



Please send us your comments no later than 5:00pm by the 21st August 2014 **to the following address:**
Forward Planning Team, Chief Executives Division, Council Offices, South Street, Atherstone, Warwickshire, CV9 1DE or email planningpolicy@northwarks.gov.uk

Any representation received will be a public document, all details of which will be stored on a database, and made available for inspection at the council's offices and on the council's website.

Name: Alex Roberts – Development Plan Manager

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Email:

Do you support the Draft Pre-Submission Site Allocations Plan

NO

If yes, we would like to know why you support the document. If no, please explain why and what changes you would like to see to the document

Paragraph No

COMMENTS

1.1

Is the plan period correct? The plan period for subsequent Local Plans following on from a Core Strategy should last for 15 years and not just until the end date of the Core Strategy. If the plan is to last until 2029, then it will need to be adopted in 2014. This is not possible given the lead in times and consultation periods for Local Plan production. A realistic time period should be used which takes into account anticipated examinations and potential delays.

1.3 bullet point 1 & 2

**Additional text should read:
...to meet the current and projected future population needs of North Warwickshire and neighbouring authorities including Tamworth.
Locations for employment sites to meet the needs of North Warwickshire and Tamworth.**

1.5

**There are 4 sources of sites considered for allocation. How has the assessment process for all 4 been standardised? Have each been assessed in the same way?
What are the technical constraints to site delivery and how can these be mitigated?
Are the sites viable and does mitigation and infrastructure impact on this?
Do the sites have willing landowners? It is not apparent from the Council's website where the SHLAA is or any other site assessment document. There is no whole plan**

	<p>viability assessment. There is no housing trajectory which indicates when sites will become available for development and their projected delivery rate.</p> <p>Until this information is available it is not possible to understand or comment on the what, where, when and how questions for all the sites in this document.</p>
1.8	<p>The dates used in the Sustainability Appraisal do not match the dates for the plan period. If land is released for employment to increase the attractiveness of the Borough then surely the level of new housing should match this increase? Attracting new people to an area will not necessarily push the existing population out to 'make room' for them. An adequate level of housing should be provided which takes into account the natural population change and the desire to increase migration into the Borough.</p>
2.1	<p>There is an unmet need for employment land arising from Tamworth as detailed in Tamworth's draft Local Plan of at least 14ha. Tamworth's Local Plan was consulted on in March 2014 for 6 weeks, North Warwickshire were consulted on and meetings were held between officers. It is surprising that this Local Plan has no mention of meeting this need at all. How does this demonstrate that the plan is 'positively prepared'?</p>
2.3	<p>Regarding previous comments on the plan period, if the plan period is extended what will the employment need be?</p> <p>There appears to be a gap of almost 2 hectares, how will this be addressed?</p> <p>How can the supply of employment land be increased? What are the barriers to new sites coming forward, this allocations plan should be addressing the problem and not just noting the lack of available sites.</p>
Employment Sites	<p>Are all the proposed allocations located within or adjacent to the settlement boundaries they are grouped into?</p>
Policy EMP6 Site DOR24	<p>This site forms an extension to Centurion Park which is located within Tamworth and does not form part of Dordon. How can this site meet local employment needs for North Warwickshire when it is wholly detached from Dordon, separated by the M42 and joined to the urban area of Tamworth? The 8.5 hectares of employment land coming forward from this proposed allocation should be to meet part of Tamworth's unmet employment need (14ha).</p> <p>Furthermore, there is no information available as to how this may impact on Tamworth, or how this site will relate to the proposed Employment allocations in Tamworth.</p>

3.04 / Policy TP2

The map clearly shows that DOR24 will form part of the Centurion business park in Tamworth.

It is not clear from the mapping or the supporting text where this route is and why it is needed. As this safeguarded route would link into the B5000 what impacts could it have on the wider local network in particular links into Tamworth.

5.3

The total housing requirement for North Warwickshire is stated as 3,650 – over the plan period this is 203 per annum. The 500 for Tamworth should not be restricted to delivered after 2022 (an issue which was debated during the Core Strategy hearing which the Planning Inspector appeared to agree should be removed as there is no justification).

5.4

There does not appear to be any flexibility within the plan, the combination of extant consents, allocations and the windfall allowance comes to 3650 units, which is the exact amount required. There is no allowance for losses and demolitions. The NPPF requires Local Plan to be flexible and therefore in this instance more than sufficient land should be allocated for meeting the current 3,650 housing requirement. How will the Local Plan respond if several sites fail to be delivered over the plan period?

