	Comments will be considered as part of the local plan process.
FP13.1	012	Resident/ General Public	No (allocate sites for self-building) No (ensure a percentage of plots on housing developments are for self-build)	Comments noted.	Comments will be considered as part of the local plan process.
FP13.1	014	Government/ Public Body	Historic England has no specific comments to make on this issue. A general comment is that any options would need to consider the	Comments noted.	Comments will be considered as part of the local plan process.



			historic environment, heritage assets and their setting as part of the Plan process.		
FP13.1	020	Developer/ Agent/ Landowner	The HBF considers that a policy which encourages self and custom-build development and sets out where it will be supported in principle would be appropriate. The HBF also considers that allocating sites specifically for self and custom-build home builders could also be appropriate, however, this would need to be done through discussion and negotiation with landowners. The HBF does not consider that requiring a proportion of large housing sites to be available for self-builders is appropriate. The HBF would be interested to know whether any of the people on the self-build register have identified a preference to living on a large housing site, and whether the Council considers that there would be evidence of a demand for such sites. The HBF would also highlight the practical issues in terms of developing a large site where there are self-build plots on site, with potentially different builders and construction programmes. The Council will also need to consider the viability implications of this provision on larger housing sites.	Comments noted. In October 2021, the Planning Policy Team distributed a survey to all those on the Self-Build and Custom Housebuilding Register. The aim of the survey was to better understand their preferences towards plot type, build specifics and location. 45% of individuals on the self-build register responded, with 33.3% of those indicating that they would be interested in a self-build plot located within a larger development. Notwithstanding, we agree that the register alone is not a reliable indication of demand, and therefore further work will be required to better assess self-build demand in the borough.	Comments will be considered as part of the local plan process. Further work will be undertaken to establish the housing needs of the borough, including self-build and custom housing.
FP13.1	026	Government/ Public Body	Education mitigation would need to be considered irrespective of type or tenure.	Comments noted.	Comments will be considered as part of the local plan process.
FP13.1	027	Resident/ General Public	Yes (allocate sites for self-building) Yes (ensure a percentage of plots on housing developments are for self-build)	Comments noted.	Comments will be considered as part of the local plan process.
FP13.1	028	Resident/ General Public	Yes (allocate sites for self-building) No (ensure a percentage of plots on housing developments are for self-build)	Comments noted.	Comments will be considered as part of the local plan process.
FP13.1	035	Other Stakeholder/ Business	As the number of plots being delivered is lower than the demand identified through the register it is suggested that options “ <i>ii) Allocate sites exclusively for custom and self-build development</i> ” and “ <i>iii) Require a proportion of plots on larger sites to be reserved for custom and self-build development</i> ” are explored in further detail. The provision of custom and self-build plots can contribute to the delivery of local housing needs, as explained through PPG (ID: 57-025-20210508) “ <i>relevant authorities can play a key role in brokering and facilitating relationships to help bring suitable land forward</i> ”, this includes “ <i>working with local partners, such as Housing Associations and third sector groups, to custom build affordable housing for veterans and other groups in acute housing need.</i> ”	Comments noted.	Comments will be considered as part of the local plan process.
FP13.1	037	Developer/ Agent/ Landowner	Whilst Bellway recognise the desire of individuals and organisations to build their own home, it is considered that any policy	Comments noted. Further work will be required to establish the demand for self-build and	Comments will be considered as part of the local plan process. Further work will be undertaken

			<p>intervention should only be implemented if there is clear evidence of need for such plots.</p> <p>Even in recognising the shortfall in plot delivery when compared with the number of individuals on the Council's Self-Build and Custom Housebuilding Register, the limitations of the Register should be recognised, namely that an individual can enter on to multiple registers skewing the data derived, and may have no means or desire to carry out such a project in reality in any case.</p>	<p>custom housebuilding opportunities in the borough.</p>	<p>to establish the housing needs of the borough, including self-build and custom housing.</p>
FP13.1	045	Developer/ Agent/ Landowner	<p>The principle of requiring a percentage of new houses to be set aside for self-build development is objected to. Self-build registers are not means tested and seldom relate to a demand for a plot on market schemes. Providing self-build housing on market schemes can be impractical (particularly in terms of construction access and health and safety) and can undermine design principles.</p> <p>BHL strongly recommend either self-build housing to be provided only on specific self-build sites, or for the plan to include policies that support individual self-build plots to be brought forward (as has been the case until now).</p>	<p>Comments noted and preferences acknowledged. Further work will be required to establish the demand for self-build and custom housebuilding opportunities in the borough.</p>	<p>Comments will be considered as part of the local plan process. Further work will be undertaken to establish the housing needs of the borough, including self-build and custom housing.</p>

# Feedback Point 14: Additional policy approaches relating to new and affordable homes

Question ID	URN	Respondent Type	Representation	Officer Response	Further Action
<b>FP14.1: Do you agree with the additional policy approaches proposed? If you do not agree, then please detail your reasons why. If applicable, please include any additional policy approaches that you feel we should include.</b>					
FP14.1	001	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP14.1	002	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP14.1	003	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP14.1	004	Local Business	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP14.1	005	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP14.1	006	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP14.1	009	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP14.1	011	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP14.1	012	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP14.1	014	Government/ Public Body	Historic England has no concerns in relation to the six proposed additional policy approaches. We would wish to highlight any policy for design would need to consider the National Model Design Code guidance.	Comment noted.	Comments will be considered as part of the local plan process.
FP14.1	020	Developer/ Agent/ Landowner	The HBF understands the need for a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area. It is, however, important that any policy is workable and ensures that housing delivery will not be compromised or stalled due to overly prescriptive requirements, requiring a mix that does not consider the scale of the site or the need to provide significant amounts of additional evidence. The HBF considers that flexibility will be important in any policy in relation to housing mix, this allows	Comments noted. Any future policy will be designed with flexibility in mind. We are aware that any policy must be flexible enough to meet the changing housing needs of the borough as we progress through the plan period. Further work will be required to determine housing need in respect of dwelling sizes, including the commission of an updated Housing and Economic Development Needs Assessment (HEDNA).	Comments will be considered as part of the local plan process. Further work will be undertaken to assess our housing need, including an updated HEDNA, and to establish whether there is a requirement for internal space standards.

			<p>developers to consider not only the identified need but also market aspirations, local and site characteristics and viability.</p> <p>The HBF considers that any affordable housing split will need to take into consideration the need to provide affordable home ownership products including First Homes in line with national policy. The NPPF states that where major development involving the provision of housing is proposed, planning policies and decision should expect at least 10% of the total homes to be available for affordable home ownership. The PPG states that First Homes are the Government's preferred discount market tenure and should account for at least 25% of all affordable housing units delivered by developers through planning obligations. The HBF also considers that it is important that the Council considers the viability implications in relation to affordable housing provision, and ensure that the policy includes flexibility to allow the proportion of affordable housing or the tenure of affordable housing to be amended if needed due to viability issues or due to changes in demand in affordable housing provision.</p> <p>The HBF notes that the nationally described space standards (NDSS) as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a 'need to have' rather than a 'nice to have' basis. PPG identifies the type of evidence required to introduce such a policy. It states that where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas: Need, Viability and Timing. The Council will need robust justifiable evidence to introduce the NDSS, based on the criteria set out above.</p>	<p>Any future affordable housing policy will include reference to First Homes. The Council have published a guidance note as to how First Homes fits in with our current affordable housing policy.</p> <p>We are also aware that further work will be required to establish our need regarding internal space standards. As suggested, viability will be assessed in accordance with the PPG.</p>	
FP14.1	026	Government/ Public Body	Education mitigation would need to be considered irrespective of type or tenure.	Comment noted.	Comments will be considered as part of the local plan process.
FP14.1	027	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP14.1	028	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP14.1	035	Other Stakeholder/ Business	In line with national planning policy and guidance the WMHAPC supports the delivery of a mixture of both dwelling sizes and tenures in order to reflect local needs, as suggested within paragraph 62 of the NPPF (2021):	Comments noted. Any future policy will be designed with flexibility in mind. We are aware that any policy must be flexible enough to meet the changing housing needs of the borough as	Comments will be considered as part of the local plan process. Further work will be undertaken to assess our housing need,

			<p>“Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.”</p> <p>However, it is important to understand the potential implications of prescriptive dwelling size and tenure requirements to the delivery of affordable homes. Further detail is needed to understand the full policy requirements that are likely to come forward. Any requirement that does come forward should provide a reasonable amount of flexibility to ensure that the requirement criteria does not hinder the viability of affordable housing and its subsequent delivery.</p> <p>Similarly, there is a need to be cautious on the inclusion of internal space standards within policy where there is not an identified need. If the Council is seeking to introduce Nationally Described Space Standards (NDSS) across residential developments, it “will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans” (PPG ID: 56-002-20160519).</p> <p>The application of internal space standards where there is no evidenced need is likely to undermine the viability of affordable housing developments, resulting in fewer affordable homes being delivered throughout Tamworth. We would like to remind the Council that NDSS are not a building regulation and remains solely within the planning system as a form of technical planning standard. It is not essential for all dwellings to achieve these standards in order to provide good quality living. For affordable housing in particular, there may be instances where achieving NDSS is impractical and unnecessary.</p> <p>It is suggested that if the Council wishes to introduce such a policy that the rational for its implementation be fully evidenced, and viability assessed in accordance with PPG:</p> <p>“Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:</p>	<p>we progress through the plan period. Further work will be required to determine housing need in respect of dwelling sizes, including the commission of an updated Housing and Economic Development Needs Assessment.</p> <p>Any future affordable housing policy will include reference to First Homes. The Council have published a guidance note as to how First Homes fits in with our current affordable housing policy.</p> <p>We are also aware that further work will be required to establish our need regarding internal space standards. As suggested, viability will be assessed in accordance with the PPG.</p>	<p>including an updated HEDNA, and to establish whether there is a requirement for internal space standards.</p>
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			<p>need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.</p> <p>viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.</p> <p>timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.”</p> <p>We acknowledge that the Council has made reference to First Homes at paragraph 6.2.6. The WMHAPC has concerns about the introduction of First Homes and its potential implications on the delivery of traditional forms of affordable housing in Tamworth, particular the delivery of shared ownership and social rented tenures. We look forward to seeing how the Council engages with First Homes in the preparation of the new Local Plan.</p>		
FP14.1	036	Developer/ Agent/ Landowner	A policy for housing mix is necessary in order to guide future development in the borough. This policy should however avoid being prescriptive and should be flexible, allowing for development to respond to the development needs at the time.	Comments noted. Any future housing mix policy will be designed with flexibility in mind. We are aware that any policy must be flexible enough to meet the changing housing needs of the borough as we progress through the plan period. Further work will be required to determine housing need in respect of dwelling sizes, including the commission of an updated Housing and Economic Development Needs Assessment.	Comments will be considered as part of the local plan process. Further work will be undertaken to assess our housing need, including an updated Housing and Economic Development Needs Assessment.
FP14.1	037	Developer/ Agent/ Landowner	Whilst Bellway do not have any specific comments to make at this stage of the Local Plan process on additional policy approaches in relation to the provision of housing, the Council should ensure that any detailed policies set out in the Local Plan are supported by sufficient evidence and provide an appropriate level of flexibility to ensure that otherwise deliverable residential schemes are not sterilised due to onerous policy requirements.	Comments noted. Any future policies will be designed with flexibility in mind. We are aware that any policy must be flexible enough to meet the changing housing needs of the borough as we travel through the plan period. Further work will be undertaken to establish the specifics of our housing need.	Comments will be considered as part of the local plan process. Further work will be undertaken to assess our housing need, including an updated Housing and Economic Development Needs Assessment.
FP14.1	043	Government/ Public Body	No. Provision for permanent residential Gypsy and Traveller sites should be investigated to see if they can help with neighbouring shortfalls.	Comments noted. Our most recently commissioned needs assessment suggests that there would not be any demand for permanent Gypsy and Traveller sites. However, we will	No further action required at this stage.

				ensure that the evidence is still appropriate and up-to-date. If deemed necessary, we will review our position accordingly.	
FP14.1	045	Developer/ Agent/ Landowner	<p>Policies relating to the mix of AH and market housing are informed by up-to date evidence of need (as per an updated Strategic Housing Market Assessment), however, should allow for sufficient flexibility to respond to localised evidence of demand, site and settlement specific considerations, and scheme viability. Additionally, policy should be sufficiently flexible and not overly prescriptive to ensure that housing delivery is not comprised or stalled.</p> <p>BHL note that internal space standards are optional and there should, therefore, be evidence of need to justify the development requirement. Moreover, TBC must take account of the impact of such a requirement on development densities and site capacities, within the context of land scarcity and uncertainty around TBC meeting their housing need. The impact of any requirement on scheme viability and the cost of housing for the end user must be taken into account.</p> <p>Any design policies should add to the guidance set out in the NPPF, National Design Guide and the July 2019 Design SPD. BHL recommend a more appropriate approach would be to refer to the Design SPD and any future iterations to it, with a view to carrying out a review of the SPD in due course.</p>	<p>Comments noted. Any future housing mix policy will be designed with flexibility in mind. We are aware that any policy must be flexible enough to meet the changing housing needs of the borough as we progress through the plan period. Further work will be required to determine housing need in respect of dwelling sizes, including the commission of an updated Housing and Economic Development Needs Assessment.</p> <p>We are also aware that further work will be required to establish our need regarding internal space standards. As suggested, viability will be assessed in accordance with the PPG.</p> <p>Furthermore, the Design SPD will be reviewed as part of the new local plan process, to determine whether it remains appropriate and up-to-date.</p>	<p>Comments will be considered as part of the local plan process. Further work will be undertaken to assess our housing need, including an updated HEDNA, and to establish whether there is a requirement for internal space standards.</p>

## Feedback Point 15: Any further comments on new and affordable homes

Question ID	URN	Respondent Type	Representation	Officer Response	Further Action
FP15: Any further comments on new and affordable homes					
FP15	005	Resident/ General Public	It worries me that housing expansion does not look at the road way systems in the borough. (I realise this does not come under the borough council BUT) Many of the B roads are used as main links into the town because the county were not forward thinking when they cancelled the A5 – Station roadway. Cycle ways are not suitable as this was a mining area and roads and geography do not suit that mode of transport regardless of what the government might require. (I realise this is a SCC issue but don't know where else to raise it and it does affect the density of housing provision).	Comments noted. As noted, vehicular and cycle networks unfortunately do not fall under control of planning policy. However, we will continue to liaise with the relevant bodies in this respect.	Comments will be considered as part of the local plan process.
FP15	006	Resident/ General Public	All affordable housing should be for OCCUPYING LESSEES/OWNERS. All building land is valued at up-market prices to protect investment values of pension funds/insurance funds etc rendering it impossible to build affordable housing as a viable venture. Land for affordable housing has a near zero value leaving Builders having to build at a loss. This is the reason why there is a national shortage of affordable housing. It is not morally acceptable for BUY-TO-LET landlords to capitalise on the limited first time buyer housing stock.	Comments noted. Unfortunately, the majority of points raised in your response cannot be influenced nor controlled by the local plan. However, in regard to your concerns, we will be looking at ways in which we can continue to provide affordable housing to meet local need.	No further action required at this stage.
FP15	014	Government/ Public Body	Historic England has nothing further to add on housing matters.	Comment noted.	No further action required.
FP15	026	Government/ Public Body	<p>Department for Education guidance 'Securing developer contributions for education, November 2019' states that</p> <p>'It expects local authorities to seek developer contributions towards school places that are created to meet the need arising from housing development.'</p> <p>'Housing development should mitigate its impact on community infrastructure, including schools'</p> <p>'The early delivery of new schools within strategic developments should be supported where it would not undermine the viability of the school, or of existing schools in the area'</p> <p>'Central government basic need grant, the DfE free schools programme and other capital funding do not negate housing</p>	Comments noted.	Comments will be considered as part of the local plan process.



			<p>developers' responsibility to mitigate the impact of their development on education.'</p> <p>'Given that basic need allocations do not explicitly factor in funding for land acquisition, it is particularly important that education land required within larger development sites is provided at no cost to the local authority...'</p>		
FP15	035	Other Stakeholder/ Business	<p>We would like the new Local Plan to recognise the role of Housing Associations in providing affordable housing in Tamworth. It would be beneficial to see the Council recognise the role of Housing Associations and encourage developers to have early active engagement with Housing Associations in the next round of consultation. Early engagement enables Housing Associations to have an active role in the planning and design of developments to ensure that development addresses local housing needs and meets the management requirements of the WMHAPC. In response to this section, the WMHAPC would like to accept the offer of engagement to help with understanding existing and likely future viability issues.</p>	Comments noted.	Comments will be considered as part of the local plan process.

## Section 6.3

# Economy

*The following section contains representations relating to Feedback Points 16, 17 and 18*

## Feedback Point 16: Ensuring the right amount of land is available for growth

Question ID	URN	Respondent Type	Representation	Officer Response	Further Action
<b>FP16.1: Do you agree with the proposal to use the HEDNA employment land requirements as a starting point? If you do not agree, then please detail the other information you feel we should use and why.</b>					
FP16.1	001	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP16.1	002	Resident/ General Public	No. All empty or already built sites should be at full capacity from occupancy before allowing any more building.	Comments noted. In addition to planning for future growth, the HEDNA also takes into account our existing employment stock.	Comments will be considered as part of the local plan process.
FP16.1	003	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP16.1	004	Local Business	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP16.1	005	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP16.1	006	Resident/ General Public	No. One should bear in mind that employment land buildings emit huge amounts of carbon and to absorb this large quantities of trees around the structures need planting. Planning applications should specify the LEAF AREA INDEX proposed to absorb the carbon emitted.	Comments noted. Although this would not appear necessarily relevant to the specific question posed above, the comments will be considered in the appropriate area of the plan.	Comments will be considered in the relevant area of the plan.
FP16.1	009	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP16.1	011	Resident/ General Public	No. Not sure if this plan considers the possibility to use existing empty building.	Comments noted. In addition to planning for future growth, the HEDNA also takes into account our existing employment stock.	Comments will be considered as part of the local plan process.
FP16.1	012	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP16.1	014	Government/ Public Body	Historic England agrees that the use of HEDNA employment land requirements is a sensible approach to progressing the draft Plan. As with housing requirements, we would wish to highlight that any of the approaches would need to link in with an overall site selection methodology that included consideration of the historic environment, heritage assets and their setting. These considerations would need to include those set out in NPPF Footnote 68 relating to unknown archaeology.  Our Historic Environment Advice Note 3 sets out a five step process for considering site allocations in Local Plans and we	Comments noted.	Comments will be considered as part of the local plan process.

			recommend that the assessment work adopts this approach to ensure the Plan can demonstrate a positive approach to the historic environment, in respect of site allocations, in line with NPPF requirements. <a href="https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/">https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</a>		
FP16.1	027	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP16.1	028	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP16.1	029	Government/ Public Body	The use of an appropriate and up to date evidence base to identify employment land requirements is supported, in line with national planning policy and guidance (NPPF, Chapter 3 'Plan-making' and Chapter 6 'Building a strong, competitive economy'). It is noted that the Council is undertaking a new assessment of Tamworth's employment needs (updating the current Housing and Economic Development Needs Assessment from 2019).	Comments noted.	Comments will be considered as part of the local plan process. As noted, an updated HEDNA is due to be commissioned as part of the plan process.
FP16.1	037	Developer/ Agent/ Landowner	<p>Using the latest version Housing and Economic Development Needs Assessment (HEDNA), published jointly with Lichfield District Council in September 2019, as the starting point in defining an appropriate level of employment growth is not considered appropriate.</p> <p>Given the latest HEDNA is already more than three years old and given the significant shift in the global economy since then caused by the Covid-19 pandemic, and as the HEDNA only plans to 2036 and the period thereafter to the end of the new Plan period would therefore be unaccounted for, it is considered reliance on this report would not be justified in line with the Framework.</p> <p>It is also noted that the HEDNA suggests employment growth at a significantly lower rate than is set out in the existing Tamworth Local Plan. Whilst this may be justified if supported by up-to-date evidence, which is queried, it is considered to be contrary to the Framework which requires Local Plans to be positively prepared.</p>	Comments noted. We will be looking to commission a new Housing and Economic Development Needs Assessment which covers the entire plan period. The respective employment figures will be updated if necessary.	Comments will be considered as part of the local plan process. As noted, an updated HEDNA is due to be commissioned as part of the plan process.
FP16.1	038	Developer/ Agent/ Landowner	As an overarching point, the reliance on the HEDNA for calculating employment requirement does not align with the NPPF requirement to plan positively or the Duty to Cooperate required by legislation. A full and up to date need assessment is required to support the emerging Local Plan process rather than relying solely on an outdated HEDNA, which was initially published over three years ago and last updated two years ago.	Comments noted. We will be looking to commission a new Housing and Economic Development Needs Assessment which covers the entire plan period. Once the appropriate needs have been identified, the respective employment figures will be updated if necessary.	Comments will be considered as part of the local plan process. Work will begin to commission an updated HEDNA as part of the plan process.

		<p>As identified by JLL, the fundamental concerns with the HEDNA are summarised as follows:          The projected requirement, at 8.8 hectares for the whole plan period to 2043, is very low, compared to previous projections. The projection is based on incomplete data.          No allowance has been made for the replacement of any future losses of employment land.          The HEDNA was produced over three years ago and does not reflect current or projected economic and market conditions. Demand for employment development land within Tamworth has been suppressed by constraints on the principal allocated sites. The extent of suppressed demand has been illustrated by development just outside Tamworth and by other market signals. The HEDNA takes no account of identified need for strategic employment sites in this broad location.          The HEDNA makes no express allowance for the accommodation and attraction of logistics and freight related industries, contrary to Central Government guidance and initiatives.</p> <p>Full details and evidence to substantiate the above comments are set out in the JLL note at Appendix A.</p> <p>From a legislative and plan-making perspective, the Duty to Cooperate set out in Section 33A of the Planning and Compulsory Purchase Act 2004 places a legal duty on local planning authorities and county councils in England, and prescribed public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan and marine plan preparation in the context of strategic cross boundary matters.</p> <p>Section 33A sets out that to maximise effective working on strategic matters throughout the preparation of Local Plans, authorities have a duty "...to engage constructively, actively and on an ongoing basis". At this stage, with its reliance on an out of date need assessment, the emerging Tamworth Local Plan 2043 has not demonstrated constructive engagement with neighbouring authorities regarding employment need and the potential to accommodate overspill need, as required by the Duty to Cooperate.</p> <p>For instance, in response to the Lichfield District Council (LDC) Local Plan 2040 Submission Plan consultation, North Warwickshire Borough Council (NWBC) submitted comments, noting that:</p>	<p>Furthermore, we will continue to work with our neighbouring authorities under the Duty to Cooperate to deliver the need in a sustainable manner, for as long as the agreement remains and beyond.</p>	
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'There are no identified employment, housing or logistics sites allocated or identified for areas adjoining North Warwickshire Borough area beyond those already existing and identified in Fazeley, Mile Oak & Bonehill, which are not considered to have any significant adverse impacts on North Warwickshire Borough. Nevertheless, the Borough are concerned the issue of wider regional and national strategic employment needs may not be adequately addressed in the Local Plan 2040 and would encourage the inclusion of a strategic policy, either separate from or as an integral part of the Strategic policy 13, to address these wider needs as was included in the recent North Warwickshire Local Plan adopted in September 2021, following examination of the Issue at the local plan hearings.'

This position equally applies to the emerging Tamworth Local Plan given that Tamworth forms part of the same commercial market area as Lichfield and North Warwickshire. The issue of wider regional and national strategic employment needs has not been adequately addressed in the emerging Tamworth Local Plan and we agree with NWBC that local plans should include provision of a strategic policy to address these wider needs, as was included in the recent North Warwickshire Local Plan adopted in September 2021 (Policy LP6).

Indeed, the Statement of Common Ground between TBC, NWBC and LDC on 'Delivery of housing and employment arising from Tamworth Borough Council', agreed as part of the North Warwickshire Local Plan examination provides evidence of the three local planning authorities working under the Duty to Cooperate to accommodate overspill needs across the strategic area.

Furthermore, a Statement of Common Ground between Tamworth Borough Council and St Modwen Developments Limited agreed during the examination of the Tamworth Local Plan 2006-2031 refers to land south east of Junction 10 of the M42, close to the Tamworth Borough border, as being 'particularly well placed to meet the employment needs arising from Tamworth'. This provides evidence of a positive approach taken to planning by working with the business community and neighbouring authorities to deliver unmet need in an appropriate location.

