

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

Dear ...

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

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

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

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

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

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

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

The report concludes:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Policy: North of Tamworth

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

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

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

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

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

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