5.10

There is no housing trajectory which would show how sites are to be released and delivered across the plan period. Without a housing trajectory setting out annual or 5 year periods of delivery it is not possible to ascertain whether sufficient housing will be delivered in the right places at the right time over the plan period. The delivery of housing should be aligned with Core Strategy policies which set out the distribution and level of housing across the Borough.

The table which is provided there appears to be an over allocation in Cat 4 settlements.

Housing General

There does not appear to be an evidence base to support a windfall allowance for the borough as a whole or within specific settlements.

Do the housing sites need to be within a policy to ensure that mitigation measures are contained in policy and not supporting text alone? It appears that some sites are allocated and some are not.

Do you have any further comments to make on the accompanying consultation documents? (Infrastructure Delivery Plan, Sustainability Appraisal)

The issue of Tamworth not being able to meet its own needs for housing and employment is long standing and was discussed before and during

the Core Strategy examination in January 2014. Since then meetings have taken place between officers and Members of each Council. Therefore it is of great concern to Tamworth Borough Council that this version of the Site Allocations Plan has not been prepared in light of the most up to date evidence. In particular the evidence which supports Tamworth's Local Plan.

Paragraph 178 of The NPPF states that:

Public bodies have a duty to cooperate on planning issues that cross administrative boundaries”

“The Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities.”

Paragraph 179 goes on to state:

“Local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans. Joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework.”

Furthermore paragraph 182 concerning the 4 tests of ‘soundness’ states:

“Plans should be positively prepared to meet... unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development”

Tamworth Borough Council urges North Warwickshire to properly consider these strategic issues. We would welcome working together to produce a joint strategy and evidence base in conjunction with Lichfield District Council which sets out how un-met needs arising from Tamworth will be delivered. Therefore further progression of this plan should not take place until the outcomes of this further work is known. If the Site Allocation plan fails to address these strategic issues it would not be produced within the requirements of the NPPF and therefore there is a risk of being found un-sound at examination. For the sake of clarity, the un-met needs arising from Tamworth are:

- 2,000 dwellings – currently 500 to be delivered in Lichfield and 500 in North Warwickshire, leaving a shortfall of 1,000 dwellings.
- 14ha of employment land. There are no agreements in place. There are sites within this plan where there is no justification how it will support the employment needs of North Warwickshire, these sites could meet a proportion of Tamworth's employment need.

The evidence base supporting Tamworth's Local Plan can be found on our website.

There is no updated draft Policies Map to show where the sites are located in the context of the whole Borough. The 2012 Planning Regulations now refers to Policies Map not Proposals Map, this should be updated through the plan and evidence base.

IDP

Why are there 3 categories for infrastructure items, how can something be necessary if it is not required for development to go ahead? Should critical and necessary be grouped together?

HRA

2.12 – have Staffordshire County Council’s Waste and Minerals plans been reviewed for the ‘in-combination’ effects?

3.2 – wrong plan period, see previous comments

3.4 – is the land allocated or safeguarded?

3.5 – The new allocations are in and around Tamworth, Polesworth, Dordon and Atherstone.

3.9 – Is land allocated or identified, these are two different things.

Sustainability Appraisal – Non-Technical Summary

1.1 - Wrong plan period, see previous comments

1.13 - The scoping report was carried out 7 – 8 years ago, surely this is now out of date and a new scoping report and consultation should have been done to support this Sustainability Appraisal?

1.15 - It is not clear from this paragraph if the Scoping Report has been updated or not? If it has been updated it should have been subject to a minimum 5 week consultation in-line with the EU SEA directive requirements.

1.19 The sites which were not considered to be reasonable alternatives: which sites are these and why have they been removed from the SA process? Has an assessment been carried out to support the removal?

Table 2

Objective 4 should be to meet local needs and needs of Tamworth.

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Monitoring Information	
This information is not intended to intrude upon your privacy in any way, but will help us to monitor whether we are reaching all sectors of the community in our consultations. Please do not fill in this section if you are completing the representation on behalf of a group.	
Gender: Male/ Female (<i>Please delete as appropriate</i>)	
Age: Under 15 16-19 20-29 30-39 40-49 50-59 60-69 70-79 80+	
Ethnicity: (<i>please tick</i>)	
White: British Irish Other White	Black or Black British: Caribbean African Other
Mixed: White & Black Caribbean White & Black African White & Asian Other	Chinese: Other Ethnic Group:
Asian or Asian British: Indian Pakistani Bangladeshi Other	
Do you consider that you have a disability? Yes/ No (<i>Please delete as appropriate</i>)	