			<p>Mindful of the above, proceeding without undertaking a new and up to date need assessment that also considers wider strategic needs would cut to the heart of the plan-making process, the Duty to Cooperate required by legislation and the NPPF requirement to plan positively. As set out in Planning Practice Guidance (PPG)6, as the Duty to Cooperate relates to the preparation of the plan it cannot be rectified post-submission, therefore if the Inspectors finds that the Duty has not been complied with then they will recommend that the local plan is not adopted. Proceeding on its current course, the emerging Tamworth Local Plan 2043 would ultimately be found unsound.</p> <p>To remedy the issues identified and to demonstrate that the plan is being prepared in accordance with the Duty to Cooperate, NPPF and PPG, a new need assessment must be carried out in order to plan properly for the economic and employment needs of Tamworth. This position is supported by JLL.</p>		
FP16.1	039	Charity/ Community Group	<p>No. The information is out of date and needs to consider business needs post-pandemic. Requirements also need to consider the environmental capacity of the area for new development. Re-development and adaption of existing sites should be a priority as well as improving the environmental performance of employment sites such as energy conservation, pollution prevention and green infrastructure.</p>	<p>Comments noted. We will be looking to commission a new Housing and Economic Development Needs Assessment to reflect the current post-pandemic position. The respective employment figures will be updated if necessary.</p>	<p>Comments will be considered as part of the local plan process. As noted, an updated HEDNA is due to be commissioned as part of the plan process.</p>

## Feedback Point 17: Existing employment allocations

Question ID	URN	Forename	Representation	Officer Response	Further Action
<b>FP17.1: Which proposed option do you think we should use?</b>					
FP17.1	001	Resident/ General Public	Option iv) Retain our existing allocations, but develop a flexible policy which permits the loss of any proposed employment site to an alternative use, subject to specific criteria.	Comments noted.	Comments will be considered as part of the local plan process.
FP17.1	002	Resident/ General Public	Option iv) Retain our existing allocations, but develop a flexible policy which permits the loss of any proposed employment site to an alternative use, subject to specific criteria.	Comments noted.	Comments will be considered as part of the local plan process.
FP17.1	003	Resident/ General Public	Option i) Retain all currently allocated employment sites. Option iv) Retain our existing allocations, but develop a flexible policy which permits the loss of any proposed employment site to an alternative use, subject to specific criteria.	Comments noted.	Comments will be considered as part of the local plan process.
FP17.1	004	Local Business	Option iv) Retain our existing allocations, but develop a flexible policy which permits the loss of any proposed employment site to an alternative use, subject to specific criteria.	Comments noted.	Comments will be considered as part of the local plan process.
FP17.1	005	Resident/ General Public	iii) and iv) seem the viable options.	Comments noted.	Comments will be considered as part of the local plan process.
FP17.1	006	Resident/ General Public	Option iv) Retain our existing allocations, but develop a flexible policy which permits the loss of any proposed employment site to an alternative use, subject to specific criteria.	Comments noted.	Comments will be considered as part of the local plan process.
FP17.1	007	Government/ Public Body	Whichever employment option is chosen, the sites should be well located and accessible by all modes.	Comments noted.	Comments will be considered as part of the local plan process.
FP17.1	009	Resident/ General Public	Option iv) Retain our existing allocations, but develop a flexible policy which permits the loss of any proposed employment site to an alternative use, subject to specific criteria.	Comments noted.	Comments will be considered as part of the local plan process.
FP17.1	011	Resident/ General Public	Option iv) Retain our existing allocations, but develop a flexible policy which permits the loss of any proposed employment site to an alternative use, subject to specific criteria.	Comments noted.	Comments will be considered as part of the local plan process.
FP17.1	012	Resident/ General Public	Option iv) Retain our existing allocations, but develop a flexible policy which permits the loss of any proposed employment site to an alternative use, subject to specific criteria.	Comments noted.	Comments will be considered as part of the local plan process.
FP17.1	014	Government/ Public Body	Historic England has no specific comments to make on this issue. A general comment is that any options would need to consider the historic environment, heritage assets and their setting as part of the Plan process.	Comments noted.	Comments will be considered as part of the local plan process.
FP17.1	027	Resident/ General Public	Option i) Retain all currently allocated employment sites.	Comments noted.	Comments will be considered as part of the local plan process.



FP17.1	028	Resident/ General Public	Option ii) Allow the loss of specific sites for alternative uses, but retain a buffer of land above the identified need to allow flexibility. Option iv) Retain our existing allocations, but develop a flexible policy which permits the loss of any proposed employment sites to an alternative use, subject to specific criteria.	Comments noted.	Comments will be considered as part of the local plan process.
FP17.1	029	Government/ Public Body	It is noted that the Council is undertaking an up to date assessment of employment needs for the Borough. The most appropriate approach to allocating land to meet employment needs will be informed by the updated assessment findings. Should the updated assessment identify a surplus of employment land allocations within the Borough for the Local Plan Review then, as per our comments to Feedback Point 10 above, the Council could explore options which allow for the repurposing of existing employment land allocations for housing land supply. This would be in accordance with national planning policy (NPPF, paragraph 122). The appropriateness of this option may however need to be considered in the context of cross boundary (or the wider Functioning Economic Market Area) employment needs and land supply.	Comments noted.	Comments will be considered as part of the local plan process.
FP17.1	036	Developer/ Agent/ Landowner	As referred to above, it will be necessary to turn on all 'taps of supply', which may include some former employment land. Employment in Tamworth is however an integral part of its economy and ensuring that there are local jobs for people living in the town, as a way to try and reduce vehicular trips. Mindful of this, it will be necessary to retain some form of policy to protect identified employment sites unless there is evidence it is no longer needed.	Comments noted.	Comments will be considered as part of the local plan process.
FP17.1	038	Developer/ Agent/ Landowner	Paragraph 6.3.2 (Option 6.3(a)) of the Issues and Options consultation document sets out the proposed options to allocating land to meet employment need.  Given the fundamental issues identified in response to Feedback Point 16, as identified above, the most appropriate approach to allocating land to meet employment need is to undertake a new assessment in order to plan properly for the economic and employment needs of Tamworth. This new assessment should be carried out in accordance with PPG7, which provides detailed guidance for local authorities when assessing need and allocating space for logistics, including the need to a) engage with logistics developers; b) analyse market signals (including trends on take-up); c) analysis of economic forecasts; and d) engagement with LEPs (or their successor bodies). This position is supported and discussed further in the JLL note at Appendix A.	Comments noted. We will be looking to commission a new Housing and Economic Development Needs Assessment which covers the entire plan period. The respective employment figures will be updated if necessary.	Comments will be considered as part of the local plan process. As noted, an updated HEDNA is due to be commissioned as part of the plan process.

FP17.1	039	Charity/ Community Group	Land could be re-allocated depending on local needs for example accessible natural greenspace, flood alleviation or biodiversity net gain provision. Relevant evidence is required to make decisions on land-use.	Comments noted.	Comments will be considered as part of the local plan process.
FP17.1	043	Government/ Public Body	Option iii) Allow the loss of specific sites for alternative uses, but remove any buffer. This would mean that we would not retain as many allocated employment sites.	Comments noted.	Comments will be considered as part of the local plan process.
FP17.1	044	Government/ Public Body	Option iv) Retain our existing allocations, but develop a flexible policy which permits the loss of any proposed employment site to an alternative use, subject to specific criteria.	Comments noted.	Comments will be considered as part of the local plan process.
FP17.1	047	Government/ Public Body	Employment land might provide suitable opportunities to accommodate health-related developments. Such facilities can also provide significant numbers of jobs.	Comments noted.	Comments will be considered as part of the local plan process.
<b>FP17.2: Are there any alternative approaches that you think should be considered?</b>					
FP17.2	006	Resident/ General Public	We should ensure that none of the Nature parks are built on which would reduce the LEAF AREA INDEX and thus allowing excess carbon into the atmosphere.	Comments noted. Although this would not appear necessarily relevant to the specific question posed above, the comments will be considered in the appropriate area of the plan.	Comments will be considered in the relevant area of the plan.

## Feedback Point 18: Any further comments on the economy

Question ID	URN	Forename	Representation	Officer Response	Further Action
<b>FP18: Any further comments on the economy</b>					
FP18	005	Resident/ General Public	More involvement and preservation of the heritage of the borough as a selling point to promote the economy.	Comments noted.	Comments will be considered as part of the local plan process.
FP18	006	Resident/ General Public	Ensure that the town centre and its outskirts are greened-up to produce a healthy environment by absorbing flood water and carbon. Hard-working people will thus be attracted to the area to produce a strong economy.	Comments noted.	Comments will be considered as part of the local plan process.
FP18	014	Government/ Public Body	Historic England has nothing further to add on economy related matters.	Comments noted.	No further action required.
FP18	026	Government/ Public Body	<p>Delivery of construction projects has become challenging since the COVID-19 pandemic, with issues in demand, supply and project risk and opportunity. Delay pressures and schedule overruns have given way to soaring costs, rising inflation and intermittent availability of key materials following the industry rebound and then the war in Ukraine. The conflict has generated increased energy costs which are increasing material and product production costs along with an increase in oil prices which are increasing delivery/haulage costs and a restriction on the flow and availability of key materials. Commodities prices for copper, steel, and aluminium have all increased.</p> <p>A shortage of supply from major neon producers in Ukraine and continued Covid-related bottlenecks for microchips and semiconductors from Asia means the electronic sector is experiencing inflation on products.</p> <p>Figures released by the Department for Business, Energy &amp; Industrial Strategy (BEIS) in May 2022 show the Construction Materials Index rising by 3.6% - a 22.9% increase over the last 12 months. With the continued high energy prices, further price increases for heavy side materials should be expected.</p> <p>In addition to this there has been major changes in Building Regulations for the first time since 2013 to reflect changes in how buildings are being constructed and the environment, which are expected to further increase the capital cost to deliver construction projects.</p>	Comments noted.	Comments will be considered as part of the local plan process.

FP18	039	Charity/ Community Group	Regard should be had to information on ecosystem services and how these can be factored in to economic decision making.	Comments noted.	Comments will be considered as part of the local plan process.
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Section 6.4

# Retail, Town Centre, Local and Neighbourhood Centres

*The following section contains representations relating to Feedback Points 19, 20, 21 and 22*

# Feedback Point 19: Defining the town centre boundary and primary shopping area

Question ID	URN	Respondent Type	Representation	Officer Response	Further Action
<b>FP19.1: Do you agree with the proposed boundaries for the primary shopping area and town centre? If you do not agree, then what streets do you think should and/or should not be included in either of these areas?</b>					
FP19.1	001	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP19.1	002	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP19.1	003	Resident/ General Public	Yes	Comment noted.	Comments will be considered as part of the local plan process.
FP19.1	004	Local Business	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP19.1	005	Resident/ General Public	Yes, bearing in mind this is the most historic part of the town with all that implies. Bring back a conservation group for consideration of proposals this would be good PR.	Although a conservation group is not something that relates specifically to the new plan, comments are noted and suggestions welcomed. Your thoughts will be communicated to the relevant team within the Council. Beyond this, we will be looking at taking proper account of conservation in the new plan through appropriate engagement.	Comments will be considered as part of the local plan process. Suggestions of a conservation group will be communicated to the relevant team.
FP19.1	006	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP19.1	009	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP19.1	011	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP19.1	012	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP19.1	014	Government/ Public Body	Historic England has no concerns to raise with the proposed boundaries for the primary shopping area or town centre. However, whilst noting the aspirations for the historic environment in Part 6.5 of the Issues and Options document, we would wish to highlight the density of heritage assets within the proposed boundaries.  The Tamworth Town Centre Conservation Area is not on the Heritage at Risk register but is classed as vulnerable. Any proposed primary shopping area and town centre policies which	Comments noted. We are mindful of the density of heritage assets within our town centre, and look to continue to protect and enhance both the assets and their setting through the new local plan.	Comments will be considered as part of the local plan process, and further advice sought from Historic England where necessary.

			<p>may be forthcoming in the Plan have the possibility of being a threat to, or opportunity for, the historic environment so it would be essential to explore the synergy between policies in the Sustainability Appraisal for the Plan.</p> <p>The density, variety and Grade range of listed buildings, highlights the specialness of the town centre along with the four Scheduled Monuments included in the town centre boundary and we would welcome any opportunities to conserve and enhance heritage assets and their setting that could be achieved through the draft Plan.</p> <p>We note from your website that there was a consultation on the Gungate Regeneration proposals in 2021 but we do not appear to have received a consultation notification. We would be pleased to engage with you further on that particular scheme separately to the Local Plan review process if it is anticipated it will move forward earlier than the draft Plan. In particular we would be able to advise in relation to Scheduled Monument Consent that would be required at the Saxon defences Scheduled Monument at Albert Road.</p>		
FP19.1	027	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP19.1	028	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP19.1	041	Developer/ Agent/ Landowner	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP19.1	047	Government/ Public Body	Increasing vacancies within town centres might provide suitable opportunities for health-related facilities.	Comment noted.	Comments will be considered as part of the local plan process.

## Feedback Point 20: Providing local shops and services

Question ID	URN	Respondent Type	Representation	Officer Response	Further Action
<b>FP20.1: Do you agree with our approach to protecting and enhancing, as far as possible, our current local and neighbourhood centres?</b>					
FP20.1	005	Resident/General Public	I agree with those stated.	Comment noted.	Comments will be considered as part of the local plan process.
FP20.1	007	Government/Public Body	Local and neighbourhood centres are not only important as hubs for services and retail but also help to reduce the need to travel and promote use of sustainable transport such as walking and cycling.	Comments noted.	Comments will be considered as part of the local plan process.
FP20.1	014	Government/Public Body	Historic England has no specific comments to make on this issue. A general comment is that any options would need to consider the historic environment, heritage assets and their setting as part of the Plan process and identify opportunities for enhancement and links with health and wellbeing, climate change, the natural environment amongst others.	Comments noted.	Comments will be considered as part of the local plan process.
FP20.1	044	Government/Public Body	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP20.1	047	Government/Public Body	The NHS supports centres and the provision of services within them where this is practicable.	Comments noted.	Comments will be considered as part of the local plan process.
<b>FP20.2: Are there any areas of the borough that you feel should be considered a local or neighbourhood centre that isn't already allocated?</b>					
FP20.2	005	Resident/General Public	There does not seem to be any mention of the new Amington Fields area (old golf course). This is badly in need of a centre and services. There may be other new areas that are lacking in provisions as well.	Comments noted. We will carry out further work to examine our current local and neighbourhood centres, and identify whether there are any existing areas which should be considered for future designation.	Comments will be considered as part of the local plan process. Further work required to determine future local and neighbourhood centres in the new plan.
FP20.2	047	Government/Public Body	The NHS supports centres and the provision of services within them where this is practicable.	Comments noted.	Comments will be considered as part of the local plan process.



## Feedback Point 21: The impact of existing retail parks

Question ID	URN	Forename	Representation	Officer Response	Further Action
<b>FP21.1: Do you think that we should have a specific designation and set of policies for the out-of-town retail areas?</b>					
FP21.1	001	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP21.1	002	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP21.1	003	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP21.1	004	Local Business	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP21.1	005	Resident/ General Public	Yes, these have had devastating effects on provision within the town especially affecting the elderly, those without cars etc. Not everyone even after covid uses a computer and many people do like to see and feel items they intend to purchase.	Comments noted.	Comments will be considered as part of the local plan process.
FP21.1	006	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP21.1	007	Government/ Public Body	Specific designation and policies for out-of-town centres would offer a more localised approach and incorporate local understanding and priorities more readily.	Comments noted.	Comments will be considered as part of the local plan process.
FP21.1	009	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP21.1	011	Resident/ General Public	Yes	Comment noted.	Comments will be considered as part of the local plan process.
FP21.1	012	Resident/ General Public	Yes	Comment noted.	Comments will be considered as part of the local plan process.
FP21.1	014	Government/ Public Body	Historic England has no specific comments to make on this issue. A general comment is that any approach would need to consider the historic environment, heritage assets and their setting as part of the Plan process.	Comments noted.	Comments will be considered as part of the local plan process.
FP21.1	021	Government/ Public Body	Yes, they should include more landscaped areas to reduce heat build-up during hot weather and help reduce flooding in a storm event. Transport networks should be green corridors that include cycle routes and footpaths, and developments should also have suitable bus or train routes to connect with communities and help reduce single car use.	Comments noted.	Comments will be considered as part of the local plan process.

FP21.1	027	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP21.1	028	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP21.1	041	Developer/ Agent/ Landowner	Yes.	Comment noted.	Comments will be considered as part of the local plan process.

## Feedback 22: Any further comments on retail, town centre, local and neighbourhood centres

Question ID	URN	Forename	Representation	Officer Response	Further Action
<b>FP22: Any further comments on retail, town centre, local and neighbourhood centres</b>					
FP22	001	Resident/ General Public	Putting College in City Centre is a mistake. It will create a ghost town for much of time.	Comments noted. The planning application related to the new college building has already been approved, and as such, will not form part of the new local plan.	No further action required.
FP22	002	Resident/ General Public	No more retail parks, far too much congestion being caused, better planning of multiple exits needed, more variety in town centres needed, more smaller, quaint local shops, not big name business.	Comments noted. Highways issues unfortunately cannot be influenced by planning policy, however we will continue to liaise with the responsible bodies (Staffordshire County Council or Highways England) in this regard.  Furthermore, although particular retailers cannot be specifically influenced through the local plan, we will pass on your thoughts to the relevant Council departments.	Comments will be forwarded to the relevant departments within the Council. We will continue to liaise with the relevant bodies in respect of our highways infrastructure.
FP22	003	Resident/ General Public	More/better cycle parking facilities in the town centre, and local and neighbourhood centres. Help and encourage people out of their cars and to use other forms of transport for quick local journeys.	Comments noted. Although this falls outside of our remit, we will try to work with the relevant parties to improve sustainable transport methods where we can.	Comments will be considered as part of the local plan process. Continued liaison with external parties required.
FP22	005	Resident/ General Public	I do think the overall plan for shopping resources should give consideration to what is not being provided in either area. While there are plenty of fast food and coffee outlets we are deficient if quality restaurants. Not everyone wants to buy shoes or underwear from a supermarket chain. Specialist shops should be encouraged.	Comments noted. Although particular retailers cannot be specifically influenced through the local plan, we will pass on your thoughts to the relevant Council departments.	Comments will be passed to the relevant departments within the Council.
FP22	012	Resident/ General Public	The essential question is whether Tamworth town centre is now in terminal decline as a retail destination. The level and quality of provision is very poor.	Comments noted.	Comments will be considered as part of the local plan process.
FP22	014	Government/ Public Body	Historic England has nothing further to add on retail or town, local and neighbourhood centre related matters.	Comments noted.	No further action required.
FP22	021	Government/ Public Body	Most local and neighbourhood centres seem to have some landscaping elements. In some cases, they could do with a more robust landscape scheme to enhance the area. This does not necessarily mean removing healthy established trees and shrubs	Comments noted.	Comments will be considered as part of the local plan process.

			but complementing the existing vegetation and making sure it can cope with the harsh urban environment.		
FP22	027	Resident/ General Public	Keep the college where it is. It's barmy to convert the Co-op Department Store to a college and demolish the current purpose built structure.	Comments noted. The planning application related to the new college has already been approved, and as such, will not form part of the new local plan.	No further action required.
FP22	028	Resident/ General Public	There should be some sort of partnership between the businesses in the retail park and those in the town centre - they should be promoting the town as an historical place of interest and if there was more to offer in the town in the way of restaurants and events that might entice visitors to the retail in to the town centre so the relationship was symbiotic.	Comments noted. Although this could be encouraged through stakeholder engagement, unfortunately it is not something that could be directly influenced by the planning process.	Comments will be considered as part of the local plan process.
FP22	039	Charity/ Community Group	As part of any regeneration, urban trees, habitat corridors and sustainable drainage systems such as rain gardens and green roofs should be included to enhance the landscape and recreation, provide urban cooling and manage water run-off. The 'Building with Nature' standards would be useful to inform any redevelopment projects. <a href="https://www.buildingwithnature.org.uk/25">https://www.buildingwithnature.org.uk/25</a> .	Comments noted.	Comments will be considered as part of the local plan process.
FP22	041	Developer/ Agent/ Landowner	The approach to out-of-town retail and leisure development has already seriously impacted upon the viability of the Town Centre, however, we cannot change the past but learn from the mistakes. Out of Town retail provides Large Space Users a suitable opportunity which is not available in an historic Town Centre. Any other uses should be strongly encouraged to seek representation in the Town Centre retail and leisure core. Parking provision is a very important facility, especially with an aging population. Not everyone can be expected to cycle or walk. Advantage Cards should be available to Local Residents to benefit from a limited amount of free parking in the Town Centre (as with the out-of-town provision). Along with this a comprehensive bus service should be supported. A properly 'curated' retail and Leisure offer should be the goal of Tamworth BC for the Town Centre not a race to the bottom.	Comments noted.	Comments will be considered as part of the local plan process.

Section 6.5

# Heritage

*The following section contains representations relating to Feedback Points 23 and 24*

## Feedback Point 23: Protecting the vitality of the historic environment without restricting its unnecessarily

Question ID	URN	Response Type	Representation	Officer Response	Further Action
<b>FP23.1: Considering the prescriptiveness of national policy, do you agree with our current approach towards heritage? If you do not agree, please detail what alternative approaches you would like to see.</b>					
FP23.1	001	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP23.1	002	Resident/ General Public	No. We need to sort out our own heritage, not every town or area will fulfil the same requirements, criteria or needs, each town will have different heritage so it can be a one for all policy.	Comments noted. The National Planning Policy Framework (NPPF) is very prescriptive as to how heritage should be managed and protected at a local level. Currently, we implement these national requirements alongside identifying any local issues which could fall outside of this remit. This ensures that there is a localised perspective woven into our approach, which acknowledges that all places, and the heritage it seeks to protect, will differ.	Comments will be considered as part of the local plan process.
FP23.1	003	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP23.1	004	Local Business	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP23.1	005	Resident/ General Public	I like the objective but has this been applied in the past!! While the National Policy does seem to cover the existing heritage within the town but the demands on costs does seem to have prevented the preservation of the most valued of sites which gave the town its character. We could ensure new development is in harmony with the older elements as this will sell the town in the future when people want to visit for leisure. Character and uniqueness do sell an area and this should be at the back of the economic progress of the area.	Comments noted and suggestions welcomed. The new local plan will reflect the importance of our heritage, as laid out in objective six. In line with this, our future policies will seek to ensure that our heritage is both protected and enhanced, whilst ensuring that they will not be adversely affected by new development.	Comments will be considered as part of the local plan process.
FP23.1	006	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP23.1	009	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP23.1	011	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.

FP23.1	012	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP23.1	014	Government/ Public Body	Historic England has no concerns with the current policy approach.	Comment noted.	Comments will be considered as part of the local plan process.
FP23.1	021	Government/ Public Body	We would be happy to see the continuation of the current approach so long as it has the protection and enhancement of the historic environment at its heart.	Comments noted.	Comments will be considered as part of the local plan process.
FP23.1	027	Resident/ General Public	No. Tamworth Council seem oblivious to our town's heritage.	Comments noted.	Comments will be considered as part of the local plan process.
FP23.1	028	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP23.1	041	Developer/ Agent/ Landowner	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
<b>FP23.2: Do you feel that there are any specific local heritage matters that you would like to see addressed through the new local plan?</b>					
FP23.2	002	Resident/ General Public	More done to keep our heritage that is left and wasn't bulldozed and make it a reason to come to Tamworth.	Comments noted.	Comments will be considered as part of the local plan process.
FP23.2	003	Resident/ General Public	Perhaps the three empty shops in Market Street which I believe the council owns could be offered at a low cost rent for local varied mixture of independent food/coffee outlets for 12/24 months to get established. Perhaps an agreement could be put in place for those outlets customers to have use of the covered area under the Town Hall with suitable seating/tables on certain days of the week when applicable.	Comments noted. Although this idea could be encouraged through stakeholder engagement, this is unfortunately not something that could be directly influenced by the planning process. We will pass your ideas onto the relevant departments within the Council.	Comments will be forwarded to the relevant departments within the Council.
FP23.2	004	Local Business	More tourists being brought to town by advertising our wonderful castle instead of advertising other castles like Warwick.	Comments noted.	Comments will be considered as part of the local plan process.
FP23.2	005	Resident/ General Public	Our connection with Sir Robert Peel as an historic character and his family should have been promoted as also the Reliant car factory especially a link with 'Only Fools and Horses' an international promotion for the 3 wheeled car. Mills and Coal and Clay mining have all been a contributor to our heritage but are seldom if ever mentioned.	Comments noted.	Comments will be considered as part of the local plan process.
FP23.2	012	Resident/ General Public	The emphasis on local heritage matters is reasonable.	Comments noted.	Comments will be considered as part of the local plan process.
FP23.2	014	Government/ Public Body	In terms of local heritage issues the extant plan sets out the origins of the place satisfactorily but there would be opportunity in the Plan review to further highlight the growth of the town over time, how that is reflected in some of the superb places and spaces we experience today, including waterways as blue infrastructure, and how Tamworth's rich heritage, forming part of centuries of resilience and adapting to change, places it in a strong position for the future. This would tie in and underpin the	Comments noted and suggestions welcomed. As part of our work on the Issues and Options, we have put together a detailed spatial portrait, which gives an insight into the borough's past, present and possible future. It covers topics such as our origins, heritage, population, environment and employment.	Comments will be considered as part of the local plan process.

			strong message set out in the Plan's vision included in Section 5 of this I&O consultation.	The new local plan will be formatted to include something similar at the beginning of the document. This is intended to offer the contextual basis upon which our policies will follow.	
FP23.2	015	Charity/ Community Group	The Coventry Canal through Tamworth has many Listed Buildings, including 8 canal bridges in Amington, Glascote and Kettlebrook, a milepost, the Tame Aqueduct and the Junction House at Fazeley. There are also 2 lock cottages at Glascote and canal walls on the Local List. What links these individual structures and gives meaning to their context is the canal itself. The canal water channel with its towpath, embankments and cuttings is a major heritage earthwork in its own right. Many other canals have long been designated as Conservation Areas and the both the Coventry Canal and the Birmingham & Fazeley Canal within Tamworth merit equal status. This recognition of the history, engineering and architecture, as well as its present day amenity value, of these canals would encourage better consideration of their setting and help to preserve their undesignated heritage features from any adverse developments.	Comments noted. As part of the new plan, we will look at our current heritage designations, and consider new allocations where appropriate.	Comments will be considered as part of the local plan process.
FP23.2	027	Resident/ General Public	Too late now the heritage of our town centre was decimated by Tamworth Council in the late Sixties early Seventies.	Comments noted.	Comments will be considered as part of the local plan process.



