



North Warwickshire
Borough Council

Core Strategy
Main Modifications
Representation Form

Ref:

(for official use)

Please return to North Warwickshire Borough Council by **21st August 2014**

PLEASE USE THIS FORM TO RESPOND TO THE MAIN MODIFICATIONS ON THE CORE STRATEGY ONLY

The Council are seeking comments on the Modifications to the Core Strategy, following the Examination in Public (January 2014). The changes are proposed by the Inspector to address issues of legal compliance and soundness and we are only able to accept representation on these matters.

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

Please provide your details below.
(If you are an agent please provide both your details as well as your clients.)

Name: Alex Roberts – Development Plan Manager

Organisation (if applicable): Tamworth Borough Council

Address: Alexander-roberts@tamworth.gov.uk

Email:

Q1. Please give the Main Modification reference number that your representation relates to
(use a separate sheet for each representation and each modification)

Modification Reference

MM43, 45, 44, 45, 46, 47, 48,
49

Q2. Do you consider the Main Modifications to be Legally Compliant?

YES

NO

Q3. If you consider the Proposed Main Modifications to be Unsound, please identify which test of soundness your comments relate to?

Positively prepared

Effective

Justified

Consistent with National Policy

Q4. Please give details of why you consider the Main Modifications not to be legally compliant or unsound. Please be as precise as possible. If you wish to support Modifications please also use the box below to set out your comments.

These suggested modifications not take into account Tamworth's unmet employment needs of 14ha. These modifications are unsound as they are not based on the most up to date evidence.

The issue of Tamworth not being able to meet its own needs for employment discussed before and during the Core Strategy examination in January 2014. Since then meetings have taken place between officers and Members of each Council where this issue has been discussed further. Therefore it is of great concern to Tamworth Borough Council that the Main Modifications have 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.

Q5 Please set out what change(s) you consider necessary to make the Main Modifications legally compliant or sound, having regard to the test you have identified above. You will need to say why this change will make the Main Modifications legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible

We suggest that these modifications are altered to recognise that North Warwickshire has a significant role to play in helping to meet the unmet employment needs arising from Tamworth. A paragraph similar to 6.9 and 6.10 (related to Tamworth being unable to meet housing needs) should be inserted or an existing paragraph amended and the employment policy should also acknowledge this unmet need.