## Feedback Point 24: Any further comments on heritage

Question ID	URN	Respondent Type	Representation	Officer Response	Further Action
<b>FP24: Any further comments on heritage</b>					
FP24	003	Resident/ General Public	Many of the local events that are run do not seem to get very well publicised in my opinion, perhaps more of an effort could be made to draw visitors in to such events. Tamworth should make more of its place in the ancient history of our country.	Comments noted.	Comments will be considered as part of the local plan process.
FP24	005	Resident/ General Public	Please support both practically and in spirit those individuals who have set up groups to promote heritage.	Comments noted.	Comments will be considered as part of the local plan process.
FP24	009	Resident/ General Public	Well done for what is currently undertaken, there is a good balance!	Comments noted.	Comments will be considered as part of the local plan process.
FP24	014	Government/ Public Body	<p>Historic England welcomes the emerging Plan's recognition of the value of heritage in managing future challenges and opportunities for Tamworth.</p> <p>This recognition could help link in with other Plan objectives, and reinforce assessment outcomes of the Sustainability Appraisal, to highlight the strong links between climate change (existing stock/embodyed carbon, retrofitting etc), natural environment elements, design, health and wellbeing opportunities, and tourism benefits as well as other economic opportunities through heritage led regeneration, for example.</p> <p>Historic England has a variety of information online which may be of use to you as the Plan progresses including the following Good Practice Advice publications and Advice Notes below:            GPA1 - Local Plan Making            GPA2 - Managing Significance in Decision-Taking in the Historic Environment            GPA3 - Setting and Views            Historic England Advice Note 2 - Making Changes to Heritage Assets            Historic England Advice Note 3 - The Historic Environment and Site Allocations in Local Plans            Historic England Advice Note 4 - Tall Buildings            Historic England Advice Note 8 - Sustainability Appraisal and Strategic Environmental Assessment            Historic England Advice Note 10 - Listed Buildings and Curtilage</p>	Comments noted and additional links to further advice welcomed. The Council will continue to liaise with Historic England throughout the local plan process.	Comments will be considered as part of the local plan process, including the online information which has been referenced. Where necessary, further consultation with Historic England will be sought.

			<p>Historic England Advice Note 14 - Energy Efficiency and Traditional Homes</p> <p>Climate change, well-being information and the data sets and information available in our annual Heritage Counts publications may also be of use to you at this early stage of the emerging Plan and Sustainability Appraisal:</p> <p><a href="https://historicengland.org.uk/whats-new/features/climate-change/">https://historicengland.org.uk/whats-new/features/climate-change/</a></p> <p><a href="https://historicengland.org.uk/research/current/social-and-economic-research/wellbeing/">https://historicengland.org.uk/research/current/social-and-economic-research/wellbeing/</a></p> <p><a href="https://historicengland.org.uk/research/heritage-counts/">https://historicengland.org.uk/research/heritage-counts/</a></p>		
FP24	021	Government/ Public Body	<p>In general, the position taken regarding heritage and the historic environment in the Issues and Options is welcomed and we would be keen to see this replicated and built upon in subsequent stages of the preparation of the Local Plan</p> <p>Just a reminder that Tamworth’s heritage also includes below ground archaeology, including a number of scheduled monuments.</p> <p>Just a reminder about the strong existing evidence base that Tamworth has with regards to its historic environment such as the Historic Environment Assessment/Extensive Urban Survey. Consideration should be given as to whether any updates are required to this considering it is now over a decade old.</p> <p>Just a reminder that since the current Local Plan was produced Historic England have provided some useful guidance with regards to the historic environment and local plans and strategic allocations. These should be of use going forward as you prepare the developing local plan.</p> <p>See query regarding the Heritage Impact Assessment under Feedback Point 10 above.</p> <p>It is worth highlighting here Historic England Guidance relating to energy efficiency and adaptation in relation to the historic environment/historic buildings</p> <p><a href="https://historicengland.org.uk/advice/technical-advice/energy-efficiency-and-historic-buildings/">https://historicengland.org.uk/advice/technical-advice/energy-efficiency-and-historic-buildings/</a>,<a href="https://historicengland.org.uk/research/current/threats/heritage-climate-change-environment/">https://historicengland.org.uk/research/current/threats/heritage-climate-change-environment/</a> and <a href="https://historicengland.org.uk/whats-new/statements/climate-change/">https://historicengland.org.uk/whats-new/statements/climate-change/</a>. Likewise the Historic England website will have guidance on appropriate reuse and sustainable development- the TBC Conservation Officer colleague should be able to advise further</p>	<p>Comments noted. As part of the local plan process, our current evidence base will be evaluated and further work commissioned where it is deemed necessary.</p>	<p>Comments will be considered as part of the local plan process.</p>

Section 6.6

# Open Spaces and Green Infrastructure

*The following section contains representations relating to Feedback Points 25 and 26*

# Feedback Point 25: Managing, protecting and enhancing our green infrastructure network

Question ID	URN	Respondent Type	Representation	Officer Response	Further Action
<b>FP25.1: Are there any particular types of open space that you feel should be specifically re-evaluated?</b>					
FP25.1	001	Resident/ General Public	Canals and rivers.	Comments noted.	Comments will be considered as part of the local plan process.
FP25.1	003	Resident/ General Public	Some of the local nature reserves may benefit from a few Sheffield Cycle stands near their entrances to encourage more people to use them and access them by bicycle maybe with their children. Broadmeadow is a good candidate for this. Tameside nature reserve I feel would benefit from having a proper flight of steps down into it from the flood bank near the underside of the A5 bypass flyover near M&S, currently it is just a scramble down a steep (sometimes slippery) bank.	Comments noted. We will pass on your suggestions for specific improvements to the relevant team. Beyond this, we will be looking into policies to protect and enhance, where relevant, our network of local nature reserves.	Comments will be passed on to the relevant team.
FP25.1	005	Resident/ General Public	Some spaces could be reallocated as 'allotment' areas as exemplified in Belgrave near the fire station. I think Glascote Heath would like to do that.	Comments noted and suggestions welcomed. We will pass your thoughts onto the relevant team.	Comments will be passed on to the relevant team.
FP25.1	006	Resident/ General Public	No.	Comment noted.	Comments will be considered as part of the local plan process.
FP25.1	009	Resident/ General Public	No, I think currently it works by having a mix of informal and formal spaces.	Comment noted.	Comments will be considered as part of the local plan process.
FP25.1	012	Resident/ General Public	None.	Comment noted.	Comments will be considered as part of the local plan process.
FP25.1	014	Government/ Public Body	Historic England has no specific comments to make on this issue. General comments are that any options would need to consider the historic environment, heritage assets and their setting as part of the Plan process, and that links between natural, historic and built environments could be explored and identified through the Sustainability Appraisal in due course.	Comments noted.	Comments will be considered as part of the local plan process.
FP25.1	015	Charity/ Community Group	The towpaths of the Coventry Canal and the Birmingham & Fazeley Canal provide valuable local recreational routes and green/blue open space with access to wildlife and heritage structures. The need for their enhancement and ongoing maintenance to higher standards should be assessed in conjunction with the Canal & River Trust (CRT) and appropriate funding procured through grants, CIL or S106 (See Infrastructure response below, Point 27).	Comments noted. Where enhancements to existing towpaths could help achieve the sustainability goals of the new local plan, these could be considered as part of the infrastructure requirements of the plan.	Comments will be considered as part of the local plan process.

FP25.1	016	Government/ Public Body	We believe that open green space, no matter how small, should be held in high value. We would reinforce the plans commitments to Objective 1, Objective 8 and Objective 10. Not only should all open green space be preserved, we feel the plan could commit to enhancing these spaces and maximising their benefit to local communities.	Comments noted.	Comments will be considered as part of the local plan process.
FP25.1	019	Government/ Public Body	Sport England are supportive of the Council commissioning a new Playing Pitch Strategy which will help inform the current and future demand for playing pitches within the authority in line with NPPF paragraph 98.  The Local Plan should contain a policy which protects and enhances existing provision and where appropriate allocate new sites to meet any identified demand for pitches (as part of new housing allocations or standalone sites) where the need cannot be met from existing sites.	Comments noted. A new Playing Pitch Strategy has been commissioned as part of our evidence base.	Comments will be considered as part of the local plan process.
FP25.1	021	Government/ Public Body	Grass verges, where local residents park due to lack of parking spaces. Protect the grass verges so they cannot be parked on and consider where people can park instead. Where there are wide grass verges, swales could be incorporated to help with flood mitigation.  Where there is a problem for locals parking, it may be better in some cases to create some parking bays, and replace the verge with specimen tree planting. Tree pits can now also be used as Suds – there are planting pit designs specifically for use as suds features. Tree species need to be carefully considered and appropriate for the location.	Comment noted.	Comments will be considered as part of the local plan process.
FP25.1	027	Resident/ General Public	No new housing on the Green Belt.	Comments noted. Any release of the Green Belt would be a last resort in delivering our housing need, and, in line with the NPPF, would only be considered once all other options have been reasonably explored.	Comments will be considered as part of the local plan process. Further work is required to determine the method(s) by which our housing need should be delivered.
FP25.1	039	Charity/ Community Group	Natural greenspaces - Consider adopting the Accessible Natural Greenspace Targets (ANGST) published by Natural England All greenspaces should be evaluated on their biodiversity value, naturalness, and carbon capture abilities, to form a baseline for decision making. Allotments and community growing spaces e.g. small orchards are particularly	Comments noted.	Comments will be considered as part of the local plan process.

			important for local food growing, mental health and community cohesion as well as biodiversity, so should be a focus in terms of meeting demand.		
<b>FP25.2: If particular examples of open space are found to be under performing or of low quality, would you prefer to see them enhanced and retained as open space, or released and reallocated for a new purpose?</b>					
FP25.2	001	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP25.2	002	Resident/ General Public	Kept, we are becoming encased in a concrete jungle on all sides of the borough...time to stop.	Comment noted.	Comments will be considered as part of the local plan process.
FP25.2	003	Resident/ General Public	Prefer to see them enhanced and retained as open space.	Comment noted.	Comments will be considered as part of the local plan process.
FP25.2	005	Resident/ General Public	Enhanced and retained as open space for biodiversity in any form rather than reallocated.	Comment noted.	Comments will be considered as part of the local plan process.
FP25.2	006	Resident/ General Public	Yes.	Comment noted.	Comments will be considered as part of the local plan process.
FP25.2	009	Resident/ General Public	I would prefer them to be retained, but rather than enhancing them, identify why they are under performing (how does one do that?). Low quality could still be valuable to the local people!	Comments noted.	Comments will be considered as part of the local plan process.
FP25.2	012	Resident/ General Public	Depending on location, there may be scope for new use, such as affordable housing.	Comment noted.	Comments will be considered as part of the local plan process.
FP25.2	014	Government/ Public Body	Historic England has no specific comments to make on this issue. General comments are that any options would need to consider the historic environment, heritage assets and their setting as part of the Plan process, and that links between natural, historic and built environments could be explored and identified through the Sustainability Appraisal in due course.	Comments noted.	Comments will be considered as part of the local plan process.
FP25.2	016	Government/ Public Body	In line with our comment above we would recommend they be enhanced and retained. We welcome conversations on land which you wish to enhance and would be happy to advise and support on how it could be used for green infrastructure. We believe green infrastructure can be implemented in a way that delivers multi-use benefits providing amenity and biodiversity value to communities as well as acting as flood and climate change resilience.	Comments noted.	Comments will be considered as part of the local plan process. Further liaison will be undertaken where necessary.
FP25.2	019	Government/ Public Body	A new Playing Pitch Strategy will help to identify the need for any playing field site (public or private) to be retained or not. Where there are shortfalls identified the sites should be protected or if an alternative use is identified then a replacement provision in line with Sport England's Exception Policy E4 and NPPF paragraph 99b should be secured.	Comments noted. A new Playing Pitch Strategy has been commissioned as part of our evidence base.	No further action required at this stage.

FP25.2	021	Government/ Public Body	Prefer to enhance and retain in the first instance.	Comment noted.	Comments will be considered as part of the local plan process.
FP25.2	028	Resident/ General Public	Enhanced.	Comment noted.	Comments will be considered as part of the local plan process.
FP25.2	039	Charity/ Community Group	This would depend on local priorities and whether local needs were being met. We would generally prefer that open space be retained and enhanced to support nature's recovery, to contribute to national targets for 30% of land to be managed for nature by 2030.	Comments noted.	Comments will be considered as part of the local plan process.
FP25.2	043	Government/ Public Body	We would support the assessment of under-performing or low quality open space to see if they can be released for housing land to help with the GBBCHMA housing land shortfall.	Comment noted.	Comments will be considered as part of the local plan process.

**FP25.3: If quality enhancement works were either unfeasible or ineffective, and the open space was reallocated for another purpose, what would you wish to see that land used for instead?**

FP25.3	001	Resident/ General Public	Housing	Comment noted.	Comments will be considered as part of the local plan process.
FP25.3	002	Resident/ General Public	Not for building or housing, an open space is for all to use, made into an LNR.	Comment noted.	Comments will be considered as part of the local plan process.
FP25.3	003	Resident/ General Public	Hard to say without knowing what particular space is involved.	Comment noted.	Comments will be considered as part of the local plan process.
FP25.3	005	Resident/ General Public	Depending on size for recreation (no no ball games signs) Perhaps public allotments if a small space or a bloom project.	Comment noted.	Comments will be considered as part of the local plan process.
FP25.3	006	Resident/ General Public	Wildlife habitat and woodland to qualify as carbon sinks to increase the town's capacity to reduce its own carbon output.	Comment noted.	Comments will be considered as part of the local plan process.
FP25.3	009	Resident/ General Public	No, would want it to stay as it is please!	Comment noted.	Comments will be considered as part of the local plan process.
FP25.3	012	Resident/ General Public	As above <i>[referring to FP25.2]</i> .	Comment noted.	Comments will be considered as part of the local plan process.
FP25.3	014	Government/ Public Body	Historic England has no specific comments to make on this issue. General comments are that any options would need to consider the historic environment, heritage assets and their setting as part of the Plan process, and that links between natural, historic and built environments could be explored and identified through the Sustainability Appraisal in due course.	Comment noted.	Comments will be considered as part of the local plan process.

FP25.3	021	Government/ Public Body	If use has fallen because of locally perceived dangers or anti-social behaviours, etc, it may be better to reallocate for new use. If that is the case, new replacement open spaces locally should be sought.	Comment noted.	Comments will be considered as part of the local plan process.
FP25.3	027	Resident/ General Public	Left fallow for the benefit of wildlife.	Comment noted.	Comments will be considered as part of the local plan process.
FP25.3	028	Resident/ General Public	Recreational for younger people, parks, skate parks, parkour etc.	Comment noted.	Comments will be considered as part of the local plan process.
FP25.3	039	Charity/ Community Group	Potentially biodiversity offsetting, flood alleviation or other green uses.	Comment noted.	Comments will be considered as part of the local plan process.
FP25.3	043	Government/ Public Body	Residential use.	Comment noted.	Comments will be considered as part of the local plan process.



## Feedback Point 26: Any further comments on open spaces and green infrastructure

Question ID	URN	Respondent Type	Representation	Officer Response	Further Action
<b>FP26: Any further comments on open spaces and green infrastructure</b>					
FP26	003	Resident/ General Public	It would be nice to have a properly surfaced cycle/footpath along the top of the flood bank that runs adjacent to the Fazeley Road currently just loose uneven gravel/stones.	Comments noted. Although these are not improvements that we can necessarily deliver ourselves, we can look at them collaboratively with our delivery partners. Where deemed appropriate and achievable, we can look to include them in our Infrastructure Delivery Plan.	Comments will be considered as part of the local plan process.
FP26	005	Resident/ General Public	Keep green 'green'. With volunteers and paid employees to oversee projects.	Comments noted. Although this idea could be encouraged through stakeholder engagement, this is unfortunately not something that could be directly influenced by the planning process. We will pass your suggestions onto the relevant department within the Council.	Comments will be considered as part of the local plan process, and suggestions forwarded to the relevant department within the Council.
FP26	009	Resident/ General Public	TBC does an excellent job in looking after our open spaces, keep up the good work!	Comments noted.	Comments will be considered as part of the local plan process.
FP26	014	Government/ Public Body	Historic England has nothing further to add on these matters at this time.	Comments noted.	No further action required.
FP26	019	Government/ Public Body	Sport England would encourage that its Active Design Guidance is incorporated within the Local Plan, with its 10 principles being developed to inspire and inform the layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and active lifestyles.  The guidance can be viewed here <a href="https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/spe003-active-design-published-october-2015-high-quality-for-web-2.pdf?VersionId=uCz_r6UyApzAZlaiEVaNt69DAaOCmkIQ">https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/spe003-active-design-published-october-2015-high-quality-for-web-2.pdf?VersionId=uCz_r6UyApzAZlaiEVaNt69DAaOCmkIQ</a>	Comments noted.	Comments will be considered as part of the local plan process.
FP26	021	Government/ Public Body	Open spaces – any consideration of open spaces should consider the importance of people's access to nature and make use of established Accessible Natural Greenspace Targets (ANGST) published by Natural England: <a href="#">Accessible Natural Green Space Standards in Towns and Cities: A Review and Toolkit for their Implementation - ENRR526 (naturalengland.org.uk)</a> <a href="#">How Natural England's Green Infrastructure Framework can help create better places to live - Natural England (blog.gov.uk)</a>	Comments noted.	Comments will be considered as part of the local plan process.

			<p>No person should live more than 300m from their nearest area of natural greenspace;</p> <p>There should be at least one accessible 20ha site within 2km from home;</p> <p>There should be one accessible 100ha site within 5km;</p> <p>There should be one accessible 500ha site within 10km.</p>		
FP26	021	Government/ Public Body	<p>Open spaces need to be managed well, this should also allow for new biodiversity enhancements, such as maintaining tree stock, allowing areas for nature – e.g., perimeter seeded and allowed to be managed as a meadow, drainage to open SUDS features, etc. Traffic calming measures including tree pits which enhance the environment and can be used as a SUDS feature. Bus stops with green roofs – and flat roof garages and homes with green roofs?</p>	<p>Comments noted. Unfortunately, the majority of suggestions listed cannot be enforced through the local plan, only encouraged. However, we will take your comments into account where relevant.</p>	<p>Comments will be considered as part of the local plan process.</p>
FP26	039	Charity/ Community Group	<p>It would be useful to set targets for biodiversity, carbon capture, water storage and sustainable management for all open spaces so that they can perform a multifunctional role while serving the local community, ensuring land is used most effectively.</p>	<p>Comments noted, we will consider where appropriate.</p>	<p>Comments will be considered as part of the local plan process.</p>

Section 6.7

## Infrastructure

*The following section contains representations relating to Feedback Points 27, 28 and 29*

## Feedback Point 27: Ensuring the timely delivery of the right infrastructure to meet community needs

Question ID	URN	Respondent Type	Representation	Officer Response	Further Action
<b>FP27.1: Do you feel that there are any deficits in our current infrastructure provision? If you believe there are, then please provide further detail.</b>					
FP27.1	001	Resident/ General Public	No.	Comment noted.	Comments will be considered as part of the local plan process.
FP27.1	002	Resident/ General Public	Yes. Roads, Ventura are not coping with all the extra traffic from numerous developments and now more are proposed, the infrastructure is lacking in all areas.	Comments noted. Highways matters do not fall under our jurisdiction, and as such, cannot be directly influenced by the local plan process. The road network is a key support to our wider infrastructure delivery, and we will continue to work closely with the relevant external parties to ensure future provision is coordinated and timely.	Continue to liaise with those responsible, and seek specific guidance where necessary.
FP27.1	003	Resident/ General Public	Yes. I feel the whole area would benefit from provision of a better bus service. More thought needs to go into local roads and school capacity too when new housing developments are being planned. The people of Tamworth should have a say in what other local councils want to build on our boundaries. The Robert Peel hospital should be extended to reflect the ever growing needs of the town.	Comments noted. Although not all of the mentioned improvements are ones that we can deliver ourselves, we can look at them collaboratively with our delivery partners. Where deemed appropriate and achievable, we can look to include them in our Infrastructure Delivery Plan upon its review.  In respect of development on our boundaries, unfortunately, it is not necessarily a concern which relates to our local plan. However, where it is a strategic issue, we will work collaboratively with our neighbours under the Duty to Cooperate. Applications from other councils are publicised, and the public have the opportunity to comment on them should they wish. The council are also normally consulted should a development be proposed close to the boundary.	Comments will be considered as part of the local plan process. In respect of infrastructure not under our control, we will continue to coordinate with those responsible.
FP27.1	005	Resident/ General Public	Transport to other areas outside Tamworth is good while provision in the borough is atrocious. We are the Cinderella when it comes to county council thinking and this has left us well behind in good road structure. Transport links are poor because there is no central 'Terminus' to make connections that could be achieved with town centre redevelopment	Comments noted. Although not all of the mentioned improvements are ones that we can deliver ourselves, we can look at them collaboratively with our delivery partners. Where deemed appropriate and achievable, we can look	Comments will be considered as part of the local plan process. In respect of infrastructure not under our control, we will continue to coordinate with those responsible.

			<p>Education will be weak if provision is not provided in new areas.</p> <p>Health provision is poor due to our position in Staffordshire. We should have been a central point or satellite area with our own services as we are linked to several counties and boroughs. The co-operation between hospital trusts is poor when residents are treated by different trusts. The distance travelled can be the difference between survival or ill health leading to death.</p> <p>Leisure provision is good, but the needs of our youths has been in decline for some time and seems to rely of school which are overstretched. Or dependant of money which they won't have.</p> <p>106 monies do not seem to have addressed provision within the borough which should have been done. The current local plan has been deficient so yes you need to develop a new approach. Look at the weaknesses and improve.</p>	to include them in our Infrastructure Delivery Plan upon its review.	
FP27.1	006	Resident/ General Public	Make sure that all planning applications for building and associated infrastructure contains sufficient planting of trees and bushes (LEAF AREA INDEX) to absorb the projected carbon emissions from the buildings proposed. Calculations should be shown on applications re LEAF AREA INDEX versus PROJECTED CARBON EMISSIONS.	The comments do not appear to necessarily relate to the specific question posed. However, your suggestions are welcomed and we will take them into account in the relevant areas.	Comments will be considered as part of the local plan process.
FP27.1	007	Government/ Public Body	<p>Although there is a significant network of sustainable transport routes, further improvements and linkages could benefit the usage of this infrastructure locally and local residents.</p> <p>Staffordshire Local Cycling and Walking Infrastructure Plan: <a href="https://www.staffordshire.gov.uk/Transport/transportplanning/documents/LCWIP-Final-Report-October-2021.pdf">https://www.staffordshire.gov.uk/Transport/transportplanning/documents/LCWIP-Final-Report-October-2021.pdf</a></p> <p>The LCWIP identifies a number of potential options for improving Tamworth's walking and cycling connectivity including: potential to upgrade some canal towpaths to better accommodate walking and cycling potential to extend the cycle network improved maintenance of existing routes opportunity for more shared-use routes</p>	Comments noted. Further work will be carried out to evaluate our current infrastructure provision, including sustainable transport.	Comments will be considered as part of the local plan process. Further liaison with Staffordshire County Council where necessary.
FP27.1	009	Resident/ General Public	No.	Comment noted.	Comments will be considered as part of the local plan process.

FP27.1	011	Resident/ General Public	Yes. Many bike lanes seem to have been designed by someone who's never been on a bike.	Comments noted. Highways matters do not fall under our jurisdiction, and as such, cannot be directly influenced by the local plan process. The road network is a key support to our wider infrastructure delivery, and we will continue to work closely with the relevant external parties to ensure future provision is coordinated and timely.	Continue to liaise with those responsible, and seek specific guidance where necessary.
FP27.1	012	Resident/ General Public	No.	Comment noted.	Comments will be considered as part of the local plan process.
FP27.1	014	Government/ Public Body	Historic England has no specific comments to make on this issue. A general comment is that any proposals would need to consider the historic environment, heritage assets and their setting as part of the Plan process.	Comment noted.	Comments will be considered as part of the local plan process.
FP27.1	015	Charity/ Community Group	The towpaths of the Coventry Canal and the Birmingham & Fazeley Canal provide valuable local recreational routes and open space with access to wildlife and heritage structures. However, the Canal & River Trust (CRT) is not sufficiently funded to improve them for increasing local use. All development sites within say 800 metres of the canals should be required to contribute towards towpath improvements through CIL (or S106), working in conjunction with CRT.	Comments noted. Where deemed appropriate and achievable, we can look to add suitable improvement projects to the Infrastructure Delivery Plan upon its review.	Comments will be considered as part of the local plan process.
FP27.1	019	Government/ Public Body	Sport England considers that any indoor sports provision should be informed by a needs assessment in line with national planning policy framework paragraph 98.	Comments noted. The relevant needs assessment will be included in the evidence base for the new plan.	Comments will be considered as part of the local plan process.
FP27.1	026	Government/ Public Body	We have worked closely with Tamworth Borough Council to identify the necessary education mitigation for the current local plan and have delivered and continue to deliver the additional infrastructure as required. Projects to mitigate the impact of the previous local plan period have included a recently delivered a secondary school expansion, a new primary school and primary school expansions. Further mitigation is underway to provide two new schools and additional school expansions. We continually monitor the number of pupils generated by developments along with patterns of pupil migration and other data to respond to additional school requirements as necessary.	Comments noted.	Comments will be considered as part of the local plan process.
FP27.1	027	Resident/ General Public	Yes. Hahahaha. The needs of the developer are always put before the desires of local residents.	Comments noted.	Comments will be considered as part of the local plan process.
FP27.1	028	Resident/ General Public	Yes. Transport - road infrastructure is poor, roads in the town centre are congested increasing pollution and the actual roads themselves are poorly maintained. Community - a total lack of youth provision, no youth club.	Comments noted. Further work will be carried out to evaluate our current infrastructure provision, including our youth provision. Highways matters do not fall under our jurisdiction, and as such, cannot be directly influenced by the local plan process. The road network is a key support to our	Comments will be considered as part of the local plan process. In respect of infrastructure not under our control, we will continue to coordinate with those responsible.

				wider infrastructure delivery, and we will continue to work closely with the relevant external parties to ensure future provision is coordinated and timely.	
FP27.1	041	Developer/ Agent/ Landowner	Yes. Public Transport and support of the older members of the local community to access the Town Centre.	Comments noted. Current policy encourages our community services to locate in particular areas, such as the town centre, and local and neighbourhood centres. This is designed to encourage sustainable neighbourhoods, whereby services and facilities are in close proximity. As part of the local plan process, further work will be carried out to evaluate our current infrastructure provision.	Comments will be considered as part of the local plan process.
FP27.1	047	Government/ Public Body	We note that the section about infrastructure does not mention health infrastructure. We feel this justifies the points we have been making. Hitherto, plans have tended to concentrate, and seek support, for services in direct control of the local authority. We would urge that this approach should change to reflect the full range of services.	'Health' is listed in the opening paragraph of the section of the document as an example of relevant infrastructure. At the time of development of the most recent Infrastructure Delivery Plan (in support of the current adopted local plan), no health infrastructure projects were proposed by the relevant bodies.	Comments will be considered as part of the local plan process. In respect of infrastructure not under our control, we will continue to coordinate with those responsible.

# Feedback Point 28: Ensuring our policy requirements do not impact the financial viability of developments

Question ID	URN	Response Type	Representation	Officer Response	Further Action
<b>FP28.1: Looking to the future, which type(s) of infrastructure would you like to see given the highest priority, and why?</b>					
FP28.1	001	Resident/ General Public	Housing because it benefits all.	Preferences acknowledged.	Comments will be considered as part of the local plan process.
FP28.1	002	Resident/ General Public	Roads, doctors, need for a more used hospital for the many thousands of extra people.	Preferences acknowledged.	Comments will be considered as part of the local plan process.
FP28.1	003	Resident/ General Public	A comprehensive network of properly protected cycling infrastructure should be implemented throughout the borough wherever possible. The mental health unit at Robert Peel hospital should be rebuilt to serve local people. A large NHS dental unit should be considered on the Robert Peel site too. The town centre bollards situation needs resolving once and for all to stop food delivery drivers treating our streets as their private parking space.	Comments noted. Although not all of the mentioned improvements are ones that we can deliver ourselves, we can look at them collaboratively with our delivery partners. Where deemed appropriate and achievable, we can look to include them in our Infrastructure Delivery Plan.	Comments will be considered as part of the local plan process.
FP28.1	005	Resident/ General Public	<p>Builders should be making larger cash contributions – they walk away with large profits – the monies should be ring fenced for provisions. It is better to leave land as green space than to build at a loss to the community.</p> <p>The items itemised before are all of importance to the quality of life the borough would hope to provide for residents.</p> <p>Tamworth is a small city and so transport links, health and education should be the priorities but mental wellbeing has been proved during the Covid emergency to be something that affects our lives, so access to green space and exercise is a huge part of community living.</p>	Comments noted. Although not all of the mentioned improvements are ones that we can deliver ourselves, we can look at them collaboratively with our delivery partners. Where deemed appropriate and achievable, we can look to include them in our Infrastructure Delivery Plan.	Comments will be considered as part of the local plan process.
FP28.1	006	Resident/ General Public	Flood plain management - increase the height of all levies (along the Fazeley Road and the Lichfield Road and other potential flood areas as necessary) to account for future global warming and plant more trees and reed beds to take up the flood water. This planting needs to be substantial for it to work.	Comments noted. Although not all of the mentioned improvements are ones that we can deliver ourselves, we can look at them collaboratively with our delivery partners. Where deemed appropriate and achievable, we can look to include them in our Infrastructure Delivery Plan.	Comments will be considered as part of the local plan process.



FP28.1	007	Government/ Public Body	Staffordshire County Council will be preparing a new Local Transport Plan by 2024/25. This will contain the transport priorities for SCC over the medium to long term. This is likely to be heavily focussed on the Government's decarbonisation plan and carbon zero by 2050 and therefore schemes with the highest priority are likely to be those that can deliver carbon reduction, such as active travel modes and passenger transport. However, highway improvements to increase traffic capacity may still be a necessity in some circumstances.	Comments noted. We will look to work collaboratively to ensure that our priorities are compatible.	Comments will be considered as part of the local plan process.
FP28.1	011	Resident/ General Public	Bike lanes and bike structures in front of supermarkets, shops... That could also accommodate cargo bike for families.	Preferences acknowledged.	Comments will be considered as part of the local plan process.
FP28.1	012	Resident/ General Public	The provision of necessary homes and employment opportunities should be the highest priority.	Preferences acknowledged.	Comments will be considered as part of the local plan process.
FP28.1	014	Government/ Public Body	Historic England has no specific comments to make on this issue. A general comment is that any approach would need to consider the historic environment, heritage assets and their setting as part of the Plan process.	Comments noted.	Comments will be considered as part of the local plan process.
FP28.1	016	Government/ Public Body	We believe the plan can be used to set out clear standards and expectations for surface water management. New developments should make use of "management train" style Sustainable Urban Drainage (SUDS) using source, site and regional controls. "Pipe to pond" style SUDS on new developments should be strongly discouraged in order for the plan to effectively deliver Objective 1, Objective 7, Objective 10 and Objective 11. Another way the plan could embed these objectives is to explicitly mandate alignment to and use of the drainage hierarchy; to ground, to watercourse, to a designated surface water system. New or increased surface water discharges to the combined sewerage network should be strongly discouraged and go against the Objectives named above.	Comments noted.	Comments will be considered as part of the local plan process.
FP28.1	021	Government/ Public Body	Green/blue links that allow people to cycle or walk easier locally. Local centres that can be used as libraries, and community meeting places etc.	Preferences acknowledged.	Comments will be considered as part of the local plan process.
FP28.1	026	Government/ Public Body	From an education perspective we would deem education infrastructure to be a high priority. Effective provision of sufficient places at local schools to mitigate the impact of any development is fundamental to successful delivery of the local plan. The level of education infrastructure needed will depend on the number and location of homes proposed. Large developments or a cluster of smaller developments in one locality delivering around 650 dwellings or more may trigger the need for a new primary school.	Comments noted.	Comments will be considered as part of the local plan process.

			Easy access to education has a positive impact on local communities, neighbourhoods and families. If school places are unavailable locally this can have transport cost implications.		
FP28.1	028	Resident/ General Public	Transport - this feeds in to net zero plans and also improving the health and wellbeing of Tamworth residents Youth provision - I have a young son and would like to see more support for young people	Preferences acknowledged.	Comments will be considered as part of the local plan process.
FP28.1	044	Government/ Public Body	<p>To integrate Primary Care and improve patient care, multidisciplinary teams dedicated to improving the health and wellbeing of their local communities and tackling health inequalities are working together within primary care networks (PCNs). However, a lack of infrastructure has in some areas held these networks back from achieving more ambitious change.</p> <p>At a national level there is recognition that there are several critical areas where with the right approach, the biggest impacts can be made in creating the environments for local systems to succeed; one of these areas is estates.</p> <p>There is a recognition that a model is required that makes estate a catalyst for integration rather than barrier to it; a lot of primary care estate is acknowledged as not being fit for purpose from those providers who use it. With the continued pressures of housing and population growth, which have not been matched with the requisite capital investment it is clear that capacity and space is a genuine constraint and one which the planning system should and local authority partners should look to prioritise together with other forms of infrastructure which are traditionally considered to support sustainable communities.</p> <p>Locally, work is ongoing in respect of strategic estates planning to understand, plan and deliver the right capacity for local communities but this will require the support of the planning system and cannot be viewed in isolation from matters such as transport, education, leisure and digital infrastructure.</p>	Comments noted. We will look to work with you directly as part of our efforts to deliver appropriate health infrastructure.	Comments will be considered as part of the local plan process, and further collaboration required where necessary.
FP28.1	047	Government/ Public Body	We have already made the points above. Health infrastructure must be afforded greater recognition and priority than it has been hitherto. Infrastructure that genuinely plays into the quality of people's lives at all stages of the life cycle should be given the highest priority.	Comments noted. We will look to work with the relevant parties to deliver appropriate infrastructure.	Comments will be considered as part of the local plan process.

**FP28.2: Which type(s) of infrastructure do you think we should give the lowest priority, and why?**

FP28.2	006	Resident/ General Public	No more highway construction except for service roads for new construction. This is because hard surfaces do not permit natural ground drainage and given that two rivers merge in Tamworth (Anker and Tame) people might be put off buying homes and setting up businesses in Tamworth if the flood risk is high due to poor flood plain management. One has to bear in mind on this point that the FIELD CAPACITY (saturation point) of the soil on the flood plains can easily flood due to the situation brought about by two rivers merging. The levies in Tamworth have to be high enough to accommodate this situation.	Comments noted. We seek to work collaboratively with the relevant authorities to ensure development is sustainable.	Comments will be considered as part of the local plan process.
FP28.2	012	Resident/ General Public	Any more retail infrastructure particularly on industrial allocated sites and green fields.	Comments noted.	Comments will be considered as part of the local plan process.
FP28.2	014	Government/ Public Body	Historic England has no specific comments to make on this issue. A general comment is that any approach would need to consider the historic environment, heritage assets and their setting as part of the Plan process.	Comment noted.	Comments will be considered as part of the local plan process.
FP28.2	047	Government/ Public Body	We have already made the points above. Health infrastructure must be afforded greater recognition and priority than it has been hitherto. Infrastructure that genuinely plays into the quality of people's lives at all stages of the life cycle should be given the highest priority.	Comments noted. We will seek to collaborate with the relevant bodies to deliver appropriate health infrastructure related to development.	Comments will be considered as part of the local plan process.

## Feedback Point 29: Any further comments on infrastructure

Question ID	URN	Respondent Type	Representation	Officer Response	Further Action
<b>FP29: Any further comments on infrastructure</b>					
FP29	014	Government/ Public Body	<p>We are aware that the Council's CIL document was updated in July 2021 and that it refers to exceptional circumstance relief. This is welcomed as the potential for exceptional circumstance relief fits with residential/employment conversion and/or new development schemes relating to heritage asset sites where viability issues may not be apparent until later in the planning process. The current offer in the CIL document provides some reassurance that alternative options may be available e.g. a S106 agreement.</p> <p>We suggest it would be worth considering highlighting heritage as a potential exceptional circumstance within any future refresh of the CIL document to further align it to the emerging Plan's vision for 'celebrating our heritage, creating a better future'.</p>	Comments noted and suggestions welcomed. We will take this into account when CIL is reviewed.	Comments will be considered as part of the local plan process.
FP29	016	Government/ Public Body	We strongly encourage that all developers contact us as early as possible to discuss appropriate drainage strategies for their site. We would recommend the plan makes this expectation clear as to not delay the delivery of the Borough's housing need or to compromise progress towards several of the plans core objectives (discussed in our comments to issue 6.7.2).	Comments noted.	Comments will be considered as part of the local plan process.
FP29	020	Developer/ Agent/ Landowner	Viability is a key issue in determining the soundness of the Local Plan at Examination. Without a robust approach to viability assessment, land will be withheld from the market and housing delivery will be threatened, leading to an unsound Local Plan and housing delivery targets not being met. In plan-making, viability is inseparable from the deliverability of development. The viability of individual developments and plan policies should be tested at the plan making stage. As set out in the NPPF, the contributions expected from development including the level & types of affordable housing provision required and other infrastructure for education, health, transport, flood & water management, open space, digital communication, etc. should be set out in the Local Plan. Development should not be subject to such a scale of obligations that the deliverability of the Local Plan is threatened. Viability assessment should not be	Comments noted. The policies included in the final plan will be subject to an appropriate viability assessment.	Comments will be considered as part of the local plan process.

			conducted on the margins of viability. If the resultant Benchmark Land Value (BLV) is lower than the market value at which land will trade, then the delivery of housing targets will not be met.		
FP29	021	Government/ Public Body	Ensure infrastructure is well designed with green/blue links and robust to meet climate change requirements. Do not build in the flood plain, make sure there is space for natural elements such as trees and shrubs, etc. Where small areas of land are unusable for development, try to provide small parks/open spaces which can be used by and perhaps maintained by local communities.	Comments noted.	Comments will be considered as part of the local plan process.
FP29	026	Government/ Public Body	<p>We will submit a full written response to facilitate our continued close working relationship to help shape a comprehensive and informed local plan.</p> <p>Department for Education guidance 'Securing developer contributions for education, November 2019' states that</p> <p>'It expects local authorities to seek developer contributions towards school places that are created to meet the need arising from housing development.'</p> <p>'Housing development should mitigate its impact on community infrastructure, including schools'</p> <p>'The early delivery of new schools within strategic developments should be supported where it would not undermine the viability of the school, or of existing schools in the area'</p> <p>'Central government basic need grant, the DfE free schools programme and other capital funding do not negate housing developers' responsibility to mitigate the impact of their development on education.'</p> <p>'Given that basic need allocations do not explicitly factor in funding for land acquisition, it is particularly important that education land required within larger development sites is provided at no cost to the local authority...'</p>	Comments noted. We will seek to collaborate with the local education authority to ensure there is appropriate education provision for development.	Comments will be considered as part of the local plan process.
FP29	037	Developer/ Agent/ Landowner	Bellway support the notion of the Local Plan detailing the infrastructure requirements expected of new development, however in line with the Framework the Council should ensure	Comments noted.	Comments will be considered as part of the local plan process.

			that such requirements do not undermine the deliverability of the Local Plan.		
FP29	042	Government/ Public Body	The future Plan should include policy which supports and protects community facilities including cultural facilities from unnecessary loss, in line with paragraph 93 of the NPPF.	Comments noted.	Comments will be considered as part of the local plan process.
FP29	044	Government/ Public Body	Primary healthcare and its associated estate is dynamic in nature and will need to adapt to capacity pressures and the ever-changing healthcare needs of local communities therefore use of S106 as a mechanism for securing appropriate funding for mitigation will continue to be important.	Comments noted. We will seek to collaborate with the relevant bodies to deliver appropriate health infrastructure related to development.	Comments will be considered as part of the local plan process. Further collaboration will be sought where necessary.
FP29	047	Government/ Public Body	As highlighted above we would like to see this consultation and our response as part of continuing engagement. We would be happy to meet or engage in any ongoing infrastructure or implementation arrangements.	Comments noted.	Comments will be considered as part of the local plan process.

# Additional Representations

*The following section contains any miscellaneous representations which do not specifically follow the pattern of questions laid out in the document.*

<b>URN</b>	016
<b>Company/Organisation</b>	Severn Trent
<b>On behalf of</b>	
<b>Sole Representation</b>	
<b>Further Representation</b>	<input checked="" type="checkbox"/> (Please see additional comments in the relevant sections above)

#### Representation

Dear Sir/Madam,

#### **Tamworth Local Plan 2043: Issues and Options Document**

Thank you for the opportunity to comment on your consultation, we have used your provided response template to summarise our comments. Several issues and questions within the consultation are not relevant to us or the services we provide, we have therefore answered these with "N/A". Please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice.

#### **Position Statement**

As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments on the impacts of future developments and to provide advice regarding policy wording on other relevant areas such as water efficiency, Sustainable Drainage Systems (SuDS), biodiversity, and blue green infrastructure. Where more detail is provided on site allocations, we will provide specific comments on the suitability of the site with respect to the water and sewerage network. In the instances where there may be a concern over the capacity of the network, we may look to undertake modelling to better understand the potential risk. For most developments there is unlikely to be an issue connecting. However, where an issue is identified, we will look to discuss in further detail with the Local Planning Authority. Where there is sufficient confidence that a development will go ahead, we will look to complete any necessary improvements to provide additional capacity.

For your information we have set out some general guidelines and relevant policy wording that may be useful to you.

#### **Wastewater Strategy**

We have a duty to provide capacity for new development in the sewerage network and at our Wastewater Treatment Works (WwTW) and to ensure that we protect the environment. On a company level we are producing a Drainage and Wastewater Management Plan covering the next 25 years, which assesses the future pressures on our catchments including the impacts of climate change, new development growth and impermeable area creep. This plan will support future investment in our wastewater infrastructure and encourages collaborative working with other Risk Management Authorities to best manage current and future risks.

Where site allocations are available, we can provide a high-level assessment of the impact on the existing network. Where issues are identified, we will look to undertake hydraulic sewer modelling to better understand the risk and where there is sufficient confidence that a development will be built, we will look to undertake an improvement scheme to provide capacity.

#### **Surface Water**

Management of surface water is an important feature of new development as the increased coverage of impermeable area on a site can increase the rainwater flowing off the site. The introduction of these flows to the public sewerage system can increase the risk of flooding for existing residents. It is therefore vital that surface water flows are managed sustainably, avoiding connections into the foul or combined sewerage system and where possible directed back into the natural water systems. We recommend that the following policy wording is included in your plan to ensure that surface water discharges are connected in accordance with the drainage hierarchy:

#### **Drainage Hierarchy Policy**

*New developments shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, whereby a discharge to the public sewerage system is avoided where possible.*

Supporting Text:

Planning Practice Guidance Paragraph 80 (Reference ID: 7-080-20150323) states:

"Generally the aim should be to discharge surface water run off as high up the following hierarchy of drainage options as reasonably practicable:

- into the ground (infiltration);
- to a surface water body;
- to a surface water sewer, highway drain, or another drainage system;
- to a combined sewer."

#### **Sustainable Drainage Systems (SuDS)**



Sustainable Drainage Systems (SuDS) represent the most effective way of managing surface water flows whilst being adaptable to the impact of climate change and providing wider benefits around water quality, biodiversity, and amenity. We therefore recommend that the following policy wording is included within your plan regarding SuDS:

#### **Sustainable Drainage Systems (SuDS) Policy**

*All major developments shall ensure that Sustainable Drainage Systems (SuDS) for the management of surface water run-off are included, unless proved to be inappropriate.*

*All schemes with the inclusion of SuDS should demonstrate they have considered all four areas of good SuDS design: quantity, quality, amenity and biodiversity.*

*Completed SuDS schemes should be accompanied by a maintenance schedule detailing maintenance boundaries, responsible parties and arrangements to ensure the SuDS are managed in perpetuity.*

Supporting Text: **Document Title [controlled | protect | internal | public]**

Sustainable Drainage Systems (SuDS) should be designed in accordance with current industry best practice, The SuDS Manual, CIRIA (C753), to ensure that the systems deliver both the surface water quantity and the wider benefits, without significantly increasing costs. Good SuDS design can be key for creating a strong sense of place and pride in the community for where they live, work and visit, making the surface water management features as much a part of the development as the buildings and roads.

#### **Blue Green Infrastructure**

We are supportive of the principles of blue green infrastructure and plans that aim to improve biodiversity across our area. Looking after water means looking after nature and the environment too. As a water company we have launched a Great Big Nature Boost Campaign which aims to revive 12,000 acres of land, plant 1.3 million trees and restore 2,000km of rivers across our region by 2027. We also have ambitious plans to revive peat bogs and moorland, to plant wildflower meadows working with the RSPB, National Trust, Moors for the Future Partnership, the Rivers Trust, National Forest and regional Wildlife Trusts and conservation groups.

We want to encourage new development to continue this theme, enhancing biodiversity and ecology links through new development so there is appropriate space for water. To enable planning policy to support the principles of blue green Infrastructure, biodiversity and protecting local green open spaces we recommend the inclusion of the following policies:

#### **Blue and Green Infrastructure Policy**

*Development should where possible create and enhance blue green corridors to protect watercourses and their associated habitats from harm.*

The incorporation of Sustainable Drainage Systems (SuDS) into blue green corridors can help to improve biodiversity, assisting with the wider benefits of utilising SuDS. National Planning Policy Framework (2018) paragraph 170 States:

“Planning policies and Decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their Statutory Status or identified quality in the development plan);
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;”

#### **Green Open Spaces Policy Document Title [controlled | protect | internal | public]**

*Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space.*

Supporting Text:

We understand the need for protecting Green Spaces, however open spaces can provide suitable locations for schemes such as flood alleviation schemes to be delivered without adversely impacting on the primary function of the open space. If the correct scheme is chosen, the flood alleviation schemes can result in additional benefits to the local green space through biodiversity and amenity benefits.

#### **Water Quality and Resources**

Good quality watercourses and groundwater is vital for the provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that the water quality of our supplies are not impacted by our operations or those of others. Any new developments need to ensure that the Environment Agency’s Source Protection Zones (SPZ) and Safeguarding Zone policies which have been adopted by Natural Resources Wales are adhered to. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan as prepared by the Environment Agency.

Every five years we produce a Water Resources Management Plan (WRMP) which focuses on how we plan to ensure there is sufficient supply of water to meet the needs of our customers whilst protecting our environment over the next 25 years. We use housing target data from Local Planning Authorities to plan according to the projected growth rates. New development results in the need for an increase in the amount of water that needs to be supplied across our region. We are committed to doing the right thing and finding new sustainable sources of water, along with removing unsustainable abstractions, reducing leakage from the network and encouraging the uptake of water meters to promote a change in water usage to reduce demand.

New developments have a role to play in protecting water resources, we encourage you to include the following policies:

### **Protection of Water Resources Policy**

*New developments must demonstrate that they will not result in adverse impacts on the quality of waterbodies, groundwater and surface water, will not prevent waterbodies and groundwater from achieving a good status in the future and contribute positively to the environment and ecology. Where development has the potential to directly or indirectly pollute groundwater, a groundwater risk assessment will be needed to support a planning application.*

Supporting Text:

National Planning Policy Framework (July 2018) Paragraph 163 states:

“Planning policies and decisions should contribute to and enhance the natural and local environment... e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should wherever possible, help to improve local environmental conditions such as river basin management plans;”

### **Water Efficiency Policy**

We are supportive of the use of water efficient design of new developments fittings and appliances and encourage the optional higher water efficiency target of 110 litres per person per day within part G of building regulations. Delivering against the optional higher target or better provides wider benefits to the water cycle and environment as a whole. This approach is not only the most sustainable but the most appropriate direction to deliver water efficiency. We would therefore recommend that the following wording is included for the optional higher water efficiency standard:

*New developments should demonstrate that they are water efficient, incorporating water efficiency and re-use measures and that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, not exceeding 110 litres/person/day.*

Supporting Text:

National Planning Policy Framework (July 2018) Paragraph 149 states:

“Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.”

This need for lower water consumption standards for new developments is supported by Government. In December 2018, the Government stated the need to a reduction in Per Capita Consumption (PCC) and issued a call for evidence on future PCC targets in January 2019, with an intention of setting a long term national target. The National Infrastructure Commission (NIC) has already presented a report including recommendations for an average PCC of 118 l/p/d. In Wales, the 110 l/p/d design standard was made mandatory in November 2018. In 2021 the Environment Agency classed the Severn Trent region as Seriously Water Stressed – link.

We recommend that all new developments consider:

- Single flush siphon toilet cistern and those with a flush volume of 4 litres.
- Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.
- Hand wash basin taps with low flow rates of 4 litres per minute or less.
- Water butts for external use in properties with gardens.

### **Water Supply**

For the majority of new developments, we do not anticipate issues connecting new development, particularly within urban areas of our water supply network. When specific detail of planned development location and sizes are available a site-specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts. If significant development in rural areas is planned, this is more likely to have an impact and require network reinforcements to accommodate greater demands.

### **Developer Enquiries**

When there is more detail available on site-specific developments, we encourage developers to get in contact with Severn Trent at an early stage in planning to ensure that there is sufficient time for a development site to be assessed and if network reinforcements are required that there is time to develop an appropriate scheme to address the issues. We therefore encourage

developers to contact us, details of how to submit a Developer Enquiry can be found here - <https://www.stwater.co.uk/building-and-developing/new-site-developments/developer-enquiries/>

We hope that this information has been useful to you and we look forward to hearing from you in the near future.

<b>Officer Response</b>	<b>Further Action</b>
Comments noted.	Comments will be considered as part of the local plan process. We will seek further consultation with Severn Trent where necessary as the new plan progresses.

<b>URN</b>	017
<b>Company/Organisation</b>	Birmingham City Council
<b>On behalf of</b>	
<b>Sole Representation</b>	<input checked="" type="checkbox"/>
<b>Further Representation</b>	

#### Representation

Dear Development Plan Team,

#### **Tamworth Council Local Plan 2043 – Issues and Options consultation September 2022**

Thank you for consulting Birmingham City Council on the Issues and Options document for the Tamworth Local Plan 2043.

The City Council welcomes the opportunity to comment on the Local Plan as well as for the continued close working and dialogue with Tamworth Council and other local authorities within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) as part of Duty to Cooperate arrangements.

#### Unmet housing needs from the wider housing market area.

The 14 local authorities that comprise the Greater Birmingham and Black Country Housing Market Area GBBCHMA, including Tamworth, have had a history working together in recent years to regularly update housing land supply capacity across the whole HMA as well as identify possible solutions and areas of search which could be further explored within individual Local Plan reviews across the HMA area. This has come about as result of the significant housing shortfall identified in Birmingham during the adoption of the Birmingham Development Plan in 2017 and, whilst some of this shortfall has been accommodated, further shortfalls in both housing and employment land have subsequently been identified in the Black Country.

Birmingham City Council is also consulting at present on Issues and Options for the Birmingham Local Plan (2042) which, once adopted, will replace the Birmingham Development Plan. Early evidence work has identified further potential shortfalls in housing of around 78,500 homes. This will add significantly to the existing shortfalls identified within the Black Country in their evidence work for the Black Country Plan (notwithstanding the fact that the Black Country authorities are now progressing individual plans). In addition, evidence for both plans have also identified shortfalls in employment land provision. It is therefore important that the 14 local authorities that comprise the HMA continue to work together to identify possible solutions and areas of search which could be further explored within individual Local Plan reviews across the HMA area.

#### Tamworth Local Plan 2043 Issues and Options

Birmingham City Council is supportive of the approach taken in the Tamworth Local Plan Issues and Options document. The main strategic comment we wish to make at this stage relates to Section 6.2 (New and Affordable Homes). Given the strategic issues highlighted above, particularly the shortfalls identified within Birmingham and the Black Country, the City Council is keen to ensure that all options concerning housing and employment provision have been considered in Local Plans across the GBBCHMA. It is recognised that Tamworth itself has also experienced issues in accommodating its own housing needs in the current local Plan which were met, in the main, in Lichfield and North Warwickshire and this is acknowledged in the Issues and Options document (Section 6.2.1).

Option 6.2 (a) ii relates to the use of a higher figure than the Standard Method figure for the provision of new homes and gives three ways in which this higher figure could be informed. However, reference has not been made within this option to potential and existing housing shortfalls experienced elsewhere within the HMA and this will need to be explored in accordance with the NPPF (paragraph 61). It is appreciated that this may not be possible given that Tamworth Council has experienced difficulties in accommodating its own housing need during the preparation of the current local plan as highlighted above. Nevertheless, evidence that this issue has been explored must be explicitly demonstrated within the evidence base and acknowledged in the production of the Plan going forward (particularly by the time the Local Plan has reached its next stage).

I trust that these comments are helpful. Birmingham City Council looks forward to continued engagement with Tamworth through Duty to Cooperate arrangements. If you require any further information or input from Birmingham City Council in support of your approach to the Local Plan Review, please do not hesitate to contact us.

<b>Officer Response</b>	<b>Further Action</b>
The comments in relation to taking account of existing shortfalls experienced elsewhere within the HMA are noted. Given the previous unmet need within Tamworth and the increasingly limited land availability within the borough, this is unlikely to have any significant impact on the overall housing need figure. However, to ensure compliance with national planning policy and cooperation with the wider HMA, this will be considered as part of the process.	Comments will be considered as part of the local plan process.

<b>URN</b>	018
<b>Company/Organisation</b>	Planning Issues
<b>On behalf of</b>	Churchill Retirement Living
<b>Sole Representation</b>	
<b>Further Representation</b>	<input checked="" type="checkbox"/> (Please see additional comments in the relevant sections above)

#### Representation

Dear Sirs,

CHURCHILL RETIREMENT LIVING  
 RESPONSE TO THE TAMWORTH LOCAL PLAN 2043 – ISSUES & OPTIONS CONSULTATION.

Thank you for the opportunity to comment on the consultation papers for the aforementioned document. Churchill Retirement Living is an independent developer of retirement housing for sale to the elderly. Please find below our comments on the Issues and Options consultation, which specifically address the need for specialist housing for the elderly.

#### National Policy Context

Government's policy, as set out in the revised NPPF, is to boost significantly, the supply of housing. Paragraph 60 reads:

*"To support the Government's objectives of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."*

The revised NPPF looks at delivering a sufficient supply of homes, Paragraph 62 identifies within this context, the size, and type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies including older people.

In June 2019 the PPG was updated to include a section on Housing for Older and Disabled People, recognising the need to provide housing for older people. Paragraph 001 states:

*"The need to provide housing for older people is **critical**. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; **by mid-2041 this is projected to double to 3.2 million**. Offering older people a better choice of accommodation to suit their changing needs can help **them live independently longer, feel more connected to their communities and help reduce costs to the social care and health systems**. Therefore, an understanding of how the ageing population affects housing needs is **something to be considered from the early stages of plan-making through to decision-taking**" (emphasis added).*

Paragraph 003 recognises that

*"the health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptive general needs housing to specialist housing with high levels of care and support".*

Thus a range of provision needs to be planned for. Paragraph 006 sets out

*"plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require."*

Therefore, recognising that housing for older people has its own requirements and cannot be successfully considered against criteria for general family housing.

#### Need for Older Persons' Housing

It is well documented that the UK faces an ageing population. Life expectancy is greater than it used to be and as set out above by 2032 the number of people in the UK aged over 80 is set to increase from 3.2 million to five million (ONS mid 2018 population estimates).

The Homes for Later Living Report notes the need to deliver **30,000 retirement and extra care houses a year** in the UK to keep pace with demand (September 2019).

The age profile of the Council can be drawn from the 2018 population projections from the Office for National Statistics which advises that there were 14,366 persons aged 65 and over in 2018, accounting for 18.7% of the total population. This age range is projected to increase by 4,538 individuals, or 32%, to 18,919 between 2018 and 2043. The population aged 65 and over is expected to increase to account for 24.7% of the total population by 2043.

It is therefore clear there will be a significant increase in older people over the Plan Period and the provision of suitable housing and care to meet the needs of this demographic should be a priority of the emerging Local Plan.

#### Benefits of Older Persons' Housing

Older peoples housing produces a large number of significant benefits which can help to reduce the demands exerted on Health and Social Services and other care facilities – not only in terms of the fact that many of the residents remain in better health, both physically and mentally, but also doctors, physiotherapists, community nurses, hairdressers and other essential practitioners can all attend to visit several occupiers at once. This leads to a far more efficient and effective use of public resources.

#### Economic

The report *'Healthier and Happier' An analysis of the fiscal and wellbeing benefits of building more homes for later living* by WPI Strategy for Homes for Later Living explored the significant savings that Government and individuals could expect to make if more older people in the UK could access this type of housing. The analysis showed that:

- Each person living in a home for later living enjoys a reduced risk of health challenges, contributing to fiscal savings to the NHS and social care services of approximately £3,500 per year.
- Building 30,000 more retirement housing dwellings every year for the next 10 years would generate fiscal savings across the NHS and social services of £2.1bn per year.
- On a selection of national well-being criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing to housing specially designed for later living.

**Each person living in a home for later living enjoys a reduced risk of health challenges, contributing fiscal savings to the NHS and social care services of approximately £3,500 per year** (*Homes for Later Living September 2019*). More detail on these financial savings is set out within the report.

A recent report entitled *Silver Saviours for the High Street: How new retirement properties create more local economic value and more local jobs than any other type of residential housing* (February 2021) found that retirement properties create more local economic value and more local jobs than any other type of residential development. For an average 45 unit retirement scheme, the residents generate £550,000 of spending a year, £347,000 of which is spent on the high street, directly contributing to keeping local shops open.

As recognised by the PPG, Retirement housing releases under-occupied family housing and plays a very important role in recycling of housing stock in general. There is a 'knock-on' effect in terms of the whole housing chain enabling more effective use of existing housing. In the absence of choice, older people will stay put in properties that are often unsuitable for them until such a time as they need expensive residential care. A further report *"Chain Reaction" The positive impact of specialist retirement housing on the generational divide and first-time buyers (Aug 2020)* reveals that about two in every three retirement properties built, releases a home suitable for a first time buyer. A typical Homes for Later Living development which consists of 40 apartments therefore results in at least 27 first time buyer properties being released onto the market.

#### Social

Retirement housing gives rise to many social benefits:

- Specifically designed housing for older people offers significant opportunities to enable residents to be as independent as possible in a safe and warm environment. Older homes are typically in a poorer state of repair, are often colder, damper and have more risk of fire and fall hazards. They lack in adaptations such as handrails, wider internal doors, stair lifts and walk in showers. Without these simple features everyday tasks can become harder and harder
- Retirement housing helps to reduce anxieties and worries experienced by many older people living in housing which does not vest suit their needs by providing safety, security and reducing management and maintenance concerns.
- The Housing for Later Living Report (2019) shows that on a selection of wellbeing criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing into housing specifically designed for later living.

#### Environmental

The proposal provides a number of key environmental benefits by:

- Making more efficient use of land thereby reducing the need to use limited land resources for housing.
- Providing housing in close proximity to services and shops which can be easily accessed on foot thereby reducing the need for travel by means which consume energy and create emissions.
- Providing shared facilities for a large number of residents in a single building which makes more efficient use of material and energy resources.
- The proposal includes renewable technology through the use of solar panels to assist in the reduction of CO2 emissions.
- All areas of the building will be lit using low energy lighting and where applicable utilise daylight and movement sensor controls.

#### Recommendations

Given all these factors and the guidance of the PPG, we consider that the best approach towards meeting the diverse housing needs of older people is **for the Local Plan to give the earliest consideration towards how best to meet these needs and to include a standalone policy in this respect.** Such policies should encourage the delivery of specialist forms of accommodation for older people and not be criteria led. Developers should not be required to demonstrate need given the many benefits that such developments bring and if a quantum is specified this should be regarded as a target and not a ceiling. Given also that such developments **“help reduce costs to the social care and health systems”** (PPG refers), requirements to assess impact on healthcare services and/or make contributions should be avoided.

While we appreciate that no one planning approach will be appropriate for all areas, an example policy is provided that, we hope, will provide a useful reference for the Council.

**“The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations.**

**The Council aims to ensure that older people are able to secure and sustain independence in a home appropriate to their circumstances by providing appropriate housing choice, particularly retirement housing and Extra Care Housing/Housing with Care. The Council will, through the identification of sites, allowing for windfall developments, and/or granting of planning consents in suitable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities.”**

We would respectfully remind the Council of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that “The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan” (Paragraph: 002 Reference ID: 10-002-20190509).

The evidence underpinning the Council’s planning obligations and building requirements should therefore be robust.

We would also like to respectfully remind the Council that the viability of specialist older persons’ housing is more finely balanced than ‘general needs’ housing and the respondents are strongly of the view that these housing typologies should be robustly assessed in the forthcoming Local Plan Viability Assessment. This would accord with the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG which states that “A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period. If this is not done, the delivery of much needed specialised housing for older people may be significantly delayed with protracted arguments about failure to meet affordable housing policy requirements which are wholly inappropriate when considering such housing.

<b>Officer Response</b>	<b>Further Action</b>
Comments noted. As part of the local plan process, further work will be undertaken to establish the specifics of our housing need, including provision for the elderly.	Comments will be considered as part of the local plan process. Further work will be commissioned to establish the specifics of our housing need.

<b>URN</b>	021
<b>Company/Organisation</b>	Staffordshire County Council Environment and Countryside
<b>On behalf of</b>	
<b>Sole Representation</b>	
<b>Further Representation</b>	<input checked="" type="checkbox"/> (Please see additional comments in the relevant sections above)
<b>Representation</b>	
<b>Public Rights of Way</b>	
<p>The plan doesn't really contain any information about public rights of way other than in Objective 8 (<i>Encourage active and healthier lifestyles by providing accessible green and blue linkages and open spaces, as well as formal indoor and outdoor recreation facilities</i>) and Objective 9 (<i>Promote sustainable transport modes for all journeys through improving walking, cycling, public transport and electric vehicle facilities</i>).</p> <p>Ultimately the actions resulting from the Plan need to aspire to improve accessibility on the walking, cycling and horse riding networks throughout the District.</p> <p>The Plan mentions the need to increase the level of housebuilding and new developments should seek to improve non-vehicular public access to the wider path network. It is essential that the plan should strive to increase the levels of physical activity and the public rights of way network should be integral to any schemes that are developed to promote this.</p> <p>Because of the high level nature of the Plan it does not recognise that any development needs to take appropriate mitigation to ensure the public path network is protected. If amendments to the path network are required to allow development to take place then these Orders need to be processed through the District Council before construction begins. The County Council should always be consulted in such cases. In relation to such development the planning authority need to be reminded that there are likely to be many non-definitive routes across proposed development sites which should be considered by any applicants. In many cases these routes could have become rights of way by virtue of established usage over many years and should be treated as public. There will also be sites where such usage or historic evidence has already resulted in applications being made to the County Council under Section 53 of the Wildlife and Countryside Act 1981 to add or modify the Definitive Map of Public Rights of Way, which affects the land in question.</p> <p>I would add that if any development is likely to affect the path network, either directly or indirectly, then we would expect Tamworth Borough Council to use section 106 funding and/or appropriate planning conditions improve the path network, through liaison with ourselves, at that time. This could be situations where housing development is likely to lead to a rise in usage of the network in the vicinity of the development.</p> <p>Applicants should be encouraged to enhance the existing path network where possible in line with Staffordshire County Council's Rights of Way Improvement Plan. This could include:</p> <ul style="list-style-type: none"> <li>the creation of public bridleways or the upgrading of public footpaths to bridleways to improve provision for horse riders and cyclists across Staffordshire where there is currently a shortfall in available access routes.</li> <li>the creation and promotion of short circular walks to promote the health benefits of walking</li> <li>the replacement of stiles with gaps (where there are no stock) or gates (where there are) in line with Staffordshire County Council's Least Restrictive Principle for path furniture</li> </ul> <p>The County Council expects to be consulted on any submitted applications in due course and is able to provide further advice and guidance as and when required.</p>	
<b>Officer Response</b>	<b>Further Action</b>
Many of the comments relate to the process of determining planning applications and will be taken into account where relevant when developing detailed development management policies for the new plan. The Council will seek to work with relevant bodies to provide appropriate infrastructure to support the new plan including the provision or upgrade of rights of way where these would help to support the sustainable development of Tamworth.	Comments will be considered as part of the local plan process.



<b>URN</b>	022
<b>Company/Organisation</b>	South Staffordshire Council
<b>On behalf of</b>	
<b>Sole Representation</b>	<input checked="" type="checkbox"/>
<b>Further Representation</b>	

#### Representation

Dear Sir/Madam,

South Staffordshire welcomes the opportunity to submit comments at this early stage of the plan preparation process of the Tamworth Borough Council (TBC) Local Plan 2043. The Council supports the decision to commit to the production of a new plan to reflect the changed planning context since the current plan was adopted.

The range of topics identified in the Issues and Options document does appear to broadly reflect the range of challenges and opportunities which need to be addressed by the new local plan. We would however welcome inclusion of references to the issues confronting the wider strategic context within which the Borough is situated, most notably the housing supply issues in the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). There is a significant emerging housing land supply shortfall emanating from the Black Country authorities of around 28,000 homes. Furthermore, the shortfall across the GBBCHMA appears to have recently increased substantially with the publication of Birmingham City Council's Issues and Options consultation which has indicated a housing land shortfall in their area of around 78,000 homes. As TBC will be aware, a Statement of Common Ground (SoCG) across the GBBCHMA has been drafted and is currently going through authorities' respective agreement processes for signing. This SoCG sets a framework for potential future workstreams and governance arrangements for the GBBCHMA authorities for considering housing shortfalls moving forward. South Staffordshire Council encourages TBC to be an active participant in this work and have regard to it in the formulation of its Local Plan where appropriate.

South Staffordshire Council has recently published an updated Gypsy and Traveller Assessment which has identified a need for 121 pitches during the plan period to 2039. South Staffordshire Council wrote to TBC (and other GBBCHMA and neighbouring authorities) in August 2022 where we set out that we had only identified a supply of 37 pitches to allocate against a 5-year requirement of 72 pitches. In the letter we set out the steps we had taken to explore supply options including exploring options in the Green Belt, options on publicly owned land, and options for new pitches as part of proposed housing allocations. We understand that as you are at the beginning of your plans preparation there will still be a lot of evidence to prepare and consider including relating to your gypsy and traveller needs. South Staffordshire Council therefore request as part of your plan formulation and evidence gathering that you consider if there is a supply of suitable new public sites in Tamworth Borough that could contribute towards meeting a proportion of South Staffordshire's unmet needs for pitches, and that in doing this, you explore the same broad options (e.g Green Belt options, land in public ownership, opportunities within wider site allocations etc) that South Staffordshire Council has so we can be satisfied that our Duty to Cooperate partners are taking a consistent approach to exploring pitch options. Furthermore, given the strategic nature of the A5 corridor which acts as a key route for gypsy and traveller families, South Staffordshire Council would in principle support to the consideration of a joint study in the future to consider gypsy and traveller needs and supply options across a wider geography of A5 authorities, that could include both South Staffordshire district and Tamworth borough.

#### Officer Response

The comments in relation to existing shortfalls experienced elsewhere within the HMA are noted. Given the previous unmet need within Tamworth and the increasingly limited land availability within the borough, this is unlikely to have any significant impact on the overall housing need figure. However, to ensure compliance with national planning policy and cooperation with the wider HMA, this will be considered as part of the process.

The comments relating to Gypsy and Traveller accommodation are also noted. An accommodation assessment was carried out in 2019 that did not identify any demand for accommodation within Tamworth at the time. This evidence will be reviewed during the development of the new plan and updated if required. Opportunities to assist South Staffordshire can be considered at that point if appropriate.

#### Further Action

Comments will be considered as part of the local plan process. Opportunities for collaborating on joint evidence to support the development of the plan will be considered at the appropriate time.

<b>URN</b>	023
<b>Company/Organisation</b>	National Highways
<b>On behalf of</b>	
<b>Sole Representation</b>	<input checked="" type="checkbox"/>
<b>Further Representation</b>	

#### Representation

Dear Development Plan Team,

#### **Tamworth Borough Local Plan 2043 – Issues and Options Consultation Document**

National Highways welcomes the opportunity to comment on the Tamworth Borough Council Local Plan 2043 Issues And Options Consultation document dated September 2022.

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. With regard to this consultation, our principal interest is in safeguarding the A5, which routes through the plan area and the M42, which routes to the east of Tamworth.<sup>2</sup>

In responding to Local Plan consultations we have regard to DfT Circular 02/2013 -Strategic road network and the delivery of sustainable development ('the Circular') which sets out how interactions with the SRN should be considered in the making of local plans. Paragraph 16 of the Circular sets out that:

*“Through the production of Local Plans, development should be promoted at locations that are or can be made sustainable, that allow for uptake of sustainable transport modes and support wider social and health objectives, and which support existing business sectors as well as enabling new growth.”*

In addition to the Circular, the response set out below is also in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.

Following our review, we note that Tamworth Borough Council is in the early stages of developing their new Local Plan. In relation to the objectives outlined in the document, National Highways interests relate to Objective 3: supply high quality and affordable homes to meet the needs of all sections of our community and Objective 4: support the existing local economy whilst being flexible enough to respond positively to new economic opportunities.

We understand that in terms of housing supply the Standard Method calculates that 2,961 new dwellings are required in the plan area by 2043. We acknowledge that this figure is considered as a starting point and is therefore likely to change during the plan making process. It is also understood that the Housing and Economic Development Needs Assessment (HEDNA) assesses the amount of employment land required in Tamworth. We note that this process is yet to be completed. Furthermore, we note that the plan proposes a total floorspace of 33,900sqm for employment uses including Class E, B1c/B2 and B8.

National Highways is interested in the location of allocated sites to assess potential impacts on the SRN. It should be noted that any potential sites identified which are anticipated to have an impact on the SRN in the area should be subject to consultation with National Highways, and appropriately assessed in line with the Circular to determine the extent of their potential impacts on the SRN in the area. Further to this, the cumulative impact of proposed site allocations also needs to be undertaken in line with the Circular to understand the likely traffic impacts on the SRN in the area in terms of capacity and safety, and identifying any possible mitigation measures (if required).

National Highways welcomes the inclusion of Objective 9: promote sustainable transport modes for all journeys through improving walking, cycling, public transport and electric vehicle facilities.

At this time, National Highways has no further comments to provide. However, we trust that the above is useful and we welcome further engagement on the Tamworth Borough Council Local Plan 2043 as it progresses.

If you require any clarification, please do not hesitate to get in contact.

<b>Officer Response</b>	<b>Further Action</b>
Comments noted. As noted, we will be commissioning a new Housing and Economic Development Needs Assessment (HEDNA) to inform our housing and economic development decisions.	Comments will be considered as part of the local plan process. This will include further work to commission a new HEDNA, with the associated figures updated if necessary. Looking forward, we will seek further consultation at the necessary stages of the local plan.

<b>URN</b>	024
<b>Company/Organisation</b>	Canal and River Trust
<b>On behalf of</b>	
<b>Sole Representation</b>	<input checked="" type="checkbox"/>
<b>Further Representation</b>	

## Representation

Dear Tamworth Borough Council

### Consultation on the Tamworth Borough Local Plan Issues and Options Consultation

Thank you for consulting the Canal and River Trust on the Local Plan Issues and Options.

We are the charity who look after and bring to life 2000 miles of canals and rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a statutory consultee in the Development Management process.

Within Tamworth Borough the Trust owns, operates and is Navigation Authority for some 10km of the Coventry Canal. The Trust considers that the canal network within the Borough has the potential to contribute positively towards delivering many of the aims set out in the vision and objectives identified in Section 5 of the consultation document.

The canal network is a multi-functional resource which can help to stimulate regional, sub-regional and local economies and can be used successfully as a tool in improving community health and wellbeing; in attracting and generating investment; in place-making and place-shaping; and in delivering wider public benefit.

The canal within the Borough is an important part of the industrial heritage of the area and provides an attraction that also contributes to the local tourist and visitor economy. Canal towpaths offer a sustainable, traffic-free route for walkers and cyclists, both for commuting and for leisure and recreation and thus contribute towards reducing reliance on private motor cars to access services and facilities and also encouraging healthier lifestyles and improving the overall health and wellbeing of local communities. The canal also forms a strategic green/blue infrastructure corridor and a valuable wildlife habitat which links urban and rural areas.

### Climate Change and Biodiversity

6.1- Climate Change and Biodiversity includes the aim of protecting and enhancing biodiversity assets. The Trust considers that the value of the canal network in the Borough as a wildlife habitat should be acknowledged and policies should seek to ensure that new development adjacent or nearby avoids harming this value and wherever possible enhances it.

The canal network can assist in providing a sustainable drainage option for adjacent new developments; the canal can often (subject to a feasibility assessment) accept surface water discharges from new developments. Water levels in Canals can be controlled to minimise the risk of overtopping and can thus help minimise the risk of flooding of adjacent land. The Trust is not a land drainage authority and discharges to our waterways are not granted as of right – where they are granted, they will be subject to completion of a commercial agreement. However, developers should be encouraged to investigate the feasibility of this option with the Trust at an early stage to ensure a sustainable approach to the discharge of surface water.

Canals can further assist in addressing the effects of climate change. For example, canal water can be used in heating and cooling systems in both existing buildings and new developments adjacent to them. Encouraging people to make greater use of canal towpaths as an active travel option for walking or cycling helps to reduce emissions generated by using vehicles.

### Heritage

6.5. Heritage sets out the objective of protecting and enhancing the heritage of the Borough. The canal is an important reminder of the industrial heritage of the area, and a number of associated buildings and structures such as canal bridges, are listed for their historic interest. The canal network is also a prime example of a historic asset that is widely used, and a major aspect of its value is that it is both useable and accessible, for boaters and towpath users, as a piece of working heritage. Much of the form and character of the surrounding urban area has historic links to the canal network, and the significant role is played in bringing raw materials in and transporting finished goods out.

The canal network is an important feature in helping to understand how the area has grown and evolved over the last 200 years and as such it should be protected and enhanced. However, as an example of working heritage which is free to access and remains widely used, the canal can act as a catalyst for regeneration and new development proposals as well as contributing to the local economy as an important visitor attraction in its own right, as well as providing links to other visitor destinations and attractions in the locality. Appropriate and sensitive development can help to enhance this role and encourage more visitors to the area by making it an attractive environment for boaters choosing to travel along this part of the canal network. Provision of facilities and links to other attractions can encourage boaters to break their journey, whether for the day or to moor their boats for overnight stays, in

order to use facilities and to visit other attractions in the locality. To fully realise this potential, it is important to encourage appropriate canalside development and to make provision for boat moorings, as well as improving the connectivity between the canal and the surrounding areas, whilst respecting the value of the canal as a heritage asset.

**Open Spaces and Green Infrastructure**

6.6 Open Spaces and Green Infrastructure identifies the objective of encouraging active and healthier lifestyles by, amongst other things, providing green and blue linkages and open spaces. The canal network offers a real opportunity for supporting and promoting healthier lifestyles and helping to improve the physical and mental wellbeing of local communities by encouraging people to be more active. It can play an important role in providing communities with a free to use accessible green space, offering significant benefits to health and wellbeing, whether through recreational and leisure use or as a traffic-free sustainable travelling route for walkers and cyclists to use to access services and facilities or to get to work or school.

In order to fully realise this potential, canal towpaths need to be in good condition, and increased use often leads to increased maintenance liabilities. Where new development is likely to result in an increase in use of the canal towpath, the Trust considers there is a case to consider the improvements that will be needed to the canal infrastructure to achieve this, whether through improving the towpath surface to make it more durable or improving existing, or providing new access points, including facilitating easier access for people with restricted mobility. As a charity, the Trust considers that developers should contribute towards such improvements to our infrastructure to offset the likely increase in maintenance liabilities that will otherwise be incurred. We consider that the Local Plan should identify this as a requirement where new development is likely to lead to increased use of the towpath, whether as a route to access services or facilities or as a recreational resource.

The review of the open spaces in the Borough (6.1.1) should include consideration of blue infrastructure assets such as the canal network and opportunities to enhance the role of the canal as an accessible open space should be identified within the Local Plan.

**Infrastructure**

6.7 Infrastructure notes the importance of ensuring that appropriate infrastructure is in place to support new development within the Borough.

The Trust considers that the Council should consider including improvements to the canal towpath within its Infrastructure Delivery Plan. The canal can play an important role in providing communities with an accessible green space, offering significant benefits to health and well-being, whether through recreational and leisure use or as a traffic-free sustainable travelling route for walkers and cyclists to use to access services and facilities or to get to work or school.

In order to fully realise this potential, the canal towpath needs to be in good condition, and increased use often leads to increased maintenance liabilities. Where new development is likely to result in an increase in use of the canal towpath, the Trust considers there is a case to consider the improvements that will be needed to the canal infrastructure to achieve this, whether through improving the towpath surface to make it more durable or improving existing, or providing new access points, including facilitating easier access for people with restricted mobility. As a charity, the Trust considers that developers should contribute towards such improvements to our infrastructure to offset the likely increase in maintenance liabilities that will otherwise be incurred.

The Trust would welcome the opportunity to work with the Council to identify the nature and extent of the improvements required to our infrastructure in order to help make new developments more sustainable and to contribute towards achieving healthy and active communities.

Please do not hesitate to contact me with any queries you may have.

Officer Response	Further Action
Comments noted and suggestions welcomed. As part of the local plan process, we will be reviewing our Infrastructure Delivery Plan. Where enhancements to existing towpaths could help achieve the sustainability goals of the new local plan, these could be considered as part of the infrastructure requirements of the plan.	Comments will be considered as part of the local plan process.

<b>URN</b>	031
<b>Company/Organisation</b>	Environment Agency
<b>On behalf of</b>	
<b>Sole Representation</b>	<input checked="" type="checkbox"/>
<b>Further Representation</b>	

## Representation

Dear The Team

### Local Plan 2043 Issues and Options

Thank you for referring the above consultation which was received on 31 September 2022.

#### River Basin Management Planning

River basin management plans (RBMPs) set the legally binding locally specific environmental objectives that underpin water regulation (such as permitting) and planning activities. They provide a stable planning base for economic development.

The plans are the foundation for delivering the government's 25 Year Environment Plan 'clean and plentiful water' goal. In preparation for the publication of the Environment Improvement Plan in 2023, the Department for Environment, Food and Rural affairs, Natural England and the Environment Agency have been assessing the use of new interventions to further improve the water environment.

Water is critical to all aspects of life. Pressure comes from all our activities and is exacerbated by population growth and climate change. Left unchecked we will see a deterioration from 14% of waters at good ecological status to 6% by 2027 unless current interventions are maintained and new interventions introduced to halt further decline. All of society from individuals to organisations and sectors (interactions with energy, food, and waste for example) have a role to play in securing and improving our shared water environment. RBMPs provide the foundation for this work.

The Environment Agency has published River Basin Management Plans (RBMPs) that identify measures that will achieve WFD requirements for all water bodies in England and Wales. Regulation 17 of the Water Environment (WFD)(England & Wales) Regulations 2003 places a duty on each public body including local planning authorities to '*have regard to*' RBMPs. The plan for your district is [the Humber RBMP](#)

Successful implementation of the Water Framework Directive will help to protect all elements of the water cycle and enhance the quality of our groundwaters, rivers, lakes, estuaries and seas. We would expect therefore for the Humber RBMP to be integrated into your Local Plan, and reflected in many of the policies your draft which relate to flooding, drainage, rivers, ecology and contaminated land.

In October 2022 we made a proposed update to the current 2015 plans. Once approved, the updated plans will be published. The Humber River Basin Management Plan 2015 is still the plan in place for your district until these updates are published.

We recommend the following guidance, which provides advice on how Local Authorities can fulfill their duties in implementing this directive. Please pass on to any other colleagues you feel may benefit from this (including those outside planning). A list is included within the document stating which LPA roles may have a role to play with regards to this.

[http://www.sustainabilitywestmidlands.org.uk//media/resources/Final\\_Executive\\_Summary\\_June\\_2012.pdf](http://www.sustainabilitywestmidlands.org.uk//media/resources/Final_Executive_Summary_June_2012.pdf)

The following issues all fall under the banner of WFD-implementation in some way and should therefore be addressed within your policies and growth proposals.

#### Foul Drainage

All the sewage treatment works serving your district drain to watercourses that are currently failing to meet the requirements of WFD, however assessment would be required to determine how much of a role each of the listed STWs play.

This should be looked at in further detail as part of a **Water Cycle Study** in order to inform the choices on levels of growth and distribution within your district.

This should demonstrate that the necessary foul drainage infrastructure is in place or viable for your allocated sites. Some areas may drain to the foul main sewer system to be treated by Severn Trent Water, but the transmission infrastructure or treatment facility may not be sufficient to handle the additional load created from growth and may in turn cause a pollution of the water environment.

Where growth will be putting additional pressure on the Severn Trent Water foul mains, it must be demonstrated there will be no significant deterioration in current spill frequency/volume from storm related discharges (CSOs, storm tanks, pumping stations) as a result of any growth. This will require hydraulic modelling from Severn Trent Water (STWL) to demonstrate no risk of deterioration.

There is the assumption that all allocations will drain to the foul main sewer, however where the main sewer is not available for small or windfall sites it must be ensured that the water environment has the ability to accommodate discharges from packaged treatment plants and other non-mains solutions. This should be looked at within the WCS and be addressed via policy requirements.

#### Water Availability

Through joint working on your Local Plan the Environment Agency are looking to ensure the following is achieved over the lifetime of your plan within the district:

- Enough water for people and the environment, taking into account a changing climate.
- Safe, secure water supplies used efficiently to meet the needs of the public, business and the environment.
- Water recognised and protected as a precious resource.
- Water efficiency in new buildings encouraged to reduce water use and cut domestic carbon emissions and those from the treatment of water.
- Protection and management of surface water, including the use of sustainable drainage systems (SUDS), where appropriate.
- Consideration given to the water environment at the catchment scale, so that local planning achieves effective planning for water and development. This should be supported by partnership working with utility companies and other agencies.

Projected water availability should take account of the impact of a changing climate. Water companies hold information and data to help with this and LPAs should work closely with water companies when they are producing their Local Plans. This information should be reflected in the Sustainability Appraisal of the Local Plan.

Evidence will need to be provided to demonstrate that adequate water can be made available to support the level and distribution of growth proposed. The Local Plan and major developments should identify and plan for the required levels of water efficiency and water supply infrastructure to support growth, taking into account costs and timings / phasing of development. In light of this we recommend a **Water Cycle Study** is undertaken to support your plan and inform your Infrastructure Delivery Plan.

In July 2021, following a consultation exercise, the Secretary of State has determined that Severn Trent Water (except their Chester zone) is now considered to be in area of 'serious water stress' for the purposes of water resources planning. This change in water stress classification means that water usage should be restricted to 110 litres per person per day. It should be highlighted however, that this requirement is a minimum only and developments that choose to go beyond this should be supported by the plan. Further limiting water consumption and encouraging re-use would provide additional benefits in relation to managing the pressures of climate change.

We publish licensing strategies which set out water availability. [Tame, Anker and Mease abstraction licensing strategy - GOV.UK \(www.gov.uk\)](#) applies to your district. Your authority should consider these strategies and reflect them in your water cycle study.

#### River Channels

Green/blue corridors provide multiple benefits to residential areas by providing services such as flood management provision, green space and ecological function and some amenity. Consequently they then need to be afforded a high level of protection (8m minimum standoff) from encroaching developments in order to facilitate their function particularly with the need for extra capacity due to climate change. This should be considered when assessing the capacity of sites that have a watercourse within or along the boundary.

Green Infrastructure offers carbon sequestration, air temperature cooling, reduces heating, and windspeeds, and soaks up rain so reducing flood risk, supports habitat connectivity and diversity as well as recreational, educational and wellbeing opportunities. There are also natural flood management opportunities utilising smaller watercourses to protect downstream developments. New and existing developments will require access to greenspace. Conversely there is a risk from colonisation by invasive non-natural species and also the establishment of new pathogens such as ash dieback, Crayfish Plague and harmful invertebrates such as the "Killer Shrimp". Hence greenspaces and waterbodies will require ongoing monitoring and interventions where necessary.

Deculverting of watercourses should be a standard policy primarily because it reduces flood risk and creates new ecological habitat (or recreates lost habitat). This will also allow more space to be freed up by for development because new development over culverts is not permitted and would need to remain undeveloped and open, and it can also reduce long-term management implications of the culvert. The new watercourse can be diverted to increase total length around the edge of developments which can provide extra flood event capacity and improve development layout.

If green spaces can be designed to be less formal areas with more semi-natural habitats this will reduce maintenance costs and provide better biodiversity and water management potential. This can also be incorporated into the surface water management of the site.

#### Groundwater Protection

Please note these comments relate solely to the protection of 'Controlled Waters', comments on the impact of contaminated land on human health should be directed to your Environmental Health team.

The vast majority of the area identified under the Local Plan covered by Tamworth is underlain by geological strata designated as Principle and Secondary Aquifers under the Environment Agency's 'Groundwater Protection: Principles and Practice' document. Several Source Protection Zones have been designated within the borough to protect Public Water Supply groundwater abstractions.

Groundwater in the underlying Principle and Secondary Aquifers and surface watercourses are 'Controlled Waters' and potential receptors of any land contamination which may be present within the borough. Therefore there is a need to give appropriate consideration to the protection of 'Controlled Waters' receptors during the development process. Such consideration is particularly required in relation to the redevelopment of brownfield sites where past activities may have caused land contamination but is also relevant when considering the future location of potentially polluting activities (e.g. the storage of fuels, oils and chemicals).

We note the presence of several historic landfills in the area covered by the Local Plan. In order to address any issues associated with the redevelopment of this type of brownfield land, suitable site investigation and risk assessment will need to be undertaken in relation to 'Controlled Waters' receptors as recommended in planning policy guidance. Normally, this risk can be managed at planning application stage, however you should be aware when allocating sites that the degree of underlying contamination (and associated cost of remediation) may be a factor in the deliverability of allocated sites and as such it may be prudent in some cases to consider undertaking assessment of these risks at the strategic stage.

Government Policy, as detailed in the National Planning Policy Framework (paragraph 120), states that *'where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner'*.

The plan proposals should be in line with the position statements in our 'Groundwater Protection: Principles and Practice' (GP3) document, available from our website at [www.environment-agency.gov.uk](http://www.environment-agency.gov.uk). This document sets out our position on a wide range of activities and developments, including:

1. Storage of pollutants and hazardous substances
2. Solid waste management
3. Discharge of liquid effluents into the ground (including site drainage)
4. Management of groundwater resources
5. Land contamination
6. Ground source heat pumps

It should be noted that certain high risk activities (e.g. underground and sub-water table storage of fuel) may not be appropriate within high risk areas such as Source Protection Zones.

#### Flood Risk

Flood risk is a key local issue as well as a cross-boundary issue and as such should be addressed by the inclusion of a specific flood risk policy to cover all types of flooding.

An up to date Strategic Flood Risk Assessment (SFRA) should be undertaken as a way to better understand the flood risk within your district and to support your growth proposals in managing flood risk sustainably. A Level 2 SFRA will also be required where sites are allocated within the mapped floodplain to demonstrate that the site proposals can be delivered safely. Site allocations at risk of flooding should be supported by evidence to demonstrate that the Sequential Test and Exception Test have been passed. We recommend that funds are set aside at this early stage to commission consultants to undertake a detailed Level 2 SFRA if necessary.

Any new development or works that take place should have a positive effect on flood risk and the conveyance of water. Opportunities to reduce flood risk should be explored in all new development proposals and ensure designs are appropriately flood resistant and resilient.

Where sites are at least partially affected by mapped floodplain. Design and layout should steer development away from these Flood Zones in line with the NPPF, and informed by a Level 2 SFRA. Where detailed modelling has not been run for the latest climate change scenarios consideration should be given to undertaking such work as part of the SFRA process.

In all locations, further assessment should be undertaken to determine whether there is flood risk elsewhere in the catchment which would benefit from being reduced as part of the development, and also whether there may be opportunities to provide that betterment as part of the scheme or not.

Development should maintain at least an 8 metre easement between all built development and the top of the bank of watercourses and the toe of flood defences to allow for maintenance and inspection requirements. The Environment Agency strongly encourages greater buffers (20m) to be incorporated into policies to allow for access for larger maintenance works, to minimise future impact on flood flow routes, and to account of the natural movement of watercourses during a development's lifetime. In addition, as the

frequency and severity of flooding is set to increase due to the impacts of climate change, this brings increased maintenance requirements of watercourses and flood defences. Developments should, where possible naturalise urban watercourses (by reinstating a natural, sinuous river channel and restoring the functional floodplain) and open up underground culverts, to provide biodiversity net gain as well as amenity improvements

#### *Surface Water*

There are many areas in the Tamworth area at risk of flooding from surface water. This risk is likely to increase as a result of climate change.

The Lead Local Flood Authority should be consulted regarding surface water issues and suitable measures to deal with surface water arising from development proposals required to minimise the impact to and from new development.

#### *Flood Defences*

There are Environment Agency maintained flood defences in Tamworth. In order to ensure that the appropriate level of protection these defences provide is maintained in future, we need to ensure we can safely access these areas in order to inspect and carry out works. It is therefore important that any proposed development is set back at least 8 metres from any flood defence for this purpose.

It should be recognised that even in defended areas there will always still be a degree of residual risk if flood defences are overtopped or breached by a flood event greater than that for which the defences were designed. For this reason, proposed development in areas benefitting from the presence of the defences will be required to incorporate raised floor levels and a financial contribution to the ongoing maintenance of these defences to ensure they remain operational and effective for the lifetime of the development.

Land that is required for current and future flood management should be safeguarded from development. Where development lies adjacent to or benefits from an existing or future flood defence scheme the developer will be expected to contribute towards the cost of delivery and/or maintenance of that scheme.

#### *Investment programme*

Other flooding problems may arise in future which will require flood alleviation measures subject to technical, economic and environmental viability. Consideration should be given to using CIL charging to secure funding for flood risk schemes that are unlikely to be wholly funded through central or local government. In some cases, schemes are unable to proceed unless contributions from beneficiaries or partner organisations can be identified and agreed.

#### *Strategic Flood Risk Assessment*

Environment Agency has updated their guidance on how climate change could affect flood risk to new developments which was published on May 2022 and came into immediate effect and these new climate change allowances should be used. More information can be found at the following link - <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>.

The existing SFRA does not take into account the revised climate change guidance to determine future flood risk. We would now expect LPAs to consider as a minimum, the potential impacts from climate change for the 2080s epoch to be included as part of the evidence base for the revised plan. Please note that the functional floodplain is now defined as land in the 1 in 30 year flood extent. The SFRA (Level 1) should be used to apply the Sequential Test and assess all proposed site allocations to determine whether they are located outside of flood risk areas from all sources of flooding without the application of the Exception Test. It should include the definition of Flood Zone 3b to establish areas where water needs to flood or be stored in times of flood. The area identified as functional floodplain should take into account the effects of defences and other flood risk management infrastructure. If an area is intended to flood, e.g. an upstream flood storage area designed to protect communities further downstream, then this should be safeguarded from development and identified as functional floodplain, even though it might not flood very often.

Appropriate policies should be included in the plan to ensure these areas are safeguarded for this purpose.

If the Level 1 SFRA shows that land outside flood risk areas cannot accommodate all the required development, a Level 2 SFRA will be required in order to provide the information necessary for application of the Exception Test for those sites. This should include an assessment of the extent, duration, velocity, depth and rate of onset of flooding, as well as identification of affected properties, infrastructure and communities. It should also assess the risk of flood defences failing, for example could defences be breached or overtopped. The likelihood of flood defences failing will change over time, for example because of limitations on maintenance funding and/or degradation. You should also consider what would happen if the flood defences failed.

We therefore advise that the SFRA (Level 1) should be updated to incorporate the latest climate change guidance as well as any other relevant issues and be used to apply the Sequential Test for proposed site allocations. It should also identify any cross-boundary flood risk.

A SFRA (Level 2) will need to be produced to support application of the Exception Test where required, and demonstrate deliverability of the plan proposals.



The conclusions of the SFRA Levels 1 and 2 should be reflected in the revised local plan.

#### Regulated Sites

The general issue of safeguarding regulated activity (such as AD plants, landfill, composting and other waste processing facilities) from proposed new sensitive receptors using a buffer zone is becoming an increasing concern. Issues can involve both housing development increasingly close to an operating waste facility, with inevitable complaints over amenity, with pressure on the Environment Agency (as the regulatory body) to act. This can result in pressure to demand that a facility closes and relocates, however a facility may be providing local or even national waste management capacity, identified in adopted waste plans.

'Safeguarding' can also refer specifically to providing for appropriate future expansion of existing infrastructure, by preventing conflicting developments. We are seeing increasing pressure on waste facilities especially in urban areas, largely due to housing developments which result in an increase in complaints to ourselves as the regulator of those facilities. Changes to planning system now allow commercial properties to be converted to residential use, such as offices on industrial estates.

It should be made clear that the Environmental Permitting Regulation does not demand 'zero impact', so conflict situations become inevitable. NPPF paragraph 182 makes reference to placing obligations onto the "Agent of Change" (i.e. the developers/applicants,) requiring them to ensure appropriate mitigations are put in place to protect neighbouring users from impacts.

As such, the Local Plan should look to identify issues where this may be an issue and consider carefully the allocation of sites which are located within close proximity to permitted waste facilities. Failure to do so can result in unacceptable levels of noise, odour, vibration, dust, smoke, flies, etc. Your local plan policies should identify these high risk facilities, steer development away from such areas and ensure that if development is proposed in close proximity it is such that it is not of a 'sensitive' nature to such nuisances. Close liaison with the waste planning authority and the Environment Agency should be maintained to ensure the plan reflects joined-up working.

#### Waste

Your plan should show how you have worked constructively alongside the Waste Planning Authority (WPA) to ensure waste management is considered alongside other spatial planning objectives. The timing and phasing of development should be synchronised with the delivery of appropriately located modern and sustainable waste management infrastructure that meets the needs of the local community. Opportunities to integrate waste management into proposed new development should be considered.

Services provided should encourage and enable communities to follow the waste hierarchy – reduce, re-use, recycle, recover, with landfill as the last resort. Waste minimisation and resource efficiency should be at the heart of all new development. The design of buildings and supporting infrastructure should consider their future repair and eventual demolition in the selection of construction mechanisms and materials ('cradle-to-cradle' design).

#### Climate Change

Climate Change is a key issue which impacts on a number of different topics within your Local Plan Review and is also a significant issue in its own right. In light of this, your plan should ensure it supports and encourages both limiting the causes of and adapting to the impacts of climate change.

Resilience against all types of potential severe weather events, not just storms and flooding, including reduced water demand and storage for very dry weather, appear to be increasingly necessary.

We note that you reference Climate Change and the need to adapt early on in Section 1, with your Plan horizon indicated as being 2043. Given that the next 20-30 years will probably prove decisive and could involve the most significant shifts in climate and related impacts we may have ever experienced, with no "return to normal" likely it may be appropriate to develop an "Active Monitoring and Response" approach to the plan, so it is agile and can keep ahead of changing pressures and new developments, including regulation.

Likewise, in relation to Section 4 it may be pragmatic to consider different planning timeline scenarios for a pessimistic "Emissions as usual" model, a "Realistic Decarbonisation" trajectory and also an optimistic "Accelerated Decarbonisation" profile.

Regarding proposed patterns of development, it may be worthwhile carrying out a spatial risk mapping exercise to identify which locations might be exposed to various climate-related impacts, and what any possible mitigations might involve. Risk factors may include the more obvious such as areas vulnerable to increased flooding or heatwave/drought, and potentially fires, but there may be less obvious aspects to consider, including impacts on forested areas, heritage locations, communities dependent on vulnerable agriculture, transport and communications, public services, etc. This might help to ensure that proposed development zones are "Climate Proof", the "Right Development in the Right Places," and hence the most sustainable option.

We would welcome the opportunity to discuss any of the above matters further with you, some of these discussions may fall under our Cost Recoverable Planning Advice Service and as such will be subject to a fee.

Appendices:

*Appendix 1 Flood Risk Policy Checklist*

*Appendix 2 Flood Risk Policy Guidance*

### **Appendix 1 - Flood Risk Policy Checklist**

In line with national planning policy any new development should be directed away from those areas at highest flood risk, i.e. towards Flood Zone 1. Planning applications for development within the Plan area must be accompanied by site-specific flood risk assessments in line with the requirements of national planning policy and advice. These should take account of the latest climate change allowances. Consideration should also be given to the impact of new development on both existing and future flood risk. Where appropriate, development should include measures that mitigate and adapt to climate change. In the longer term, consideration should be given to identifying opportunities to remove development from floodplains through land swapping to maximise natural storage of flood water, reduce flooding problems and increase landscape, ecological and conservation value.

It should be further expanded to cover a wider range of relevant flood risk management issues including the following:

New development proposals must also demonstrate that they will not increase flood risk **elsewhere** both in and out of the Plan area.

The sequential approach should also be used within development sites to inform site layout with the most vulnerable part of the development located in the lowest risk areas and the higher risk areas being used for flood risk management, environmental, recreation or amenity purposes.

On greenfield sites surface water runoff rates should not be increased. On brownfield sites surface water runoff should be reduced to the greenfield rate wherever practical. Applicants should target a reduction in surface water discharge in accordance with Defra and LLFA guidance. Approved development proposals will be expected to be supplemented by appropriate maintenance and management regimes for surface water drainage.

All new development, including infill development and small scale development, should incorporate sustainable drainage systems (SuDS) to reduce flood risk and manage surface water and to ensure that runoff does not increase the risk of flooding elsewhere taking account of the impact of climate change. Long-term maintenance arrangements for all SuDS should also be in place for the lifetime of the development and agreed with the relevant risk management authority. Development should ensure that SuDS link to green infrastructure to provide environmental benefits as well as balancing flood flows and improving water quality.

Proposals for new development should consider future flood risk and, where appropriate, include resilience measures that mitigate and adapt to the anticipated impacts of climate change.

All development should be set back from main rivers with a minimum of an 8 metres wide undeveloped buffer strip in order to provide maintenance access, make space for water and provide additional capacity to accommodate climate change.

Existing open watercourses should not be culverted. Building over existing culverts should be avoided. Where feasible, opportunities to open up culverted watercourses should be sought to reduce the associated flood risk and danger of collapse whilst taking advantage of opportunities to enhance biodiversity and green infrastructure. Where this is not possible, an assessment of its structural integrity should be made, with any remedial actions taken prior to the development of the site. In addition, a maintenance regime should be agreed to reduce the likelihood of blockage.

Where possible, opportunities should be sought to work with other bodies and landowners to encourage and promote implementation of natural flood management measures which will contribute towards delivering a reduction in local and catchment-wide flood risk and the impacts of climate change as well as achieve other wider environmental benefits.

Where possible, opportunities should be sought to undertake river restoration and enhance natural river corridors as part of a development in line with the Water Framework Directive and to make space for water.

River habitats should be retained and enhanced and take opportunities to improve connectivity.

### **Appendix 2 - Flood Risk Policy Guidance**

National planning policy is clear about the approach to be taken by local authorities towards dealing with flooding issues at all stages of the planning process. Development plan policies must take full account of flood risk and develop policies to manage flood risk by applying the sequential test, avoiding inappropriate development in areas at risk of flooding, directing development away from areas at highest risk or where development is necessary, making it safe without increasing flood risk elsewhere. Decisions on land use, including development, should reflect the level of current and future flood risk.

District councils and unitary authorities have key roles in land use planning and working with communities to ensure that development is appropriate for the area in question. This is supported by the Environment Agency as a statutory consultee for flooding and other organisations such as infrastructure and utility providers who provide advice. The Environment Agency also has a

regulatory role in permitting works carried out by others in, or adjacent to, watercourses and flood defences to ensure that they have regard to flood risk and do not cause unnecessary environmental damage.

The Environment Agency will work with local authorities and developers to avoid inappropriate building or redevelopment in areas of high flood risk. Key to this is ensuring that risks are effectively identified in local strategies and that there is good **co-operation between the lead local flood authority and the planning authority**. This should ensure that local development plans and other plans include appropriate policies and avoid inappropriate development in areas at risk. Proper consideration should be given to flood risk management issues in managing land use and developing/re-developing areas within a catchment that are not directly at risk, to ensure that risks are not increased in other areas.

## 1. Flood Risk Overview

- 1.1. Flooding can have a devastating impact on communities. 5.2 million homes and businesses in England are at risk from flooding. That risk comes from rivers, the sea, rising groundwater and overwhelmed drains and sewers. Some properties are at risk from more than one of these. However, during a significant flood event, we all have the potential to be affected by flooding as local services and utilities are disrupted. Flood risk in England is expected to increase due to climate change and development in areas at risk. Changes in weather patterns and, in particular, more torrential rainfall is likely to increase flood risk from surface water as well as rivers.
- 1.2. Flooding is a natural process which cannot be prevented entirely, but there are actions that can be taken to manage these risks and reduce the impacts on communities. We need to plan for increasing pressures under a changing climate and a growing population.
- 1.3. It is not technically, economically or environmentally feasible to prevent flooding altogether. A risk-based management approach targets resources to those areas where they have greatest effect. Risk management measures consider both the probability over time of a flood happening and the consequences that might arise if it did.

## 2. Government Policy

- 2.1. Government policy states that flood risk should be managed in a co-ordinated way **within catchments** and balance the needs of communities, the economy and the environment.
- 2.2. The 25 Year Environment Plan, published in early 2018 sets out the government's ambition to protect and enhance England's natural landscape for now and the long-term. How we manage flood and coastal risk will be a key part of how the plan is implemented. Collaboration between Risk Management Authorities (RMAs)<sup>1</sup> and their partners in managing all sources of flooding and at all spatial scales is essential if we are to achieve this and increase the country's resilience to such pressures.

1 Risk Management Authorities include: Environment Agency, Lead Local Flood Authorities, District Councils, Internal Drainage Boards, Water Companies and Highway Authorities.

## 3. Consequences of Flooding

- 3.1. Flooding can also cause major disruption to energy, water, communications and transport infrastructure. It can interfere with public services such as schools and hospitals and have significant indirect effects through disruption to travel or loss of income. Such losses can have significant impacts on the local economy outside the area directly affected. Flooding can also have significant impacts on the environment and on cultural heritage, including causing pollution or damage to historic buildings and changes to habitats. However, for some habitats and heritage assets, managed flooding and/or deposits of material eroded from elsewhere are essential for their existence and health.
- 3.2. It is important that the consequences of flooding are taken into consideration. Risk to life should be of primary importance alongside other factors such as damage to property, business and the economy, infrastructure and the environment, including the historic environment. The numbers of properties in at risk areas may be an indicator of risk to life and property but additional important factors which should be considered include the depth and rate of flow of floodwater, the length of time an area remains flooded and the potential for contamination of the flood water. The depth and rate of flow of floodwater can be particularly important in assessing risk to life as deep, fast flowing floods such as those that may arise from steep, upland rivers or from reservoir failure can present an immediate risk to life. Pressures such as climate change, deterioration in the condition of risk management assets, new development and changes in land use can increase the probability and consequences of flooding.

## 4. Population Change, Development and Land Management

- 4.1. Providing for the housing, business and associated needs of an increasing population may increase the consequences of a flood incident. The population of England is predicted to increase considerably, increasing the need to provide homes and infrastructure. Unless this development is carried out appropriately, it could increase risks by placing more people and property in areas at risk. It is therefore essential that spatial planning ensures that new developments take flood risk fully into account, and are safe from, do not increase, and where possible reduce risk over their lifetimes.
- 4.2. Land management and development can have significant effects on the movement of water within a catchment. Development or changes in land use in areas that themselves may not be at risk of flooding can reduce or prevent rainwater infiltration into the ground, speed up surface water runoff and as a result increase the risk of flooding downstream. This can also apply to rural and agricultural land use where changes in vegetation may cause similar impacts.
- 4.3. The cost of damages caused when properties are flooded is also likely to increase with inflation and in line with general increases in wealth over time as the value of goods and fittings in households and businesses increases. As a result, even if the likelihood of flooding were to decrease over time, the consequences may still increase as the value of property and contents continues to rise.

**5. Catchment Approach**

- 5.1. In understanding and managing flood risks locally, it is essential to consider the impacts on other parts of the catchment. Activities must seek to avoid passing risk on to others within the catchment without prior agreement. This agreement could, potentially, include the provision of funding by upstream communities for actions and measures carried out by others to manage downstream risks. The catchment approach is also key to managing risks at source and achieving wider benefits through more integrated water management and increasing the opportunity for developing new sources of funding as well as pooling resources and expertise.

**6. Multiple Benefits**

- 6.1. As well as reducing the risks to people and property, flood risk management can bring significant economic, environmental and social benefits. It can enhance and protect the built, rural and natural environments, cultural heritage and biodiversity by preventing loss and damage to habitats and heritage assets and reducing pollution, for example through the use of Sustainable Drainage Systems (SuDS). It can contribute to regeneration and income generation, protect infrastructure and transport links, and contribute to economic growth.
- 6.2. To achieve wider environmental objectives and other benefits, the measures used to manage all flood risks (including local sources of flooding) should work with natural processes wherever possible and be based on partnership working with local communities. Working with natural processes can include taking action to manage flood risk by protecting and restoring the natural function of catchments, rivers and floodplains. This could, for example, involve using farmland to store flood water temporarily, reinstating washlands and wetlands to store flood water away from high risk areas or other techniques include protecting and restoring natural river systems and features.
- 6.3. The management of surface water should be considered early when designing a development to ensure that the best possible drainage system is built. Use of public space and the multifunctional use of open space could be considered as part of preparing local flood risk management strategies to reduce the potential land take from SuDS for new developments. The aim of these measures is to minimise the impacts of development on flood risk and to improve water quality. They will also have other benefits such as to local amenity and biodiversity. New or re-developments should also consider how damages and risk to life from flooding can be avoided through better design and layout.

Officer Response	Further Action
Comments noted.	Comments will be considered as part of the local plan process.

<b>URN</b>	032
<b>Company/Organisation</b>	Avison Young
<b>On behalf of</b>	National Grid
<b>Sole Representation</b>	<input checked="" type="checkbox"/>
<b>Further Representation</b>	

## Representation

Dear Sir/Madam,

### Issues and Options Consultation

October-November 2022

### Representations on behalf of National Grid

National Grid has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

#### About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

#### National Grid assets within the Plan area

Following a review of the above Development Plan Document, we have identified one or more National Grid assets within the Plan area.

Details of National Grid assets are provided below.

#### *Electricity Transmission*

#### **ZF ROUTE TWR (002 - 059): 400Kv Overhead Transmission Line route:**

#### **DRAKELOW - HAMS HALL**

A plan showing details and locations of National Grid's assets is attached to this letter. Please note that this plan is illustrative only.

Please also see attached information outlining further guidance on development close to National Grid assets.

#### Utilities Design Guidance

The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by National Grid infrastructure.

National Grid advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines, underground gas transmission pipelines, and other National Grid assets.

Therefore, to ensure that future Design Policies remain consistent with national policy we would request the inclusion of a policy strand such as:

*"x. taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites."*

#### Further Advice

National Grid is happy to provide advice and guidance to the Council concerning their networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid's assets. We would be grateful if you could check that our details as shown below are included on your consultation database.

If you require any further information in respect of this letter, then please contact us.



**Officer Response**

Comments noted.

**Further Action**

Comments will be considered as part of the local plan process. We will update our consultation database to reflect the contact information provided.

<b>URN</b>	033
<b>Company/Organisation</b>	Gladman
<b>On behalf of</b>	
<b>Sole Representation</b>	<input checked="" type="checkbox"/>
<b>Further Representation</b>	

## Representation

Dear Sir/Madam,

### **Re: Local Plan 2043 – Issues and Options Consultation**

This letter comprises Gladman Developments Ltd (Gladman) written representation in response to Tamworth Borough Council's (TBC/the Council) consultation on its Local Plan Issues and Options document published in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations (as amended).

Gladman is a leading strategic land promoter with considerable experience of the development management and plan-making process. As a company, Gladman has submitted representations on numerous planning documents both at a national and local level. Gladman has also actively participated in multiple Examination in Public hearing sessions on emerging Local Plans. This experience has enabled Gladman to develop expertise and in-depth understanding of the requirements necessary to prepare a legally compliant and sound Local Plan.

This representation is made with the desire to assist the Council in successfully preparing and adopting a sound Local Plan, which positively meets the needs of the Borough and delivers sustainable development. The comments contained herein focus on select topics covered within the Issues and Options document, and are preceded by a brief overview of the plan-making elements of the National Planning Policy Framework (the Framework) and relevant legal requirements.

### **Plan-Making Requirements and Legal Compliance**

#### National Planning Policy and Guidance

On 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published a revised National Planning Policy Framework; which was subsequently updated in February 2019. These publications formed the first revisions of the Framework since 2012 and implemented changes that were informed through the Housing White Paper, The Planning for the Right Homes in the Right Places consultation and the draft Revised Framework consultation.

Building on these changes, a further revised version of the Framework was published in July 2021. The Framework (2021) places greater emphasis on beauty, place-making, the environment, sustainable development and underlines the importance of local design codes.

Throughout the preparation of the new Local Plan, the Council should have regard to the Framework and associated guidance. In relation to plan-making, Section 3 of the Framework sets out the main requirements of a Local Plan both in terms of its contents and when it is independently examined. Paragraph 15 of the Framework, for example, establishes that up-to-date plans should provide a positive vision for the future of the area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings. These requirements are further expanded upon in paragraph 16, which, inter alia, states that plans should be prepared with the objective of contributing to the achievement of sustainable development, and be prepared positively, in a way that is aspirational but deliverable.

As the Council will be aware, to be found 'sound' at the examination stage, paragraph 35 of the Framework sets out that plans must be:

- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs;
- b) and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- c) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- d) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- e) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

#### Duty to Cooperate

The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated

through the outcome of the 2020 Sevenoaks District Council Local Plan examination and subsequent Judicial Review, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.

Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration, as set out in the Planning Practice Guidance (PPG) it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard, TBC must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross-boundary strategic issues, and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation.

The revised Framework introduced a number of significant changes to how local planning authorities are expected to cooperate including the preparation of Statements of Common Ground (SoCG), which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist. Planning guidance sets out that local planning authorities should produce, maintain, and update one or more Statements of Common Ground (SoCG), throughout the plan making process. The SoCG should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with e.g., unmet housing needs.

In the context of the DTC, the Council should be able to demonstrate how it has actively sought to engage with neighbouring authorities to address any cross boundary strategic issues, including any unmet housing needs. We note here that Tamworth forms part of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). It has been established that there is a significant shortfall in planned provision to meeting housing requirements in the GBBCHMA. The Birmingham Local Plan Issues and Options (October 2022) document quantified its shortfall as 78,415 homes over the period 2020-2042. It is, therefore, incumbent upon the 13 other local authorities of the GBBCHMA (including Tamworth) to help deliver this unmet need through their respective Local Plans.

In accordance with national planning policy, as a starting position the Council should seek to meet its full housing needs within its own administrative area, unless it can robustly demonstrate that the effects of doing so would significantly and demonstrably outweigh the benefits. Only then should the Council seek to engage with neighbouring authorities to see if they could meet a proportion of the Council's unmet housing needs. At the same time, the Council should actively respond to requests from neighbouring authorities to meet a proportion of their unmet housing needs, where the need arises.

#### Sustainability Appraisal

In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to a Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the plan-making process, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.

The Council should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment and the appraisal process why some policy options have been progressed, and others have been rejected. Undertaking a comparative, fair and equal assessment of each reasonable alternative, the Council's decision-making in selecting sites for development and its policy choices should be robust, justified and transparent.

#### **Issues and Options**

##### Introduction

In broad terms, Gladman are supportive of the need and justification for a new Local Plan for Tamworth. The current Tamworth Local Plan was adopted in 2016 and pre-dates substantive changes in national planning policy and guidance. It is fundamental to the delivery of a plan-led system that Tamworth is able to adopt an up-to-date Local Plan that can identify and deliver the development needs of the Borough; it is also crucial that the Local Plan is consistent with the Framework.

Notwithstanding the above, we do have concerns regarding the overarching approach of the consultation document insofar as it appears that the Local Plan will be reliant on surrounding authorities to meet its housing requirement. It is our view that seeking to defer responsibility for meeting the development needs of the Borough to other authorities is an inappropriate starting point. While it is in the Council's gift, through cooperation, to work with neighbouring authorities and members to agree that housing needs can be met elsewhere within the GBBCHMA, it should not pre-empt that other authorities will be able to accommodate or allocate sufficient land to meet the needs and development aspirations of the Borough. The Council should also be actively exploring opportunities to help meet an appropriate proportion of the wider unmet housing needs that exists within the GBBCHMA.



We believe that the Local Plan must sit together in a coherent manner with those of other authorities comprising the GBBCHMA, and that the Local Plan must not result in a situation where it cannot meet the needs of the Borough. The failure to provide a level of housing which is at least equivalent to that of its Local Housing Need figure (calculated using the standard method) will undermine the overall effectiveness of the Local Plan. Accordingly, the emerging Local Plan should be prepared on the basis that it will, as a minimum, meet the development and infrastructure needs of the Borough in full.

In the event that the Council is unable to meet the Borough's housing needs in full, it must carefully consider the most appropriate locations to meet any unmet housing need. If housing provision is to genuinely meet needs, it should be located as close as possible to where it arises. This means that unmet housing need should be delivered in an adjoining authority(ies), particularly where the functional urban area adjoins or already extends beyond authority boundaries. In the case of Tamworth, the Council will need to, for example, explore whether any unmet housing need (should it arise) can be accommodated within the authority of Lichfield but on the urban fringe of Tamworth.

#### Proposed Timeline (Plan Period)

We note the Council's comments at section 4 of the consultation document, which proposes a plan period for the new Local Plan extending to 2043. This is said to ensure that the new plan period is at least 15 years from the point of adoption. We are supportive in principle of the year 2043 being the end date for the new Local Plan.

It is our view, however, that the Council must maintain a degree of flexibility in respect of the end date of the new Local Plan during the formative stages of the plan-making process. This is to ensure that any delays in the preparation and/or examination of the plan do not result in it having a plan period less than the minimum 15 years required by the Framework post adoption.

The Framework seeks for strategic policies to look ahead over a minimum of 15 years from adoption, which will allow for anticipation and response to long-term requirements and opportunities. Further to this, the Framework seeks for policies with a vision of at least 30 years where larger-scale developments, such as new settlements or significant extensions to existing villages and towns, form part of the strategy for the area, so as to take into account the likely timescale for delivery (paragraph 22). The Framework also expects the identification of specific, developable sites of broad locations for growth in years 6-10 and, where possible, years 11-15 of the plan, which is in addition to specific and deliverable supply of sites for the first five years (paragraph 68).

We, therefore, recommend that the Council continue to maintain its commitment to planning for a full plan period of a minimum of 15 years. With the Council's latest Local Development Scheme (July 2021) anticipating submission of the new Local Plan for Examination in Public in late 2024, there is a risk that delays in the examination of the plan could result in it failing to have a plan period of 15 years once adopted. Compromising on the plan period could inhibit future growth, and as a result, the new Local Plan would be at risk of being found unsound and not positively prepared at examination.

The Framework also states that policies in Local Plans should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary (paragraph 33). We consider that the Local Plan should clearly include a policy commitment that it will undergo regular review (i.e., at least every five years) in order to align with the Framework. The new Local Plan would also benefit from the inclusion of an early review mechanism, which would be triggered in the event of changing circumstances affecting the area (such as a sustained situation of no five-year supply of deliverable housing land) or relevant changes in national policy.

#### Vision and Objectives

Section 5 of the Issues and Options document suggests that the starting point for the new Local Plan's vision is that set out in the Council's Corporate Plan (adopted February 2022). The proposed vision for the new Local Plan – "Celebrating our heritage, creating a better future" – is then translated into 11 proposed objectives. We agree with the principles of the objectives but regard the proposed vision to be too vague and not clear enough to steer the planning process. The proposed Local Plan vision needs to be expanded and updated to include a provision for meeting the Borough's developments needs. This is a fundamental principle of the planning system and should be reflected in the vision of the Local Plan.

For the avoidance of doubt, the Framework (paragraph 22) requires that Local Plans plan for development for a period of not less than 15 years from the point of adoption. The Local Plan should make this point clear, with the plan period registered within the plan's vision and linked to outcomes (including any delivery targets) to provide clarity and meaning by which it can be measured. One of the key planning issues facing Tamworth is unmet housing need and its implications, which includes housing affordability pressures. When one considers the median affordability ratio for Tamworth compared to the rest of the West Midlands region, the position becomes apparent: the median quartile income to median quartile house price affordability ratio is 8.59, which is significantly above the regional affordability ratio of 7.50.

While we acknowledge that one of the proposed objectives of the new Local Plan is linked to the provision of high quality and affordability homes to meet local needs, it is our view is that housing delivery linked to tangible outcomes should be identified within the primary purpose of the Local Plan vision.

## Climate Change and Biodiversity

In respect of climate change, the current consultation document notes how the Government is in the process of implementing changes to the Building Regulations that will gradually require improvements to the emissions associated with/energy performance of residential dwellings in accordance with its proposed Future Homes Standard. Accordingly, we would question whether it is necessary to implement local energy or emissions performance standards that could duplicate or contradict the evolving requirements of the Building Regulations regime. Therefore, we would recommend that the Council rely on national standards and building regulations to set the carbon reduction levels for new buildings.

Should the Council seek to set its own carbon reduction or energy performance standards that are stricter than the national requirements, we would draw attention to the Framework's approach to viability and deliverability. Viability is linked closely to the concept of deliverability, and with regard to housing, a Local Plan can be said to be deliverable if sufficient sites are viable to deliver the plan's housing requirement over the plan period. Viability is thus critical to the soundness of Local Plans, the setting of CIL (where appropriate) and the delivery of sites for housing. When looking to set standards for climate change (or other related issues), particularly where related standards are above statutory requirements, the Council must pay careful attention to ensuring that the policies of the Local Plan, individually and cumulatively, are robustly evidenced and do not make the delivery of housing sites and the whole plan unviable and thus unsound.

On biodiversity net gain, the Council's proposals indicate that the authority will look to implement a policy that asks for the gain of 10% required by the Environment Act 2021. Noting that any gain is a 'gain', and should therefore be seen as a benefit, and the 10% gain will become a national standard condition of granting planning permission, we welcome this approach and the acknowledgement that net gains can be delivered onsite or via offsite contributions. Embedding this flexibility into any future biodiversity net gain policy is essential, as it is not always possible (due to site constraints of other factors) to deliver a net gain onsite.

## New and Affordable Homes

The Framework makes clear that Local Plans should "*...provide a clear strategy for bringing sufficient land forward...to address objectively assessed needs over the plan period*" (paragraph 23) and set out strategic policies for the scale of development planned in an area and make sufficient provision for, inter alia, housing, including affordable housing (paragraph 20).

In determining the minimum number of homes needed, strategic plans should be based upon a local housing needs assessment defined using the standard method, unless there are exceptional circumstances to justify an alternative approach. These needs should be met as a minimum unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so. This includes considering the application of policies such as those relating to Green Belt and giving consideration as to whether or not these provide a strong reason for restricting the overall scale, type and distribution of development (Framework paragraph 11b(i)). Where it is found that full delivery of housing needs cannot be achieved (owing to conflict with specific policies of the Framework), local planning authorities are required to engage with their neighbours to ensure that identified housing needs can be met in full (see paragraph 35 of the Framework).

Referring to the requirements of national planning policy, the consultation document identifies that the current local housing need for Tamworth is 141 dwellings per annum; this equates to a minimum requirement of 2,961 homes to be delivered by 2043 (although this figure may change during the plan-making process). We welcome the acknowledgement that the authority's LHN figure should provide the starting point for determining a new housing requirement for the Borough. However, at the same time, Gladman would encourage the Council to explore whether there are any circumstances that would justify a housing requirement above the LHN baseline figure, taking account of the PPG on Housing and Economic Needs Assessments (PPG ID: 2a-010).

Increasing the housing requirement will have two key benefits. First, the delivery of new market housing will increase supply and temper the rate of house price growth. Secondly, increasing the level of affordable housing delivered will directly increase the quantum of affordable housing available. There is significant justification in the context of the anticipated level of unmet need and worsening affordability, for the Council to take positive action to reverse this trend, beyond that engaged by the Standard Method affordability adjustment.

As described above, once a Council's LNH figure has been identified, the objective should be to meet these needs in full unless there are clear and justified reasons for doing otherwise. In this regard, we note the Council's concern regarding its ability to meet its LHN figure in full over the proposed new plan period. Notwithstanding the relatively constrained nature of the authority, it is crucial to the preparation of a sound Local Plan and future prosperity of the Borough that the Council investigate thoroughly all options for meeting its LHN. Meeting the Borough's LHN will require the allocation of new housing sites in sustainable locations. While the consultation documents presents a "brownfield-first" approach as one option to meeting housing needs, there will inevitably be a need for both brownfield (or previously developed land) and greenfield land (of a variety of types and sizes, including that designated as Green Belt) to be allocated for development.

On the issue of the Green Belt, the consultation documents presents the release of Green Belt land as one option to meet housing need. It does, however, go on to state that this option acknowledges that national policy views this (i.e., Green Belt release) as a last resort. The Framework supports the long-standing principles of Green Belt protection, but also acknowledges that the objectives of the planning are evolutionary and ever changing in response to land use pressures and social trends. It is the Governments priority to significantly boost the supply of homes (Framework, paragraph 60). The Framework also reinforces the plan-led system, which grants Local Planning Authorities the power necessary to undertake Green Belt reviews to help inform emerging spatial strategy for Local Plans so that they meet development needs.

The role and function of the Green Belt needs, therefore, be considered within this overarching context to assist in meet housing needs and the delivery of sustainable development. Tamworth should consider revising Green Belt boundaries consistent with the policies of the Framework in the context of achieving sustainable (including the aim of significantly boosting the supply of housing), and the exceptional circumstances test, particularly given the relatively constrained nature of the authority.

We would also welcome the Council’s commitment to working pro-actively with site promoters to overcome any potential constraints to development as the Local Plan continues to progress, and that the authority will apply this principle fairly and equally to ensure its decision making and site selection processes are sound.

Finally, with reference to affordable housing, the consultation document makes clear that the provision of affordable housing remains an important and pressing issue in the Borough. To meet the affordable housing requirements of the Borough, a significant step-change in affordable housing is required. At this stage, the appropriate amount of affordable housing to be delivered through the new Local Plan has not been determined. In respect of the proposed approach for the delivery of affordable homes, we would encourage the Council to continue with its aim to try and strike a balance between providing affordable housing and contributions towards other infrastructure. The level of affordable housing required for residential development sites should be robustly evidence based and reflect the assessed affordability needs of the Borough. There is also a necessity for any future onsite or offsite affordable housing requirements to be subject to viability to take account of site specific circumstances where the full affordable housing requirement is not achievable, thus alleviating the risk of policy requirements leading to unviable schemes which will deter development.

To help alleviate the affordability issue, the Local Plan should be seeking to boost the supply of housing and reduce the affordability gap. It is therefore evident that the very clear potential that the need for affordable housing in the borough will not be met leads to a need to increase the overall housing requirement.

**Summary**

In summary, Gladman support the preparation of a new Local Plan for Tamworth. However, we consider that the Council needs to ensure that the Local Plan provides for, and provides sufficient flexibility, that the Borough’s development needs can be met over the emerging plan period. While we generally agree with the policy themes set out within the consultation document, the approach to solving those issues through the Local Plan requires further detail to be meaningful and effective.

We are grateful for the opportunity to comment on the Local Plan Issues and Options consultation document and look forward to commenting on future iterations of the plan.

Officer Response	Further Action
Comments noted.	Comments will be considered as part of the local plan.

<b>URN</b>	036
<b>Company/Organisation</b>	Turley
<b>On behalf of</b>	Vistry
<b>Sole Representation</b>	
<b>Further Representation</b>	<input checked="" type="checkbox"/> (Please see additional comments in the relevant sections above)

#### Representation

Dear sir / madam

#### **TAMWORTH BOROUGH COUNCIL'S LOCAL PLAN 2043: ISSUES AND OPTIONS DOCUMENT (SEPTEMBER 2022) CONSULTATION**

We write on behalf of Vistry in response to the Tamworth Borough Council's Local Plan 2043 Issues and Options Document (September 2022) consultation.

National Planning Policy Framework (2022) (NPPF) paragraph 33 is clear that local plans and spatial development strategies should be reviewed to assess whether they need updating every five years. It is therefore welcomed that Tamworth intends to review its Local Plan adopted in February 2016, especially given the borough's housing challenges outlined at page 6 of the consultation document.

#### **Background**

Vistry is promoting a sustainable opportunity for new homes to the north of Gillway Lane, Tamworth. The site is largely located within Lichfield District, the southernmost extent of the site is located within Tamworth Borough. A vision document for the site is enclosed at **Appendix 1** of this letter.

The Greater Birmingham and Black Country (GBBC) Strategic Growth Study (February 2018) recognised the site and the wider area as a 'recommended area of search for strategic development'. It is identified as one of the strongest performing 'urban extension options' which should be taken forward for further detailed consideration by the GBBC housing market area authorities.

Beyond the site's boundaries there is a clear opportunity to take a wider plan led approach to growth in this area. This includes working with Gladman, the promoters of land to the north of the site, to support a larger and demonstrably deliverable and sustainable housing site together with associated infrastructure.

We have engaged with Lichfield District regarding the above and are keen to meet with Tamworth as part of the emerging Local Plan process to discuss the site further.

#### **Next Steps**

We trust these representations are of assistance and would welcome the opportunity to meet with officers to discuss Vistry's site to the north of Tamworth further.

<b>Officer Response</b>	<b>Further Action</b>
Comments noted.	Further work on the quantum and distribution of housing to be carried out prior to the Preferred Options stage.

<b>URN</b>	038
<b>Company/Organisation</b>	WSP
<b>On behalf of</b>	Hodgett's Estates
<b>Sole Representation</b>	
<b>Further Representation</b>	<input checked="" type="checkbox"/> (Please see additional comments in the relevant sections above)

#### Representation

#### Hodgetts Estates

#### Tamworth Local Plan 2043 – Issues and Options

#### Feedback Point 16 – Notes on Employment Land

1. Feedback Point 16 raises two questions. These are: -

- Do you agree with the proposal to use HEDNA employment land requirements as a starting point?
- If not, what other information should we use, and why?

2. These are covered briefly below in turn.

#### HEDNA

3. We consider that the HEDNA is not a sound starting point for the following principal reasons: -

- The projected requirement, at 8.8 hectares for the whole plan period to 2043, is very low, compared to previous projections.
- The projection is based on incomplete data.
- No allowance has been made for the replacement of any future losses of employment land.
- The HEDNA was produced over three years ago and does not reflect current or projected economic and market conditions.
- Demand for employment development land within Tamworth has been suppressed by constraints on the principal allocated sites.
- The extent of suppressed demand has been illustrated by development just outside Tamworth and by other market signals.
- The HEDNA takes no account of identified need for strategic employment sites in this broad location.
- The HEDNA makes no express allowance for the accommodation and attraction of logistics and freight related industries, contrary to Central Government guidance and initiatives.

4. These reasons are expanded on below.

5. The 2016 adopted Local Plan identifies a need of 32 hectares for the plan period (2006 – 2031). 18 hectares of this need is accommodated on 10 sites within the Borough. The remaining 14 hectares is to be delivered outside the Borough's boundaries, primarily in North Warwickshire.

6. A reduction in the requirement from 32 hectares to just 8.8 hectares does not seem to be realistic in market terms. Nor does it represent a strategy encouraging economic growth.

7. The projection of 8.8 hectares is based principally on the past completion's trend method. However, it is acknowledged by the HEDNA (paragraph 11.36) that no reliable completions data is available from the Council. For reasons that are not clear, the Council does not seem to maintain or produce regular or recent monitoring reports. The most recent annual monitoring report available on the Council's Planning Policy webpage is the 2018/2019 version.

8. In addition, the projection of need takes no account of the replacement of future losses of employment land. This is despite express guidance provided in the PPG on Economic Need. Paragraph 2a-026-20190202 of the PPG states that "the recent pattern of employment land supply **and loss**" (our emphasis) is a matter for assessment in preparing evidence on economic need. Paragraph 2a-028-20190202 makes specific reference also as to how local planning authorities can identify the existing stock of employment land and the recent pattern of supply **and loss** of employment land.

9. The HEDNA was produced primarily in September 2019. An update was produced in November 2020, however, this update (Appendix A) concentrated only on Lichfield. Much of the data used covers the period to 2018. Since 2018, there have been significant changes in economic and market conditions.

10. With regards to the latter, there has been a noticeable increase in the development and take up of industrial and warehouse property, both nationally and regionally. This has been particularly for the big box warehouse sector (i.e., for units greater than 100,000 sq ft), but also for the mid-box (25,000 sq ft to 75,000 sq ft) and multi-let (5,000 sq ft to 25,000 sq ft) sectors.

11. Across all these sectors, demand has outstripped supply. This has resulted in a marked decrease in the vacancy rate of units, despite substantial levels of new space coming on to the market (often through speculative development). The last 3 years have witnessed also a significant hike in rents – a true indicator of the imbalance of demand over supply.

12. The speculative development of Site EMP8 (of the 2016 adopted Local Plan) – land adjacent to Relay Park – is a good example of the confidence of developers and investors over recent years. Opus Land developed the site (2.84 hectares) for a single unit of 12,500 sq m (135,000 sq ft) and let the unit to Movianto.
13. The development of the other principal allocated site – EMP1 – has been held up by the constraints of the site. EMP1 – land south of the A5, Bitterscote South – measures 9.8 hectares and accounts for over half of the total supply of allocated sites (18 hectares in total). This site was first granted outline planning permission in 2016, with a hybrid planning permission (for car showrooms and B1, B2 and B8) approved in 2018. However, the permissions require a significant improvement of the junction with the A5 dual carriageway and this has constrained development of the site.
14. This constraint has severely suppressed take up in Tamworth. All other allocated sites are relatively small or fragmented, with none being greater than 1.7 hectares. This has restricted both quantitatively and qualitatively the offer Tamworth makes to the wider industrial and warehouse market.
15. The extent how constraints in supply have suppressed development activity within Tamworth Borough’s boundaries is illustrated by the level and depth of development activity at Junction 10 of the M42 motorway over the last 10 years. This includes the following successful developments: -
- Phases 2 and 3, Birch Coppice (IM Properties) – 2.11 million sq ft (196,000 sq m) in seven units.
  - Core 42 (Hodgetts Estates and Panattoni) – 680,000 sq ft (63,000 sq m) in six units.
  - Tamworth Logistics Park (St Modwen) – 680,000 sq ft (63,000 sq m) in seven units.
  - Centurion Park Extension (St Modwen) – 206,000 sq ft (19,000 sq m) in two units.
16. These four developments have all been fully occupied. They are located just outside the Borough’s boundaries within the Borough of North Warwickshire. However, their principal economic relationship is with Tamworth. They total 3.68 million sq ft (341,000 sq m) and have required 115 hectares (gross) of land for their development.
17. The HEDNA recognises that there is a strong demand for logistics and distribution related industries in Tamworth (paragraph 10.28). It also acknowledges that Tamworth’s warehousing market “is relatively buoyant, benefitting in particular from its proximity to the M42 on the edge of the ‘golden triangle’ and has seen take up of some large units” (paragraph 11.53). However, it singularly fails to address these market advantages in projecting a need.
18. This failure cuts across both evidence and guidance on the provision of strategic employment sites, the identification of development land for logistics, and better planning for freight. These are considered in more detail below in turn.
19. In May 2021, the West Midlands Strategic Employment Sites Study was published. This study was commissioned by Staffordshire County Council on behalf of the four principal LEPs to the West Midlands. It concluded that there was a limited supply of available, allocated and/or committed strategic employment sites across the West Midlands and a “urgent” need for additional sites to be brought forward. The study identified four key locations for future strategic employment sites. This included Area 2 – the M42 corridor stretching from Redditch to Tamworth. This area was identified as having the lowest level of allocated/committed sites relative to take up and, thus, the greatest need for new sites.
20. National Planning Policy Guidance issued by Central Government now recognises to a much greater extent the critical role that the logistics industry plays in terms of the wider economy. Changes made to the NPPF and PPG since the publication of the HEDNA acknowledge the sector’s contribution to local employment opportunities and its distinct locational requirements (i.e., suitably accessible locations).
21. In June this year, the DfT published the Future of Freight: a long-term plan. One of the principal themes is Planning. It set a goal of “a planning system which fully recognises the needs of the freight and logistics sector now and in the future and empowers the relevant planning authority to plan for these needs”. In addition, “an increase in site allocations for freight and supply infrastructure being adopted in local plans to reflect the needs of the sector” is provided as a future measure of success for the overall strategy for freight in the UK.

**What Other Information to Use?**

22. Paragraph 6.3.1 of the Issues and Options refers to an updated assessment being carried out in the future. Given our reservations about the appropriateness of relying on the 2019 HEDNA (for the reasons provided above), we would support a new assessment being carried out in order to plan properly for the economic and employment needs of Tamworth.
23. Guidance in the PPG emphasises the importance of identifying gaps in employment land provision for different market sectors on both a quantitative and qualitative basis (paragraph 2a-029-20190220). Paragraph 2a-031-20190722 – provides more detailed guidance on how local planning authorities should assess need and allocate land for logistics. This refers to: -

- Engagement with logistics developers.
- Analysis of market signals (including trends on take up).
- Analysis of economic forecasts.
- Engagement with LEPs (or their successor bodies).

24. We would advocate that a new assessment is undertaken with these criteria setting the principal scope. Moreover, the assessment should be outward, as well as inward, looking. The economic and market influence of Tamworth stretches beyond its tightly drawn boundaries and because of its strategic location at an important nodal point on the motorway and trunk road network (i.e., M42 and A5) and rail freight network (Birmingham International Freight Terminal at Birch Coppice).

25. An assessment based on this basis is likely to lead to a significantly greater need for employment land, particularly to serve the logistics and freight sectors. This requirement, if projected properly, is likely to exceed supply. This will require co-operation with neighbouring local planning authorities (e.g., North Warwickshire), as with the previous adopted plan, to ensure the full needs of Tamworth are met.

Officer Response	Further Action
Comments noted. As part of the local plan development process, we will be reviewing existing evidence to establish whether it will need to be updated. The respective employment figures, including our projected need, will therefore be updated if necessary.	Comments will be considered as part of the local plan process. As noted, a review of the evidence base will establish if the existing HEDNA requires updating and new evidence will be gathered if applicable.

<b>URN</b>	040
<b>Company/Organisation</b>	WSP
<b>On behalf of</b>	B&S Aucott
<b>Sole Representation</b>	<input checked="" type="checkbox"/>
<b>Further Representation</b>	

## Representation

Dear Sir/Madam,

### Tamworth Borough Council Local Plan 2043 - Issues and Options Consultation

I am writing on behalf of our client, The Trustees of JB Aucott and B&S Aucott (Aucott), to submit representations for the Issues and Options Consultation for Tamworth Borough Council Local Plan 2043.

Aucott own Ventura Retail Park the employment allocation south of the A5 and other retail, commercial and business facilities south of Tamworth town centre. They are a major landowner and developer within Tamworth who have delivered significant investment and employment opportunities to the local area. Aucott want to ensure that their retail and employment provision remains attractive, competitive and aligned with market requirements, and that the Local Plan encourages investment in the Borough.

In short, Aucott consider the following:

- Ventura Retail Park should be established and allocated as a retail destination within the Local Plan;
- Gungate Precinct should be allocated for a leisure and residential-led scheme, in line with their recent consultations on the site;
- Land south of A5 should continue to be allocated for employment generating uses; and
- Land off Darcy Close, Chawton Way and Bennett Close should be allocated for residential development.

Below, we set out our full response on the Issues and Options Consultation.

### EMERGING RETAIL POLICY

#### Out of centre retail parks

Section 6.4 of the Issues and Options document looks at retail destinations, town centre, Local and Neighbourhood Centres.

Section 6.4.3 focuses on the “*impact of existing retail parks*”. The sub-text recognises that Ventura Retail Park contain significant amount of retail floorspace outside the town centre and is a “*destination is its own right*”. Furthermore, the sub-text recognises that these areas draw in visitors from the wider region.

Section 6.4.3 then provides two options relating to the existing retail parks:

- “i) Give the existing out of centre retail areas their own designation and policies within the plan to mitigate their impact on the town centres.*
- ii) Rely on national policy and other, more broad, local policies when determining planning applications in the out-of-town retail areas.”*

Feedback Point 21 then goes on to state “*do you think that we should have a specific designation and set of policies for the out-of-town retail areas?*”

Given the importance of Ventura Retail Park to Tamworth’s economy, we consider that the existing retail parks should be recognised as important economic drivers that should have their own designations. The designation should recognise that retail uses within these retail parks will be supported subject to design, environmental and highways matters. There should be no requirement to undertake a sequential or retail impact assessment as the retail parks serve a different market to the town centre. The retail parks will not compete directly with the town centre so these tests are unnecessary and will not help the decision making process.

In addition, the existing Local Plan Policy EC1 (Hierarchy of Centres for Town Centre Uses) requires a Retail Impact Assessment (RIA) to be undertaken if 250sqm (or more) of retail floorspace is proposed. This threshold is significantly less than what is required under the National Planning Policy Framework (NPPF) of 2,500sqm. The reality is that a retail development of a local scale (under 500sqm) scale will not have a significant adverse impact on any existing town centres.

As noted, a RIA should not be required for the Ventura Retail Park and the Jolly Sailor retail parks, but if the Council insist that a RIA is required, the threshold should, at the very least, follow the NPPF requirements of 2,500sqm.

In short, the existing retail parks within Tamworth are well established within the Borough and any new investment within these retail parks should be supported by the Borough and not hindered. The retail policies should support new retail floorspace in these areas or, at the very least, follow the NPPF retail impact assessment threshold of 2,500sqm.



### Town Centre sites

Section 3 of the Issues and Options provides detail of Tamworth “at a glance”. We note that “Our Town Centre” text recognises that the town centre (which includes the Gungate site) is due to undergo extensive regeneration following the Council’s award of £21.65 million from the Government’s Future High Street Fund. Consultations of the Gungate site have changed since the most recent consent (that has now expired) for a large amount of retail floorspace. The consultations on the Council’s website now propose a leisure and residential led scheme. The consultation states that “*retail is not being suggested as a major component of this particular site due to its decline on the high street in recent years and a need to focus on the existing site*”<sup>1</sup>.

1 This reference is misleading and should be amended to state: “due to structural changes in the way people shop and a need....”

Aucott recognise the importance of bringing a viable scheme forward that helps to regenerate the town centre and the Gungate site should be allocated for residential and leisure use.

### **ECONOMIC FLEXIBILITY**

We support retaining the existing employment land allocations (6.3 (a) – Option (i)) at the land south of A5. Given the changes in economic circumstances the protection of this land supply is increasingly vital.

The past decade has been a time of unprecedented and structural changes to the ways in which people live, shop, and work with huge growth on online sectors and the lasting impacts of the Covid-19 pandemic. This has led to a rapidly changing industry in the UK with some industries, such as the warehouse and distribution sector experiencing significant growth.

Given these recent structural changes there is a need to demonstrate flexibility to enable a local response as the UK and the borough’s employment needs continue to evolve. Ensuring the ability to rapidly respond to unanticipated economic changes is increasingly important to ensure economic growth. This is reflected in the paragraph 82 of the NPPF, which states that planning policies should:

*“Be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices ... and to enable a rapid response to changes in economic circumstances.”*

Additionally, the importance of flexibility to ensure economic growth in the future is also recognised in the Objective of Section 6.3 of the Local Plan 2043 Issues and Options Document, which states the objective of the section is to:

*“Support the existing local economy whilst being flexible enough to respond positively to new economic opportunities. Planning policies should help create the conditions in which existing businesses can adapt and grow, as well as providing opportunities for new and innovative businesses to develop.”*

Therefore, retaining employment land allocations would allow for flexibility for the Tamworth economy in future years.

### Appropriate for Employment led Development

The Land South of the A5 site is well connected in both a local and national context.

Paragraph 8 of the NPPF establishes the overarching economic objective for achieving sustainable development. This stating that it should be the economic objection of the planning system:

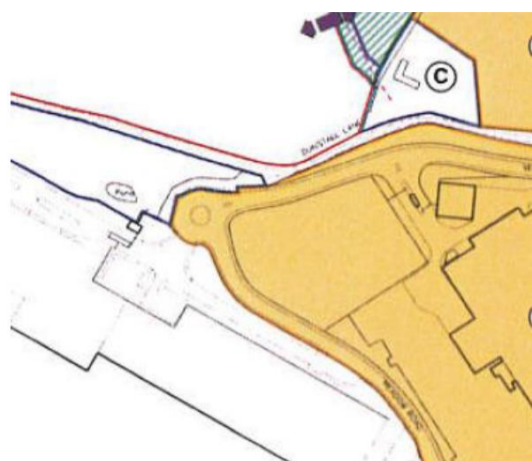
*“To help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure”*

The Land South of the A5 site is an appropriate site for employment led development, as it is well connected to the Tamworth and the A5. Aucott strongly support the retention of the Land South of the A5 site as an allocation for employment development. To confirm, Aucott is actively pursuing employment led development.

The site is both commercially attractive and available for employment led development.

Given the need for flexibility to allow delivery, allocation for the Land South of the A5 site be expanded to include all economic development that generates jobs. This should include smaller ancillary uses which can support the main employment use, such as eateries, nurseries and creches. Such facilities added amenity and convenience to future occupiers on-site and make the site more attractive for potential occupiers.

In addition, there is vacant land behind Brakes which had permission for commercial use in 2017 however, some of this land has not been developed but previously allocated for employment use. To ensure that this land can continue to come forward within the development plan, it should be recognised for employment generating uses and uses that support employment uses as well as the approved residential developments at Dunstall Farm. A screenshot of the site has been provided below (the land coloured in yellow and to the east of the roundabout):

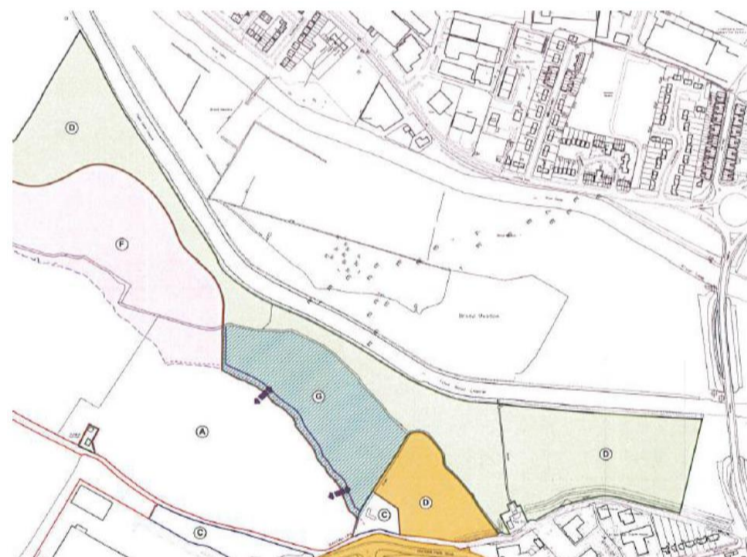


## RESIDENTIAL SITES

Section 6.2 of the Local Plan 2043 Issues and Options Document considers the New and Affordable Homes. Paragraph 6.2.1 establishes that 2,961 homes would be required by 2043 as calculated through the standard method, and paragraph 6.2.2 considers options for delivering this need.

In order to meet target housing delivery of 2,961 homes by 2043, we support allocating additional land for housing. In recent years new residential development has come forward at Land at Dunstall Farm, Dunstall Lane.

Aucott consider that the land to the north of the existing Dunstall Farm residential site be allocated for housing. The plan below identifies the site (referenced as Part G, the green hatched area and Part D, the light green area):



This land is bound by the brook to the north and the existing residential development, off Darcy Close, Chawton Way, and Bennett Close, to the south. This parcel is a logical extension to the existing residential development whilst minimising impact on the countryside and with a clear boundary. If residential development at this site to come forward, the land to north of the brook would be protected as public open space, creating a buffer to guard against the incursion into the countryside.

Whilst the site is currently within the countryside, it is not within the Green Belt, and is an appropriate residential site. If the Council is to meet its housing targets, such sites will need to be developed and they should be identified in the Local Plan.

## SUMMARY

In summary, Aucott welcome that the Council recognise the importance of the existing retail parks within the Borough. They should be supported through having their own designation that welcomes investment and job creation. If the Council are, however, minded to require a RIA for new retail floorspace within these areas, the policy should, at the very least, follow the NPPF threshold of 2,500sqm.

We are pleased to see that the Council consider that the Gungate site demands have changed and a large retail designation within the town centre no longer follows the market demands. We, therefore, welcome the development for the Gungate site which is leisure-led.

We strongly support the retention of the existing Local Plan site allocation ref. EMP1 for the Land South of A5. This allocation is vital for ensure Tamworth has flexibility to respond positively and quickly to changing economic circumstances, the allocation should be expanded to include all economic development that generates jobs. This should include smaller ancillary uses which can support employment development. Page 6

In addition, the site located to the land off Darcy Close, Chawton Way and Bennett Close should be allocated for residential use to help the Council deliver much needed housing for the Borough.

We trust the above representations are clear and will be taken into consideration in producing the new plan. We would very welcome the opportunity of meeting with you to discuss them, and to understand the process as the new plan moves forward.

<b>Officer Response</b>	<b>Further Action</b>
Comments noted. As part of the local plan process, we will evaluate our existing allocations and consider new allocations where appropriate. In relation to Ventura retail park, any policies and/or designations will be based on appropriate evidence and in line with national planning policy.	Comments will be considered as part of the local plan process.

<b>URN</b>	046	
<b>Company/Organisation</b>	Staffordshire County Council Flood Risk Management	
<b>On behalf of</b>		
<b>Sole Representation</b>		
<b>Further Representation</b>	<input checked="" type="checkbox"/> (Please see additional comments in the relevant sections above)	
<b>Representation</b>		
<b>6.1.2 Issue: Mitigation impacts of flooding</b>		
<p>An increase in the frequency and intensity of extreme weather events as a result of the climate emergency gives rise to a greater risk of flooding. This poses an increasing threat to new and existing development close to the areas which are at risk from <del>river</del> <u>all sources</u> of flooding. As part of the plan making process, we will be updating our Strategic Flood Risk Assessment to ensure we avoid siting new development in areas of greatest flood risk.</p>		
<b>Officer Response</b>	<b>Further Action</b>	
Comments noted and suggestions to wording are welcomed.	The appropriate alterations will be made in respect of future documents.	

<b>URN</b>	047
<b>Company/Organisation</b>	Tyler Parkes
<b>On behalf of</b>	Midlands NHS Foundation Trust
<b>Sole Representation</b>	
<b>Further Representation</b>	<input checked="" type="checkbox"/> (Please see additional comments in the relevant sections above)

#### Representation

##### Tamworth Local Plan 2043 - Issues and Options

The Midlands NHS Foundation Trust welcome the opportunity to participate in the early stages of consultation on the review of the Tamworth Local Plan. We also welcome and support the high degree of priority given to healthy living and would anticipate this will continue as part of the review. A good working relationship between our organisations should be seen as integral to the operation of the Duty to Co-operate.

The Midlands Partnership NHS Foundation Trust (MPFT) was formed on 1 June 2018 following a merger between South Staffordshire and Shropshire Healthcare NHS Foundation Trust and Staffordshire and Stoke on Trent Partnership NHS Trust. It provides mental health, learning disability, and some physical care services across Staffordshire, Stoke-on-Trent and Shropshire.

Growth in Tamworth and Staffordshire will have profound implications for future service requirements. The NHS locally fully appreciates this has implications and obligations for them as well as the Council and other service providers. A recent reorganisation has resulted in a partnership between the Council and Social Care providers. This will mean that there will be shared responsibility between the Councils and the NHS Trusts to ensure sufficient infrastructure is available, accessible, and maintained with sufficient capacity to serve the whole community.

Significant growth in population and housing is envisaged in plans across the West Midlands and it is important that NHS services are seen as integral to the supporting infrastructure necessary to support the increasing population. This means infrastructure across the full range of health services and not to be confined to support for primary care infrastructure alone.

To this effect, the Trust is seeking to ensure that as local plans are reviewed that the supporting evidence base and emerging policies enable the growth in demand for NHS services to be reflected so that necessary funding in support of service improvement can be sought. We would then hope that the policies in the plan are clear that resources for health service improvements to meet the needs of the growing population would be sought as part of S106 and CIL.

This has implications for the evidence base such as any viability assessment. Hitherto, while viability assessments may have been carried out our experience is that they do not specifically take account of support for the provision of health infrastructure as part of the analysis. We believe this is wrong and that the provision of the full range of health service provision should be considered alongside other key elements of infrastructure such as education and transport infrastructure provision.

We would hope to continue liaison with you during the plan preparation process and then beyond into the implementation phase when we would hope to provide the necessary supporting information to enhance health service provision alongside the growth that will be taking place.

Officer Response	Further Action
Comments noted.	Comments will be considered as part of the local plan process, and further liaison sought where necessary.

<b>URN</b>	010
<b>Respondent</b>	Councillor John Harper
<b>Company/Organisation</b>	Tamworth Borough Council
<b>On behalf of</b>	
<b>Sole Representation</b>	<input checked="" type="checkbox"/>
<b>Further Representation</b>	

#### Representation

**Please Note: The following comments form part of a wider response entitled 'Town Centre Regeneration Suggestions'. Due to the scale of the document, the full version is unfortunately unable to be included within this format. However, should you wish to receive a copy of the full comments, then please get in touch with the Planning Policy Team at [developmentplan@tamworth.gov.uk](mailto:developmentplan@tamworth.gov.uk).**

Since the 1950s Tamworth has consistently failed to recognise or appreciate what sets it apart from other towns – its history. Extreme haste to push ahead with what was perceived to be a progressive way forward led to much ill-advised demolition which resulted in loss of character and local identity. Heritage was viewed more as a hindrance than an asset. Despite past mistakes Tamworth is still a historic town with much to offer those who live and work in the community, as well as those who visit. To properly appreciate what need to be done it is therefore imperative that the council sees the town as visitors do. Anything that is better elsewhere will inevitably prompt unfavourable comparisons. The future belongs to our children and to their children's children. Our greatest gift would be to pass on a town they can truly be proud of.

Problems to address:

- Scruffy, unclean streets with highways disfigured by potholes
- Low quality retail choices
- No properly designated Tourist Information Centre/Council Office
- Unreliable and often non-existent taxis
- An overly complicated road system
- Insufficient car parking
- Lack of a police station and poor police presence
- Insufficient toilet facilities
- Sparsity of good quality pubs, restaurants and other hospitality outlets
- Lack of popular town centre attractions
- Poorly promoted heritage, leisure and entertainment facilities
- Inferior street paving and lighting
- Insufficient signposting
- Underwhelming night-time economy
- Lack of an attention grabbing 'Wow Factor'

Reasons to be cheerful:

- Magnificent landmark buildings  
Tamworth Castle, Parish Church, Town Hall, Assembly Rooms, Moat House.
- Excellent leisure facilities  
Snowdome, Peaks Leisure Centre, Odeon Cinema, Strykers Bowling etc.
- Castle Pleasure Grounds
- Superb motorway/rail links with the rest of the country
- A large resident population
- Good business parks (industrial, office and commercial)
- Several fine nature reserves
- A good canal network
- Two splendid rivers
- Ventura Retail Park
- A unique history that puts Tamworth at the forefront of lesser towns and cities

If the environment in which Tamworth people live is made safe, clean, attractive, welcoming and interesting then we are on the right road to future prosperity.

<b>Officer Response</b>	<b>Further Action</b>
Comments noted and suggestions welcomed.	Comments will be considered as part of the local plan process.